

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- ☐ Initial Assessment
- ☒ Annual Surveillance Assessment (2_2)
- ☐ Recertification Assessment (Choose an item.)
- ☐ Extension of Scope

Client Company Name / Parent Company: SD GUTHRIE BERHAD
Client Company / Parent Company Address: Level 11, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, Ara Damansara 47301 Petaling Jaya, Selangor, Malaysia
Certification Unit: PT Indotruba Tengah – Sekunyir Palm Oil Mill Location of Certification Unit: Amin Jaya Village, Pangkalan Banteng Sub-District, Kotawaringin Barat District, 74183 Kalimantan Tengah Province, Indonesia
Date of Final Report: 02/07/2024

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	SD Guthrie Berhad		
RSPO Membership Number	1-0008-04-000-00	Membership Approval Date	07/09/2004
Address	Level 11, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, Ara Damansara 47301 Petaling Jaya, Selangor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT Indotruba Tengah – Sekunyir Palm Oil Mill		
Location / Address	Amin Jaya Village, Pangkalan Banteng Sub District, Kotawaringin Barat District, 74183 Kalimantan Tengah Province, Indonesia		
Website	www.simedarbyplantation.com		
Management Representative	Alagendran Maniam (Head of Sustainability)	E-mail	alagendran.maniam@simedarbyplantation.com
Telephone	+62-21-29926000	Facsimile	+62-21-29922686
Note: A significant change was initiated by the management of Sime Darby Plantation Berhad (also known as "SD Plantation" or "Company"). On 31 May 2024, they sent an email to the RSPO Secretariat, announcing their official name change to SD Guthrie Berhad. This change was further confirmed on 04 June 2024, through an announcement on the company's official website. By 11 June 2024, the RSPO Secretariat acknowledged this change and updated the company name in the membership account to SD Guthrie Berhad, marking the completion of the transition process. Now, the company formerly known as Sime Darby Plantation Berhad operates under the new name, SD Guthrie Berhad.			

2. Certification Information			
Certificate Number	RSPO 744702	Certificate Start Date	07/07/2022
Date of First Certification	23/11/2010	Certificate Expiry Date	06/07/2027
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK).		
Visit Objectives	To conduct an Annual Surveillance Assessment (ASA 2-2) and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by the organisation's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organisation's specified objectives, as applicable with regard to the scope of the management standard, and to confirm the on-going achievement and applicability of the forward strategic plan and where applicable to identify potential areas for improvement of the management system.		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_2) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		

Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 of the RSPO P&C 2018		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	45 MT/hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-Site Audit (Option AI)	<input type="checkbox"/> On-Site Audit (Option AII)	<input type="checkbox"/> Remote Audit (Option B)

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
SGS-ID-ISPO-0043	ISPO (Permentan 38/2020)	PT SGS Indonesia	11 August 2025

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Sekunyir Palm Oil Mill	Amin Jaya Village, Pangkalan Banteng Sub District, Kotawaringin Barat District, Kalimantan Tengah Province, Indonesia	02° 26' 41.00" S	112° 00' 25.00" E
Sekunyir Estate	Amin Jaya Village, Pangkalan Banteng Sub District, Kotawaringin Barat District, Kalimantan Tengah Province, Indonesia	02° 26' 48.00" S	112° 00' 32.00" E
Seruyan Estate	Pembuang Hulu II Village, Hanau District, Seruyan Regency, Kalimantan Tengah Province, Indonesia	02° 24' 28.00" S	112° 04' 05.00" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No			<input type="checkbox"/> Yes	
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Sekunyir Estate	3,287.33	52.26	215.60	3,555.19	92.47
Seruyan Estate	3,194.65	45.48	939.27	4,179.40	76.44
Total	6,481.98	97.74	1,154.87	7,734.59	83.81

6. Plantings & Cycle			
Estate / Smallholders	Age (Years) - ha	Mature	Immature

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	0 - 3	4 - 14	15 - 25	>25		
Sekunyir Estate	796.86	1,504.09	0.00	986.38	2,490.47	796.86
Seruyan Estate	822.14	1,327.69	0.00	1,044.82	2,372.51	822.14
Total (ha)	1,619.00	2,831.78	0.00	2,031.20	4,862.98	1,619.00

Note: Only Mature area is considered as production area

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

Estate / Smallholders	Tonnage (MT) / year			
	Estimated Last Year (May 2023 – Apr 2024)	Actual (Apr 2023 – Mar 2024)		Forecast (May 2024 – Apr 2025)
		Previous License Period (Apr 2023 – Jul 2023)	Current License Period (Aug 2023 – Mar 2024)	
Sekunyir Estate	45,870.64	19,530.26	34,742.46	52,787.00
Seruyan Estate	68,947.36	21,258.13	35,233.64	58,255.00
Total	114,818.00	110,764.49		111,042.00

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

Estate / Smallholders	Tonnage (MT) / year			
	Estimated Last Year (May 2023 – Apr 2024)	Actual (Apr 2023 – Mar 2024)		Forecast (May 2024 – Apr 2025)
		Previous license period (Apr 2023 – Jul 2023)	Current license period (Aug 2023 – Mar 2024)	
N/A		N/A	N/A	
Total		N/A		

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)

Out growers / smallholders	Tonnage (MT) / year			
	Estimated Last Year (May 2023 – Apr 2024)	Actual (Apr 2023 – Mar 2024)		Forecast (May 2024 – Apr 2025)
		Previous License Period (Apr 2023 – Jul 2023)	Current License Period (Aug 2023 – Mar 2024)	
PT. ITR	14,789.97	668.08	14,121.89	12,000.00
CV. Fortuna	2,591.13	0	4,245.83	6,000.00
Total	17,381.10	19,035.80		18,000.00

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit

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No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	April 2023	7,148.73	0.00	7,148.73
2	May 2023	10,548.56	0.00	10,548.56
3	June 2023	11,414.42	0.00	11,414.42
4	July 2023	11,676.68	668.08	12,344.76
5	August 2023	10,410.72	2,572.82	12,983.54
6	September 2023	9,594.18	3,422.49	13,016.67
7	October 2023	9,310.02	3,751.77	13,061.79
8	November 2023	9,674.52	2,493.13	12,167.65
9	December 2023	8,492.34	2,163.12	10,655.46
10	January 2024	8,722.81	1,287.12	10,009.93
11	February 2024	7,394.03	1,022.57	8,416.60
12	March 2024	6,377.48	1,654.70	8,032.18
TOTAL		110,764.49	19,035.80	129,800.29

10. Summary of Certified Tonnage (MT) (not applicable for ISS)

Estimated Last Year (May 2023 – April 2024)	Actual (April 2023 – March 2024)		Forecast (May 2024 – April 2025)
	Previous License Period (April – July 2023)	Current License Period (August 2023 – March 2024)	
FFB	FFB		FFB
151,702.59 mt	40,788.39 mt	69,976.10 mt	111,042.00 mt
	TOTAL	110,764.49 mt	
CPO (OER: 22.00 %)	CPO (OER: 22.97 %)		CPO (OER: 22.50 %)
33,559.03 mt	9,132.53 mt	16,311.68 mt	24,985.00 mt
	TOTAL	25,444.21 mt	
PK (KER: 4.00 %)	PK (KER: 4.54 %)		PK (KER: 4.50 %)
6,437.23 mt	1,653.52 mt	3,371.93 mt	4,997.00 mt
	TOTAL	5,025.45 mt	

Note:

Volume extension approved by RSPO on 12 March 2024:

- FFB = 36,884.59 MT
- CPO = 8.299,03 MT
- PK = 1,844.23 MT

Previous Report Estimates + Volume extension:

- FFB = 114,818 + 36,884.59 = 151,702.59 MT

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- CPO = 25,260 + 8,299.03 = 33,559.03 MT
- PK = 4,593 + 1,844.23 = 6,437.23 MT

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	April 2023	1,459.90	248.10
2	May 2023	2,406.14	389.48
3	June 2023	2,608.73	489.31
4	July 2023	2,657.76	526.63
5	August 2023	2,353.70	477.76
6	September 2023	2,115.96	455.85
7	October 2023	2,119.60	466.46
8	November 2023	2,148.88	448.09
9	December 2023	1,930.51	409.70
10	January 2024	1,942.34	377.02
11	February 2024	1,705.70	338.05
12	March 2024	1,994.99	399.00
TOTAL		25,444.21	5,025.45

11. Summary of Actual Volume Sold					
Current License period (August 2023 – March 2024)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	0.00	0.00	0.00	11,052.00	11,052.00
PK (MT)	4,062.52	0.00	0.00	0.00	4,062.52
Credits	1,906.00	0.00	0.00	0.00	1,906.00
Previous License period (April 2023 – July 2023)					
CPO (MT)	0.00	0.00	0.00	9,160.00	9,160.00
PK (MT)	869.63	0.00	0.00	0.00	869.63
Credits	0.00	0.00	0.00	0.00	0.00
Note: Conventional is RSPO certified material but sold as non-RSPO. Total RSPO Certified CPO sold including Credits is 22,118.00 MT (86.93 %)					

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Total RSPO Certified PK is 4,932.15 MT (98.14 %)

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 Teguh Sempurna – Pematang Kernel Crushing Plant	RSPO_PO1000004588	-	4,932.15
TOTAL			-	4,932.15

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)
	NA	-	-	-
TOTAL				

11C. Records of CPO & PK Sold as conventional since the last audit (if any)

No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	Classified	20,212.00	-
TOTAL		20,212.00	-

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)

No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
1	McDonald's Corporation	RSPO_PO1000011148	1,906.00
TOTAL			1,906.00

12. Independent Smallholders Certified Tonnage (MT) / Volume

	Estimated last year (key in period)			Actual (key in period)			Forecast (key in period)		
Phase	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

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IS-CSPO	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IS-CSPKO	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IS-CSPKE	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CSPK	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

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)
N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL		N/A	N/A	N/A	N/A	N/A
Note: 1 mt = 1 credit						

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (key in period)							
Credits	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Previous License period (key in period)							
Credits	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A	N/A	N/A	N/A	N/A

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

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 12 – 15 March 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 on-site assessment was conducted on 06 May 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 (Re-Certification) 2	Year 2 (ASA2-1)	Year 3 (ASA2-2)	Year 4 (ASA2-3)	Year 5 (ASA2-4)
Sekunyir POM	X	X	X	X	X
Sekunyir Estate	X	X	X	X	X
Seruyan Estate	X	X	X	X	X

Tentative Date of Next Visit: March 3, 2025 - March 6, 2025

Total Number of Mandays: 11

2.2 BSI Assessment Team

Name	Role	Competency
Eko Purwanto (EP)	Team Leader	<p>Education: Holds a Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, IPB University.</p> <p>Work Experience: Over 9 year working expiring in oil palm plantation with last position as Estate Manager. He has experience in implementing good agricultural practice including integrated pest management and limited pesticides uses. Over 11 years working experience as auditor since 2012 covering ISO9001, RSPO and ISPO.</p> <p>Training attended: Completed SMETA Requirements Training, ISPO Permentan 38/2020, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, CQI and IRCA Certified ISO 45001:2018 Lead Auditor Training Course, ISO 37001:2016 Anti-bribery Management System Implementing Training Course, RSPO P&C 2018 Refresher Training, Sustainability Reporting Assurance Training, RSPO P&C Lead Auditor Refresher Course, RSPO Supply Chain Certification Refresher Course, RSPO NEXT Training Course For Lead Auditor by RSPO Secretariat, Elaborating on the RSPO P&C Social and Labour Standards and the Mechanics of Social Auditing, RABQSA accredited Lead Auditor Training of Environment Management System, Endorsed RSPO Green House Gas (GHG) Training for Trainer, Endorsed RSPO P&C Lead Auditor Training, Understanding Environmental Management System (EMS), Indonesia Sustainable Palm Oil (ISPO) Lead Auditor Training, Endorsed RSPO Supply Chain Certification (SCC) Lead Auditor Training, RABQSA accredited Lead Auditor Training of Quality Management System.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit:</p>

		<input type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements <input type="checkbox"/> Social <input type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)
Haikal Ramadhan Kharismansyah (HRK)	Team Member	<p>Education: Holds a bachelor degree in majoring Plant Pest and Disease from Padjadjaran University.</p> <p>Work Experience: 3 Years working experience in oil palm industry as Agronomy Assistant. More than five years working experience as RSPO Auditor and RSPO Lead Auditor.</p> <p>Training attended: Completed Endorsed RSPO P&C Lead Auditor Training Course, ISPO Auditor/Lead Auditor Course, RSPO P&C Social and Labour Standards and the Mechanics of Social Auditing Training, ISO 9001:2008, ISO 14001 : 2015 Auditor/Lead Auditor Course, RSPO ISH Standard Training Course and Endorsed RSPO Supply Chain Lead Auditor Training Course.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English.</p> <p>Aspect covered in this audit:</p> <input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements <input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)
Nanang Rusmana (NR)	Team Member	<p>Education: Holds a Bachelor Degree of Forestry, Bogor Agricultural University (IPB)</p> <p>Work Experience: 5 years working experience in palm oil industry as SHE Assistant at PT Astra Agro Lestari Tbk. 3 years working experience in mining industry as Environment Coordinator and SHE Coordinator with PT Kapuas Prima Coal Group. 6 years working experience as RSPO/ISPO auditor.</p> <p>Training attended: Completed ISO 9001:2015 Lead Auditor Course, ISPO Auditor Course, ISO 14001:2015 Lead Auditor Course, ISO 45001:2018 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO Supply Chain Certification Lead Auditor Course, SMK3 Auditor Course, HCV Assessor Course, General OHS Expert Course, SMETA Requirements training, RSPO Independent Smallholder Training by RSPO Secretariat, and Endorsed RSPO Refresher Courses.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English.</p> <p>Aspect covered in this audit:</p> <input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements <input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)

Accompanying Persons:

Name	Role
Nil	

2.3 Assessment Plan

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

Date	Time	Subjects	EP	HRK	NR
Tuesday, 12/03/2024	05.30-07.00	Flight Jakarta – Pangkalan Bun <i>By Nam Air</i>	√	√	√
	07.00-09.00	Travelling Pangkalan Bun – PT Indotruba Tengah	√	√	√
	09.00-09.30	Opening Meeting (RSPO & ISPO): - Presentation by Lead Auditor. - Confirmation audit scope, requirements, document access permission and clarifying audit plan.	√	√	√
	09.30-12.00	Document review: General information; time bound plan; partial certification verification; RSPO P&C (Management Plan); Palm Oil Mill's and Estate Best Management Practices, Social policy and implementation, Continual Improvement.	√	√	√
	12.00-14.00	Break	√	√	√
	14.00-17.00	Field visit to Sekunyir POM to verify: - Best Management Practice for Mill Processing and RSPO Supply Chain Certification Standard - Element for Palm Oil Mill – site visit to check on FFB receiving, - FFB process, CPO and PK dispatch, document, and record keeping. - Visit to POM housing: house condition, water supplies, sanitation, access to affordable food, welfare amenities. - Implementation of OHS (loading ramp, processing stations, workshop, boiler, turbine, diesel bowser, material warehouse, fire-fighting equipment) - Implementation of Environmental and Waste Management Aspect (POME Pond, Empty Bunch Area, Reservoir/Intake Point, hazardous waste storage, Biogas Plant) - Interview with workers related to human resource management, worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc. - Interview with workers related to health and safety condition, training provision, worker right and condition, etc.	√	√	√

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Date	Time	Subjects	EP	HRK	NR
Wednesday, 13/03/2024	08.00-12.00	Field visit to Sekunyir Estate to verify: <ul style="list-style-type: none"> - Visit to plantation activity and interview workers: harvesting, spraying, fertilizer application, EFB application, area with slope - Visit to plantation IPM implementation: barn owl boxes, beneficial plant nursery. - Interview with workers related to human resource management, health and safety condition, training provision, worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc. - Visit to worker housing: house condition, water supplies, sanitation, medical, access to affordable food, welfare amenities. - Chemical warehouse, mixing bay, fertilizer store, workshop, fire-fighting equipment. - Visit to HGU boundary poles, border with surrounding entities - Visit to HCV area, riparian zone. 	√	√	√
	12.00-14.00	Break	√	√	√
	14.00-17.00	Document Review: <ul style="list-style-type: none"> - Principle 1: Behave ethically and transparently - Principle 2: Operate legally and respect rights - Principle 3: Optimize productivity, efficiency, positive impact, and resilience - Principle 4: Respect community and human rights and deliver benefit - Principle 5: Support smallholder inclusion - Principle 6: respect workers' rights and conditions - Principle 7: Protect the environment, conserve biodiversity, and ensure sustainable management of natural resources 	√	√	√

Date	Time	Subjects	EP	HRK	NR
Thursday, 14/03/2024	08.00-12.00	Field visit to Seruyan Estate to verify: <ul style="list-style-type: none"> - Visit to plantation activity and interview workers: harvesting, spraying, fertilizer application, EFB application, area with slope - Visit to plantation IPM implementation: barn owl boxes, beneficial plant nursery. - Interview with workers related to human resource management, health and safety condition, training provision, worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc. - Visit to worker housing: house condition, water supplies, sanitation, medical, access to affordable food, welfare amenities. - Chemical warehouse, mixing bay, fertilizer store, workshop, fire-fighting equipment. - Visit to HGU boundary poles, border with surrounding entities - Visit to HCV area, riparian zone. 	√	√	√
	12.00-14.00	Break	√	√	√
	14.00-17.00	Document Review: <ul style="list-style-type: none"> - Principle 1: Behave ethically and transparently - Principle 2: Operate legally and respect rights - Principle 3: Optimize productivity, efficiency, positive impact, and resilience - Principle 4: Respect community and human rights and deliver benefit - Principle 5: Support smallholder inclusion - Principle 6: respect workers' rights and conditions - Principle 7: Protect the environment, conserve biodiversity, and ensure sustainable management of natural resources 	√		√
		Stakeholder consultation: <ul style="list-style-type: none"> - Stakeholder consultation to relevant agencies of Kotawaringin Barat Regency; - Stakeholder consultation with local community/villagers; - Stakeholder consultation with previous landowners; - Stakeholder consultation with gender committee and worker union. 		√	

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Friday, 15/03/2024	08.00-12.00	Document Review: <ul style="list-style-type: none"> - Principle 1: Behave ethically and transparently - Principle 2: Operate legally and respect rights - Principle 3: Optimize productivity, efficiency, positive impact, and resilience - Principle 4: Respect community and human rights and deliver benefit - Principle 5: Support smallholder inclusion - Principle 6: respect workers' rights and conditions - Principle 7: Protect the environment, conserve biodiversity, and ensure sustainable management of natural resources 	√	√	√
		Stakeholder consultation: <ul style="list-style-type: none"> - Stakeholder consultation to local NGO; - Stakeholder consultation with contractors. 		√	
	12.00-14.00	Break	√	√	√
	14.00-15.00	Document Review: (continued)	√	√	√
	15.00-16.00	Report Preparation and Auditor Discussion	√	√	√
	16.00-17.00	Closing Meeting <ul style="list-style-type: none"> • Presentation of audit findings (Noteworthy Positive Component, Non-Conformities, OFI, Timeline of CAR's, Conclusion) • Comments, Responses and Questions 	√	√	√
	17.00-19.00	Traveling to Pangkalan Bun Overnight at Pangkalan Bun	√	√	√
Saturday, 16/03/2024	07.30-08.50	Flight Pangkalan Bun – Jakarta <i>By Citilink</i>	√	√	√

NCR Close Out Visit

Date	Time	Subjects	EP	ICT Planned
Monday, 06/05/2024	08.30-09.00	Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan. 	✓	Teleconference via MS Teams
	09.00-11.30	<ul style="list-style-type: none"> Verification on Critical NC: <ol style="list-style-type: none"> 2468985-202403-M1 2468985-202403-M2 Virtual observation by video call, workers interview by call (individual and group session). Document review – implemented evidence 	✓	Teleconference via MS Teams and WhatsApp video call
	11.30-12.00	Closing Meeting	✓	Teleconference via MS Teams
	12.00-13.00	Break	✓	
	13.00-17.00	Reporting	✓	

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?	<p>Sime Darby Plantation Berhad TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table.</p> <p>On 16/01/2020, Sime Darby Plantation Berhad under its subsidiary Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation – Liberia) to Mano Palm Oil Industries Ltd (MPOI):</p> <p>https://sime-darbyplantation.com/sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/</p>	Complied
<p>Have all the estates and mills certified within five (5) years after obtaining RSPO membership?</p> <p>If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021</p>	<p>Generally, all estates and mills excepted stated below or in the TBP are certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As of Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 01/10/2018, the mill has completed the selling off transaction. In Indonesia, PT Mitral Austral Sejahtera (MAS) was sold and currently Sime Darby Plantation Berhad have no control in the management. Refer TBP approval dated 13/07/2023.</p>	Complied
<p>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.</p> <p>If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.</p>	<p>There are no new acquisitions. There is new propose on 2024 for Land legalization still in progress dated approval by RSPO on 13 July 2023 for these Estate.</p> <p>(1) Ladang Panjang Estate: 1,796.19 Ha.</p> <p>(2) Rantau Panjang Estate, Napal Estate / Karang Ringin Estate: 1,843.73 Ha.</p> <p>(3) Mangun Jaya Estate: 1,398.55 Ha.</p> <p>(4) Sungai Jernih Estate: 851.57 Ha.</p> <p>(5) Pelanjau Estate (PT BAL) & Beturus Estate (PT BAL): 4,071.76 Ha.</p> <p>(6) Karya Palma Estate (PT SNP): 476.70 Ha.</p> <p>(7) West and East Estate: 1,452.93 Ha.</p>	Complied

Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Although there is deviation has been identified at those Indonesia management units, but it has been justified and approved by RSPO Secretariat on 13/07/2023 that these units are still awaiting to receive land titles.	Complied
<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required.</p> <p>Is this consistent with the ACOP reporting?</p>	<p><u>Indonesia</u></p> <ul style="list-style-type: none"> - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification. - PT Mitral Austral Sejahtera: The properties were sold and currently Sime Darby Plantation Berhad have no control in the management. The property was disposed on 25/06/2019 and an official letter on disposal of PT MAS was sent to RSPO Secretariat on 27/06/2019. <p><u>Malaysia</u></p> <ul style="list-style-type: none"> - Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate has been transferred to SOU Lavang. - Bintang Oil Mill: Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 01/10/2018, the mill has completed the selling off transaction. <p><u>Papua New Guinea</u></p> <ul style="list-style-type: none"> - Markham Farming Company Limited (MFCL)/ Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public Notification letter: www.rspo.org/certification/public-announcement <p><u>Liberia</u></p> <ul style="list-style-type: none"> - As at 16/01/2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI): https://sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/. 	Complied

	ACOP 2022 has been cross-referenced as below: https://rspo.org/members/1-0008-04-000-00/	
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	Although there are lapses has been identified at those Indonesia management units, but it has been justified that these units are still awaiting to receive land titles.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as these 2 assets were disposed.	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.	Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units. Refer TBP approval dated 13/07/2023.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	<p>New plantings within Sime Darby Plantation Berhad that have completed NPP notification:</p> <p>(1) NBPOL (Poliamba Limited) 23/05/2020 – no comments https://rspo.org/public-consultation/sime-darby-plantation-berhad-nbpol-poliamba-limited/</p> <p>(2) NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/2018 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-a-subsiidiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd/</p> <p>(3) NBPOL (Ramu Agri Industries Limited) 29/01/2018 – no comments https://rspo.org/public-consultation/nbpol-ramu-agri-industries-ltd/</p> <p>(4) NBPOL (Ramu Agri Industries Limited) 02/09/2016 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-ltd-ramu-agri-industries-limited/</p> <p>(5) NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-ltd-higaturu-oil-palms/</p> <p>(6) NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO website https://rspo.org/public-consultation/nbpol-poliamba-limited-lamawan-png/</p>	Complied

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	<p>(7) NBPOL (Poliamba Limited – Lamendauen) 07/04/2014 – no comments captured in RSPO website https://rspo.org/public-consultation/nbpol-poliamba-limited-lamendauen-png/</p> <p>(8) NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website https://rspo.org/public-consultation/new-britain-palm-oil-ltd-roka-mini-estate/</p> <p>(9) NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website https://rspo.org/public-consultation/new-britain-palm-oil-ltd-j-estate/</p> <p>(10) NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/new-britain-palm-oil-limited-higaturu-oil-palm/</p> <p>(11) NBPOL (Ramu Agri Industries Ltd) 06/03/2012 – no comments captured in RSPO website: https://rspo.org/public-consultation/rail-new-planting-assessment-call-for-comments/</p> <p>(12) Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment/</p> <p>(13) Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-1/</p> <p>(14) Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-2/</p> <p>Management units for 12 – 14 above were disposed.</p>	
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	<p>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as both sites was disposed.</p> <p>The RaCP tracker was checked. There are 21 Management units that have potential liabilities. There are some discrepancies between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited, there are 19 management units for the Indonesia Operations that requires LUCA. All LUCAs</p>	Complied

	<p>were submitted but the review was delayed due to change of RSPO reviewer. As of August 2023, 16 out of 19 management units in Indonesia operations completed LUCA review with 1 Concept note (covering all 19 affected manage units) has been endorsed by RSPO.</p> <p>As per Internal Audit conducted in 16-25 Oct 2023, and 13-17 Nov 2023, all issues of are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C.</p> <p>It has been further verified through RSPO complaint tracker, Internet (Media) which there is no complaint about land conflict has been lodge by stakeholders as at the day of audit.</p>	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	<p>Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism.</p> <p>As per Internal Audit conducted in 16-25 Oct 2023, and 13-17 Nov 2023, no labour dispute issues reported.</p> <p>It has been further verified through RSPO complaint tracker, Internet (Media) which there is no complaint about labour dispute has been lodge by stakeholders as at the day of audit.</p> <p>Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labour, stakeholders and communities are to be dealt using this mechanism</p>	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	<p>Sime Darby Plantation maintains corporate governance to monitor and address any legal non-compliances. Through the published Code of Business Conduct and charters, the company is committed to delivery their business complying to the laws and regulations of the country.</p> <p>Under RSPO DSF, the latest registered complaint for SD was in 2017. No latest complaint case reported in DSF.</p>	Complied
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.	<p>Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. The issue is mainly waiting for Land Titles. The last audit was conducted in July 2022. The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance. HCV Assessment has been conducted for all SDP operations since 2010, there has been no clearance</p>	Complied

	of HCV areas after the HCV Assessment has been conducted and verified during the annual RSPO External and Internal Audit reports. The liability happened as there were no HCV Assessment done at the time of planting for the cases which were entered into the RACP process.	
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?	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?	Respective sites are maintaining the stakeholder engagements as part of the estates/mills' operations. Especially in Indonesia, socialization of company.	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? 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.	Not Applicable, because currently no scheme smallholder associated with PT Indotruba Tengah.	Not Applicable

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Approved Time Bound Plan

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Total Managed Area (Ha)	Certification Status (Certified / Not Certified)	Plan Year for Certification	Actual Certification Year	Date of Last TBP Verified and Approved by CB	REVISION OF THE TBP (Only applicable when revision is made)			
								Any revision from the last approved TBP? (Yes / No)	New Proposed Year for Certification	Justification of changes for each UoC	Date of approval from RSPO
Manggala	Indonesia	Manggala Mill	13,836.00	Certified	N/A	23-Nov-10					
	Indonesia	Manggala -1 Estate	4,919.00	Certified	N/A	23-Nov-10					
	Indonesia	Manggala -2 Estate	4,922.00	Certified	N/A	23-Nov-10					
	Indonesia	Manggala -3 Estate	3,995.00	Certified	N/A	23-Nov-10					
Alur Dumai	Indonesia	Alur Dumai Mill	3,759.00	Certified	N/A	16-Jan-12					
	Indonesia	Alur Dumai Estate	3,759.00	Certified	N/A	16-Jan-12					
Teluk Siak	Indonesia	Teluk Siak Mill	11,555.31	Certified	N/A	11-Oct-11					
	Indonesia	Teluk Siak Estate	3,321.20	Certified	N/A	11-Oct-11					
	Indonesia	Pinang Sebatang Estate	3,799.21	Certified	N/A	11-Oct-11					
	Indonesia	Pinang Sebatang Estate	448.00	Not Certified	2023	N/A		Yes	2024	Land legalization process for 448 ha at Pinang Sebatang Estate is still in process.	13-Jul-23
	Indonesia	Aneka Persada Estate	4,434.90	Certified	N/A	11-Oct-11					
Blang Simpo	Indonesia	Blang Simpo Mill	8,777.22	Certified	N/A	3-May-13					
	Indonesia	Blang Simpo -1 Estate	3,460.06	Certified	N/A	3-May-13					
	Indonesia	Blang Simpo -2 Estate	2,677.83	Certified	N/A	3-May-13					
	Indonesia	Tamiang (PT PPP) Estate	1,451.99	Certified	N/A	3-May-13					
	Indonesia	Batang Ara (PT PSK) Estate	1,187.34	Certified	N/A	3-May-13					

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Teluk Bakau	Indonesia	Teluk Bakau Mill	13,317.81	Certified	N/A	11-Oct-11					
	Indonesia	Teluk Bakau Estate	4,025.07	Certified	N/A	11-Oct-11					
	Indonesia	Nusa Lestari Estate	3,456.74	Certified	N/A	11-Oct-11					
	Indonesia	Nusa Perkasa Estate	5,836.00	Certified	N/A	11-Oct-11					
Mandah	Indonesia	Mandah Mill	12,366.18	Certified	N/A	1-Apr-14					
	Indonesia	Mandah Estate	5,053.18	Certified	N/A	1-Apr-14					
	Indonesia	Rotan Semelur Estate	7,313.00	Certified	N/A	1-Apr-14					
Sungai Pinang	Indonesia	Sungai Pinang Mill	6.51	Certified	N/A	11-Sep-12					
	Indonesia	Sungai Pinang Estate	3,374.42	Certified	N/A	11-Sep-12					
	Indonesia	Bukit Pinang Estate	3,138.58	Certified	N/A	11-Sep-12					
Ladang Panjang	Indonesia	Ladang Panjang Mill	1,202.04	Certified	N/A	9-Jul-12					
	Indonesia	Ladang Panjang Estate	1,202.04	Certified	N/A	9-Jul-12					
	Indonesia	Ladang Panjang Estate	1,796.19	Not Certified	2023	NA		Yes	2024	Land legalization process for 1,796.19 ha is still in progress.	13-Jul-23
Rantau Panjang	Indonesia	Rantau Panjang Mill	10,139.91	Certified	N/A	16-Mar-12					
	Indonesia	Bumi Ayu Estate	2,960.98	Certified	N/A	16-Mar-12					
	Indonesia	Rantau Panjang Estate	2,679.74	Certified	N/A	16-Mar-12					
	Indonesia	Rantau Panjang Estate	1,843.73	Not Certified	2023	NA		Yes	2024	Land legalization process of 1843.73 ha for Rantau Panjang Estate, Napal Estate / Karang Ringin Estate is still in process.	13-Jul-23
	Indonesia	Napal Estate/Karang Ringin	4,359.74	Certified	N/A	16-Mar-12					

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	Indonesia	Napal Estate/Karang Ringin	1,843.73	Not Certified	2023	N/A		Yes	2024	Land legalization process of 1843.73 ha for Rantau Panjang Estate, Napal Estate / Karang Ringin Estate is still in process.	13-Jul-23
	Indonesia	Mangun Jaya Estate	139.45	Certified	N/A	16-Mar-12					
	Indonesia	Mangun Jaya Estate	1,398.55	Not Certified	2023	N/A		Yes	2024	Land legalization process of 1398.55 ha is still in process.	13-Jul-23
	Indonesia	Sungai Jernih Estate	851.57	Not Certified	2023	N/A		Yes	2024	Land legalization process of 851.57 ha is still in process.	13-Jul-23
Angsana	Indonesia	Angsana Mill	15,151.19	Certified	N/A	6-Jul-11					
	Indonesia	Angsana Estate	3,250.06	Certified	N/A	6-Jul-11					
	Indonesia	Gunung Sari Estate	2,826.94	Certified	N/A	6-Jul-11					
Mustika	Indonesia	Mustika Mill	14,840.76	Certified	N/A	3-Jul-13					
	Indonesia	Mustika Estate	3,648.74	Certified	N/A	3-Jul-13					
	Indonesia	Pantai Bonati Estate	2,534.00	Certified	N/A	6-Jul-11					
Gunung Aru	Indonesia	Gunung Aru Mill	12,740.54	Certified	N/A	5-Jul-11					
	Indonesia	Gunung Aru Estate	2,684.41	Certified	N/A	5-Jul-11					
	Indonesia	Gunung Kemas Estate	3,511.36	Certified	N/A	5-Jul-11					
	Indonesia	Laut Timur Estate	3,207.28	Certified	N/A	5-Jul-11					
	Indonesia	Pantai Timur Estate	3,337.49	Certified	N/A	5-Jul-11					

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Ungkaya	Indonesia	Ungkaya Mill	4,145.00	Certified	N/A	10-Jul-12					
	Indonesia	Ungkaya Estate	4,145.00	Certified	N/A	10-Jul-12					
Rantau	Indonesia	Rantau Mill	24,169.56	Certified	N/A	30-Dec-11					
	Indonesia	Rantau Estate	4,638.00	Certified	N/A	30-Dec-11					
	Indonesia	Matalok Estate	3,082.00	Certified	N/A	30-Dec-11					
	Indonesia	Selabak Estate (PT SAA)	3,757.67	Certified	N/A	16-Mar-12					
	Indonesia	Randi Estate (PT SAA)	2,882.98	Certified	N/A	16-Mar-12					
	Indonesia	Sangkoh Estate (PT SAA)	3,789.34	Certified	N/A	16-Mar-12					
	Indonesia	Lanting Estate (PT LMR)	3,249.27	Certified	N/A	16-Mar-12					
	Indonesia	Betung Mill	7,579.57	Certified	N/A	1-Apr-14					
Betung	Indonesia	Betung Estate	4,266.00	Certified	N/A	1-Apr-14					
	Indonesia	Sekayu Estate	3,313.57	Certified	N/A	1-Apr-14					
Bebunga	Indonesia	Bebunga Mill	14,274.77	Certified	N/A	16-Mar-12					
	Indonesia	Bebunga Estate	3,958.43	Certified	N/A	16-Mar-12					
	Indonesia	Bakau Estate	5,342.14	Certified	N/A	16-Mar-12					
	Indonesia	Sungai Cengal Estate	4,974.20	Certified	N/A	16-Mar-12					
Pondok Labu	Indonesia	Pondok Labu Mill	15,876.20	Certified	N/A	16-Mar-12					
	Indonesia	Pondok Labu Estate	3,569.53	Certified	N/A	16-Mar-12					
	Indonesia	Binturung Estate	4,072.01	Certified	N/A	16-Mar-12					
	Indonesia	Rampa Estate	3,656.20	Certified	N/A	16-Mar-12					
	Indonesia	Sesulung Estate	4,578.46	Certified	N/A	16-Mar-12					
Sekunzir	Indonesia	Sekunzir Mill	7,734.59	Certified	N/A	23-Nov-10					
	Indonesia	Sekunzir Estate	3,555.19	Certified	N/A	23-Nov-10					
	Indonesia	Seruyan Estate	4,179.40	Certified	N/A	23-Nov-10					
Sukamandang	Indonesia	Sukamandang Mill	14,779.92	Certified	N/A	5-Jul-11					
	Indonesia	Sukamandang Estate	3,936.56	Certified	N/A	5-Jul-11					
	Indonesia	Sapiri Estate	3,530.90	Certified	N/A	5-Jul-11					
	Indonesia	Baras Danum Estate	3,664.60	Certified	N/A	5-Jul-11					
	Indonesia	Kuala Kuayan Estate	3,647.86	Certified	N/A	5-Jul-11					

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Pemantang	Indonesia	Pemantang Mill	16,601.66	Certified	N/A	5-Jul-11					
	Indonesia	Pemantang Estate	3,857.91	Certified	N/A	5-Jul-11					
	Indonesia	Kawan Batu Estate	4,400.00	Certified	N/A	5-Jul-11					
	Indonesia	Hatantiring Estate	3,811.00	Certified	N/A	5-Jul-11					
	Indonesia	Batang Garing Estate	4,532.75	Certified	N/A	5-Jul-11					
Lembiru	Indonesia	Lembiru Mill	9,409.07	Certified	N/A	3-Jul-14					
	Indonesia	Lembiru Estate	4,929.49	Certified	N/A	3-Jul-14					
	Indonesia	Awatan Estate	3,476.79	Certified	N/A	3-Jul-14					
	Indonesia	Pelanjau Estate (PT BAL)	1,002.79	Certified	N/A	3-Jul-19					
	Indonesia	Pelanjau Estate (PT BAL)	4,071.76	Not Certified	2023	N/A		Yes	2024	Land legalization process for 4,071.76 Ha for Pelanjau & Beturus Estate is still in process	13-Jul-23
	Indonesia	Beturus Estate (PT BAL)	4,071.76	Not Certified	2023	N/A		Yes	2024	Land legalization process for 4,071.76 Ha for Pelanjau & Beturus Estate is still in process	13-Jul-23
	Indonesia	Karya Palma Estate (PT SNP)	476.70	Not Certified	2023	N/A		Yes	2024	Land legalization process for 476.70 ha is still in process.	13-Jul-23
Bukit Ajong	Indonesia	Bukit Ajong Mill	11,498.82	Certified	N/A	18-Oct-10					
	Indonesia	West Estate	4,562.34	Certified	N/A	18-Oct-10					
	Indonesia	West Estate	1,452.93	Not Certified	2023	N/A		Yes	2024	Land legalization process for 1452.93 ha (West and	13-Jul-23

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										East Estate) is still in process.	
	Indonesia	East Estate	2,665.48	Certified	N/A	18-Oct-10					
	Indonesia	East Estate/Sei Mawang	1,452.93	Not Certified	2023	N/A		Yes	2024	Land legalization process for 1452.93 ha (West and East Estate) is still in process.	13-Jul-23
Sungai Dingin	Malaysia	Sungai Dingin Oil Mill	19,517.17	Certified	N/A	12-Aug-10					
	Malaysia	Anak Kulim Estate	1,523.35	Certified	N/A	12-Aug-10					
	Malaysia	Sungai Dingin Estate	4,244.03	Certified	N/A	12-Aug-10					
	Malaysia	Somme Estate	941.56	Certified	N/A	12-Aug-10					
	Malaysia	Bukit Selarong Estate	3,896.17	Certified	N/A	12-Aug-10					
	Malaysia	Padang Buluh Estate	4,008.47	Certified	N/A	12-Aug-10					
	Malaysia	Bukit Hijau Estate	2,725.00	Certified	N/A	12-Aug-10					
	Malaysia	Jentayu Estate	2,178.59	Certified	N/A	12-Aug-10					
Chersonese	Malaysia	Chersonese Oil Mill	11,099.36	Certified	N/A	5-Oct-11					
	Malaysia	Chersonese Estate	3,293.72	Certified	N/A	5-Oct-11					
	Malaysia	Kalumpang Estate	2,716.80	Certified	N/A	5-Oct-11					
	Malaysia	Tali Ayer Estate	3,756.10	Certified	N/A	5-Oct-11					
	Malaysia	Holyrood Estate	1,332.74	Certified	N/A	5-Oct-11					
Elphil	Malaysia	Elphil Oil Mill	6,814.60	Certified	N/A	18-Jun-11					
	Malaysia	Kamuning Estate	3,888.43	Certified	N/A	18-Jun-11					
	Malaysia	Elphil Estate	1,865.43	Certified	N/A	18-Jun-11					
	Malaysia	Kinta Kellas Estate	1,060.74	Certified	N/A	18-Jun-11					
Flemington	Malaysia	Flemington Oil Mill	11,226.23	Certified	N/A	5-Oct-11					
	Malaysia	Flemington Estate	1,906.84	Certified	N/A	5-Oct-11					
	Malaysia	Bagan Datoh Estate	3,781.86	Certified	N/A	5-Oct-11					
	Malaysia	Sabak Bernam Estate	2,511.79	Certified	N/A	5-Oct-11					

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	Malaysia	Sg. Samak Estate	3,025.74	Certified	N/A	5-Oct-11					
Seri Intan/ Selaba	Malaysia	Seri Intan Oil Mill	14,474.29	Certified	N/A	3-Mar-11					
	Malaysia	Selaba Oil Mill	1,549.75	Certified	N/A	3-Mar-11					
	Malaysia	Seri Intan (+ Selaba) Estate	4,013.16	Certified	N/A	3-Mar-11					
	Malaysia	Sabrang Estate	3,945.23	Certified	N/A	3-Mar-11					
	Malaysia	Sogomana Estate	2,214.08	Certified	N/A	3-Mar-11					
	Malaysia	Sg. Wangi Estate	2,226.66	Certified	N/A	3-Mar-11					
	Malaysia	Bikam Estate	2,075.16	Certified	N/A	3-Mar-11					
	Malaysia	Cluny (+ Bedford) Estate	1,549.75	Certified	N/A	3-Mar-11					
Tennamaram	Malaysia	Tennamaram Oil Mill	10,706.26	Certified	N/A	3-Mar-11					
	Malaysia	Tennamaram Estate	1,981.60	Certified	N/A	3-Mar-11					
	Malaysia	Sungai Buluh Estate	5,152.22	Certified	N/A	3-Mar-11					
	Malaysia	Bukit Talang Estate	3,572.44	Certified	N/A	3-Mar-11					
Bukit Kerayong	Malaysia	Bukit Kerayong Oil Mill	6,346.90	Certified	N/A	15-Apr-11					
	Malaysia	Bukit Kerayong Estate	2,699.28	Certified	N/A	15-Apr-11					
	Malaysia	Bukit Cheraka Estate	3,647.62	Certified	N/A	15-Apr-11					
East	Malaysia	East Oil Mill	10,902.94	Certified	N/A	19-May-10					
	Malaysia	East Estate	5,634.45	Certified	N/A	19-May-10					
	Malaysia	Sepang Estate	2,092.28	Certified	N/A	19-May-10					
	Malaysia	Dusun Durian Estate	3,176.21	Certified	N/A	19-May-10					
West	Malaysia	West Oil Mill	5,912.69	Certified	N/A	19-May-10					
	Malaysia	West Estate	5,912.69	Certified	N/A	19-May-10					
Bukit Puteri	Malaysia	Bukit Puteri Oil Mill	3,875.80	Certified	N/A	7-Jul-11					
	Malaysia	Bukit Puteri Estate	3,875.80	Certified	N/A	7-Jul-11					
Kerdau	Malaysia	Kerdau Oil Mill	13,781.50	Certified	N/A	7-Jul-11					
	Malaysia	Kerdau Estate	5,683.04	Certified	N/A	7-Jul-11					
	Malaysia	Mentakab Estate	3,266.49	Certified	N/A	7-Jul-11					
	Malaysia	Chenor Estate	2,834.98	Certified	N/A	7-Jul-11					
	Malaysia	Sg Mai Estate	1,996.99	Certified	N/A	7-Jul-11					

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Jabor	Malaysia	Jabor Oil Mill	2,332.92	Certified	N/A	7-Jul-11					
	Malaysia	Jabor Estate	2,332.92	Certified	N/A	7-Jul-11					
Labu	Malaysia	Labu Oil Mill	4,529.72	Certified	N/A	30-Dec-11					
	Malaysia	Labu Estate	4,529.72	Certified	N/A	30-Dec-11					
Tanah Merah	Malaysia	Tanah Merah Oil Mill	6,203.87	Certified	N/A	19-May-10					
	Malaysia	Tanah Merah Estate	4,341.73	Certified	N/A	19-May-10					
	Malaysia	Bukit Pelandok Estate	1,862.14	Certified	N/A	19-May-10					
Sua Betong	Malaysia	Sua Betong Oil Mill	18,457.27	Certified	N/A	18-Feb-14					
	Malaysia	Sua Betong Estate	2,870.75	Certified	N/A	18-Feb-14					
	Malaysia	Sengkang Estate	2,831.51	Certified	N/A	18-Feb-14					
	Malaysia	Bradwall Estate	3,828.34	Certified	N/A	18-Feb-14					
	Malaysia	PD Lukut Estate	1,523.79	Certified	N/A	18-Feb-14					
	Malaysia	Tampin Linggi Estate	2,106.71	Certified	N/A	18-Feb-14					
	Malaysia	Sg. Bahrui Estate	1,427.31	Certified	N/A	18-Feb-14					
	Malaysia	Salak Estate	3,868.86	Certified	N/A	18-Feb-14					
Kok Foh	Malaysia	Kok Foh Oil Mill	14,852.64	Certified	N/A	7-Jul-11					
	Malaysia	Muar River Estate	1,584.62	Certified	N/A	7-Jul-11					
	Malaysia	Sg. Senarut Estate + Sg Gemas Estate	2,958.38	Certified	N/A	7-Jul-11					
	Malaysia	Kok Foh Estate	2,275.84	Certified	N/A	7-Jul-11					
	Malaysia	Bukit Pilah Estate	3,667.31	Certified	N/A	7-Jul-11					
	Malaysia	St. Helier Estate	1,992.65	Certified	N/A	7-Jul-11					
	Malaysia	Sungai Sabaling Estate	1,321.35	Certified	N/A	7-Jul-11					
	Malaysia	Pertang Estate	1,052.49	Certified	N/A	7-Jul-11					
Kempas	Malaysia	Kempas Oil Mill	11,828.51	Certified	N/A	20-May-10					
	Malaysia	Kempas Estate	4,505.45	Certified	N/A	20-May-10					
	Malaysia	Tangkah Estate	2,537.78	Certified	N/A	20-May-10					
	Malaysia	Kemuning Estate	2,671.05	Certified	N/A	20-May-10					
	Malaysia	Serkam Estate	2,114.23	Certified	N/A	20-May-10					

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Diamond Jubilee	Malaysia	Diamond Jubilee Palm Oil Mill	7,356.19	Certified	N/A	5-Oct-11					
	Malaysia	Diamond Jubilee Estate	2,836.19	Certified	N/A	5-Oct-11					
	Malaysia	Bukit Asahan Estate	3,072.18	Certified	N/A	5-Oct-11					
	Malaysia	Welch Estate	1,447.82	Certified	N/A	5-Oct-11					
Pagoh	Malaysia	Pagoh Oil Mill	7,418.59	Certified	N/A	28-Jan-14					
	Malaysia	Pagoh Estate	2,325.93	Certified	N/A	28-Jan-14					
	Malaysia	Lanadron Estate	1,964.44	Certified	N/A	28-Jan-14					
	Malaysia	Pengkalan Bukit Estate	3,128.22	Certified	N/A	28-Jan-14					
Chaah	Malaysia	Chaah Oil Mill	8,699.93	Certified	N/A	18-Nov-10					
	Malaysia	Chaah Estate	2,795.36	Certified	N/A	18-Nov-10					
	Malaysia	Sg. Simpang Kiri Estate	2,371.66	Certified	N/A	18-Nov-10					
	Malaysia	North Labis Estate	3,532.91	Certified	N/A	18-Nov-10					
Gunung Mas	Malaysia	Gunung Mas Oil Mill	12,305.54	Certified	N/A	19-May-10					
	Malaysia	Gunung Mas Estate	3,466.17	Certified	N/A	19-May-10					
	Malaysia	Kempas Klebang Estate	2,473.06	Certified	N/A	19-May-10					
	Malaysia	Bukit Paloh Estate	3,390.90	Certified	N/A	19-May-10					
	Malaysia	Yong Peng Estate	2,975.41	Certified	N/A	19-May-10					
Bukit Benut	Malaysia	Bukit Benut Oil Mill	8,495.13	Certified	N/A	5-Oct-11					
	Malaysia	Bukit Benut Estate	2,799.78	Certified	N/A	5-Oct-11					
	Malaysia	Lambak Elaeis Estate	3,740.16	Certified	N/A	5-Oct-11					
	Malaysia	CEP Nyior Estate	1,955.19	Certified	N/A	5-Oct-11					
Ulu Remis	Malaysia	Ulu Remis Oil Mill	17,115.58	Certified	N/A	11-Apr-11					
	Malaysia	Ulu Remis Estate	2,598.25	Certified	N/A	11-Apr-11					
	Malaysia	Cenas Estate	1,974.06	Certified	N/A	11-Apr-11					
	Malaysia	Bukit Badak Estate	3,234.25	Certified	N/A	11-Apr-11					
	Malaysia	Tun Dr. Ismail Estate	4,271.44	Certified	N/A	11-Apr-11					
	Malaysia	Pekan Estate	3,258.70	Certified	N/A	11-Apr-11					
	Malaysia	Sembrong Estate	1,778.88	Certified	N/A	11-Apr-11					

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Hadapan	Malaysia	Hadapan Palm Oil Mill	11,371.82	Certified	N/A	29-Mar-11					
	Malaysia	Sri Pulau Estate	2,049.87	Certified	N/A	29-Mar-11					
	Malaysia	Kulai Estate	3,023.42	Certified	N/A	29-Mar-11					
	Malaysia	Layang Estate	3,258.90	Certified	N/A	29-Mar-11					
	Malaysia	CEP Renggam Estate	3,039.63	Certified	N/A	29-Mar-11					
Sandakan Bay	Malaysia	Sandakan Bay Oil Mill	16,764.34	Certified	N/A	1-Oct-08					
	Malaysia	Tun Tan Siew Sin Estate	3,125.60	Certified	N/A	1-Oct-08					
	Malaysia	Tunku Estate	3,199.05	Certified	N/A	1-Oct-08					
	Malaysia	Tigowis Estate	2,074.02	Certified	N/A	1-Oct-08					
	Malaysia	Sentosa Estate	3,545.54	Certified	N/A	1-Oct-08					
	Malaysia	Segaliud Estate	4,820.13	Certified	N/A	1-Oct-08					
Melalap	Malaysia	Melalap Oil Mill	5,246.18	Certified	N/A	21-Jan-11					
	Malaysia	Melalap Estate	2,096.73	Certified	N/A	21-Jan-11					
	Malaysia	Sapong Estate	3,149.45	Certified	N/A	21-Jan-11					
Binuang	Malaysia	Binuang Oil Mill	11,659.58	Certified	N/A	16-Jan-09					
	Malaysia	Binuang Estate	3,271.08	Certified	N/A	16-Jan-09					
	Malaysia	Sungang Estate	3,407.98	Certified	N/A	16-Jan-09					
	Malaysia	Tingayu Estate	1,881.08	Certified	N/A	16-Jan-09					
	Malaysia	Jeleta Bumi Estate	3,099.44	Certified	N/A	16-Jan-09					
Giram	Malaysia	Giram Oil Mill	8,345.02	Certified	N/A	16-Jan-09					
	Malaysia	Giram Estate	4,166.98	Certified	N/A	16-Jan-09					
	Malaysia	Mostyn Estate	4,178.04	Certified	N/A	16-Jan-09					
Merotai	Malaysia	Merotai Oil Mill	11,545.71	Certified	N/A	16-Jan-09					
	Malaysia	Merotai Estate	3,052.66	Certified	N/A	16-Jan-09					
	Malaysia	Imam Estate	3,773.56	Certified	N/A	16-Jan-09					
	Malaysia	Tiger Estate	2,497.86	Certified	N/A	16-Jan-09					
	Malaysia	Table Estate	2,221.63	Certified	N/A	16-Jan-09					
Layang	Malaysia	Layang Oil Mill	24,836.54	Certified	N/A	30-Dec-11					
	Malaysia	Layang Estate	4,363.83	Certified	N/A	30-Dec-11					
	Malaysia	Rasan Estate	3,454.00	Certified	N/A	30-Dec-11					

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	Malaysia	Belian Estate	2,847.00	Certified	N/A	30-Dec-11					
	Malaysia	Kelida Estate	2,460.00	Certified	N/A	30-Dec-11					
	Malaysia	Lavang (Special) Estate	included under Lavang Estate Ha	Certified	N/A	30-Dec-11					
	Malaysia	Pekaka Estate	2,626.14	Certified	N/A	30-Dec-11					
	Malaysia	Ruai Estate	2,460.96	Certified	N/A	30-Dec-11					
	Malaysia	Dulang Estate	2,548.00	Certified	N/A	30-Dec-11					
	Malaysia	Charquest Estate	1,448.71	Certified	N/A	30-Dec-11					
	Malaysia	Paroh Estate	2,627.90	Certified	N/A	30-Dec-11					
Rajawali	Malaysia	Rajawali Oil Mill	14,104.45	Certified	N/A	30-Dec-11					
	Malaysia	Rajawali Estate	6,087.27	Certified	N/A	30-Dec-11					
	Malaysia	Samudera Estate	3,308.60	Certified	N/A	30-Dec-11					
	Malaysia	Semarak Estate	2,248.68	Certified	N/A	30-Dec-11					
	Malaysia	Bayu Estate	2,459.90	Certified	N/A	30-Dec-11					
Derawan	Malaysia	Derawan Oil Mill	9,528.83	Certified	N/A	30-Dec-11					
	Malaysia	Derawan Estate	2,490.79	Certified	N/A	30-Dec-11					
	Malaysia	Sahua Estate	2,644.00	Certified	N/A	30-Dec-11					
	Malaysia	Takau Estate	2,107.00	Certified	N/A	30-Dec-11					
	Malaysia	Damai Estate	2,287.04	Certified	N/A	30-Dec-11					
Guadalcanal Plains Palm Oil Limited (GPPOL)	Solomon Islands	Tetere Oil Mill	9,025.69	Certified	N/A	18-Mar-11					
	Solomon Islands	Tetere Estate	2,947.79	Certified	N/A	18-Mar-11					
	Solomon Islands	Ngalimbiu Estate	2,498.65	Certified	N/A	18-Mar-11					
	Solomon Islands	Mbalisuna Estate	2,868.47	Certified	N/A	18-Mar-11					
	Solomon Islands	Smallholders – West Zone (83)	245.50	Certified	N/A	18-Mar-11					
	Solomon Islands	Smallholders – Central Zone (53)	181.71	Certified	N/A	18-Mar-11					
	Solomon Islands	Smallholders – MBA East Zone (59)	180.80	Certified	N/A	18-Mar-11					
	Solomon Islands	Smallholders – MBE East Zone (37)	102.77	Certified	N/A	18-Mar-11					

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Milne Bay Estates (MBE)	Papua New Guinea	Hagita Oil Mill	16,508.59	Certified	N/A	15-Feb-13					
	Papua New Guinea	Giligili Estate	1,095.47	Certified	N/A	15-Feb-13					
	Papua New Guinea	Hagita Estate	2,450.02	Certified	N/A	15-Feb-13					
	Papua New Guinea	Waigani Estate	2,341.13	Certified	N/A	15-Feb-13					
	Papua New Guinea	Sagarai Estate	2,864.55	Certified	N/A	15-Feb-13					
	Papua New Guinea	Padipadi Estate	4,517.67	Certified	N/A	15-Feb-13					
	Papua New Guinea	Mariawatte Estate	1,680.14	Certified	N/A	15-Feb-13					
	Papua New Guinea	Smallholders - East Gurney Estate (259)	450.59	Certified	N/A	15-Feb-13					
	Papua New Guinea	Smallholders - West Gurney Estate (231)	479.13	Certified	N/A	15-Feb-13					
	Papua New Guinea	Smallholders - East Sagarai Estate (156)	283.93	Certified	N/A	15-Feb-13					
	Papua New Guinea	Smallholders - West Sagarai Estate (212)	345.96	Certified	N/A	15-Feb-13					
Poliamba (POL)	Papua New Guinea	Poliamba Oil Mill	10,720.53	Certified	N/A	19-Mar-12					
	Papua New Guinea	Kara Estate	1,032.10	Certified	N/A	19-Mar-12					
	Papua New Guinea	Nalik Estate	2,666.75	Certified	N/A	19-Mar-12					
	Papua New Guinea	West Coast Estate	627.60	Certified	N/A	19-Mar-12					
	Papua New Guinea	Noatsi Estate	2,064.10	Certified	N/A	19-Mar-12					
	Papua New Guinea	Madak Estate	1,517.11	Certified	N/A	19-Mar-12					
	Papua New Guinea	Smallholders -North Division (615)	1,022.12	Certified	N/A	19-Mar-12					
	Papua New Guinea	Smallholders- South Division (866)	1,257.21	Certified	N/A	19-Mar-12					
	Papua New Guinea	Smallholders -West Division (309)	533.54	Certified	N/A	19-Mar-12					
Ramu Agricultural Industries Ltd (RAIL)	Papua New Guinea	Gusap Mill	14,606.08	Certified	N/A	5-Aug-10					
	Papua New Guinea	Gusap East (Gusap) Estate	2,856.45	Certified	N/A	5-Aug-10					
	Papua New Guinea	Gusap West (Paddox) Estate	3,019.09	Certified	N/A	5-Aug-10					
	Papua New Guinea	Surinam Estate	2,154.14	Certified	N/A	5-Aug-10					
	Papua New Guinea	Dumpu Estate	2,254.36	Certified	N/A	5-Aug-10					
	Papua New Guinea	Ngaru Estate	854.33	Certified	N/A	5-Aug-10					
	Papua New Guinea	J Estate (Jephcott) Estate	2,824.01	Certified	N/A	5-Aug-10					
	Papua New Guinea	Smallholders - Madang VOPs (71)	360.00	Certified	N/A	5-Aug-10					
	Papua New Guinea	Smallholders - Morobe VOPs (253)	283.70	Certified	N/A	5-Aug-10					

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Higaturu Oil Palm (HOP)	Papua New Guinea	Sangara Oil Mill		Certified	N/A	1-Feb-13					
	Papua New Guinea	Mamba Oil Mill		Certified	N/A	1-Feb-13					
	Papua New Guinea	Embi Estate	1,737.78	Certified	N/A	1-Feb-13					
	Papua New Guinea	Ambogo Estate	2,040.00	Certified	N/A	1-Feb-13					
	Papua New Guinea	Sangara Estate	1,780.00	Certified	N/A	1-Feb-13					
	Papua New Guinea	Sumbiripa Estate	2,545.00	Certified	N/A	1-Feb-13					
	Papua New Guinea	Mamba Estate	4,013.10	Certified	N/A	1-Feb-13					
	Papua New Guinea	Sambogo Estate	2,637.85	Certified	N/A	1-Feb-13					
	Papua New Guinea	Scheme Smallholder Sorovi Division (2019)	3,940.21	Certified	N/A	1-Feb-13					
	Papua New Guinea	Scheme Smallholder Saiho Division (842)	1,493.06	Certified	N/A	1-Feb-13					
	Papua New Guinea	Scheme Smallholder Aeka Division (911)	1,474.23	Certified	N/A	1-Feb-13					
	Papua New Guinea	Scheme Smallholder Igora Division (1367)	2,940.15	Certified	N/A	1-Feb-13					
	Papua New Guinea	Scheme Smallholder Ilimo Division (671)	1,063.66	Certified	N/A	1-Feb-13					
West New Britain (WNB)	Papua New Guinea	Mosa Oil Mill		Certified	N/A	10-Sep-08					
	Papua New Guinea	Kumbango Oil Mill		Certified	N/A	10-Sep-08					
	Papua New Guinea	Kapiura Mill		Certified	N/A	10-Sep-08					
	Papua New Guinea	Numundo Mill		Certified	N/A	10-Sep-08					
	Papua New Guinea	Waraston Mill		Certified	N/A	10-Sep-08					
	Papua New Guinea	Bebere Estate	2,226.71	Certified	N/A	10-Sep-08					
	Papua New Guinea	Kumbango Estate	2,610.80	Certified	N/A	10-Sep-08					
	Papua New Guinea	Togulo Estate	1,509.20	Certified	N/A	10-Sep-08					
	Papua New Guinea	Dami Estate	1,507.00	Certified	N/A	10-Sep-08					
	Papua New Guinea	Waisisi Estate	1,090.00	Certified	N/A	10-Sep-08					
	Papua New Guinea	Kautu Estate	4,280.60	Certified	N/A	10-Sep-08					
	Papua New Guinea	Karassu Estate	2,387.64	Certified	N/A	10-Sep-08					
	Papua New Guinea	Moroa Estate	848.16	Certified	N/A	10-Sep-08					
	Papua New Guinea	Bilomi Estate	2,011.70	Certified	N/A	10-Sep-08					
	Papua New Guinea	Loata Estate	562.00	Certified	N/A	10-Sep-08					
	Papua New Guinea	Haella Estate	4,220.30	Certified	N/A	10-Sep-08					
	Papua New Guinea	Garu Estate	3,709.60	Certified	N/A	10-Sep-08					

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	Papua New Guinea	Daliavu Estate	2,484.10	Certified	N/A	10-Sep-08					
	Papua New Guinea	Sapuri Estate	2,180.90	Certified	N/A	10-Sep-08					
	Papua New Guinea	Malilimi Estate	3,837.00	Certified	N/A	10-Sep-08					
	Papua New Guinea	Rigula Estate	3,720.00	Certified	N/A	10-Sep-08					
	Papua New Guinea	Nomundo Estate	2,645.17	Certified	N/A	10-Sep-08					
	Papua New Guinea	Navarai / Karato ME /KDC EU Estate	1,103.77	Certified	N/A	10-Sep-08					
	Papua New Guinea	Volupai / Lotomgam / Natupi / Goruru Estate	1,992.59	Certified	N/A	10-Sep-08					
	Papua New Guinea	Lolokoru Estate	2,453.10	Certified	N/A	10-Sep-08					
	Papua New Guinea	Ove Estate	3,541.00	Certified	N/A	10-Sep-08					
	Papua New Guinea	Tamare Estate	1,362.70	Certified	N/A	10-Sep-08					
	Papua New Guinea	Smallholders LSS Mosa (1822)	5,008.53	Certified	N/A	10-Sep-08					
	Papua New Guinea	Smallholders VOP East (1817)	5,324.37	Certified	N/A	10-Sep-08					
	Papua New Guinea	Smallholders VOP Central (1964)	5,756.57	Certified	N/A	10-Sep-08					
	Papua New Guinea	Smallholders VOP West (1279)	2,804.10	Certified	N/A	10-Sep-08					
	Papua New Guinea	Smallholders LSS Kapiura (551)	551.00	Certified	N/A	10-Sep-08					
	Papua New Guinea	Smallholders VOP Kapiura (850)	847.00	Certified	N/A	10-Sep-08					
	Papua New Guinea	Smallholders Kaulong/Akami/Pushiki/Repamira/Sakapei (20)	700.37	Certified	N/A	10-Sep-08					
Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.	Papua New Guinea	Erap Mill	5,399.40	Certified	N/A	27-Mar-20				There is total area for NPP: 710.30 ha which is currently excluded from the certification scope of MFCL until the NPP is approved.	
	Papua New Guinea	Munum Estate	1,734.57	Certified	N/A	27-Mar-20					
	Papua New Guinea	Maralumi Estate	2,427.15	Certified	N/A	27-Mar-20					
	Papua New Guinea	Erap Estate	1,237.68	Certified	N/A	27-Mar-20					

3.3 Details of Nonconformities

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

During this Assessment there were two (2) Critical; five (5) Minor nonconformities and no (0) Opportunity For Improvement raised. The PT Indotruba Tengah – Sekunyir POM Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the 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 #	2468985-202403-M1	Issued Date	15 March 2024
Due Date	14 June 2024	Closure Date	7 May 2024
Indicator & Category (Critical / Minor)	Indicator 3.8.12 (Critical)		
Statement of Nonconformity:	The Company does not maintain accurate and up-to-date records related to RSPO Supply Chain requirements.		
Requirement Reference:	Record keeping 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.		
Objective Evidence:	<p>Based on a review of Conventional (non-certified) CPO delivery documents:</p> <ul style="list-style-type: none"> • Weighbridge Ticket Sekunyir Factory "Despatch" No.066750, dated 28 Feb 2024. Origin: PT Indotruba Tengah (Sekunyir Factory). Destination: Bulking Pangkalan Banteng. Product: CPO Standard (MKS). Quantity Net Weight 21,290 kg. Transporter: Bumdes Sebukat Karya Sejahtera. Vehicle No. BD 8377 IO. • Weighbridge Ticket Sekunyir Factory "Despatch" No.066752, dated 28 Feb 2024. Origin: PT Indotruba Tengah (Sekunyir Factory). Destination: Bulking Pangkalan Banteng. Product: CPO Standard (MKS). Quantity Net Weight 19,290 kg. Transporter: Bumdes Sebukat Karya Sejahtera. Vehicle No. BD 8377 IO. <p>The stamp "RSPO Certified Mass Balance" and the certificate number "RSPO 744702" was found on the weighbridge ticket. However, this is only found on sales document (weighbridge tickets), whilst transactions on PalmTrace are not carried out, because this is a conventional sale.</p> <p>Based on interview, "RSPO Certified Mass Balance" was stamped by the weighbridge operator on weighbridge ticket because he doesn't know whether the product was sold as certified or not. Whilst the certificate number "RSPO 744702" has become a printed template for weighbridge tickets.</p>		

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Corrections:	Creating a "Cancel" stamp to be affixed to the statement of "RSPO Mass Balance" and "RSPO Certificate Number" on the sales/delivery document if it is known that the product being sold as conventional.
Root Cause Analysis:	The relevant personnel (weighbridge operator) have not fully understood the mechanism for the sale of Conventional oil palm product (Non-RSPO Certified), because previously the Palm Oil Mill used supply chain model IP.
Corrective Actions:	<ol style="list-style-type: none"> 1. Conducted refresh training to the personnel who responsible for implementation of RSPO supply requirement especially weighbridge operator. 2. PIC of RSPO supply chain conducted monitoring to the sales/delivery document to ensure that the documents are in accordance with the product delivered.
Assessment Conclusion:	<p>During NCR Close Out audit on 6 May 2024, audit team verified the weighbridge ticket of Conventional (non-certified) CPO delivery:</p> <ul style="list-style-type: none"> • Weighbridge Ticket Sekunyir Factory "Despatch" No.066630, dated 17/02/2024. Origin: PT Indotruba Tengah (Sekunyir Factory). Destination: Bulking Pangkalan Banteng. Product: CPO Standard (MKS). Quantity Net Weight 18,420 kg. Transporter: Bumdes Sebukat Karya Sejahtera. Vehicle No. KH 8188 GR. • Weighbridge Ticket Sekunyir Factory "Despatch" No.064104, dated 03/03/2024. Origin: PT Indotruba Tengah (Sekunyir Factory). Destination: Bulking Pangkalan Banteng. Product: CPO Standard (MKS). Quantity Net Weight 10,170 kg. Transporter: BPB – Bulking Pangkalan Banteng. Vehicle No. KH 8805 GA. • Weighbridge Ticket Sekunyir Factory "Despatch" No.066919, dated 07/04/2024. Origin: PT Indotruba Tengah (Sekunyir Factory). Destination: Bulking Pangkalan Banteng. Product: CPO Standard (MKS). Quantity Net Weight 17,840 kg. Transporter: PT Sebukat Karya Perkasa. Vehicle No. KH 9002 PM. <p>It was verified that "RSPO Mass Balance" has been overwritten with "CANCEL" stamp. "RSPO Mass Balance" stamp is no longer visible on weighbridge ticket of conventional product deliveries.</p> <p>Moreover, since 1 May 2024, Sekunyir POM has no longer applied "RSPO Mass Balance" stamp for conventional product delivery document, as evident in:</p> <ul style="list-style-type: none"> • Weighbridge Ticket Sekunyir Factory "Despatch" No.067056, dated 03/05/2024. Origin: PT Indotruba Tengah (Sekunyir Factory). Destination: Bulking Pangkalan Banteng. Product: CPO Standard (MKS). Quantity Net Weight 15,760 kg. Transporter: PT Sebukat Karya Perkasa. Vehicle No. AE 8490 UC. • Weighbridge Ticket Sekunyir Factory "Despatch" No.067057, dated 03/05/2024. Origin: PT Indotruba Tengah (Sekunyir Factory). Destination: Bulking Pangkalan Banteng. Product: CPO Standard (MKS). Quantity Net Weight 15,340 kg. Transporter: PT Sebukat Karya Perkasa. Vehicle No. KH 9048 PM.

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	<p>Whilst the RSPO certificate number still appears because it shows that Sekunyir POM is an RSPO certified mill, not as a claim that the product delivered is a certified product, and this notation applies to all goods weighed at the mill.</p> <p>Refreshment training of RSPO supply chain requirements has been conducted on 21 March 2024 to weighbridge operators and production clerk. Based on interview to weighbridge operators, they have understood that due to mass balance model, the product delivered from Sekunyir POM can be certified and non-certified. They have understood that "CANCEL" stamp shall be applied for non-certified product delivery. They also aware that since 1 May 2024, Sekunyir POM has no longer applied "RSPO Mass Balance" stamp for conventional product delivery document. Sekunyir POM has implemented monitoring to the sales/delivery document as documented in "Monitoring Bulanan Penerapan Stempel Cancel RSPO PT. ITH". Verified that monitoring has been conducted to sales/delivery document in March and April 2024.</p> <p>The unit of certification has demonstrated consistent implementation of correction and corrective action planned. This Critical NC is closed satisfactorily.</p>
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Non-conformity			
NCR Ref #	2468985-202403-M2	Issued Date	15 March 2024
Due Date	14 June 2024	Closure Date	7 May 2024
Indicator & Category (Critical / Minor)	Indicator 6.7.3 (Critical)		
Statement of Nonconformity:	There are workers (press station operators) who do not use appropriate PPE when working at the work site.		
Requirement Reference:	(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.		
Objective Evidence:	<p>Based on field observations in the factory area (Press Station), it was found that press operators did not use appropriate PPE (ear protection) when working, even though PPE (ear plugs) had been provided by the company. It is known that the worker used earphones that connected to a cell phone device while working.</p> <p>In the press station area, the organization has posted a warning that workers must wear helmets, safety shoes and ear protection.</p> <p>Furthermore, the results of noise analysis in the Press Station area in Semesters I and II 2023 (RKL RPL Report) show values of 87 and 89 dB (Threshold Value 85 dB) so that the recommendations from the 2023 RKL RPL report include "every worker who works at the factory are required to use ear protectors (ear plugs/ear muffs) to protect hearing".</p>		

Corrections:	<ol style="list-style-type: none"> 1. Imposing sanctions to supervisors and employees who violate regulations related PPE, in the form of warning letter. 2. Conducted re-dissemination (Safety Briefing) to all employee regarding the importance of using PPE.
Root Cause Analysis:	The company has provided adequate PPE for all employees considering the needs and work location, however supervisory concern and awareness level regarding the uses of Personal Protective Equipment (PPE) among employees is still lacking.
Corrective Actions:	<ol style="list-style-type: none"> 1. Department of Safety and Mill Assistant conducted monitoring of PPE on daily basis. 2. Make a statement letter regarding commitment of using PPE to be read and signed by all employees of Sekunyir POM.
Assessment Conclusion:	<p>During NCR Close Out audit on 6 May 2024, audit team verified the warning letter for operator who are found not using appropriate PPE. This warning letter issued on 16 March 2024. A warning letter was also given on 16 March 2024, to process supervision personnel who had been negligent in monitoring and controlling the use of PPE.</p> <p>Each worker has signed a statement letter that they will always use the PPE provided by the company during working with full responsibility. The statement letter was signed by 96 employees, acknowledged by Mill Assistant, KTU and Mill Manager.</p> <p>Refreshment training regarding the importance of PPE by Mill Manager, KTU and SQM Assistant has been conducted to all employees in two session, which is on 16 and 20 March 2024. Daily briefing prior to work also conducted by Safety Officer or Mill Assistants to emphasize the importance of using PPE.</p> <p>Daily checking of PPE use has been conducted by Safety Department and Mill Assistant, as evident in "Pemeriksaan Harian Pemakaian APD" period March and April 2024.</p> <p>Based on virtual observation and interview to the operator and supervision (Mandor) verified that all personnel has been wearing appropriate PPE during work. They have been aware that wearing PPE is a necessity. They admitted that Safety Officer or Mill Assistants conduct a briefing at the start of each work to remind them regarding the use of PPE and check the completeness of PPE every day.</p> <p>The unit of certification has demonstrated consistent implementation of correction and corrective action planned. This Critical NC is closed satisfactorily.</p>

Non-conformity			
NCR Ref #	2468985-202403-N1	Issued Date	15 March 2024
Due Date	ASA 2_3	Closure Date	ASA 2_3
Indicator & Category (Critical / Minor)	Indicator 3.1.3 (Minor)		

Statement of Nonconformity:	The Company has not been able to show sufficient evidence that the Management Review has covered all the required agendas.
Requirement Reference:	The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken. - Minor compliance -
Objective Evidence:	The company has shown the minutes of the Management Review which was carried out on 20 February 2024, but based on these minutes, the Management Review only discussed the results of the internal audit.
Corrections:	Collect records of management review meetings that include the agenda in guidance of indicator 3.1.3 and document them properly.
Root Cause Analysis:	Records of Management Review Meeting were not well documented.
Corrective Actions:	Create a management review schedule, monitor the implementation of the management review and document every record of the management review.
Assessment Conclusion:	<p>During NCR Close Out audit on 6 May 2024, the unit of certification has demonstrated:</p> <ul style="list-style-type: none"> - Minutes of management review meeting dated 30 March 2024. - "Lembar Kertas Kerja Kesimpulan Pemeriksaan (LK3P)" Sekunyir Estate, dated 16 – 20 November 2023. - "Lembar Kertas Kerja Kesimpulan Pemeriksaan (LK3P)" Seruyan Estate, dated 21 – 25 November 2023. - "Review Hasil SORA Round-01 2024" Sekunyir POM, dated 27 March 2024. - Structured Crop Recovery Assessment (SCRA), dated 29 January – 1 February 2024. - Structured Oil Recovery Assessment (SORA), dated 29 – 31 January 2024. - Management review schedule 2024, as documented in "Monitoring Pelaksanaan Management Review PT Indotruba Tengah 2024". <p>Audit team has accepted the implementation evident of correction and corrective action. Verification on consistent implementation of corrective action will be conducted on next ASA.</p>

Non-conformity			
NCR Ref #	2468985-202403-N2	Issued Date	15 March 2024
Due Date	ASA 2_3	Closure Date	ASA 2_3
Indicator & Category (Critical / Minor)	Indicator 6.2.7 (Minor)		
Statement of Nonconformity:	Company has not been able to show sufficient evidence that all core work has been carried out by permanent workers.		
Requirement Reference:	Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal. - Minor compliance -		

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Objective Evidence:	<p>Based on the results of document review and interviews with employee representatives and management representatives, it is known that there is use of PKWT personnel for the harvest and processing process at PKS. The results of the RSPO Internal Audit on 11 – 15 December 2023 have stated the inappropriateness of the use of PKWT workers for permanent work. Furthermore, in the Management review on 20 February 2024, this issue was also declared closed.</p> <p>However, based on the employee list updated in February 2024, it is known that there is still use of <i>PKWT</i> in harvesting and processing with the following details:</p> <ul style="list-style-type: none"> • SKE: 47 Harvesters and 4 Carriers • SRE: 38 Harvesters and 14 pickers • SKF: 18 process workers <p>Employee Appointment Plan</p> <ul style="list-style-type: none"> • SKE: Letter Number 004/SKE/I/2024 dated 20 January 2024 to the CEO of KTB for the appointment and extension of PKWT employees, one of which is with the type of work Harvest, 34 people submitted as SKU, 1 person extended PKWT, and 5 people added PKWT • SRE: Letter Number 029/SRE-Int/I/2024 dated 30 January 2024 to the CEO of KTB for the appointment of 31 harvesting employees to SKU. <p>The letter has been signed by the CEO of KTB on 7 February 2024, and still waiting approval from the Head of Strategy Innovation and Transformation.</p> <p>During this audit, there were still core jobs being carried out by <i>PKWT</i> workers. Apart from that, it was also found that there were still <i>PKWT</i> workers for harvesting and processing at the mill who had just newly joined in January - March 2024.</p> <p>Based on the description above, it can be concluded that the Company has not been able to show sufficient evidence that all core work has been carried out by permanent workers.</p>
Corrections:	Request the HR Department to immediately process all applications for the appointment of PKWT workers to SKUs that have been submitted from Estate and Mill.
Root Cause Analysis:	There is a delay in submitting SKU appointment from Estate/Mill.
Corrective Actions:	KTU and Estate & Mill Assistant monitor the status of all employees working in the main job monthly.
Assessment Conclusion:	The unit of certification has identified the root cause; prepared correction and corrective action plan. Verification on consistent implementation of corrective action will be conducted on next ASA.

Non-conformity			
NCR Ref #	2468985-202403-N3	Issued Date	15 March 2024
Due Date	ASA 2_3	Closure Date	ASA 2_3
Indicator & Category (Critical / Minor)	Indicator 7.2.8 (Minor)		
Statement of Nonconformity:	There are ex pesticide containers that used for other purposes which are not in accordance with the SOP.		

Requirement Reference:	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 -
Objective Evidence:	Based on field verification, it was found that there are ex pesticide containers that used for other purposes, for example: <ul style="list-style-type: none"> - At the SRE Traction, there are 3 jerry cans of ex pesticide containers (Supremo) used to store diesel fuel. - At the SKE Division I and II housing complex, there are 2 jerry cans of ex pesticide containers (Supremo) used to store Peralite fuel. This is not in accordance with the SOP for Management of Hazardous and Non-hazardous Waste, dated 10 January 2022, pages 16-17.
Corrections:	Conducted inspection in housing complex regarding whether or not ex pesticide container is still in use, and conducted confiscation of existing ex pesticide containers to be handed over to temporary hazardous waste storage.
Root Cause Analysis:	Estate and mill employees understanding of procedures for Hazardous Waste Management is lacking.
Corrective Actions:	<ol style="list-style-type: none"> 1. Conducted re-dissemination of SOP for Management of Hazardous and Non-hazardous Waste to all employees and housing residents. 2. Estate and Mill Assistants carry out regular checks monthly to check for hazardous waste that is not managed properly in housing complex both in the estates and the mill.
Assessment Conclusion:	<p>During NCR Close Out audit on 6 May 2024, the unit of certification has demonstrated:</p> <ul style="list-style-type: none"> - Handover notes of hazardous waste "Berita Acara Serah Terima LB3" Sekunir Estate No.57/BAST-INT/III/2024, dated 21 March 2023, for 36 kg of ex-chemical containers; Seruyan Estate No.56/BAST-INT/III/2024, dated 21 March 2023, for 5 kg of ex-chemical containers; Sekunir POM No.33/BAST-INT/III/2024, dated 19 March 2023, for 93 kg of ex-chemical containers. - Notes of employee housing checks "Pemeriksaan Rumah Karyawan" Sekunir Estate, dated 23 March 2024; Seruyan Estate, dated 18 March 2024; Sekunir POM, dated 22 March 2024. - Minutes of dissemination in Sekunir Estate on 23 March 2024; in Seruyan Estate on 22 March 2024; in Sekunir POM on 16 and 20 March 2024, regarding: <ul style="list-style-type: none"> o Prohibition on the use of ex-pesticide container and other hazardous waste in employee housing, traction, generator houses and other company environments. o Waste management and prohibition of burning waste in employee housing. - Statement letter from each employee regarding not using ex-pesticide container and other hazardous waste and not using fire for waste disposal. <p>Audit team has accepted the implementation evident of correction and corrective action. Verification on consistent implementation of corrective action will be conducted on next ASA.</p>

Non-conformity			
NCR Ref #	2468985-202403-N4	Issued Date	15 March 2024
Due Date	ASA 2_3	Closure Date	ASA 2_3
Indicator & Category (Critical / Minor)	Indicator 7.3.2 (Minor)		
Statement of Nonconformity:	There are ex chemical containers (blue jerry cans) at the employee housing location.		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -		
Objective Evidence:	Based on field verification at the factory employee compound, it was found that there was 1 empty jerry can of ex chemicals (blue jerry can) at the back of employee's compound. This is not in accordance with the SOP for Management of Hazardous and Non-hazardous Waste, dated 10 January 2022, pages 16-17.		
Corrections:	Conducted inspection in housing complex regarding whether or not ex pesticide container is still in use, and conducted confiscation of existing ex pesticide containers to be handed over to temporary hazardous waste storage.		
Root Cause Analysis:	Estate and mill employees understanding of procedures for Hazardous Waste Management is lacking.		
Corrective Actions:	<ol style="list-style-type: none"> 1. Conducted re-dissemination of SOP for Management of Hazardous and Non-hazardous Waste to all employees and housing residents. 2. Estate and Mill Assistants carry out regular checks monthly to check for hazardous waste that is not managed properly in housing complex both in the estates and the mill. 		
Assessment Conclusion:	<p>During NCR Close Out audit on 6 May 2024, the unit of certification has demonstrated:</p> <ul style="list-style-type: none"> - Handover notes of hazardous waste "Berita Acara Serah Terima LB3" Sekunyir Estate No.57/BAST-INT/III/2024, dated 21 March 2023, for 36 kg of ex-chemical containers; Seruyan Estate No.56/BAST-INT/III/2024, dated 21 March 2023, for 5 kg of ex-chemical containers; Sekunyir POM No.33/BAST-INT/III/2024, dated 19 March 2023, for 93 kg of ex-chemical containers. - Notes of employee housing checks "Pemeriksaan Rumah Karyawan" Sekunyir Estate, dated 23 March 2024; Seruyan Estate, dated 18 March 2024; Sekunyir POM, dated 22 March 2024. - Minutes of dissemination in Sekunyir Estate on 23 March 2024; in Seruyan Estate on 22 March 2024; in Sekunyir POM on 16 and 20 March 2024, regarding: <ul style="list-style-type: none"> o Prohibition on the use of ex-pesticide container and other hazardous waste in employee housing, traction, generator houses and other company environments. o Waste management and prohibition of burning waste in employee housing. 		

	<ul style="list-style-type: none"> - Statement letter from each employee regarding not using ex-pesticide container and other hazardous waste and not using fire for waste disposal. <p>Audit team has accepted the implementation evident of correction and corrective action. Verification on consistent implementation of corrective action will be conducted on next ASA.</p>
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Non-conformity			
NCR Ref #	2468985-202403-N5	Issued Date	15 March 2024
Due Date	ASA 2_3	Closure Date	ASA 2_3
Indicator & Category (Critical / Minor)	Indicator 7.3.2 (Minor)		
Statement of Nonconformity:	There is not enough evidence that the company does not use open fire for waste disposal.		
Requirement Reference:	The unit of certification does not use open fire for waste disposal. - Minor compliance -		
Objective Evidence:	Based on field verification, it was found that there were traces of domestic waste burning in employee housing and in housing occupied by civil contractors. This is not in accordance with the requirements in indicator 7.3.3 and in SOP 001/SKE-K3/08/15 dated 15 August 2015 "SOP for Management of Domestic Waste" which is explained in Part IV point c. "Waste burning is prohibited."		
Corrections:	Conducted inspection in housing complex regarding whether or not use of fire for domestic waste disposals, and give warning letters to housing residents who have use fire for waste disposals.		
Root Cause Analysis:	Estate and mill employees understanding of procedures for Domestic Waste Management is lacking.		
Corrective Actions:	<ol style="list-style-type: none"> 1. Conducted re-dissemination of SOP for Management of Hazardous and Non-hazardous Waste to all employees and housing residents. 2. Estate and Mill Assistants carry out regular checks monthly to check whether there is use of fire for waste disposal in housing complex both in the estates and the mill. 		
Assessment Conclusion:	<p>During NCR Close Out audit on 6 May 2024, the unit of certification has demonstrated:</p> <ul style="list-style-type: none"> - Notes of employee housing checks "Pemeriksaan Rumah Karyawan" Sekunyir Estate, dated 23 March 2024; Seruyan Estate, dated 18 March 2024; Sekunyir POM, dated 22 March 2024. - Minutes of dissemination in Sekunyir Estate on 23 March 2024; in Seruyan Estate on 22 March 2024; in Sekunyir POM on 16 and 20 March 2024, regarding: <ul style="list-style-type: none"> o Prohibition on the use of ex-pesticide container and other hazardous waste in employee housing, traction, generator houses and other company environments. 		

	<ul style="list-style-type: none"> Waste management and prohibition of burning waste in employee housing. Statement letter from each employee regarding not using ex-pesticide container and other hazardous waste and not using fire for waste disposal. <p>Audit team has accepted the implementation evident of correction and corrective action. Verification on consistent implementation of corrective action will be conducted on next ASA.</p>
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Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description
PF 1	Nil

3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2319871-202303-M1	Issued Date	9 March 2023
Due Date	8 June 2023	Closure Date	25 March 2023
Indicator & Category (Critical / Minor)	Indicator 3.8.8 (Critical)		
Statement of Nonconformity:	The document for sales of CSPK from PT. Indotruba Tengah-Sekunir POM does not indicate RSPO certificate number for the certification unit (RSPO 744702)		
Requirement Reference:	<p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number 		

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Objective Evidence:	<ul style="list-style-type: none"> • Weighbridge ticket "Despatch" No.64102; for D/O No.00262/00255/02/23/L-ITH-KERNEL; Seller PT. Indotruba Tengah-Sekunyir Factory; Buyer PT. Teguh Sempurna; Product Palm Kernel; Quantity 14,320 kg; Truck No.KH8491FD; Delivery Date 03/03/2023; not indicate RSPO certificate number. • Weighbridge ticket "Despatch" No.064140; for D/O No.00262/00255/02/23/L-ITH-KERNEL; Seller PT. Indotruba Tengah-Sekunyir Factory; Buyer PT. Teguh Sempurna; Product Palm Kernel; Quantity 12,470 kg; Truck No.KH8991FB; Delivery Date 04/03/2023; not indicate RSPO certificate number.
Corrections:	Mill Manager Sekunyir Factory and SQM have coordinated with the IT Department for the inclusion of the RSPO Certificate Number on each weigh ticket by system so that when the weigh ticket is printed, the RSPO Certificate Number can be printed automatically.
Root Cause Analysis:	Management of Sekunyir Factory and SQM lack coordination with the IT Department regarding the inclusion of the RSPO Certificate Number for PT. ITH in Weigh tickets for CPO & PK sales.
Corrective Actions:	<ul style="list-style-type: none"> • Head Office IT (Jakarta) has included the RSPO Certificate Number on each weighing ticket automatically, • Mill and SQM will conduct Periodic Monitoring once a month, • Internal audits will be carried out intensively and periodically to ensure that Corrections are carried out effectively, • Ensure the PIC related to SCCS at Mill (Mill Manager, Kasie Sekunyir POM and Weighbridge Operator) is competent and understands all SCCS requirements. <p>Data verified:</p> <ul style="list-style-type: none"> • Record on Monthly Monitoring to ensure indicate RSPO certificate number for the certification unit (RSPO 744702) as per "Monitoring Bulanan Pencantuman Nomor Sertifikat RSPO", example Month March 2023. Status completed. • Refreshment training related to RSPO SCC requirement dated 10th March 2023. The training was delivered by SQM Department that was attended by Mill Manager, Kasie Sekunyir POM and Weighbridge Operator. Record seen: Attendance list and Training Material. • Internal audits report dated 9th March 2023, the special aspect to ensure indicate RSPO certificate number for the certification unit (RSPO 744702). Record seen: Internal audit report and the followed-up report • Management Review Report dated 10th March 2023. Special agenda to ensure indicate RSPO certificate number for the certification unit (RSPO 744702), that was attended by Chairman of SOU for PT Indotruba Tengah. • Weighbridge ticket "Despatch" No.64222; for DO:00268.00256/03/23/L-ITH-KERNEL; Seller PT. Indotruba Tengah-Sekunyir Factory; Buyer PT. Teguh Sempurna; Product Palm CPO; Quantity 14,030 kg; Truck No.KH8491FD; Delivery Date 33/03/2023; has completed with indicate RSPO certificate number for the certification unit (RSPO 744702). • Weighbridge ticket "Despatch" No.064151; for D/O No.00263/00256/03/23/L-ITH-KERNEL; Seller PT. Indotruba Tengah-Sekunyir Factory; Buyer PT. Teguh

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	Sempurna; Product Palm Kernel; Quantity 13,540 kg; Truck No.KH8991FB; Delivery Date 21/03/2023; indicate RSPO certificate number for the certification unit (RSPO 744702)
Assessment Conclusion:	Based on the evidence of the improvements shown above in corrections and corrective actions, they can be followed up effectively. Discrepancies related to Indicator 3.8.8 Sales and Goods Out have been able to be closed as of 25 th March 2023.
Effectiveness Closure (for previous audit closed Critical NC):	<p>During ASA 2_2, audit team verified the Sales and Goods Out documents for RSPO certified products as follow:</p> <ul style="list-style-type: none"> - Weighbridge Ticket Sekunyr Factory "Despatch" No.066247, dated 4 Dec 2023. Seller: PT Indotruba Tengah (Sekunyr Factory). Customer: PT Teguh Sempurna. Product Palm Kernel. Quantity Net Weight 13,010 kg. Vehicle No. KH 8991 FB. Driver Syahruli. Delivery Order No.00272/00265/11/23/L-ITH-KERNEL. Stamped RSPO Certified Mass Balance. RSPO Certificate No. RSPO 744702. - Weighbridge Ticket Sekunyr Factory "Despatch" No.066520, dated 18 Jan 2024. Seller: PT Indotruba Tengah (Sekunyr Factory). Customer: PT Teguh Sempurna. Product Palm Kernel. Quantity Net Weight 12,950 kg. Vehicle No. KH 8991 FB. Driver Syahruli. Delivery Order No.00274/00267/01/24/L-ITH-KERNEL. Stamped RSPO Certified Mass Balance. RSPO Certificate No. RSPO 744702. <p>It was verified that the documents has indicated RSPO supply chain model and RSPO certificate number (RSPO 744702). This critical NC remain closed.</p>

Previous Audit Minor Non-conformity			
NCR Ref #	Nil	Issued Date	
Due Date		Closure Date	
Indicator & Category (Critical / Minor)			
Statement of Nonconformity:			
Requirement Reference:			
Objective Evidence:			
Corrections:			
Root Cause Analysis:			
Corrective Actions:			
Assessment Conclusion:			

Previous Audit Opportunity for Improvement	
OFI#	Description
OFI 1	OFI Statement: Nil

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3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2189761-202204-M1	Critical	Indicator 2.3.1	16 April 2022	Closed on 12 May 2022
2189761-202204-M2	Critical	Indicator 3.8.7	16 April 2022	Closed on 12 May 2022
2189761-202204-N1	Minor	Indicator 3.2.2	16 April 2022	Closed on 9 March 2023
2189761-202204-N2	Minor	Indicator 6.1.4	16 April 2022	Closed on 9 March 2023
2189761-202204-N3	Minor	Indicator 7.3.2	16 April 2022	Closed on 9 March 2023
2319871-202303-M1	Critical	Indicator 3.8.8	9 March 2023	Closed on 25 March 2023
2468985-202403-M1	Critical	Indicator 3.8.12	15 March 2024	Closed on 6 May 2024
2468985-202403-M2	Critical	Indicator 6.7.3	15 March 2024	Closed on 6 May 2024
2468985-202403-N1	Minor	Indicator 3.1.3	15 March 2024	Will be verified on next ASA
2468985-202403-N2	Minor	Indicator 6.2.7	15 March 2024	Will be verified on next ASA
2468985-202403-N3	Minor	Indicator 7.2.8	15 March 2024	Will be verified on next ASA
2468985-202403-N4	Minor	Indicator 7.3.2	15 March 2024	Will be verified on next ASA
2468985-202403-N5	Minor	Indicator 7.3.3	15 March 2024	Will be verified on next ASA

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss PT Indotruba Tengah – Sekunyir POM's environmental and social performance, legal and any known dispute issues.

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Governmental Department	• Dinas Ketenagakerjaan – Manpower Agency of Kotawaringin Barat Regency	Phone interview

	<ul style="list-style-type: none"> • Dinas Perkebunan – Plantation Agency of Kotawaringin Barat Regency • Dinas Lingkungan Hidup – Environmental Agency of Kotawaringin Barat Regency • Kantor Pertanahan – Lands Office of Kotawaringin Barat Regency. 	
Local Communities	<ul style="list-style-type: none"> • Village Head of Amin Jaya • Village Head of Pembuang Hulu II 	Face to face interview
Union	Worker Union of PT Indotruba Tengah	Face to face interview
Internal	<ul style="list-style-type: none"> • Gender Committee • New Mother • Sample of workers 	Face to face interview
Contractor	CV Fortuna (FFB Supplier and Civil contractor)	Face to face interview
NGO	Wetlands; Sawit Watch; WALHI; WWF; Aid Environment; Forest Watch; WCS; Links; Solidaridad; Forest for Orangutans	Invitation email to comment was sent

Stakeholders comment	
1	<p>Feedbacks:</p> <p>Dinas Ketenagakerjaan – Manpower Agency of Kotawaringin Barat Regency</p> <p>The company has good coordination with the department, for example by regularly reporting the composition of the workforce through WLTK (mandatory reporting to workers) and PKWT (temporary worker) reporting. Currently, there are still contract workers, but they should only be hired on a temporary basis. Over the past year there have never been any issues regarding employment problems. The company is located in two regency in one province so it uses the highest UMK (minimum wage), which is the UMK of Seruyan Regency.</p> <p>Audit Team verification and response:</p> <p>During this audit, there were still core jobs being carried out by PKWT workers. Apart from that, it was also found that there were still PKWT workers for harvesting and processing at the mill who had just newly joined in January - March 2024. PKWT worker has been issued as Non-Conformity in indicator 6.2.7.</p>
2	<p>Feedbacks:</p> <p>Dinas Perkebunan – Plantation Agency of Kotawaringin Barat Regency</p> <p>Communication and coordination with the Plantation Service is poor. Mandatory reporting such as LPUP has not been submitted in an orderly manner. Even though the company's IUP was issued before 2007, it should from now on have developed a strategy to fulfil 20% of the development of plasma plantations or equivalent productive businesses in order to avoid conflicts when the HGU period ends.</p>

	<p>Audit Team verification and response:</p> <p>PT Indotruba Tengah has demonstrated its commitment to submit Plantation Business Development Report (LPUP) to the Kotawaringin Barat Regency Plantation Service, by setting a delivery deadline for each report to government agencies. PT Indotruba Tengah demonstrates working plan to assist smallholder as documented in "<i>PT Indotruba Tengah Action Plan Pembangunan Kebun Plasma 1,500 Ha</i>", dated 10 January 2022. Detail process of implementation described in indicator 5.1.8. There is no negative issue to be followed up.</p>
3	<p>Feedbacks:</p> <p>Dinas Lingkungan Hidup – Environmental Agency of Kotawaringin Barat Regency</p> <p>No feedback obtained.</p> <p>Audit Team verification and response:</p> <p>Invitation letter to comment was sent, however there was no respond when contacted during audit days.</p>
4	<p>Feedbacks:</p> <p>Kantor Pertanahan – Lands Office of Kotawaringin Barat Regency</p> <p>No feedback obtained.</p> <p>Audit Team verification and response:</p> <p>Invitation letter to comment was sent, however there was no respond when contacted during audit days.</p>
5	<p>Feedbacks:</p> <p>Village Head of Amin Jaya</p> <p>The company has good communication and coordination with the Village. So far, social responsibility has also been carried out routinely, whether in the form of social assistance or community empowerment. In 2024, collaboration with BUMDES (Village-owned enterprises) is planned to develop the paving block business. The company also involves considering the Village Head's suggestions when preparing the CSR program by identifying needs. Up to this moment, there have been no issues regarding land disputes or environmental pollution.</p> <p>Audit Team verification and response:</p> <p>There is no negative issue that need further verification.</p>
6	<p>Feedbacks:</p> <p>Village Head of Pembuang Hulu II</p> <p>The company has realized its social responsibility to villages with a proposal submission system. So far, there have been no programs created jointly between the community and the company. Currently there are demands from the community regarding requests for compensation funds in the amount of IDR 2,000,000/Ha for area of PT Indotruba Tengah which is included in the Seruyan Regency area (Pembuang Hulu II Village and Derangga Village).</p> <p>Audit Team verification and response:</p> <p>The latest progress on 9 February 2024 that there was meeting between the company and the Community of Pembuang Hulu II and Derangga Villages, was also attended by Hanau District Head, Commander of Pembuang Hulu II Military District, Head of Hanau Sector Police, chairman of Hanau District DAD. However, during the meeting no agreement was found so it will be taken to the Seruyan Regency level. Detail explanation can be seen in indicator 4.2.3.</p>

7	<p>Feedbacks:</p> <p>Worker Union of PT Indotruba Tengah</p> <p>The company supports union and gathering activities and never intervenes in worker union activities. So far there have been no issues related to employment because the communication process is felt to be very good. The company has fulfilled its minimum wage obligations, included employees in the BPJS program, and paid compensation to PKWT whose work period has ended. PKWT for harvesting and processing still exists, however this is part of the training period and after that they will be appointed as permanent employees.</p> <p>Audit Team verification and response:</p> <p>During this audit, there were still core jobs being carried out by PKWT workers. Apart from that, it was also found that there were still PKWT workers for harvesting and processing at the mill who had just newly joined in January - March 2024. PKWT worker has been issued as Non-Conformity in indicator 6.2.7.</p>
8	<p>Feedbacks:</p> <p>Gender Committee</p> <p>The company supports and facilitates gender committee activities. Currently the new structure has been validated in December 2023 and is still in a transition period. The main issues that are part of the new management's work program include increasing participation in every activity held, preventing and handling incidents of sexual harassment and violence in the workplace or domestic violence and plans to develop soft skills in the art of knitting.</p> <p>Audit Team verification and response:</p> <p>There is no negative issue that need further verification.</p>
9	<p>Feedbacks:</p> <p>CV Fortuna (FFB Supplier and Civil contractor)</p> <p>Cooperation is established in accordance with the Cooperation Agreement Letter which in the clause states compliance with relevant regulations including the use of legal labour. The company also regularly provides outreach regarding its policies.</p> <p>The source of FFB supplied is from 43 growers who form farmer groups and are permanent suppliers to CV Fortuna. Field verification regarding the legality of FFB has been carried out either by CV Fortuna or the company.</p> <p>There are no issues regarding delays in work payments or TBS payments.</p> <p>Audit Team verification and response:</p> <p>There is no negative issue that need further verification.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Nil					
Based on review of legality documents (HGU Decree, HGU Certificate and Risalah Panitia B) and interview with management, Village Heads and Plantation Agency, it is found that the HGU areas were came from government land bank that initially was purposed for transmigration program. Due to the failure of the transmigration program,					

the government offered the land to investors. Therefore, there was no land acquisition process to the individual landowners or customary rights and no FPIC related process.



Previous land owner / user comment	
	Feedbacks: Nil
	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.

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The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that PT Indotruba Tengah – Sekunzir 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 Indotruba Tengah – Sekunzir POM is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Eko Purwanto	Name: Alagendran Maniam
Company Name: On behalf of BSI Services Malaysia Sdn Bhd	Company Name: PT Indotruba Tengah – Sekunzir POM
Title: Lead Assessor	Title: Head of Sustainability
Signature: 	Signature: (I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.) 
Date: 20 May 2024	Date: 22 May 2024

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Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Behave ethically and transparently Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.			
Criteria 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	(C) Management documents that are specified in the RSPO P&C are made publicly available. - Critical (Major) compliance -	<p>The company has an SOP for Information Requests Document No. 01/SPO/2016 dated 1 April 2016 and has been revised on 22 January 2022. Based on this SOP, documents that can be accessed by the public include the following:</p> <ul style="list-style-type: none"> - Land title/User right - OHS plan - Environment and Social Impact Assessment - HCV & HCS - Corporate Social Responsibility - Pollution prevention and reduction plan - Negotiation procedure - Complaints and grievance - Continuous Improvement plan - Company policy <p>The total number of documents that can be freely accessed by the public is 29 items. The list has also been socialized to internal and external stakeholders in accordance with the results of consultations with worker representatives, Pembuang Hulu II Village representatives and Amin Jaya Village representatives.</p>	Complied

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1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Interviews result with relevant stakeholders such as government agency representatives, village representatives and employee representatives, it is known that information is available in Bahasa Indonesia and can be accessed by making an information request. Documents are in accordance with the list of documents that can be accessed by the public. Some are available at the plantation office in the form of original documents or copies. If the documents are not yet available at the plantation office, the flow of providing documents follows the information request procedure.</p> <p>Some information that is routinely provided to stakeholders includes:</p> <ul style="list-style-type: none"> • Mandatory Employment Report every year • Plantation Business Development Report every 6 months • OHS Committee report every 3 months • Annual HGU utilization report. 	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a logbook of incoming and outgoing letters as a way to monitor whether or not there are incoming information requests, the response time period, and the status of the information request. Some examples of responses to requests for information are as follows:</p> <ul style="list-style-type: none"> • January 2024 letter (undated) from Pembuang Hulu II Village to PT ITH requesting a meeting with the company regarding plasma compensation. The follow-up to the letter was a meeting on 17 January 2024 and the process is still continuing. • Letter dated 5 December 2023 from SPSI (worker union) PT ITH regarding request for information on UMK and Wage Scale for 2024. The letter has been responded to by Human Resources Manager and a determination of the wage scale structure and UMK (minimum wage) information for 2024 has been issued in accordance with Internal Memo No. 073/HRM-i5.1/XII/2023, dated 18 December 2023. 	Complied

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		Based on the results of document verification and interviews with stakeholder representatives, it is known that the company responded to every request for information requested. The response period also does not exceed the time limit set out in the procedure, which is 1 week if it does not require approval from the head of department and 1 month if approval from the head of department is required.	
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 -	Company has a procedure of communication and consultation which described in SOP No 394/ITH revision 3 dated 14 September 2016. In this procedure stated that time to respond for the information request is no longer than 15 days. Based on stakeholder consultation known that this procedure has been informed to the parties through Plantation Service Department Officer and PSQM Team.	Complied
1.1.5	An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives. - Minor compliance -	PT Indrotuba Tengah has Stakeholder List period 2024 with information of detail contact update in 28 February 2024. Based on the list known that stakeholder grouped in : <ol style="list-style-type: none"> 1. District level : Government agencies of Seruyan and Kotawaringin Barat 2. Sub-disrict and village level : Government agencies of Pangkalan banteng and Hanau, Hanau and Pangkalan Banteng sector police, military subdistrict command of Pangkalan banteng, Amin Jaya and Pembuang Hulu II Village 3. Community Head : Amin Jaya Sp1 Village and Pembuang Hulu II 4. Contractor : 9 entities 5. Head of Community Development. That list has information includes the name of the organization representative, address and contact number.	Complied

Criteria 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.

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1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>PT. Indotruba Tengah is a subsidiary of Sime Darby Plantation. Therefore PT. Indotruba Tengah referred to "Kode Etik Bisnis Minamas Plantation" which referring to Code of Business Conduct Handbook Sime Darby Plantation, December 2021". This policy on the conduct of fair and ethical business on all transactions and business operating, including:</p> <ul style="list-style-type: none"> - Working with others (Mutual respect; Equal opportunity and no discrimination; Prohibit harassment and violence; Illegal substance, criminal act; Environmental-Health-Safety) - Avoid Conflict of Interest (Transaction with supplier, customer, agent and competitor; personal transaction with supplier and customer; Membership on legal entity; Family member and personal; Investment) - Prevent bribery and corruption. - Gift, Entertainment and Travel - Donation - Protection to Group and Shareholder (Protection to Group Asset; Financial information accuracy; Confidential information; Insider trading; Information technology; Archive management; Business communication) - Relation with Business Partner (Partner; Business partner; Antitrust; Environmental access to land and sustainable development) - Relation with Government, Politic party, and International Organization (Politic activity; Anti money laundering; Anti-terrorist funding). <p>There is no change related to the Code of Business Conduct until this ASA 2_2 audit.</p> <p>This information including channel for raising concern for Malaysia, Indonesia, South Africa, Netherlands, other country": eform, email, phone number, hotline, fax, PO BOX address.</p>	Complied
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1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>PT. Indotruba Tengah already has a system or mechanism to monitor the implementation of company policies including the company code of ethics. PT Indotruba Tengah ensure operational activity align with the company's procedures.</p> <p>Communication:</p> <ul style="list-style-type: none"> - Socialization to all Sekunyir Estate worker, on 29 September 2023. In addition, each worker sign statement letter has attended code of business conduct training and understand the policy. - Socialization to all Seruyan Estate worker, on 12 October 2023. In addition, each worker sign statement letter has attended code of business conduct training and understand the policy. - Socialization to all Sekunyir POM worker, on 16 October 2023. In addition, each worker sign statement letter has attended code of business conduct training and understand the policy. - This information on code of ethical business conduct have been communicated to workers and surrounding communities from villages, 27 June 2023. 48 persons attended from Pangkalan Banteng district, Derangga Village, Hanau district, Amin Jaya village, Sungai Pakit village. <p>Sample verified regarding promotion process:</p> <ul style="list-style-type: none"> - In Seruyan Estate, promotion on behalf Bejo Yuwono as Krani Panen/Harvest Admin promotion to Mandor Panen/Harvest Supervisor, dated 01 July 2023. - In Seruyan Estate, promotion on behalf Agus Budi Setiawan as Krani Panen/Harvest Admin promotion to Mandor Panen/Harvest Supervisor, dated 01 July 2023. - In Sekunyir Estate, promotion on behalf Gunardi as Krani Divisi/Division Admin promotion to Mandor Bibitan/Nursery Supervisor, dated 30 September 2023. - In Sekunyir Estate, promotion on behalf Taufik Hidayat as Acting Upkeep 	Complied
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		<p>Supervisor promotion to Upkeep Supervisor, dated 30 November 2023.</p> <ul style="list-style-type: none"> - In Sekunyir POM, promotion on behalf Affandi Min Thohirin as Mill Compound worker promotion to Operator Sterilizer, dated 20 November 2023. - In Sekunyir POM, promotion on behalf Mahmudin as Compound worker promotion to Operator Ramp Bottom, dated 20 November 2023. - In Sekunyir POM, promotion on behalf Indra Eka Fauzi as Compound worker promotion to Operator Ramp Bottom, dated 20 November 2023. - Sighted performance evaluation for the said worker, from Division Assistant, Senior Assistant, Estate Manager as supporting document. <p>Systems to monitor compliance and ethical business is implemented by unit of certification through internal audit. The internal audit also ensuring all business activity are comply with company policy. The last internal audits report dated 11-15 December 2023, the special aspect to ensure indicate RSPO. Record seen: Internal audit report and the followed-up report.</p>	
Principle 2: Operate legally and respect rights Implement legal requirements as the basic principles of operation in any jurisdiction.			
Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The unit of certification complies to relevant regulations. - Critical (Major) compliance -	Unit of Certification has been complied to relevant regulations such as: 1. Deed of establishment. "Perseroan Terbatas PT. Indotruba Tengah No.178", dated 13 March 1990. Registration to Ministry of Law "Keputusan Menteri Kehakiman Republik Indonesia No.C2-1164.HT.01.01.Th'91" dated 30 March 1991. 2. Land tenure and land-use rights. - HGU certificate #04/1998, covered 3,260 Ha (Sekunyir Estate) – valid until 24 September 2033, based on "Surat Keputusan Menteri Negara Agraria/Kepala Badan Pertanahan Nasional" No. 152/HGU/BPN/97,	Complied

		<p>dated 26th September 1997.</p> <ul style="list-style-type: none"> - HGU certificate #05/1998, covered 829.2 Ha (Sekunzir Estate) – valid until 24 September 2033, based on “Surat Keputusan Menteri Negara Agraria/Kepala Badan Pertanahan Nasional” No. 11/HGU/BPN/99, dated 11 April 1998. - HGU certificate #05/1998, covered 740.4 Ha (Seruyan Estate) – valid until 23 June 2033, based on “Surat Keputusan Menteri Negara Agraria / Kepala Badan Pertanahan Nasional” No.10/HGU/BPN/98, dated 2 April 1998. - HGU certificate #06/1998, covered 2,905 Ha (Seruyan Estate) – valid until 23 June 2033, based on “Surat Keputusan Menteri Negara Agraria / Kepala Badan Pertanahan Nasional” No.13/HGU/BPN/98, dated 2 April 1998 <p>3. Labour. Unit of certification has implementing minimum wage as refer to updated Regional Minimum Wage year 2024 as per Governor Decree of Kalimantan Tengah No. 188.44/552/2023, dated 24 November 2023 for Seruyan Regency Rate IDR 3,634,451/month.</p> <p>4. Agricultural practices. Hold plantation business license as refer to “Surat Pendaftaran Usaha Perkebun (SPUP) No. 700/Menhutbun-VII/2000” dated 21 June 2000, issued by Minister of Forestry and Plantation, covered 7,734.60 Ha and processing unit (POM) with permitted capacity 45 tons FFB/hour and installed capacity 30 tonnes FFB/hour.</p> <p>5. Environment. Unit of certification obtained Environmental Permit Approval “Surat Menteri pertanian Republik Indonesia No.020/RKL-RPL/BA/X/94, Perihal Persetujuan RKL-RPL Perkebunan Kelapa Sawit dan Pabrik Minyak Sawit PT. Indotruba Tengah” dated 18 October 1994.</p> <p>Storage. Toxic and hazardous storage already have official license as refer to “Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Kabupaten Kotawaringin Barat No. 553/011/DPMPTSP-III/LH/2018 tentang Izin Penyimpanan Sementara Limbah Bahan</p>	
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		Berbahaya dan Beracun kepada PT. Indotruba Tengah-PKS Sekunzir', dated 25 September 2018 and valid until 5 years. During ASA 2_2 was verified that organization has a new permit of Hazardous Waste Storage as stated in the Document of Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Propinsi Kalimantan Tengah No. 570/12/LH-SKKL/II/DPMPTSP-2024 dated 1 February 2024 related to "Kelayakan Lingkungan Hidup Kegiatan Perkebunan dan Pabrik Pengolahan Kelapa Sawit PT Indotruba Tengah".	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.</p> <p>- Minor compliance -</p>	<p>Unit of certification has established documented system for ensuring legal compliance through updating list of applicable regulation and internal audit.</p> <p>PT. Indotruba Tengah demonstrated list of applicable regulation and legislation under "Daftar Peraturan Terkait RSPO-ISPO Tahun 2024", updated by Assistant PSD (Plantation Services Department) on 8 January 2024.</p> <p>The list comprises of 51 Undang-undang/Act; 49 Peraturan Presiden/President Regulation; 4 Instruksi Presiden/President Instruction; 7 Keputusan Presiden/President Decree; 141 Keputusan dan Peraturan Menteri/Ministerial Decree; 2 Governor Decree.</p> <p>The updated for applicable regulation for year 2024, e.g.: Regulation related to minimum wage as refer to updated Regional Minimum Wage year 2023 as per Governor Decree of Kalimantan Tengah No. 188.44/552/2023, dated 24 November 2023 for Seruyan Regency Rate IDR 3,634,451/month.</p> <p>PT. Indotruba Tengah has "SOP Persyaratan Hukum No.011/PH-GP/I/II/11" dated 10 February 2011. Section 5. PIC stated PSD Department and ESH Manager responsible for identifying and inventory and evaluating compliance of all applicable legal and statutory requirement related to OHS, Environmental, Activity, Product, Service of Company; responsible to summarize the applicable legal and statutory requirements; to communicate applicable legal and statutory evaluation to all operating unit and other parties; to maintain the copy of applicable legal and statutory document obtained; to monitor the implementation of applicable legal and statutory.</p>	Complied

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		<p>Manager is responsible to communicate applicable legal and statutory evaluation to all subordinates; to understands the legal responsibility; to revise relevant document when new applicable legal and statutory occurs.</p> <p>Control and monitoring were regulated under the SOP; Section 6.2 Compliance stipulates PSD Department, Group Hukum & Perizinan and ESH Manager shall: identifying new regulation applicability, review the impact for current activity/operation; identifying the steps to comply; communicating to all parties, including contractor; monitor the performance through inspection, operational data analysis, internal audit and external audit.</p>	
2.1.3	<p>Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.</p> <p>- Minor compliance -</p>	<p>The unit of certification demonstrated the record on report of inspection and monitoring of legal boundaries – last report on 13-14 January 2024, conducted by Internal Inspection Team consisted of PSD, PSQM and POD. There was identified 47 poles – the pole position is accordance with legal boundary poles map – issued by National Land Agency (BPN).</p> <p>Boundary poles verified during field observation:</p> <p>Sekunyir Estate:</p> <ul style="list-style-type: none"> • Pole No. BPN-ITH-14 – Field A006 Div.2 Sekunyir Estate. GPS 2° 23' 54.79" S and 112° 00' 44.78" E. Bordering with community land. • Pole No. BPN-ITH-15 – Field A006 Div.2 Sekunyir Estate. GPS 2° 23' 32.78" S and 112° 00' 51.16" E. Bordering with community land and PT BJAP. • Pole No. BPN-ITH-16 – Field A006 Div.2 Sekunyir Estate. GPS 2° 23' 33.41" S and 112° 01' 21.33" E. Bordering with PT BJAP. <p>Seruyan Estate:</p> <ul style="list-style-type: none"> • Pole No. BPN-ITH-29 – Field G016 Div.3 Seruyan Estate. GPS 2° 27' 40.52" S and 112° 04' 50.59" E. Bordering with PT TN. • Pole No. BPN-ITH-30 – Field G016 Div.3 Seruyan Estate. GPS 2° 28' 09.96" S and 112° 04' 50.08" E. Bordering with community land and PT TN. 	Complied

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		<ul style="list-style-type: none"> Pole No. BPN-ITH-29 – Field G016 Div.3 Seruyan Estate. GPS 2° 28' 10.18" S and 112° 04' 40.99" E. Bordering with community land. 	
Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	<p>A list of contracted parties is available.</p> <p>- Minor compliance -</p>	<p>PT. Indotruba Tengah demonstrated the list of contracted parties, consist of CV Fortuna and PT Indotruba Timur as FFB supplier. Beside as FFB supplier, CV Fortuna is also engaged as a civil contractor. As of March 2024, there was contractor for FFB transportation i.e. CV Putra Isen Mulang and CV Hanau Jaya Sejahtera and CPO transportation namely PT Sebukat Karya Perkasa and Bumdes Sebukat Karya Sejahtera.</p> <p>Based on document review and interview with management and workers, there is no other contractor providing operational services or supplying labour engaged with PT Indotruba Tengah.</p>	Complied
2.2.2	<p>All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.</p> <p>- Minor compliance -</p>	<p>During ASA 2_2 verified the contract document of FFB supplier as per "Surat Perjanjian Kerja PT Indotruba Tengah – CV Fortuna No. SPJB TBS No. 007/TBS/ITH-Fortuna/IX/2023 dated 1 September 2023 – Article 1 stipulated - always comply to all legal requirement, including from local government and public official referring and relevant to laws relate to implementation of agreement and other requirement related to health, safety, environment and manpower, including but not limited to prohibit underage worker, forced worker and human trafficking practices.</p> <p>Evidence for checking requirement from FFB supplier as follows:</p> <ul style="list-style-type: none"> Notary act "Akta Notaris No.35 CV Fortuna by Teguh Hendrawan SH Mkn" dated 6 June 2018. Certificate of Company Registration "Tanda Daftar Perusahaan" for Persekutuan Komanditer (CV) No. TDP 15.05.3.82.00437 from Regent of Kotawaringin Barat Regency – Dinas Penanaman Modal dan PTSP Kabupaten Kotawaringin Barat. Surat Izin Usaha Perdagangan (SIUP) Kecil / Business License CV Fortuna No. 15.02/268/DPM-PTSP/III/X/2018 dated 16 October 2018 from Regent 	Complied

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		<p>of Kotawaringin Barat Regency – Dinas Penanaman Modal dan PTSP Kabupaten Kotawaringin Barat.</p> <ul style="list-style-type: none"> - Operational/Commercial Permit from OSS for CV Fortuna NIB 912050487xxxx dated 29 August 2019. <p>Based on review to other contract document e.g. PT Indotruba Timur, CV Putra Isen Mulang, CV Hanau Jaya Sejahtera, PT Sebukat Karya Perkasa and Bumdes Sebukat Karya Sejahtera, verified that all contract has contained specific clause on meeting relevant legal requirements. This clause can be demonstrated by the third party during field observation.</p> <p>Based on document review and interview with management and workers, there is no other contractor providing operational services or supplying labour engaged with PT Indotruba Tengah.</p>	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>During ASA 2_2 verified the contract document of FFB supplier as per "Surat Perjanjian Kerja PT Indotruba Tengah – CV Fortuna No. SPJB TBS No. 007/TBS/ITH-Fortuna/IX/2023 dated 1 September 2023 – Article 1 stipulated - always comply to all legal requirement, including from local government and public official referring and relevant to laws relate to implementation of agreement and other requirement related to health, safety, environment and manpower, including but not limited to prohibit underage worker, forced worker and human trafficking practices.</p> <p>Based on review to other contract document e.g. PT Indotruba Timur, CV Putra Isen Mulang, CV Hanau Jaya Sejahtera, PT Sebukat Karya Perkasa and Bumdes Sebukat Karya Sejahtera, verified that all contract has contained specific clause on disallowing child, forced and trafficked labour. This clause can be demonstrated by the third party during field observation.</p> <p>Based on document review and interview with management and workers, there is no other contractor providing operational services or supplying labour engaged with PT Indotruba Tengah.</p>	Complied
Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.			

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2.3.1	<p>(C) For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> • Information regarding the geolocation of FFB origins; • Proof of ownership status, right/claim of the land by grower/smallholder; • If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. <p>- Critical (Major) compliance -</p>	<p>PT. Indotruba Tengah – Sekunyir POM mainly received and process FFB coming from company-owned estate, Sekunyir Estate and Seruyan Estate.</p> <ul style="list-style-type: none"> - Information regarding geolocation of FFB origins was similar to palm oil mill details (under same company) see Section 1; - Proof of ownership (under same company) land title see 2.1.1; - Business license (under same company) of Business permit as in document of "Surat Pendaftaran Usaha Perkebun (SPUP) No. 700/Menhutbun-VII/200" dated 2020. <p>PT. Indotruba Tengah – Sekunyir POM also received FFB from non-certified oil palm plantation company PT. Indotruba Timur as directly FFB supplier. Minamas Plantation prepared report "Laporan Responsible Sourcing Guideline for 3rd party FFB PT. Indotruba Timur to Sekunyir Factory No.SQM/RSG/2022/01" dated 31 January 2022. The report reviewing the readiness of non-certified FFB supplies from PT. Indotruba Timur: planting year (before and after 2010); environmental aspect (location against peat area, national park, conservation area, protected forest and production forest); social aspect (internal and external disturbance); financial aspect (i.e. tax issues). The report results stated low risk because no peat area in concession, no national park, conservation area, protected forest, and production forest in the concession, "Pelepasan Kawasan Hutan of 1,164.75 Ha" on 13 May 2019.</p> <p>Unit of certification demonstrates geolocation 2° 23' 28.612"S 112° 3' 33.364"E and operating license of PT. Indotruba Timur as follows:</p> <ul style="list-style-type: none"> - "Keputusan Bupati Seruyan No.188.45/343/2019 tentang Izin Usaha Perkebunan untuk Budidaya (IUP-B) atas nama PT. Indotruba Timur" dated 21 August 2019 for plantation of 1,253.8 Ha. - Unit of certification demonstrates the land title is in process, HGU not issued; "Surat Keputusan Bupati Seruyan No.188.45/90/26 tentang Perubahan dan Perpanjangan Izin Lokasi Seluas 10,500 Ha Menjadi 1,253.8 Ha untuk Keperluan Pelepasan Kawasan Hutan atas nama PT. Indotruba Timur di 	Complied
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		<p>Desa Pembuang Hulu II Kecamatan Hanau, Kabupaten Seruyan”.</p> <ul style="list-style-type: none">- Letter from "PT. Indotruba Timur No. B/014/ITR/UM/GR/VI/2021 to Deputi Bidang Survei Pengukuran dan Pemetaan Up. Direktur Penetapan Batas Bidang dan Direktur Survei dan Penetapan Tematik" stating the company is applying for "Pengukuran kadastral atas lahan seluas 1,003 Ha di Desa Pembuang Hulu II, Kecamatan Hanau, Kabupaten Seruyan, Provinsi Kalimantan Tengah" – survey planning for land of 1,003 Ha in Pembuang Hulu II village, Hanau District, Seruyan Regency, Kalimantan Tengah Province, letter dated 16 June 2021.- Letter from “Kementerian Agraria dan Tata Ruang/Badan Pertanahan Nasional Kantor Wilayah Badan Pertanahan Nasional Provinsi Kalimantan Tengah No.IP.02/381-62.200/I/2023; Perihal Pemberitahuan Pelaksanaan pengukuran dan Pemetaan Kadastral PT. Indotruba Timur” dated 27 January 2023. Informing the cadastral measurement for PT. Indotruba Timur started 2 February 2023.							
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>During ASA 2_2, based on document verification and interview to the Manager of Sekunyir POM it was known that Sekunyir POM has received FFB from indirect supplier namely CV Fortuna as stated in the Surat Perjanjian Jual Beli (SPJB) Tandan Buah Segar Kelapa Sawit No. SPJB TBS No. 007/TBS/ITH-Fortuna/IX/2023 dated 1 September 2023 with area 473 Ha. Document verified as follows:</p> <ul style="list-style-type: none">• Information regarding the geolocation of FFB origins and proof of ownership status, right/claim of the land by grower/smallholder. <p>Verified document as follows:</p> <table><tr><th>Name of farmers</th><th>Land Legality Status</th><th>GPS Coordinate</th></tr><tr><td>Khanis</td><td>SHM/ownership certificate</td><td>2°29'04.7"S; 111°57'06.2"E</td></tr></table>	Name of farmers	Land Legality Status	GPS Coordinate	Khanis	SHM/ownership certificate	2°29'04.7"S; 111°57'06.2"E	Complied
Name of farmers	Land Legality Status	GPS Coordinate							
Khanis	SHM/ownership certificate	2°29'04.7"S; 111°57'06.2"E							

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		<table><tr><td>Ishak Saputra</td><td>SHM/ownership certificate</td><td>2°27'33.4"S; 111°57'16.9"E</td></tr><tr><td>Lubis</td><td>SHM/ownership certificate</td><td>2°27'04.3"S; 111°57'24.5"E</td></tr></table> <ul style="list-style-type: none">Valid planting/operational/trading license. Verified document as follows:<ul style="list-style-type: none">- Notary act "Akta Notaris No.35 CV Fortuna Teguh Hendrawan SH Mkn" dated 6 June 2018.- Certificate of Company Registration "Tanda Daftar Perusahaan" for Persekutuan Komanditer (CV) No. TDP 15.05.3.82.00437 from Regent of Kotawaringin Barat Regency – Dinas Penanaman Modal dan PTSP Kabupaten Kotawaringin Barat.- Surat Izin Usaha Perdagangan (SIUP) Kecil / Business License CV Fortuna No. 15.02/268/DPM-PTSP/III/X/2018 dated 16 October 2018 from Regent of Kotawaringin Barat Regency – Dinas Penanaman Modal dan PTSP Kabupaten Kotawaringin Barat.- Operational/Commercial Permit from OSS for CV Fortuna NIB 912050487xxxx dated 29 August 2019.	Ishak Saputra	SHM/ownership certificate	2°27'33.4"S; 111°57'16.9"E	Lubis	SHM/ownership certificate	2°27'04.3"S; 111°57'24.5"E	
Ishak Saputra	SHM/ownership certificate	2°27'33.4"S; 111°57'16.9"E							
Lubis	SHM/ownership certificate	2°27'04.3"S; 111°57'24.5"E							
Principle 3: Optimise productivity, efficiency, positive impact and resilience Implement plans, procedures and systems for continuous improvement.									
Criteria 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.									
3.1.1	(C) A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance -	The unit of certification has provided long-term management plan in document "Bisnis Plan PT Indotruba Tengah". This document described the five-year business projection, stating the business plan for 2024-2028 of PT. Indotruba Tengah. The long-term management plan covered parameter as follows: <ul style="list-style-type: none">Estimation of seedling requirements	Complied						

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- Projection of FFB production (MT)
- Projection of Oil Extraction and Kernel Extraction (%)
- Projection of CPO production (MT)
- Projection of PK production (MT)
- Estimation of CPO Price (IDR/MT)
- Estimation of PK Price (IDR/MT)
- Estimation of Revenue (IDR)
- Estimation of Production Cost (IDR/MT CPO)
- Replanting Program (Ha)

Estimated production of PT Indotruba Tengah FY 2024-2028:

Description	2024	2025	2026	2027	2028
FFB Production (MT)	105,720	107,085	111,188	128,579	147,244
- own estates -					
External FFB	52,500	52,500	52,500	52,500	52,500
Total FFB	158,220	159,585	163,688	181,079	199,744
OER (%)	22.50	22.50	22.50	23.00	23.00
KER (%)	4.50	4.47	4.25	4.12	4.50
CPO Production (MT)	35,599	35,907	36,830	41,648	45,941
PK Production (MT)	7,120	7,133	6,957	7,460	8,988

The CPO and PK production estimates in the 2024-2028 Business Plan signed by the Head of Sustainability are based on historical actual extraction ratios.

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		PT Indotruba Tengah demonstrates "Independent Auditors Report to the Shareholders, by Eddy Rintis, SE. CPA., (No.AP.0230) from Kantor Akuntan Publik Tanudiredja, Wibisana, Rintis & Rekan", dated 31 March 2023. The audit opinion "in our opinion, the accompanying financial statement present fairly, in all material respects, the financial position of the Company as at 31 December 2022, and its financial performance and cash flows for the year then ended, in accordance with Indonesian Financial Accounting Standards". Available letter from Public Accountant Eddy Rintis No. OL202401090019/ EDR/EDR, dated 9 Jan 2024, stating that financial report for the year ended at 31 Dec 2023 in under process.																												
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	<p>The unit of certification has documented long range replanting program, consist or plan and realisation of replanting since 2013. Realisation of replanting are reviewed annually by the Management.</p> <p>Please find below plan and realisation of replanting PT Indotruba Tengah (Sekunyir Estate and Seruyan Estate) for period 2020-2027:</p> <table><tr><th>Year</th><th>Plan (Ha)</th><th>Realization (Ha)</th></tr><tr><td>2020</td><td>668.73</td><td>668.73</td></tr><tr><td>2021</td><td>534.64</td><td>534.64</td></tr><tr><td>2022</td><td>223.27</td><td>223.27</td></tr><tr><td>2023</td><td>689.31</td><td>689.31</td></tr><tr><td>2024</td><td>725.53</td><td>On progress</td></tr><tr><td>2025</td><td>627.27</td><td>-</td></tr><tr><td>2026</td><td>505.57</td><td>-</td></tr><tr><td>2027</td><td>229.01</td><td>-</td></tr></table>	Year	Plan (Ha)	Realization (Ha)	2020	668.73	668.73	2021	534.64	534.64	2022	223.27	223.27	2023	689.31	689.31	2024	725.53	On progress	2025	627.27	-	2026	505.57	-	2027	229.01	-	Complied
Year	Plan (Ha)	Realization (Ha)																												
2020	668.73	668.73																												
2021	534.64	534.64																												
2022	223.27	223.27																												
2023	689.31	689.31																												
2024	725.53	On progress																												
2025	627.27	-																												
2026	505.57	-																												
2027	229.01	-																												

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		Based on the replanting record and field observation to replanting activity at Block D17 Sekunyir Estate and Block E018 Seruyan Estate, there is no fire usage during the process. All process proceeds by heavy equipment (excavator) for palm felling, chipping, pry the roots, digging etc.	
3.1.3	<p>The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.</p> <p>- Minor compliance -</p>	<p>Management review conducted as per requirement stating management review carried out after internal audit and prior to external audit, with minimum once in 12 months (1 year). The latest management review carried out on 20 February 2024, attended by all unit head, internal auditor and COU of PT Indotruba Tengah.</p> <p>The latest management review carried out on 20 February 2024, discussing internal audit result and status of corrective action. Correction and Corrective Action have been determined and implemented. Latest internal audit of RSPO P&C carried out by Mr. Tjahjo Moeljo Widjajanto and Mr. Asmara Hadi. Mr. Tjahjo has been trained with RSPO Internal Audit based ISO19001:2002 by PT. Bumi Hijau Cemerlang in January 2011. Mr. Asmara Hadi demonstrate training certificate titled Understanding and Implementing RSPO SCCS, by Mutu Institute, 21-22 December 2020.</p> <p>Internal audit conducted on 11-15 Dec 2023 resulting 7 critical NC and 5 minor NC issued related to implementation of RSPO P&C Indonesia NI 2020, such as:</p> <ul style="list-style-type: none"> - Communication logbook, - Boundary marker, - Contract document, - Records related RSPO Supply Chain (production and training records) - Worker welfare - Health and safety - Environment, GHG, HCV. 	<p>Non-compliance (2468985-202403-N1)</p>

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		<p>Replanting realization "Realisasi Replanting Program Sekunyir Estate Jan-Dec 2023": felling chipping for 397.10 Ha (52,364 palms); CECT 257,095 meter; Digging holes 397.10 Ha (52,364 palms); making Main Drain 4,260 meter; making central drain 8,426 meter.</p> <p>Management review of social aspect and impact conducted on 24 January 2024, discussing matters such as:</p> <ul style="list-style-type: none"> • Occupational aspects; • Public services; • Economic development of surrounding communities; • FPIC and conflict resolutions; • Environment aspects. <p><i>Minor Non-conformity:</i></p> <p><i>The Company has not been able to show sufficient evidence that the Management Review has covered all the required agendas.</i></p> <p><i>The company has shown the minutes of the Management Review which was carried out on 20 February 2024, but based on these minutes, the Management Review only discussed the results of the internal audit.</i></p>	
Criteria 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.			
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>The unit of certification has implemented action plan for continuous improvement based on consideration of the main social and environmental impact and opportunities. Below are sample of action plan that routinely implemented based on social and environment management and monitoring plan (RKL/RPL):</p> <p>Estate: Excellent Sustainable Pruning (ESP)</p>	Complied

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		<ul style="list-style-type: none">• Pruning conducted by special workers,• No dry frond in 360 days at ESP block,• ESP workers cannot be allocated for other type of work.• Pruning cost can be minimized from IDR 585/palm to IDR 276/palms. <p>Palm Oil Mill:</p> <ul style="list-style-type: none">• Installation of automatic lighting• Provision of refill water• Electric lawn mower• Dabbling nut hopper (self-managed)• Installation of storage tank indicators (alarm and siren)• Installation of waste pond monitoring <p>Environment:</p> <ul style="list-style-type: none">• Optimized Fertilizer and Pesticide Use• Efficient Water Management• Reduced Soil Erosion• Biodiversity Conservation• Carbon Footprint Reduction: By optimizing farming practices and reducing inputs such as fertilizers and pesticides. <p>Social:</p> <ul style="list-style-type: none">• Education and Skills Development: Implementing programs that provide education and skills training opportunities for local community, such as agriculture, entrepreneurship, and basic literacy and numeracy skills.• Healthcare Access: Providing access to company healthcare services	
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		<ul style="list-style-type: none"> Infrastructure Development: Investing in infrastructure projects such as road construction, bridges, improve access to markets, healthcare, and education for local communities. Smallholder Support Programs: Implementing support programs tailored to the needs of smallholders, improve their productivity and income levels. Livelihood Diversification: Supporting initiatives that promote livelihood diversification, promoting alternative crops, such as fruits, vegetables, or agroforestry systems, as well as non-farm income-generating activities like handicraft production or eco-tourism. 	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.</p> <p>- Minor compliance -</p>	<p>Unit of certification has submitted RSPO Metric Template to Certification Body during this ASA 2_2 as part of the monitoring and continuous improvement process. The spreadsheet covers 1 POM and 2 Estates, have been checked by Auditor Team. The annual report submitted to the RSPO Secretariat by Certification Body.</p>	Complied
Criteria 3.3: Operating procedures are appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>There is no change to the Standard Operating Procedures for estate and mill operation. SOP for estate is available on Minamas Plantation Agricultural Reference Manual (ARM) Oil Palm Planting No.POLICY:110/EST-ARM/13 dated 16 September 2013. Whilst SOP for palm oil mill is available on Palm Oil Mill manual No.POLICY:1110/POD-FAC/2007 and POLICY:130/POD-FAC/07 dated 30 April 2007.</p> <p>Standard Operating Procedures for estate operation:</p> <ul style="list-style-type: none"> Planting Oil Palm "<i>Penanaman Kelapa Sawit – Bahan Tanaman</i>" dated 1 September 2013. Nursery "<i>Teknik Pembibitan</i>" dated 1 September 2013. Replanting Oil Palm "<i>Penanaman Kembali</i>" dated 1 September 2013. Land preparation "<i>Persiapan Lahan</i>" dated 1 September 2013. 	Complied

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		<ul style="list-style-type: none"> - Oil Palm planting distance "<i>Kerapatan Tanaman</i>" dated 1 September 2013. - Immature Oil Palm "<i>Umur Mulai Panen</i>" dated 1 September 2013. - Oil Palm Upkeep "<i>Pemeliharaan Lapangan</i>" dated 1 September 2013 (incl. infill planting, census, pruning). - Oil Palm Fertilizer "<i>Pemupukan</i>" dated 1 September 2013. - Oil Palm Canopy "<i>Manajemen Kanopi</i>" dated 1 September 2013. - Oil Palm Ablation "<i>Ablasi</i>" dated 1 September 2013. - Oil Palm harvesting criteria "<i>Kriteria Kematangan Panen</i>" dated 1 September 2013. - Harvesting cycle Oil Palm "<i>Pusingan Panen</i>" dated 1 September 2013. - Loose fruit collection - Oil Palm "<i>Pengutipan berondolan</i>" dated 1 September 2013. - Oil Palm protection "<i>Proteksi Tanaman</i>" dated 1 September 2013. - Weed control Oil Palm "<i>Pengendalian Gulma</i>" dated 1 September 2013. - Oil Palm Legume cover crop "<i>Penanaman Kacangan Penutup Tanah</i>" dated 1 September 2013. <p>Standard Operating Procedures for palm oil mill operation:</p> <ul style="list-style-type: none"> - Chapter I Basic for Oil Palm Processing "<i>Dasar-dasar Pengolahan Kelapa Sawit</i>". - Chapter II Palm Oil and Palm Kernel Storage "<i>Penimbunan Minyak dan Inti Sawit</i>". - Chapter III Palm Oil Mill Effluent Control "<i>Pengendalian Air Limbah Pabrik</i>". - Chapter IV Water Treatment "<i>Pengolahan Air</i>". - Chapter V Laboratory Analysis "<i>Analisa Laboratorium</i>". 	
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3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor compliance -</p>	<p>The unit of certification has established mechanism to check consistent implementation of procedures under SOP 721/TQEM-PKA/08; dated 12 June 2008; "Pedoman Kerja Asisten Lapangan TQEM" and SOP SDP/GSQM/SORASOP/01; dated 7 January 2019; Structured Oil Recovery Assessment (SORA). The objectives of the procedure are to check if the result of work are in accordance with existing procedures; to evaluate the work and keep in accordance with the standards; to use as a reference for making improvements. Inspections are carried out on items related to harvesting, weeding, manuring, pest and disease, replanting and nursery, covers: checking of harvesting quality, FFB grading at palm oil mill, checking of OHS, mill cleanlines evaluation, and monitoring of delivery and palm products loading/unloading.</p> <p>Sample verified:</p> <p>Structured Crop Recovery Assessment dated of Sekunyir and Seruyan Estate, dated 15-18 November 2023. The report consist of SCRAcExecutive summary, Compliance to Critical control parameters 1 (2) and 2 (4), overall SCRA result by operating unit, and Issues of concern. The overall SCRA scores is 96.91 (rating 4). Issues of concern found in Security and Harvesting process compliance. All issues have been followed up with corrective action.</p> <p>Structured Oil Recovery Assessment (SORA) of Sekunyir POM, dated 16-18 November 2023. The report consist of Executive summary, Compliance to Critical control parameters 1 (7) and 2 (15), overall SORA assessment result, and Issues of concern. The overall SORA scores of Sekunyir POM is 85.06 (rating 4), decreased with score compared to R.3-23: 90.61 (rating 5). Issues of concern found in Process control, Spillage/leakages, CPO quality, Laboratory, Oil losses, and ESH/Security. All issues have been followed up with corrective action.</p>	Complied
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p>	<p>The unit of certification monitors operational activity in all level of workers. Each field supervisor has equipped with monitoring sheets/worksheets. For example,</p>	Complied

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	- Minor compliance -	<p>harvesting supervisor collected harvesting record and quality of each harvesters. The report submitted to Estate Manager daily.</p> <p>In palm oil mill, daily operational activity recorded in daily worksheet by mill supervisor prior reported to the mill manager.</p> <p>To ensure the result of operational activity in line with the procedures, mill/estate manager conducted regularly monitoring and management review to solve the findings issues. All results of management review shall be implemented by respective staff.</p> <p>Sample verified:</p> <p>Structured Crop Recovery Assessment dated of Sekunyir and Seruyan Estate, dated 15-18 November 2023. The report consist of SCRAExecutive summary, Compliance to Critical control parameters 1 (2) and 2 (4), overall SCRA result by operating unit, and Issues of concern. The overall SCRA scores is 96.91 (rating 4). Issues of concern found in Security and Harvesting process compliance. All issues have been followed up with corrective action.</p> <p>Structured Oil Recovery Assessment (SORA) of Sekunyir POM, dated 16-18 November 2023. The report consist of Executive summary, Compliance to Critical control parameters 1 (7) and 2 (15), overall SORA assessment result, and Issues of concern. The overall SORA scores of Sekunyir POM is 85.06 (rating 4), decreased with score compared to R.3-23: 90.61 (rating 5). Issues of concern found in Process control, Spillage/leakages, CPO quality, Laboratory, Oil losses, and ESH/Security. All issues have been followed up with corrective action.</p>	
Criteria 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	(C) SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the	There is no new planting at PT. Indotruba Tengah – Sekunyir POM and its Supply bases (Sekunyir Estate and Seruyan Estate). During ASA 2_2 year 2024, there were no changed to the document of SEIA.	Complied

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	<p>smallholder/outgrower scheme (if any). The assessment is to be documented.</p> <p>- Critical (Major) compliance -</p>	<p>A comprehensive Social and Environmental Impact Assessment (SEIA) has been carried out by PT. Indotruba Tengah (cooperated with independent consultant PT. Anima Rekayasa Perkasa) before development of mill and plantation. SEIA document present in "Laporan Akhir Analisis Dampak Lingkungan (ANDAL) Perkebunan Kelapa Sawit Kumai dan Pabrik Minyak Sawit PT. Indotruba Tengah" year 1993.</p> <p>Aspect of plantation and mill management that have social and environmental impact were identified and listed on SEIA document. SEIA are conducted since 1993 and covered 10,000 Ha plantation areas and maximum mill capacity are 60 MT FFB/hour, this document has been approved by Agriculture Department based on decree No.220/95/B/I/94 dated 17 January 1994 and Approval Letter from Agriculture Department No. 020/RKL-RPL/BA/X/94, dated 18 October 1994.</p> <p>During SEIA, the company conducted stakeholders meeting with surrounding local communities which affected the project. The SEIA has been conducted and documented according to local requirements and include consultation with relevant stakeholders to identify impact and to develop any mitigation measures.</p> <p>An additional SIA study, led by Aksenta consultants, took place from 24 – 28 August 2009. The conclusive report of this SIA was released in January 2010. The study was characterized by participatory methods, actively engaging affected stakeholders such as the surrounding community, local government, company representatives, and non-governmental organizations. The document provided tangible evidence of stakeholder consultations and focused group discussions.</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.</p> <p>- Minor compliance -</p>	<p>While conducting the audit, the SEIA document was accessible. A social and environmental management plan, along with its monitoring procedures, was formulated in accordance with the RKL – RPL document. This document is integrated into the SEIA and has been effectively communicated to and involves the affected parties and stakeholders. The social and environmental management and monitoring plan aim to mitigate adverse effects, including:</p>	Complied

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		<ul style="list-style-type: none"> • Soil fertility management and soil erosion prevention by EFB mulching to increase organic material, land cover crop planting, U shape palm oil frond stacking, silt pit and road silt pit development, individual terracing in slope area, mounting, water management and neprolephis planting, appropriate fertilizing according to procedure. • Water quality management to prevent water pollution by wastewater management at palm oil mill with land application according to regulation and permit. Water quality monitoring is conducted each semester to monitor the water quality met with regulation threshold. • Air quality and noise management by centralized the housing area/emplacement, provision of PPE masker and earmuff for workers at mill. • Biodiversity management and monitoring to enhance and protect the biodiversity within the plantation area by establishing HCV area and conserve the HCV area, management and monitoring HCV area, socialization to workers and surrounding community. • Hazardous waste handling and monitoring. The company has developed temporary hazardous waste storage and manages hazardous waste according to regulation. • Fire prevention and mitigation. The company has established procedures for emergency response and develop the emergency response team; training and simulation related to fire prevention and mitigation; monitoring hotspot and fire during dry season. • Enhance surrounding community economic rate and environment healthy. The company has a developing approach program of CSR. <p>The Social Impact Assessment conducted by Aksenta consultants from 24 – 28 August 2009, involved focus group discussions with workers on 25 August 2009 and with the surrounding community on 26 August 2009. Representatives from</p>	
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		Amin Jaya Village, Derangga Village, Karang Mulya Village, and Pembuang Hulu II Village participated in these discussions.	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The implementation of the social and environmental management and monitoring plan, along with its periodic review and updates, is exemplified in the "Laporan Hasil Pelaksanaan RKL – RPL," which serves as the latest report covering the period from July to December 2023.</p> <p>The reports on RKL – RPL undergo evaluation and are submitted to the Ministry of Environment and Forestry (Kementerian Lingkungan Hidup dan Kehutanan) every semester through an online reporting system called SIMPEL.</p> <p>Each institution such as "Dinas Lingkungan Hidup" in local regency and province can access the report through SIMPEL. Evidence of reporting can be demonstrated during audit, sample seen for report year 2023: Elektronik Receipt/Tanda Terima Elektronik from SIMPEL (Sistem Informasi Pelporan Elektronik Lingkungan Hidup) Ministry of Environment and Forestry dated 11 January 2024, Reporting period for 2nd Semester year 2023 (July – December), Company ID 1261 – PT Indotruba Tengah. The report is for Ministry of Environment and Forestry, Environment Agency of Kalimantan Tengah Province and Environment Agency of Kotawaringin Barat.</p> <p>The SEIA management and monitoring plan includes:</p> <ul style="list-style-type: none"> • Maintain soil fertility and erosion: use of EFB, use of POME (incl. monitoring BOD), construction silt pit, roadside pit, U-shape frond stacking, platform, maintain Neprolepis, conduct leaf census, fertilizer follow recommendation, monitoring soil fertility in land application, monitoring erosion. • Water quality and Effluent management: using POME pond installation, and POME land application, monitoring and recording effluent water, monitoring and recording well water. • Air quality and noise: boiler chimney and planting trees around POM, provision of PPE (masker, ear protection and helmet) for worker, monitoring air emission, odour and ambient, monitoring boiler and genset emission and 	Complied

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		<p>noise.</p> <ul style="list-style-type: none"> • Flora and Fauna Biodiversity: established HCV map, socialization HCV to all staff and worker, prohibit hunting-poaching-poisoning, monitoring HCV, monitoring wildlife. • Hazardous waste management: temporary hazardous waste storage with license, transporting hazardous waste with licensed transporter, monitoring hazardous waste balance, reporting to government. • Fire Prevention and Fire Control: Establish firefighting team, training to firefighting team, prepare firefighting infrastructure, equipment and tools, fire danger rating and fire risk. • Surrounding community social, economy, culture and health condition: communication, partnership with cooperative for FFB transport, provide qurban, road hardening, aide for school and student, medical treatment for community. <p>The social and environmental management and monitoring plan for the year 2023 was outlined in the document titled "Review Management Rencana & Realisasi Pengelolaan dan Pemantauan Dampak Sosial Perkebunan Secara Partisipatif – PT. Indotruba Tengah 2023." This document comprehensively covered various aspects including industrial relations, public services, economic development of the surrounding community, FPIC, conflict resolution, and environmental concerns. The supporting document, the Form Questionnaire SEIA, was duly verified.</p> <p>On 29 December 2023, a dissemination and communication session was held, attended by 11 community representatives from Amin Jaya Village and Pembuang Hulu Village.</p>	
Criteria 3.5: A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made	The certification unit has procedures related to employment which are regulated in several documents for example Standard Operating Procedure "Penerimaan	Complied

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	<p>available to the workers and their representatives in accordance with the applicable regulation.</p> <p>- Minor compliance -</p>	<p>Karyawan” – employee recruitment (No. 394/ITH-SOP-26/11). This procedure described recruitment selection, hiring and promotion is based on skills, capabilities, qualities, and medical fitness. Job opportunities were communicated and given to surrounding villagers as a priority where no discrimination was observed during interviews and related records of workers being employed. All workers have been treated equally in accordance with company regulations including the rights of worker as well.</p> <p>Apart from that, there are also Company Regulations which have been ratified by the Central Kalimantan Province Manpower and Transmigration Service on 21 September 2023 valid to 20 September 2025 in accordance with letter number: KEP.139/565/HI/IX/Nakertrans. This company regulation has described regarding employment regulations starting from entry hours, wages, promotions, sanctions, to holidays.</p>	
3.5.2	<p>Employment procedures are implemented and records are maintained.</p> <p>- Minor compliance -</p>	<p>The implementation of employment procedures includes the following:</p> <p>Employee promotion</p> <p>Inter Office Mail Number 105/FM SKF-RCEO/X/2023 related approval of SKU-H promotion for 8 worker:</p> <ul style="list-style-type: none"> - Affandi Min Tohirin. - Andika surya - Muhaimin Iskandar - Mahmudin - Indra Eka - Kukuh Prasetyo - Titi Tri Utami - Mustolih <p>This letter has been approved by RCEO Central Kalimantan Region.</p>	Complied

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		<p>Employee Performance Assessment</p> <p>For example, it is shown by the employee evaluation form for Andika Surya with average value 4.5 and recommended upgrade to SKU-H (permanent worker).</p> <p>The results of interviews with worker representatives and worker union representatives show that the company has implemented its employment procedures fairly and transparently.</p>	
Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of Certification has established the OHS policy that was signed by Head of Plantation Upstream Indonesia in December 2011, stated that the company committed to provide safety and health workplace by implementation effectively management to prevent workplace accidents and unhealthy to all employees, guest, and contractor. The policy was also displayed on public boards both in mill and estates. There is no change related to the policy until this ASA 2_2 audit.</p> <p>PT Indotruba Tengah – Sekunyir POM has also prepared the procedure for Identification and evaluation of hazardous potential evaluation (No. Doc. 724/TQEM-ESH/10). There is no change related to the SOP until this ASA2.2 audit.</p> <p>PT Indotruba Tengah – Sekunyir POM has defined HIRAC (Hazard Identification, Risk Assessment and Control) for Sekunyir Mill, Sekunyir Estate, and Seruyan Estate, last review in January 2024.</p> <p>All the operational activities that have been covered, such as: land clearing, manuring, harvesting, road maintenance, FFB transport, IPM activities, weighbridge, grading station, sterilizer station, pressing station, engine room, boiler, dispatch of CPO.</p> <p>All working risks have men identified and mitigated, such as by giving regular training, increasing supervision, PPE provision, and regular medical check-up.</p> <p>Based on field observation and interview with workers and Labor Union during ASA 2_2, the HIRAC (updated in January 2024) has been implemented in the</p>	Complied

		<p>field such as by giving regular dissemination of OHS awareness and provision of appropriate PPE. One of the improvements of to reduce risk is by build specific storage for harvesting pole and sickle in every housing area. The harvesters are prohibited to store their sickle in the house.</p> <p>Medical check-up has conducted in August 2023 by PJK3 – PT Cahaya Krisnako. Sample seen:</p> <ul style="list-style-type: none"> - Certificate of Examination Results, No. 601/CPK/VIII/2023 dated 28 August 2023 on behalf Ny Sarvina (pesticides applicator – Seruyan Estate). - Certificate of Examination Results, No. 605/CPK/VIII/2023 dated 28 August 2023 on behalf Ny Dwi Lestari (pesticides applicator – Seruyan Estate). - Certificate of Examination Results, No. 603/CPK/VIII/2023 dated 28 August 2023 on behalf Ny Listiana (pesticides applicator – Seruyan Estate). - Certificate of Examination Results, No. 588/CPK/VIII/2023 dated 28 August 2023 on behalf Ny Siti Khomyati (pesticides applicator – Seruyan Estate). - Certificate of Examination Results, No. 604/CPK/VIII/2023 dated 28 August 2023 on behalf Ny Winarni (pesticides applicator – Seruyan Estate). - Certificate of Examination Results, No. 780/CPK/VIII/2023 dated 28 August 2023 on behalf Ny Firna (pesticides applicator – Sekunyir Estate). - Certificate of Examination Results, No. 770/CPK/VIII/2023 dated 28 August 2023 on behalf Ny Dalniyah (pesticides applicator – Sekunyir Estate). - Certificate of Examination Results, No. 771/CPK/VIII/2023 dated 28 August 2023 on behalf Ny Erni Refianti (pesticides applicator – Sekunyir Estate). - Certificate of Examination Results, No. 769/CPK/VIII/2023 dated 28 August 2023 on behalf Ny Dewi Astuti (pesticides applicator – Sekunyir Estate). - Certificate of Examination Results, No. 677/CPK/VIII/2023 dated 28 August 2023 on behalf Ahmad Nur (Sterilizer Operator – Sekunyir POM). - Certificate of Examination Results, No. 702/CPK/VIII/2023 dated 28 August 2023 on behalf Galih Catur (Tippler Operator – Sekunyir POM). 	
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		<ul style="list-style-type: none"> - Certificate of Examination Results, No. 696/CPK/VIII/2023 dated 28 August 2023 on behalf Bryan Tara (Press Operator – Sekunyir POM). 	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>PT Indotruba Tengah – Sekunyir POM has been managing and monitoring the aspects of occupational health and safety through the annual "Health and Safety Plan 2023-2024", such as:</p> <ul style="list-style-type: none"> - OHS meetings for estates and mill every 3 months. - Install and Monitoring of OHS sign board/notice board every 3 months. - Emergency Tool Inspection every month. - OHS Patrol every 2 months. - Socialization of HIRAC every 6 months. - Annual medical check-up every 6 months for pesticides operator. - National OHS Month in January – February. <p>The effectiveness of the H&S plans to address health and safety risks have been monitored in the form of:</p> <ul style="list-style-type: none"> - Monthly OHS Committee meeting, to discuss and address current OHS issues. - Documentation of accident record and the calculation of LTA. - Annual review of HIRAC. - Trimester OHS Report, that has been submitted regularly to Manpower Agency. The recent report is for period of Juli – September 2023, has been reported in November 2023. 	Complied
Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender- specific needs, and which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training.</p>	<p>PT. Indotruba Tengah has shown the document of training program. Training program has shown as per "Program Pelatihan Pelatihan dan Pengembangan Sumber Daya Manusia 2023", updated on 20 January 2023 consisted of:</p> <ul style="list-style-type: none"> - (Refreshment) Training of harvesting, planned in January 2023. 	Complied

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	- Critical (Major) compliance -	<ul style="list-style-type: none"> - (Refreshment) Training of spraying operator, planned in February 2023. - (Refreshment) Training of fertilizing, planned in March 2023. - (Refreshment) Training of Integrated Pest Management, planned in April. - (Refreshment) Training for handling hazardous chemical material, planned in April 2023. - (Refreshment) Training for boiler operator, planned in May 2023. - (Refreshment) Training for operation in Mill, planned May 2023 - Refreshment training on implementation of RSPO requirement for staff and supervision, planned in June 2023. - OHS training (including aspect of Electrical, HIRAC) for all workers, planned in July 2023. - Training on handling of hazardous waste, planned in April 2023. <p>Record of training realization provided in indicator 3.7.2.</p>	
3.7.2	<p>Records of training are maintained, where appropriate on an individual basis.</p> <p>- Minor compliance -</p>	<p>Document of implementation the training has demonstrated, e.g.,</p> <ul style="list-style-type: none"> - Refreshment training of harvesting activity in March 2024 - Refreshment training of BMP (upkeep, fertilizing activity, spraying activity, sortation, IPM) in February 2024 - Refreshment training of Fire emergency response in February 2024 - Refreshment training of HCV in June 2023 and November 2023 - Refreshment training of OHS aspects (electrical) in July 2023 - Refreshment training of Hazardous waste handling in February and December 2023. - Refreshment training of Environment Aspect in March and October 2023. - Training related to RSPO Supply Chain Certification Standard to relevant personnel. Latest training on 24 February 2024 and 5 March 2024. The training subjected to Manual RSPO SCCS (SCCS-Std/RSPO/PSQM/02) Rev.01 	Complied

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		dated 2 July 2020. Training attended by 33 participants on 24 Feb 2024 and 20 participants on 5 Mar 2024.	
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 -	The latest refreshment training of supply chain has been conducted to personnel involved in supply chain requirement in Sekunyir POM, on 24 Feb 2024 and 5 Mar 2024. The training subjected to Manual RSPO SCCS (SCCS-Std/RSPO/PSQM/02) Rev.01 dated 2 July 2020. Training attended by 33 participants on 24 Feb 2024 and 20 participants on 5 Mar 2024. Relevant personnel have attended the training including Mill Manager, Office Assistant, Process Assistant, SQM Staff, Safety Officer, operators, weighbridge clerk, production clerk, security and contractor.	Complied
Criteria 3.8: Supply chain requirements for mills. Procedure note: all requirements are classified as Critical Indicators . However it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.	Currently, PT Indotruba Tengah – Sekunyir POM does not implement RSPO supply chain model Identity Preserved since the mill received un-certified FFB from PT Indotruba Timur.	Not Applicable
3.8.2	Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base.	PT Indotruba Tengah – Sekunyir POM since March 2022 has received and processed FFB from un-certified supplier, which is PT Indotruba Timur, therefore the mill uses Mass Balance as the supply chain model.	Complied

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	In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.		
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.	<p>The RSPO Public Summary report, certificate, and RSPO IT Platform documented the projected tonnage of certified CPO and PK that PT Indotruba Tengah – Sekunyir POM could potentially produce. The palm oil mill has fulfilled registration and reporting obligations by registering on the RSPO IT Platform (PalmTrace) with the ID number RSPO_PO1000000321.</p> <p>Below is the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in period May 2023 to April 2024 (based on previous RSPO P&C Public Summary Report):</p> <p><u>Forecast volume (May 2023 – April 2024)</u></p> <ul style="list-style-type: none"> - FFB : 114,818 MT - CPO : 25,260 MT (OER: 22.00%) - PK : 4,593 MT (KER: 4.00%). 	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<p>PT Indotruba Tengah – Sekunyir POM is subsidiary of Sime Darby Plantation Berhad, a member of RSPO, with RSPO membership No.1-0008-04-000-00 since 7 September 2004.</p> <p>The mill has met all registration and reporting requirements through the RSPO IT Platform/PalmTrace account RSPO_PO1000000321, with member name Sime Darby Plantation - Sekunyir POM, PT ITH.</p>	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</p>	<p>There is no change in procedure of supply chain, PT Indotruba Tengah – Sekunyir POM still uses "<i>Manual RSPO SCCS Standar Sertifikasi Rantai Pasok RSPO</i>"(SCCS-Std/RSPO/PSQM/02), dated 2 July 2020.</p> <p>PT Indotruba Tengah - Sekunyir 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.</p> <p>As per Manual, the responsible person in charge to the supply chain system is Mr. Sapon Priyanto – KTU Sekunyir POM as per Inter Office Mail from Manager</p>	Complied

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	<p>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</p> <p>c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard.</p> <p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<p>No.005/SKF/MR/II/2024 dated 3 February 2024. During audit, the PIC is able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill.</p> <p>The document "<i>Manual RSPO SCCS Standar Sertifikasi Rantai Pasok RSPO</i>" (SCCS-Std/RSPO/PSQM/02) has described procedure for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill, as described in Section "<i>4.3 Pembelian dan Barang Masuk</i>".</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p> <p style="padding-left: 20px;">a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p style="padding-left: 20px;">b) Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>The document "<i>Manual RSPO SCCS Standar Sertifikasi Rantai Pasok RSPO</i>" (SCCS-Std/RSPO/PSQM/02), Section 4.2.2 described that internal audit conducted once in a year at minimum; Section 4.2.3 indicated Internal audit will be carried out minimum 2 months prior to external audit.</p> <p>Latest internal audit of RSPO P&C carried out on 11-15 Dec 2023. Internal auditor was Mr. Tjahjo Moeljo Widjanto and Mr. Asmara Hadi. Mr. Tjahjo has been trained with RSPO Internal Audit based ISO19001:2002 by PT. Bumi Hijau Cemerlang in January 2011. Mr Asmara Hadi demonstrate training certificate titled Understanding and Implementing RSPO SCCS, by Mutu Institute, 21-22 December 2020.</p> <p>There were 7 critical NC and 5 minor NC issued related to implementation of RSPO P&C Indonesia NI 2020. None of them related to Supply Chain requirements. Correction and Corrective Action have been determined and implemented, due date on 17 February 2024.</p> <p>Management review conducted as per requirement stating management review carried out after internal audit and prior to external audit, with minimum once in 12 months (1 year). The latest management review carried out on 20 February</p>	Complied

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		2024, attended by all unit head, internal auditor and COU of PT Indotruba Tengah.	
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>The document "<i>Manual RSPO SCCS Standar Sertifikasi Rantai Pasok RSPO</i>" (SCCS-Std/RSPO/PSQM/02), Section 4.3 "<i>Pembelian dan Barang Masuk</i>" indicates the Weighbridge Operator in POM has to ensure supplier information covers information e.g., estate name and block number, mill name, date of delivery, product description and quantity, stamp of RSPO certified, transporter identity and unique identification number. Marketing in Jakarta responsible to verify the validity of supplier certificate or trader and distributor license.</p> <p>PT Indotruba Tengah – Sekunyir POM receive certified FFB from company owned estates, consist of Sekunyir Estate and Seruyan Estate. Document "Surat Pengantar Buah" (FFB Delivery Note) and FFB weighing ticket described identity and location of FFB source and other item required e.g.</p> <p>Certified FFB:</p> <ul style="list-style-type: none"> - FFB delivery "Surat Pengantar Buah No.24010672" dated 13 Mar 2024 from Sekunyir Estate, Division II, Field D004 – total 467 bunches; vehicle KH 8511 GD, stamped "RSPO Certified"; - Weighbridge ticket "Sekunyir Factory" No.299579 dated 13 Mar 2024, for 467 FFB bunches; nett weight 4,180 kg; from Sekunyir Estate, Division II, Field 15D004; vehicle KH 8511 GD; Driver Sugeng Chandra; stamped "RSPO Certified"; certificate number RSPO 744702. - FFB delivery "Surat Pengantar Buah No.24010110" dated 13 Mar 2024 from Seruyan Estate, Division I, Block B016 – total 2200 bunches; vehicle PM 07, stamped "RSPO Certified". - Weighbridge ticket "Sekunyir Factory" No.299576 dated 13 Mar 2024, for 2,200 FFB bunches; nett weight 6,810 kg; from Seruyan Estate, Block 21B016; vehicle PM 007; Driver Kasmono; stamped "RSPO Certified"; certificate number RSPO 744702. 	Complied

PT Indotruba Tengah – Sekunyir POM receive non-certified FFB from other company, named PT Indotruba Timur and CV Fortuna. Document “Surat Pengantar Buah” (FFB Delivery Note) and FFB weighing ticket described identity and location of FFB source and other item required e.g.

Non-certified:

- FFB delivery “Surat Pengantar Buah dan Brondolan No.2372/SPB/I/ITR-X/03/2024” dated 13 Mar 2024 from PT Indotruba Timur, Division I, Block C27 (163 bunches) and D27 (182 bunches), total 345 bunches; vehicle KH 8371 GO; stamp “Non RSPO certified”;
- Weighbridge ticket “Sekunyir Factory” No.299570 dated 13 Mar 2024, for 345 FFB bunches; nett weight 6,921 kg; from PT Indotruba Timur, Division I, Field 1; vehicle KH 8371 GO; Driver Sulistiyono.
- FFB delivery “Surat Pengantar Buah dan Brondolan No.34/SPB-FORTUNA/ITH/03/2024” dated 9 Mar 2024 from CV FORTUNA, total 500 bunches; vehicle KH 8852 P; stamp “Non RSPO certified”;
- Weighbridge ticket “Sekunyir Factory” No.299482 dated 9 Mar 2024, for 500 FFB bunches; nett weight 8,957 kg; from CV FORTUNA, Division I, Field 1; vehicle KH 8852 P; Driver Kholil.

Based on PalmTrace certified volume and Mill production statistic, obtained data below:

Product	PalmTrace certified volume (license period May 2023-April 2024) + Volume extension	Actual production since last assessment
	MT	MT
FFB	114,818 + 36.884,59 = 151,702.59	110,764.49
CSPO	25,260 + 8.299,03	25,444.21

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		<table><tr><td></td><td>= 33,559.03</td><td></td></tr><tr><td>CSPK</td><td>4,593 + 1.844,23 = 6,437.23</td><td>5,025.45</td></tr></table> <ul style="list-style-type: none">Volume extension approved by TP PalmTrace on 12 Mar 2024. <p>The document "Manual RSPO SCCS Standar Sertifikasi Rantai Pasok RSPO" (SCCS-Std/RSPO/PSQM/02), Section 4.3 "Pembelian dan Barang Masuk (Goods In)", has explains about mechanism for handling non-conforming FFB and/or documents.</p>		= 33,559.03		CSPK	4,593 + 1.844,23 = 6,437.23	5,025.45	
	= 33,559.03								
CSPK	4,593 + 1.844,23 = 6,437.23	5,025.45							
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none">a) The name and address of the buyer;b) The name and address of the seller;c) The loading or shipment / delivery date;d) The date on which the documents were issued;e) RSPO certificate number;f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);g) The quantity of the products delivered;h) Any related transport documentation;	<p>Since the previous assessment period, the unit of certification only sold physical CSPO as conventional and some volume sold as credit, 1.906,00 MT.</p> <p>RSPO Certified Palm Kernel (CSPK) was sold to sister company PT Teguh Sempurna Pematang Kernel Crushing Plant). The CSPK delivery was completed with Delivery document as follow:</p> <ul style="list-style-type: none">- Sales Contract PT Indotruba Tengah No.00265/ITH/KTR-KERNEL/LOK/XI/2023, dated 21 Nov 2023. Commodity: KERNEL (PALM KERNEL in BULK). Quantity: 200,000 kg. Seller: PT Indotruba Tengah. Seller Address: The Plaza Tower Lt. 36, Jl. MH Thamrin kav.28-30, DKI Jakarta 10350. Buyer: PT Teguh Sempurna; Buyer Address: The Plaza Tower Lt. 36, Jl. MH Thamrin kav.28-30, DKI Jakarta 10350.- Delivery Order No.00272/00265/11/23/L-ITH-KERNEL, dated 21 Nov 2023. Seller: PT Indotruba Tengah. Buyer: PT Teguh Sempurna. Product: KERNEL (PALM KERNEL in BULK). Quantity 200,000 kg. Delivery Period : 20 Nov 2023 - 30 Nov 2023. Name of vessel: by Truck.- Weighbridge Ticket Sekunzir Factory "Despatch" No.066247, dated 4 Dec 2023. Seller: PT Indotruba Tengah (Sekunzir Factory). Customer: PT Teguh Sempurna. Product Palm Kernel. Quantity Net Weight 13,010 kg. Vehicle No. KH 8991 FB. Driver Syahruli. Delivery Order No.00272/00265/11/23/L-ITH-	Complied						

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	<p>i) A unique identification number.</p>	<p>KERNEL. Stamped RSPO Certified Mass Balance. RSPO Certificate No. RSPO 744702.</p> <ul style="list-style-type: none"> - Sales Contract PT Indotruba Tengah No.00267/ITH/KTR-KERNEL/LOK/I/2024, dated 5 Jan 2024. Commodity: KERNEL (PALM KERNEL in BULK). Quantity: 450,000 kg. Seller: PT Indotruba Tengah. Seller Address: The Plaza Tower Lt. 36, Jl. MH Thamrin kav.28-30, DKI Jakarta 10350. Buyer: PT Teguh Sempurna; Buyer Address: The Plaza Tower Lt. 36, Jl. MH Thamrin kav.28-30, DKI Jakarta 10350. - Delivery Order No.00274/00267/01/24/L-ITH-KERNEL, dated 5 Jan 2024. Seller: PT Indotruba Tengah. Buyer: PT Teguh Sempurna. Product: KERNEL (PALM KERNEL in BULK). Quantity 450,000 kg. Delivery Period: 04 Jan 2024 - 31 Jan 2024. Name of vessel: by Truck. - Weighbridge Ticket Sekunyir Factory "Despatch" No.066520, dated 18 Jan 2024. Seller: PT Indotruba Tengah (Sekunyir Factory). Customer: PT Teguh Sempurna. Product Palm Kernel. Quantity Net Weight 12,950 kg. Vehicle No. KH 8991 FB. Driver Syahruli. Delivery Order No.00274/00267/01/24/L-ITH-KERNEL. Stamped RSPO Certified Mass Balance. RSPO Certificate No. RSPO 744702. <p>Information for RSPO certified products made available:</p> <ul style="list-style-type: none"> • The name and address of the buyer: PT Teguh Sempurna, address: The Plaza Tower Lt. 36, Jl. MH Thamrin kav.28-30, DKI Jakarta 10350; • The name and address of the seller: PT Indotruba Tengah, address: The Plaza Tower Lt. 36, Jl. MH Thamrin kav.28-30, DKI Jakarta 10350; • The loading or shipment/ delivery date: 4 Dec 2023 and 18 Jan 2024; • The date on which the documents were issued: Contract issued on 21 Nov 2023 and 5 Jan 2024; Transport document issued on 4 Dec 2023 and 18 Jan 2024; 	
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		<ul style="list-style-type: none"> • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): on Weighbridge Ticket stated product is Palm Kernel, stamped RSPO Certified Mass Balance; • The quantity of the products delivered: 13,010 kg and 12,950 kg; • Any related transport documentation: Weighbridge Ticket No.066247 and No.066520; • Supply chain certificate number of the seller: on Weighbridge Ticket stated RSPO Certificate is No. RSPO 744702. • A unique identification number: Contract 00265/ITH/KTR-KERNEL/LOK/XI/2023 and No.00267/ITH/KTR-KERNEL/LOK/I/2024, <p>RSPO CSPK was sold to sister-company PT Teguh Sempurna. The CSPK certified delivery was completed with Delivery Form.</p>	
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> - 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. - The mill shall ensure the following: <ul style="list-style-type: none"> 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 	<p>Sekunyir POM does not outsource its milling activities. The mill outsourced the transport activity of CPO to the jetty/bulking station. From jetty station, CPO transferred to vessel which is instructed and managed by buyer.</p> <p>Transport of CSPK is using company-owned vehicle.</p> <p>The mill has legal ownership of the CPO during transported by the third party. This evident by the sales contract of CPO is between PT Indotruba Tengah and the buyer.</p> <p>There is also available contract between PT Indotruba Tengah and the CPO transporter:</p> <ul style="list-style-type: none"> - Addendum I Surat Perjanjian Pengangkutan, Contract No.009/Angkutan CPO/ITH-SKF/VIII/2023, dated 21 Dec 2023, regarding CPO transport between PT Indotruba Tengah and PT Sebukat Karya Perkasa, address: Desa Amin Jaya, Pangkalan Banteng, Kalimantan Tengah. Valid until 31 Dec 2024. 	Complied

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	<p>access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>- Addendum I Surat Perjanjian Jasa Pengangkutan, Contract No.008/Angkutan CPO/ITH-SKF/VIII/2023, dated 21 Dec 2023, regarding CPO transport between PT Indotruba Tengah and BUMDES Sebukat Karya Sejahtera, address: Jl. Kayu Mas RT 003 / RW 001, Pangkalan Banteng, Kalimantan Tengah. Valid until 31 Dec 2024. Contact: Feridan Muhtiaji.</p> <p>The document "Manual RSPO SCCS Standar Sertifikasi Rantai Pasok RSPO" (SCCS-Std/RSPO/PSQM/02), Section 4.5.1 to 4.5.5 has described a documented control system for the outsourced process. The procedure has been communicated to the relevant contractor; the latest communication conducted on 24 Feb 2024.</p> <p>The mill has a contractual agreement as mentioned above that ensured the independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	
3.8.10	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p>Sekunyir POM has recorded the names and contact details of all contractors used for product transport.</p> <p>For example:</p> <p>- Addendum I Surat Perjanjian Pengangkutan, Contract No.009/Angkutan CPO/ITH-SKF/VIII/2023, dated 21 Dec 2023, regarding CPO transport between PT Indotruba Tengah and PT Sebukat Karya Perkasa, address: Desa Amin Jaya, Pangkalan Banteng, Kalimantan Tengah. Valid until 31 Dec 2024. Contact: M. Bakri.</p> <p>- Addendum I Surat Perjanjian Jasa Pengangkutan, Contract No.008/Angkutan CPO/ITH-SKF/VIII/2023, dated 21 Dec 2023, regarding CPO transport between PT Indotruba Tengah and BUMDES Sebukat Karya Sejahtera, address: Jl. Kayu Mas RT 003 / RW 001, Pangkalan Banteng, Kalimantan Tengah. Valid until 31 Dec 2024. Contact: Feridan Muhtiaji.</p>	Complied

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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 document "Manual RSPO SCCS Standar Sertifikasi Rantai Pasok RSPO" (SCCS-Std/RSPO/PSQM/02), Section 4.5.5 described obligation of the mill to inform CB of the names and contact details of any new contractors used to handle RSPO certified products. Nama and contact detail of contractors informed though RSPO Pre-Audit Information Checklist.	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>PT Indotruba Tengah has maintained accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements as following:</p> <ul style="list-style-type: none"> - Sales Contract - Delivery Order - Daily mill reports (<i>Statistik Produksi SKF</i>) - Monthly report (Supply Chain Mass Balance) - Weighbridge ticket of FFB - Weighbridge ticket of CPO and PK - PalmTrace Shipping Announcement and Remove - Training record - Internal Audit - Minute of Management Review. <p>RSPO SCCS Training record: "Notulen Training RSPO SCCS – Sekunyir Factory", dated 24 Feb 2024 and 5 Mar 2024. The training subjected to Manual RSPO SCCS (SCCS-Std/RSPO/PSQM/02) Rev.01 dated 2 July 2020. Training attended by 33 participants on 24 Feb 2024 and 20 participants on 5 Mar 2024. Relevant personnel have attended the training including Mill Manager, Office Assistant, Process Assistant, SQM Staff, Safety Officer, operators, weighbridge clerk, production clerk, security and contractor.</p> <p>The document "Manual RSPO SCCS Standar Sertifikasi Rantai Pasok RSPO" (SCCS-Std/RSPO/PSQM/02), Section 4.7 Record Keeping, indicates the Retention</p>	Non-compliance (2468985-202403-M1)

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		<p>times for all records and reports shall be a minimum of ten (10) years and shall comply with relevant legal and regulatory requirements.</p> <p>Based on Daily Mill Record, the mill can record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. Supply Chain Mass Balance record available for 3-monthly period: April-June 2023; July-September 2023; October-December 2023; January-to date March 2024. All volumes of certified PK that are delivered are deducted from the material accounting system according to actual conversion ratios. The mill has never implement sell short.</p> <p><i>Critical Non-conformity:</i></p> <p><i>The Company does not maintain accurate and up-to-date records related to RSPO Supply Chain requirements.</i></p> <p><i>Based on a review of Conventional (non-certified) CPO delivery documents:</i></p> <ul style="list-style-type: none"> - Weighbridge Ticket Sekunyir Factory "Despatch" No.066750, dated 28 Feb 2024. Origin: PT Indotruba Tengah (Sekunyir Factory). Destination: Bulking Pangkalan Banteng. Product: CPO Standard (MKS). Quantity Net Weight 21,290 kg. Transporter: Bumdes Sebukat Karya Sejahtera. Vehicle No. BD 8377 IO. - Weighbridge Ticket Sekunyir Factory "Despatch" No.066752, dated 28 Feb 2024. Origin: PT Indotruba Tengah (Sekunyir Factory). Destination: Bulking Pangkalan Banteng. Product: CPO Standard (MKS). Quantity Net Weight 19,290 kg. Transporter: Bumdes Sebukat Karya Sejahtera. Vehicle No. BD 8377 IO. <p><i>The stamp "RSPO Certified Mass Balance" and the certificate number "RSPO 744702" was found on the weighbridge ticket.</i></p>	
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of</p>	<p>Extraction rate is applied to provide reliable estimation of CPO and PK produced. The Mill determine and set their own extraction rates based upon past</p>	Complied

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	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.	experience. For period May 2023 – April 2024, the estimated extraction rate from FFB into CPO is 22.00%, whilst from FFB to PK is 4.00%.	
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	The actual Oil Extraction Rates (OER) and Kernel Extraction Rates (KER) are monitored on daily basis through sounding result and documented in " <i>Laporan Produksi</i> " dan " <i>Working Sheet Extraction</i> ". Based on the record, actual extraction rate for period April 2023 – March 2024, actual OER is 22.97% and actual KER is 4.54%.	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Audit team verifies that Sekunyir POM is processing certified and uncertified FFB into production. The mill uses Mass Balance as the supply chain model. Thus, this indicator is not applicable.</p> <p>However, Sekunyir Palm Oil Mill has 2 weighbridges that uses for weighing palm product, both have been calibrated based on:</p> <ul style="list-style-type: none"> - "Keterangan Hasil Pengujian" No.510.3/1155/DPPKUKM.3/SKHP dated 30 Nov 2023, issued by Dinas Perindustrian, Perdagangan, Koperasi, Usaha Kecil dan Menengah Kabupaten Kotawaringin Barat for weighbridge brand: Mettler Toledo; Type IND 560 HARSH; Serial Number C238839463; Capacity 50,000 kg; verified on 14 Nov 2023. Due for next verification on 14 Nov 2024. - "Keterangan Hasil Pengujian" No.510.3/1156/DPPKUKM.3/SKHP dated 30 Nov 2023, issued by Dinas Perindustrian, Perdagangan, Koperasi, Usaha Kecil dan Menengah Kabupaten Kotawaringin Barat for weighbridge brand: Mettler Toledo; Type IND 560; Serial Number B445226681; Capacity 50,000 kg; verified on 15 Nov 2023. Due for next verification on 15 Nov 2024. <p>Unit of certification has 3 storage tanks consist of Storage Tank No. 1 (capacity 1000 MT), No. 2 (capacity 1000 MT) and No.3 (capacity 2000 MT). Storage tanks are dedicated only for CPO from Sekunyir POM. Cleaning of storage tanks evident by notes ("Berita Acara Pencucian Tangki"), ST No.1 on 24 May 2023 (used after</p>	Not Applicable

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		cleaning on 22 Jan 2024), ST No.2 on 10 Feb 2022 (used after cleaning on 21 Sep 2023), and ST No.3 on 6 January 2024.	
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>As a Palm Oil Mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product, PT Indotruba Tengah – Sekunyir POM has made Shipping Announcement for certified PK sold, e.g.:</p> <ul style="list-style-type: none"> - Shipping Announcement Transaction ID TR-c5bb9f50-1885. Seller: Sime Darby Plantation – Sekunyir POM, PT ITH. Member ID: RSPO_PO1000000321. Buyer: PT Teguh Sempurna – Pemantang Kernel Crushing Plant. Member ID: RSPO_PO1000004588. Product name: CSPK. Supply Chain Model: Mass Balance. Volume 418.56 MT. Contract No. 00267/ITH/KTRKERNEL/LOK/I/2024; Shipping date 31 Jan 2024. Confirmation date 28 Feb 2024. - Shipping Announcement Transaction ID TR-21aa6900-818d. Seller: Sime Darby Plantation – Sekunyir POM, PT ITH. Member ID: RSPO_PO1000000321. Buyer: PT Teguh Sempurna – Pemantang Kernel Crushing Plant. Member ID: RSPO_PO1000004588. Product name: CSPK. Supply Chain Model: Mass Balance. Volume 84.96 MT. Contract No. 00265/ITH/KTRKERNEL/LOK/XI/2023; Shipping date 31 Dec 2023. Confirmation date 22 Jan 2024. - Shipping Announcement Transaction ID TR-83b11a14-dd3e. Seller: Sime Darby Plantation – Sekunyir POM, PT ITH. Member ID: RSPO_PO1000000321. Buyer: PT Teguh Sempurna – Pemantang Kernel Crushing Plant. Member ID: RSPO_PO1000004588. Product name: CSPK. Supply Chain Model: Mass Balance. Volume 113.04 MT. Contract No. 00265/ITH/KTRKERNEL/LOK/XI/2023; Shipping date 30 Nov 2023. Confirmation date 29 Dec 2023. <p>PT Indotruba Tengah provides evident status of PalmTrace, for Remove and Credit Allocation, as follows:</p>	Complied

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		<ul style="list-style-type: none"> - Remove from Certified Stock with transaction ID ST-TR-85dbc029-b3a3; Product CSPO; Supply Chain Model Mass Balance; Volume to remove 11,040.95 MT; Reason for Removal: Sold as conventional; Removal Date: 8 Mar 2024. - Remove from Certified Stock with transaction ID ST-TR-64128706-05d3; Product CSPO; Supply Chain Model Mass Balance; Volume to remove 11.05 MT; Reason for Removal: Sold as conventional; Removal Date: 8 Mar 2024. - Credit Allocation with transaction ID ST-TR-4d1f255f-ccb3; Product CSPO; Supply Chain Model Mass Balance; Volume allocated as credit 5,260 MT; Credit Type: CSPO Credit; Equivalent Credits: 5,260 MT; Allocation Date: 5 Dec 2023. <p>Available evidence of RSPO credit sales (off market) as follows:</p> <ul style="list-style-type: none"> - Execution ID 13205; dated 10 Jan 2024; quantity 146 CSPO; sold to McDonalds Corporation. - Execution ID 13206; dated 10 Jan 2024; quantity 500 CSPO; sold to McDonalds Corporation. - Execution ID 13207; dated 10 Jan 2024; quantity 1,260 CSPO; sold to McDonalds Corporation. <p>Total quantity 1,906 CSPO.</p>	
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>PT Indotruba Tengah – Sekunyir POM only makes claims on RSPO Certified product in compliance with RSPO Rules on Market Communications and Claims as stated in "Manual RSPO SCCS Standar Sertifikasi Rantai Pasok RSPO" (SCCS-Std/RSPO/PSQM/02), Section 4.11.1 Claims. Statement of RSPO Certified Mass Balance is only stated in sales documents of RSPO certified product.</p>	Complied
General corporate communications			

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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.	Sime Darby Plantation Berhad, the parent company of PT. Indotruba Tengah is highlighting its commitment to the principles of RSPO. The corporate communication can be found at https://www.simedarbyplantation.com .	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	Sime Darby Plantation Berhad, in its website: a. Did not display its RSPO membership status. b. Did not display the RSPO web address. c. State the member supports the work of the RSPO: Not in direct manner. In the website, Sime Darby Plantation Berhad stated “World’s Largest Producer of Certified Sustainable Palm Oil”. d. Did not State the member’s history with regards to the RSPO. e. Did not use RSPO trademark in its corporate communication such in website.	Complied
4.3	Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	No, Sime Darby Plantation Berhad 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.	No, Sime Darby Plantation Berhad in its corporate communications did not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil 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.”	No, Sime Darby Plantation Berhad did not made statements that highlight their RSPO certification status and product-related claims in their corporate communication tools.	Complied

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	<ul style="list-style-type: none"> • "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." 		
4.6	<p>RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following:</p> <p>A. Use the RSPO Trademark with a valid trademark licence number to promote its membership of RSPO. It is sufficient for non-certified members to indicate this only once in their communication.</p> <p>B. Claim statements are limited to the following examples:</p> <ol style="list-style-type: none"> "The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR)." X% of palm oil sourced by our organisation are certified through the Roundtable on Sustainable Palm Oil (RSPO) supply chains as <ol style="list-style-type: none"> Identity Preserved Segregated Mass Balance, or 	No, Sime Darby Plantation Berhad did not made product-related claims in their corporate communication tools.	Complied

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	(d) Book and Claim. C. In cases wherein an organisation/member would like to indicate their commitment to sourcing RSPO certified volumes, the statement shall be accompanied with a disclaimer: "This reported figure is not audited through RSPO Certification".		
Product-specific communications			
5.1 General			
5.1.1	Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	No, PT Indotruba Tengah – Sekunyir POM does not display product-specific communications both on-pack or off-pack to any public statement about an individual product that contains RSPO sustainable palm oil.	Complied
5.1.2	Product-specific communications are voluntary.	No, PT Indotruba Tengah – Sekunyir POM does not display product-specific communications both on-pack or off-pack to any public statement about an individual product that contains RSPO sustainable palm oil.	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.	No, PT Indotruba Tengah – Sekunyir POM does not display product-specific communications such as RSPO label.	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.	No, PT Indotruba Tengah – Sekunyir POM does not use any 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	PT Indotruba Tengah – Sekunyir POM is entering RSPO P&C certification. Not applicable.	Not Applicable

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	<p>whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO Trademark licence number, the following conditions shall be met as shown below</p> <ul style="list-style-type: none"> • RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field. • Both parties shall inform their certification body in writing about the agreement. • The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer. 		
5.1.6	Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain	PT Indotruba Tengah – Sekunzir POM is entering RSPO P&C certification. Not applicable.	Not Applicable
5.2 Off pack claims			
5.2.1	Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be	Based on the desktop study, documentation review, and interview conducted with the UoC personnel, it is verified that the only off-pack claims made by the UoC is on the shipping documents.	Complied

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	used together with the valid trademark licence number wherever an off pack claim is made.		
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.	Yes, PT Indotruba Tengah – Sekunyir POM stating the supply chain model and certificate number in their sales documents such as contract, delivery order, weighbridge ticket.	Complied
5.2.3	<p>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:</p> <ul style="list-style-type: none"> • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products, it is essential that customers are aware that the products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation. • If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. 	PT Indotruba Tengah is not a distributor or wholesaler.	Complied
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.	No, PT Indotruba Tengah – Sekunyir POM does not made on-pack claims in their product. Furthermore PT Indotruba Tengah entering RSPO P&C certification.	Complied

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5.3.2	<p>In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:</p> <p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p> <ul style="list-style-type: none"> • RSPO IP/SG CERTIFIED* • Contains RSPO IP/SG palm oil* • Contains RSPO certified palm oil (IP/SG)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	No, PT Indotruba Tengah – Sekunyir POM does not made on-pack claims in their product. Furthermore PT Indotruba Tengah entering RSPO P&C certification.	Complied
	<p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> • RSPO MIXED* • Contributes to the production of RSPO certified palm oil* • Contains RSPO certified palm oil (MB)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	No, PT Indotruba Tengah – Sekunyir POM does not made on-pack claims in their product. Furthermore PT Indotruba Tengah entering RSPO P&C certification.	Complied
	<p>C) For Partially Certified Products:</p> <ul style="list-style-type: none"> • RSPO 50% MIXED* • Contains at least 50% RSPO certified palm oil* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	No, PT Indotruba Tengah – Sekunyir POM does not made on-pack claims in their product. Furthermore PT Indotruba Tengah entering RSPO P&C certification.	Complied
	<p>D) For Products covered with Book and Claim (B&C):</p> <ul style="list-style-type: none"> • RSPO CREDITS* 	No, PT Indotruba Tengah – Sekunyir POM does not made on-pack claims in their product. Furthermore PT Indotruba Tengah entering RSPO P&C certification.	Complied

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	<ul style="list-style-type: none"> Supports the production of RSPO certified palm oil* Contains palm oil covered by the purchase of RSPO Credits* <p>*Add RSPO TM Licence Number below or next to the claim.</p>		
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	No, PT Indotruba Tengah – Sekunyir POM does not made on-pack claims in their product. Furthermore PT Indotruba Tengah entering RSPO P&C certification.	Complied
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	No, PT Indotruba Tengah – Sekunyir POM does not made on-pack claims in their product. Furthermore PT Indotruba Tengah entering RSPO P&C certification.	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.	No, PT Indotruba Tengah – Sekunyir POM does not made on-pack claims in their product. Furthermore PT Indotruba Tengah entering RSPO P&C certification.	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.	No, PT Indotruba Tengah – Sekunyir POM does not made on-pack claims in their product. Furthermore PT Indotruba Tengah entering RSPO P&C certification.	Complied
MODULE B – MASS BALANCE SPECIFIC RULES			
Mass Balance palm oil content			
	95% of the palm oil content must be RSPO MB-certified.	The Certified volume that can be sold is only the volume requested in the RSPO PalmTrace. Hence the CPO and PK volume sold is considered 100% content.	Complied
	If 100% of RSPO MB certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.	The Certified volume that can be sold is only the volume requested in the RSPO PalmTrace. Hence the CPO and PK volume sold is considered 100% content.	Complied
Messaging			

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	<p>Messaging ALLOWED in storytelling in product-specific communications includes:</p> <ul style="list-style-type: none"> • [Palm oil products]/[palm oil]/[palm kernel oil] from RSPO certified mills and plantations were mixed with non-certified palm oil products in the supply chain. • The volume of [palm oil products]/[palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. 	There is no product partial claims.	Not Applicable
Product-Specific Communications Labelling			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> • The RSPO Label MUST contain the tag "MIXED". The tag "MIXED" designates palm oil products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag "MIXED" on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO Label can also include the statement: "[The palm oil contained in this product] contributes to the production of certified sustainable palm oil". 	There is no product partial claims.	Not Applicable
Principle 4: Respect community and human rights and deliver benefit			
Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.			
Criteria 4.1: The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is	Company has a Human Right Charter (Piagam Hak Asasi manusia) of Sime Darby Plantation year 2020. This policy has described some issues such as respect	Complied

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	documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces. - Critical (Major) compliance -	human rights, that prohibits intimidation and harassment including prohibiting retaliation against Human Rights Defenders. This policy has been communicated to relevant stakeholder including all employee for example during morning briefing. Besides that, dissemination has been conducted to external stakeholder i.e representative of the village and government agencies during stakeholder meeting in February 2024. Other dissemination can be seen in signboard or poster installed in strategic area (Main Office, Division Office, and Housing Area). Interview result with worker representative and stakeholder representative known that there is no issue related Human Right Violence.	
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 information gathered during interviews with a sample of workers at the mill and estate, it was reported that there have been no instances of violence or harassment occurring within the unit of certification during their employment tenure.	Complied
Criteria 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	Company has a procedure No. 01/MPK-OU/XII/21 dated 1 December 2021 which described timeline to respond the grievance (max 14 days), to ensure the anonymity of any party if requested, and grievance resolution without any reprisal or intimidation. If the cases cannot be handled at Estate/Mill level, the cases will be escalated to the next level of management, using mediator, or to be escalated to the court or RSPO website (complaint panel). Interview result with representative of Pembuang Hulu II Village and Amin Jaya Village known that they have aware about how to submit a complaint and the PIC who will handle it.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	Interview result with representative of Pembuang Hulu II Village and Amin Jaya Village known that they have aware about how to submit a complaint and the PIC who will handle it. Illiterate party can convey their complaints to the its representative, for example the village head or other institution.	Complied

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4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Based on the results of a document review and interviews with the Head of Pembuang Hulu II Village, it is known that currently there is a demand from the people of Pembuang Hulu II Village and Derangga Village against the company regarding the application for a plantation permit in the form of money to the community for the company area which is in the Seruyan Regency area (Pembuang Village). Hulu II and Derangga Village). With these demands, several meetings were held as follows:</p> <ul style="list-style-type: none"> On 17 January 2024. Between PT ITH and Community Representatives and MUSPIKA Hanau. The community's demand is payment of IDR 2,000,000 / Ha for the estate area that falls within Seruyan Regency. The company informed that it is willing to facilitate the development of community plantation in accordance with regulations or in the form of productive business activities. The conclusion of this meeting was that the community rejected the company's submission because the demand they wanted was compensation in the form of money and requested a follow-up meeting not later than 7 days from this meeting. On 29 January 2024. With the minutes in the form of a Community Demand, they are requesting financial compensation for the non-fulfilment of 20% plasma in the area included in Pembuang Hulu II Village and Derangga Village in the amount of IDR 2,000,000/ha/month. If the demands are not met, a mass harvest will be carried out and the company's activities will be closed on 3 February 2024. The company said that in principle it is willing to facilitate the development of partnership plantation in accordance with applicable regulations/or productive economic business activities. A follow-up meeting is planned after the general election. On 9 February 2024. Minutes of meeting Number 500.17.4.1/030/PEM-TFSL/III/2024 with an agenda of mediation between PT ITH and the Community of Pembuang Hulu II and Derangga Villages attended by the Head of Pembuang Hulu II Village, the Head of Derangga Village, Representatives PT ITH, Hanau District Head, Commander of Pembuang Hulu II Military District, Head of Hanau Sector Police, chairman of Hanau 	Complied
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		<p>District DAD. At the meeting no agreement was found so it will be taken to the Seruyan Regency level.</p> <p>The results of an interview with one of the complainants on 14 March 2024 revealed that the party did not yet know the progress of the complaint submitted, while the company representative stated that he was still waiting for information and invitations from the Regency.</p>	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>As described in 4.2.1 procedure of grievance resolution has covered that if the cases cannot be handled at Estate/Mill level, the cases will be escalated to the next level of management, using mediator, or to be escalated to the court or RSPO website (complaint panel). The document sighted that the external complaints resolution can be involved with third party mediator.</p>	Complied
Criteria 4.3: The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local community are demonstrated.</p> <p>- Minor compliance -</p>	<p>Company has a Corporate Social Responsibility Report for year of 2023 which inform :</p> <ul style="list-style-type: none"> - Program and Realization of CSR - Evaluation for CSR programme - Plan for CSR Program of 2024 <p>In general, the pillars of PT Indotruba Tengah CSR implementation include Environment, Education, and Community Development. In preparing the program the company has involved relevant stakeholders through "musrenbangdes" - village development planning deliberation activities.</p> <p>Realization of CSR in 2023 among others are :</p> <ul style="list-style-type: none"> - Teacher honorarium assistance for Amin Jaya and Pembuang Hulu II Villages during the January - March period. 	Complied

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		<ul style="list-style-type: none"> - Independent village award for preventing land fire - Assistance for religious holidays, holidays and traditional events. <p>In general, PT Indotruba Tengah Corporate Social Responsibility (CSR) program has been running according to plan. The encouragement of stakeholders to respond to sustainability issues is an important part of Company activities. Improving sustainability governance, developing monitoring and evaluation processes for activities sustainability, as well as the integration of environmental, social and governance issues into business strategies are becoming processes of the future. In the coming years, the program being prepared will involve external parties and the community in mapping potential and recommendations for CSR programs contained in the Sustainable Livelihood Asset document.</p>	
Criteria 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>There is no additional information until this assessment regarding the legal ownership. Company has Land title which cover an area of 7,734.60 Ha with following detail :</p> <ul style="list-style-type: none"> • HGU number 04/1988, covered 3,260 Ha – valid until 24 September 2033, based on “Surat Keputusan Menteri Negara Agraria / Kepala Badan Pertanahan Nasional” No 152/HGU/BPN/97, dated 26 September 1997 • HGU number 05/1988, covered 829.2 Ha – valid until 24 September 2033, based on “Surat Keputusan Menteri Negara Agraria / Kepala Badan Pertanahan Nasional” No 11/HGU/BPN/99, dated 11 April 1998 • HGU number 05/1988, covered 740.4 Ha – valid until 23 June 2033, based on “Surat Keputusan Menteri Negara Agraria / Kepala Badan Pertanahan Nasional” No 10/HGU/BPN/98, dated 2 April 1998 • HGU number 06/1988, covered 2,905 Ha – valid until 23 June 2033, based on “Surat Keputusan Menteri Negara Agraria / Kepala Badan Pertanahan Nasional” No 13/HGU/BPN/98, dated 2 April 1998 	Complied

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		Interview result of representative of Pembuang Hulu II Village and Amin Jaya Village known that the company has the "Hak Guna Usaha" as a legal basis for operational areas since 1980's and the validity period has been extended.	
4.4.2	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>- Minor compliance -</p> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p> <p>4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;</p> <p>4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities. Including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p>	There are no new acquisition up to this assessment so the information presented is still the same as the previous assessment. According to the information given in " <i>Risalah Pemeriksaan Tanah B'</i> " No.01/PPTB/I/1995 dated 12 January 1995, No.02/PPTB/I/1995" dated 12 January 1995 and No.006/PPTB/VIII/93" dated 7 August 1993, the land is State ownership land and has no customary or indigenous rights upon the land. Government planning categorized several pieces of the land as transmigration programs, but the program was cancelled. Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community and relevant government also informed in the " <i>Risalah Pemeriksaan Tanah B'</i> " document.	Complied
4.4.3	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	The company has an operational map with map references listed in the HGU certificate at a scale of 1 : 100,000 in accordance with map regulations which indicate the boundaries of the operational area in accordance with the permit held. One form of stakeholder participation is by making the map publicly accessible if necessary.	Complied

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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 -	As described in 4.4.1 the land acquired is owned by the state for cancelled transmigration purposes. Currently the legality of the land owned is in the form of an HGU which is still valid until 2033.	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 -	Evidence to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose is available in the " <i>Risalah Pemeriksaan Tanah B</i> " document where representative of affected parties have signed in the document.	Complied
4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	According to " <i>Risalah Pemeriksaan Tanah B</i> " No.01/PPTB/I/1995 dated 12 January 1995, No.02/PPTB/I/1995 dated 12 January 1995 and No.006/PPTB/VIII/93" dated 7 August 1993 the land is State Ownership land and has no customary or indigenous rights upon the land. Government planning categorized several pieces of the land as transmigration programs, but the program was cancelled. Then, there is no negotiated agreement or FPIC for land compensation at the time.	Complied
Criteria 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	Based on document review and interviews with representatives of Amin Jaya Village and Pembuang Hulu II, and representatives of the Plantation Service, it is known that plantation land clearing has been carried out since the early 1990's and to date there has been no new land clearing. The land was originally intended for transmigration but because it failed, the land was offered to the company. Based on the description above, it can be concluded that there was no land clearing after 2010 and there was no land acquisition process.	Complied
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	As described in 4.5.1 there is no new planting conduct by the company. Thus, this indicator is not applicable.	Not Applicable

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	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 -		
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 -	As described in 4.5.1 there is no new planting conduct by the company. Thus, this indicator is not applicable.	Not Applicable
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 -	As described in 4.5.1 there is no new planting conduct by the company. Thus, this indicator is not applicable.	Not Applicable
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 -	As described in 4.5.1 there is no new planting conduct by the company. Thus, this indicator is not applicable.	Not Applicable

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4.5.6	Evidence is available that the communities or their representatives gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	As described in 4.5.1 there is no new planting conduct by the company. Thus, this indicator is not applicable.	Not Applicable
4.5.7	After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes. - Minor compliance -	Based on document verification of environmental, land use title and public consultation with relevant stakeholder, there's no new planting after 2018. Thus, this indicator is not applicable.	Not Applicable
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	Based on document verification of environmental, land use title and public consultation with relevant stakeholder, there's no new planting after 2018. Thus, this indicator is not applicable.	Not Applicable
Criteria 4.6: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	Company has a procedure of Land Acquisition (No. 343/PSD-OKUP/11 dated 23 February 2012) which described land owner identification, FPIC process and fair land compensation/payment. Current condition there is no land acquisition to individual landowner or customary rights in HGU granting process. After Unit of certification was granted of HGU in 1997 and 1998, Unit of certification did not conduct any land development/land acquisition. Until the present, Unit of certification also has no plan to conduct any new land expansion in the future.	Complied
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	There is no revision of procedure until this assessment. Mutually agreed procedure for calculating and distributing fair and gender-equal compensation have been covered in the SOP of Land Acquisition (No. 343/PSD-OKUP/11 dated 23 February 2012). The procedure has covered land title and owner (male/female) identification, FPIC process, and fair land compensation/payment.	Complied

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	- Critical (Major) compliance -		
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement). - Minor compliance -	Based on explanation from Criterion 4.5 and Indicator 4.6.1, there was no land acquisition from individual landowner or customary right since the HGU granting process until present time.	Complied
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 -	Based on explanation from Criterion 4.5 and Indicator 4.6.1, there was no land acquisition from individual landowner or customary right since the HGU granting process until present time.	Complied
Criteria 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	There is no revision of procedure until this assessment. Mutually agreed procedure for calculating and distributing fair and gender-equal compensation have been covered in the SOP of Land Acquisition (No. 343/PSD-OKUP/11 dated 23 February 2012). The procedure has covered land title and owner (male/female) identification, FPIC process, and fair land compensation/payment.	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties. - Critical (Major) compliance -	There is no revision of procedure until this assessment. Mutually agreed procedure for calculating and distributing fair and gender-equal compensation have been covered in the SOP of Land Acquisition (No. 343/PSD-OKUP/11 dated 23 February 2012). The procedure has covered land title and owner (male/female) identification, FPIC process, and fair land compensation/payment.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development. - Minor compliance -	There is no land expansion conduct by the unit of certification.	Complied
Criteria 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.			

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4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	According to previous reports, there are land dispute in PT Indotruba Tengah located in Seruyan Estate for an area of 807.31 Ha. This area located in Blocks G25, G28, G31 and G34. The chronology of this disputed land described below (based on interview with management and stakeholders, as well as review of legal document, dispute resolution, and chronology documents): - Unit of certification started to develop the plantation gradually in 1993, 1994, 1995, and 1996 after granted Location Permit. - The development was not finished yet in 1996. - Unit of certification was granted HGU Decree in 1997 and 1998. - Just after HGU granted, there was a national and global monetary crisis in 1998. The ongoing development in that time was postponed due to the lack of financing. - For the areas that not yet cleared, and some areas that had been planted by oil palm, occupied by some communities (Group of H. Ruslan ± 486 Ha and others individuals ± 139 Ha). - Participatory identification, mapping, and verification have been conducted. H. Ruslan and other occupants stated that the land acquired by acquisition from previous landowners. - Due to PT Indotruba Tengah acquired the land from government (unsuccessful transmigration program), whereas H. Ruslan acquired the land from land compensation to the individual landowners, it seems that both parties have an equal justification of the land ownership status. - On 27 July 2011, the Agrarian Agency came to PT Indotruba Tengah to discuss the disputed area and asked whether the land initially abandoned by Unit of certification or occupied by the communities. - On 31 November 2011, had been conducted land verification by Agrarian Agency, Plantation Agency, and PT Indotruba Tengah. In this moment, PT	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -		Complied
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4). - Minor compliance -		Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -		Complied

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		<p>Indotruba Tengah asked Agrarian Agency to appoint this area as abandoned area, so that Unit of certification has no obligation to pay the land taxes.</p> <ul style="list-style-type: none"> - So far, the unit of certification has considered taking this case to court. However, considering the negative social impact that might be expected at that time (tensions would increase), the Certification Unit postponed the plan. <p>Field observation to these disputed areas during ASA 2_2, can be concluded that the area has been participatory mapped and well demarcated, both occupant and Unit of certification did not disturb each other. Therefore, there is no conflict in the field currently. It is also has been verified based on interview with Villages Heads and Plantation Agency. Dispute area will be removed from HGU when Land title expired in 2033.</p>	
Principle 5: Support smallholder inclusion Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.			
Criteria 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices for FFB are publicly available and accessible by smallholders. - Minor compliance -	PT. Indotruba Tengah – Sekunyir POM received FFB from non-certified oil palm plantation company PT. Indotruba Timur (ITR) as directly FFB supplier and CV Fortuna as indirectly FFB supplier. Sekunyir POM has inform the prices of FFB by letter to CV Fortuna, verified document as stated in the Inter Office Mail from RCEO KTB period 4 March 2024, the price is IDR 2,650/Kg. Interview also has been carried out during ASA 2_2 to CV Fortuna as FFB Supplier, its mentioned that CV Fortuna has received the FFB prices regularly.	Complied
5.1.2	(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders. - Critical (Major) compliance -	PT. Indotruba Tengah – Sekunyir POM received FFB from non-certified oil palm plantation company PT. Indotruba Timur (ITR) as directly FFB supplier and CV Fortuna as indirectly FFB supplier. Sekunyir POM has inform the prices of FFB by letter to CV Fortuna, verified document as stated in the Inter Office Mail from RCEO KTB period 4 March 2024, the price is IDR 2,650/Kg.	Complied

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		Interview also has been carried out during ASA 2_2 to CV Fortuna as FFB Supplier, its mentioned that CV Fortuna has received the FFB prices regularly.	
5.1.3	(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented. - Critical (Major) compliance -	PT. Indotruba Tengah – Sekunyir POM received FFB from non-certified oil palm plantation company PT. Indotruba Timur (ITR) as directly FFB supplier and CV Fortuna as indirectly FFB supplier. Fair pricing, including premium pricing has agreed as stated in the SPJB (Surat Perjanjian Jual Beli)/ Sale and Purchase agreement Letter No. SPJB TBS No. 007/TBS/ITH-Fortuna/IX/2023 dated 1 September 2023 – Article 6 “Prices, Volume and Tonase of FFB”	Complied
5.1.4	(C) Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and re-payments through FFB price reductions for replanting and/or, other support mechanisms where applicable. - Critical (Major) compliance -	PT. Indotruba Tengah – Sekunyir POM received FFB from non-certified oil palm plantation company PT. Indotruba Timur (ITR) as directly FFB supplier and CV Fortuna as indirectly FFB supplier. CV Fortuna has a women member that bound in the SPK/Agreement with Sekunyir POM, who have the same right within the CV Fortuna organization.	Complied
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	PT. Indotruba Tengah – Sekunyir POM was received FFB from non-certified oil palm plantation company PT. Indotruba Timur (ITR) as directly FFB supplier and CV Fortuna as indirectly FFB supplier. The contract agreement has available as per SPJB (Surat Perjanjian Jual Beli)/ Sale and Purchase agreement Letter No. SPJB TBS No. 007/TBS/ITH-Fortuna/IX/2023 dated 1 September 2023 – Section 3 stipulated timeframe of contract, Section 4 stipulate the piece rate/service price per distance coverage, Section 6 stipulate payment period and method. The contracts are fair, legal and transparent and have an agreed timeframe.	Complied
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 -	PT. Indotruba Tengah – Sekunyir POM was received FFB from non-certified oil palm plantation company PT. Indotruba Timur (ITR) as directly FFB supplier and CV Fortuna as indirectly FFB supplier. The contract agreement has available as per SPJB (Surat Perjanjian Jual Beli)/ Sale and Purchase agreement Letter No. SPJB TBS No. 007/TBS/ITH-Fortuna/IX/2023 dated 1 September 2023 – Article 6 “Prices, Volume and Tonase of FFB”.	Complied

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		Verified Bank payment voucher dated 15 February 2024 No ref 202402130938428844 – SKN Transfer CIMB Bank, from Indotruba Tengah to CV Fortuna IDR 301,612,976 as per INV 10/1/2024, status of transfer: success.	
5.1.7	<p>Weighing equipment is verified by an independent third party on a regular basis.</p> <p>- Minor compliance -</p>	<p>All weighing equipment has been calibrated by related government agencies according to national regulation (cooperative and industry agency of Kalimantan Tengah Province).</p> <p>Sekunyir POM has 2 weighbridges that uses for weighing oil palm product, both have been calibrated based on:</p> <ul style="list-style-type: none"> - "Keterangan Hasil Pengujian" No.510.3/1156/DPPKUKM.3/SKHP dated 25 October 2023, issued by "Dinas Perindustrian, Perdagangan, Koperasi, Usaha Kecil dan Menengah Kabupaten Kotawaringin Barat" for weighbridge brand: Mettler Toledo; Type IND 560; Serial Number B445226681; Capacity 50,000 kg; verified on 30 November 2023. Due for next verification on 30 November 2024. - "Keterangan Hasil Pengujian" No.510.3/1155/DPPKUKM.3/SKHP dated 25 October 2023, issued by "Dinas Perindustrian, Perdagangan, Koperasi, Usaha Kecil dan Menengah Kabupaten Kotawaringin Barat" for weighbridge brand: Mettler Toledo; Type IND 570 HARSH; Serial Number C 238839463; Capacity 50,000 kg; verified on 30 November 2023. Due for next verification on 30 November 2024. 	Complied
5.1.8	<p>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.</p> <p>- Minor compliance -</p>	<p>PT. Indotruba Tengah demonstrates working plan to assist smallholder as documented in "PT. Indotruba Tengah Action Plan Pembangunan Kebun Plasma 1,500 Ha", dated 10 January 2022.</p> <p>Progress implementation:</p> <ul style="list-style-type: none"> - "Notulen Survey Calon Lahan Fasilitasi Kebun Masyarakat (Plasma)" dated 2 February 2022. The land survey carried out on Sidomulyo Village with community and farmer group attending. There are 250 members with 2 Ha oil palm plantation each, totalling 500 Ha, ex-PIR-Trans PTPN XIII. Currently the smallholders are in process registering the land for land certificate 	Complied

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		<p>(PTSL). Other discussion related to plantation costing. The area has been mapped.</p> <ul style="list-style-type: none"> - Communication and dissemination of smallholder program to Sungai Hijau Village, Pangkalan Banteng District "Sosialisasi KKPA Desa Sungai Hijau" dated 15 February 2023. The socialization attended by 84 community members (male and female). - Identification and summary of potential plan for smallholder development "Rekapitulasi Penyerahan Calon Petani Plasma KKPA Desa Sungai Hijau", total 169.66 Ha. - Statement Letter of Commitment Regarding Land Handover from Head of Sei Bengkuang Village, until this ASA 2_2 was noted with area 73 Ha from 38 farmers. 	
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>PT. Indotruba Tengah – Sekunyir POM received FFB from non-certified oil palm plantation company PT. Indotruba Timur (ITR) as directly FFB supplier and CV Fortuna as indirectly FFB Supplier.</p> <p>PT. Indotruba Tengah – Sekunyir POM has a SOP of Grievance Resolution of Stakeholder (No. 01/MPK-OU/XII/21 dated 1 December 2021). The SOP has included timing to respond the grievance (max 14 days), to ensure the anonymity of any party if requested, and grievance resolution without any reprisal or intimidation. If the cases cannot be handled at Estate/Mill level, the cases will be escalated to the next level of management, using mediator, or to be escalated to the court or RSPO website (complaint panel).</p> <p>SOP has been disseminated regularly to all stakeholders including CV Fortuna, latest dissemination conducted on 27 June 2023.</p>	Complied
Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	<p>The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p>	<p>Unit of certification engages with smallholders who express interest, including women and other partners within their supply chain, to evaluate their requirements for assistance in enhancing their livelihoods. PT Indotruba Tengah has laid out its action plan to support smallholders, as detailed in the document</p>	Complied

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	- Minor compliance -	<p>"PT. Indotruba Tengah Action Plan Pembangunan Kebun Plasma 1,500 Ha," dated 10 January 2022. In response to invitations and commitments from smallholders in the surrounding villages, PT. Indotruba Tengah revised its smallholder development plan for 2023, dated February 22, 2023, with a timeline including seedling orders in April 2023, land preparation reviews and approvals in March 2023, actual land preparation and contractor appointments in April 2023, land clearing in April 2023, and planting in May 2023. Here's a breakdown of the progress:</p> <ul style="list-style-type: none"> • A land survey was conducted on 2 February 2022, in Sidomulyo village, attended by community members and farmer groups. About 250 members with 2 Ha of oil palm plantation each, totalling 500 Ha, were identified. These smallholders are currently in the process of registering their lands for land certificates (PTSL). Discussions also centered around plantation costing, and the area has been mapped. • A dissemination event regarding the smallholder program was held in Sungai Hijau Village, Pangkalan Banteng District, on 15 February 2023, with 84 community members in attendance. • The potential plan for smallholder development was identified and summarized in the document "Rekapitulasi Penyerahan Calon Petani Plasma KKPA Desa Sungai Hijau," totalling 169.66 Ha. • A Statement Letter of Commitment Regarding Land Handover was obtained from the Head of Sei Bengkuang Village, noting an area of 73 Ha from 38 farmers up to this ASA 2_2. 	
5.2.2	<p>The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).</p> <p>- Minor compliance -</p>	<p>As of the audit date, PT. Indotruba Tengah has demonstrated its working plan to support smallholders. This was confirmed through the verified communication and dissemination of the smallholder program to Sungai Hijau Village, Pangkalan Banteng District, during the "Sosialisasi KKPA Desa Sungai Hijau" session held on 15 February 2023. This dissemination event was attended by 84 community members, both male and female.</p>	Complied

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		Furthermore, a similar dissemination event regarding the KKPA Program was conducted in Pembuang Hulu Village and Derangga Village on 17 January 2024. The purpose of these meetings and surveys was to gauge interest and reach an agreement on the costs and benefits associated with smallholder development.	
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	PT. Indotruba Tengah's commitment to supporting smallholders is evident as of the audit date, confirmed through the identification and summarization of potential plans for smallholder development (KKPA). This information is derived from the Plan of KKPA Activity PT ITH for January to December 2024. The activity plan outlines various initiatives, including land clearing activities for Sei Hijau and Sei Bengkuang Village, the preparation of planting holes in Sei Hijau Village covering a total area of 41.11 Ha, the planting of 6,031 oil palm trees in Sei Hijau Village, the application of 3,015.5 Kg of fertilizer, the application of 141,810 Kg of EFB, and a second round of fertilization totalling 1,550 Kg.	Complied
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	PT. Indotruba Tengah currently does not have scheme smallholder as its supply base. This indicator is not applicable.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme. - Minor compliance -	Based on document review and interview during ASA 2_2, it was known that PT Indotruba Tengah has regularly review and publicly report on the progress of smallholder support program to Plantation Agency (Dinas Perkebunan) in Kotawaringin Barat Regency. The last communication from PT Indotruba Tengah to the Dinas Perkebunan Kabupaten Kotawaringin Barat as stated in the report of "LKUP (Laporan Kegiatan Usaha Perkebunan)". Report has been sent to the Dinas Perkebunan on 13 Jan 2024 and the report also can be seen in the SIPERIBUN. The progress of the smallholder support programme as follows. 1. Sample progress of smallholders support program: Conducting survey for smallholder's land, as per recorded: "Notulen Survey Calon Lahan Fasilitas Kebun Masyarakat (Plasma)" dated 2 February 2022. The land survey carried out on Sidomulyo Village with community and farmer group attending. There	Complied

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		<p>are 250 members with 2 Ha oil palm plantation each, ex-PIR-Trans PTPN XIII.</p> <ol style="list-style-type: none"> 2. In 2023, PT. Indotruba Tengah demonstrates working plan to assist smallholder, as of audit date, verified through identification and summary of potential plan for smallholder development "Rekapitulasi Penyerahan Calon Petani Plasma KKPA Desa Sungai Hijau", total 169.66 Ha. 3. The target of total area for KKPA is 500 Ha for Kotawaringin Barat Regency and 700 Ha for Seruyan Regency. 4. Statement Letter of Commitment Regarding Land Handover from Head of Sei Hijau Village on 27 March 2023 with area 170 Ha from willing registered farmers. Sampled document are: <ul style="list-style-type: none"> • Statement Letter from Petrus Dale, Sungai Bengkoang Village, handed over 2 Ha of land to build KKPA, dated 12 January 2024; • Riadi, Sungai Bengkoang Village, handed over 2 ha of land to build KKPA, dated 12 January 2024; • Kamran, Sungai Bengkoang Village, handed over 2 ha of land to build KKPA, dated 12 January 2024; • Murtajono, Sungai Bengkoang Village handed over 2 ha of land to build KKPA, dated 12 January 2024; • Nurbadri, handed over 2 ha of land to build KKPA, dated 12 January 2024; • Stefanus SE, Sei Hijau Village handed over 2 ha of land to build KKPA, dated 5 October 2023; • Simon Kobe, Sei Hijau Village, handed over 2 ha of land to build KKPA, dated 12 January 2024; • Servasius Deke, Sei Hijau Village, handed over 2 ha of land to build KKPA, dated 12 January 2024; • Darmanto, Sei Hijau Village, handed over 2 ha of land to build KKPA, 	
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		<p>dated 12 January 2024;</p> <ul style="list-style-type: none"> Nikolamus Naggla, Sei Hijau Village, handed over 2 ha of land to build KKPA, dated 12 January 2024. <p>5. Progress of Land Clearing for KKPA at Sei Hijau Village until March 2024 is 56,62 ha, and was planted with area 40.75 ha.</p> <p>6. Work of Agreement/ "Surat Perjanjian Kerja – Sekunyir Estate" No. 053/SPK-ITH-SKE/X/2023 dated 1 October 2023 regarding Land Clearing activity for KKPA at Sei Hijau Village with area 100 ha.</p> <p>7. Progress of Land Clearing for KKPA at Sei Bengkuang Village until March 2024 is 1.3 ha.</p>	
Principle 6: respect workers' rights and conditions Protect workers' rights and ensure safe and decent working conditions.			
Criteria 6.1: Any form of discrimination is prohibited.			
6.1.1	<p>(C) A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>Company has established the policy of equal opportunity, non-discrimination and treatment in employment, which is contained in the Guidelines for Sustainable Plantation Management No. 724/TQEM-SPMS/09. The policy was explained that in order to realize harmonious industrial relations, dynamic and fair company implemented industrial relations of each operational unit without distinction of race, religion, race and gender in all types of field work.</p> <p>Form of dissemination can be seen in signboard / poster installed in strategic area i.e Main Office, Division office, and housing area.</p>	Complied
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.</p> <p>- Critical (Major) compliance -</p>	<p>Based on a document review, interviews with worker representatives, and interviews with Labour union representatives, it is known that there has never been an incident of discrimination within the company. This is demonstrated, among other things, by:</p> <ul style="list-style-type: none"> Transparency in job vacancies and the selection process, including no recruitment fees. 	Complied

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		<ul style="list-style-type: none"> - Equal pay based on the same scope of work which refers to the wage structure and scale. - Training and self-development opportunity. - Equivalent welfare facilities for employees according to position, such as provision of clean water. 	
6.1.3	<p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>Companies can show evidence of recruitment, selection, training, promotion based on qualification capabilities and job availability. This is demonstrated, among other things, by:</p> <p>Employee promotion</p> <p>Inter Office Mail Number 105/FM SKF-RCEO/X/2023 related approval of SKU-H promotion for 8 worker:</p> <ul style="list-style-type: none"> - Affandi Min Tohirin. - Andika surya - Muhaimin Iskandar - Mahmudin - Indra Eka - Kukuh Prasetyo - Titi Tri Utami - Mustolih <p>This letter has been approved by RCEO Central Kalimantan Region.</p> <p>Employee Performance Assessment</p> <p>For example, it is shown by the employee evaluation form for Andika Surya with average value 4.5 and recommended upgrade to SKU-H (permanent worker).</p> <p>Training</p>	Complied

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		All workers have received regular training and awareness, both in official events, morning briefings or in direct superiors and warnings. Interview result with worker representative known that periodical training has been set by the company. Record of its training can be seen in indicator 3.7.1.	
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance -	Pregnancy tests carried out by companies are not part of discrimination but rather part of a positive effort to ensure that no pregnant or breastfeeding women work with toxic chemicals. If there are pregnant or breastfeeding women who have the potential to be exposed, they will be transferred to other jobs such as manual upkeep or housekeeping. This was also confirmed based on the results of interviews with representatives of the company gender committee.	Complied
6.1.5	(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Critical (Major) compliance -	Unit of Certification has a Gender Committee in each unit of Estate and Mill. Organization of Gender Committee has a structure i.e.: <ul style="list-style-type: none"> • Chairman • Secretary • Member <p>Interview result with Gender Committee representative know that the company support all activities to be carried out. The company also provides assistance in increasing the capacity of management to understand developing issues, including increasing the capacity of women.</p>	Complied
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	Based on the results of document review and interviews with worker representatives, it is known that the company has implemented the same wages for each scope of work. Even if there are differences, this is more due to the wage scale structure which considers length of service and employee class. Record of payment <ul style="list-style-type: none"> • NIK 0000171658 (Harvester): Basic salary IDR 3,634,451. • NIK 0000171513 (Harvester): Basic salary IDR 3,634,451 	Complied

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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	<p>(C) Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>The wage reference used by the Unit of Certification is the Circular Letter of the Governor of Central Kalimantan Number 188.44/552/2023 concerning Determination of Minimum Wages for Provinces and Regencies/Cities throughout Central Kalimantan in 2024. Based on this circular it is known that the Minimum Wage for Kotawaringin Barat Regency is IDR 3,474,797 and for Seruyan Regency is IDR 3,634,451. The company uses wages with the highest value.</p> <p>Unit of Certification show Direction Circular Letter No. 073/HRM-i5.1/XII/2023 which stated minimum wage for year 2024 is IDR 3,634,451.</p> <p>Record of Payslip</p> <table><tr><td>Period: February ID: 000017513 Basic salary : IDR 3,634,451 Harvesting premium: IDR 503,000 Social insurance : IDR 251,623 Health insurance : IDR 153,898 Rice allowance : IDR 213,000</td><td>Deduction Social insurance : IDR 367,047 Health insurance : IDR 192,373</td></tr><tr><td colspan="2">Gross: IDR 4,756,472</td></tr><tr><td colspan="2">Nett income: IDR 4,197,052</td></tr></table>	Period: February ID: 000017513 Basic salary : IDR 3,634,451 Harvesting premium: IDR 503,000 Social insurance : IDR 251,623 Health insurance : IDR 153,898 Rice allowance : IDR 213,000	Deduction Social insurance : IDR 367,047 Health insurance : IDR 192,373	Gross: IDR 4,756,472		Nett income: IDR 4,197,052		Complied
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Gross: IDR 4,756,472									
Nett income: IDR 4,197,052									
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll</p>	<p>Every worker has a documented employment agreement with the company, for example shown by Agreement letter No. 21/SKF/SPK-PKWT/III/2023 dated 18 March 2023 for the position of Mill Compound. This letter has described working hours, duties and responsibilities, wages, probationary period, leave, Holiday allowance, Social/Health Insurance, and others.</p>	Complied						

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	documents give accurate information on compensation for all work performed. - Critical (Major) compliance -	Apart from that, there are also Company Regulations which have been ratified by the Central Kalimantan Province Manpower and Transmigration Service on 21 September 2023 valid to 20 September 2025 in accordance with letter number KEP.139/565/HI/IX/Nakertrans. The company regulation explains the provisions of employment including recruitment and transfer of workers, working hours, wages, overtime, social security and social assistance, PPE, pension, type of work, termination of employment, separation, company and worker obligations, ways of resolving labour disputes, transitional provisions, and other terms of employment.	
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 -	<p>Company has been shown evidence that comply with labour requirement i.e.:</p> <p>Regular working hour</p> <p>As stated in company regulation and interview with worker representative, working hour is 7 hours in a day for 6 days. No issue regarding regular working hour both from worker or labour union. During working hours workers are also given a break of 1 hour.</p> <p>Overtime</p> <p>Stated in company regulation period of 2023 – 2025, which among other things, regulates overtime working hours in the company.</p> <p>The company can show implementation of overtime which is in accordance with the regulations for example ID: 0000162736 with total of overtime payment IDR 3,313,707. Overtime orders, details of overtime pay, and details of day-by-day overtime hours can be shown.</p> <p>Implementation of entitlement holiday</p> <p>The company has a company regulation for the period 2023 – 2025 explain related leave, permission to leave the company, and holidays.</p>	Complied

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		<p>Maternity and Menstrual Leave</p> <p>Described in Company Regulation for the period 2023 – 2025, maternity leave (H-2) is given 90 days which divide 45 days before and 45 days after birth. While menstrual leave given if on the first day of the menstrual period that the worker feel not well.</p> <p>As a result of interviews with employee representatives and labour union representatives, it was found that the company had implemented policies regarding employment properly referring to applicable regulations.</p>	
6.2.4	<p>(C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the results of the field visit, it is known that the welfare facilities and infrastructure provided by the company to employees include the following:</p> <ul style="list-style-type: none"> • Employee housing • Clean water supply • Electricity • Daycare • Waste management • Sports facilities such as badminton courts and volleyball courts. <p>The results of interviews with employee representatives, revealed that the facilities and infrastructure provided were in good condition. Even if there is damage, it can be followed up immediately through reporting.</p> <p>Housing Programme</p> <p>Summary of Housing Project budget 2021, 2022 and 2023, it is known that for the KTB (Kalimantan Tengah dan Barat) area, a total of 2036 houses are planned to be built with implementation details as follows:</p> <ul style="list-style-type: none"> • 2022: 236 units • 2023: 270 units 	Complied

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		<ul style="list-style-type: none">• 2024: 168 units• 2025: 352 units• 2026: 270 units• 2027: 298 units• 2028: 280 units <p>The results of field visits to SKE (Sekunyir Estate), SRE (Seruyan Estate) and SKF (Sekunyir Factory/POM) housing also found that progress in houses development and replacing them from semi-permanent to permanent is still ongoing.</p>																																																																																																																																						
6.2.5	The unit of certification makes efforts to improve workers’ access to adequate, sufficient and affordable food. - Minor compliance -	Based on the results of field visits and interviews with employee representatives at the SKE,SKF, and SRE housing complexes, it is known that employees can easily access basic needs because apart from sellers entering the housing area, there are also stalls in the employee housing area.	Complied																																																																																																																																					
6.2.6	A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours. - Minor compliance -	<p>Until now, the DLW benchmark for Indonesia has not been determined, so companies calculate the prevailing wage by referring to the guidelines issued by the RSPO as follows :</p> <table><tr><th>No</th><th>Benfit</th><th>Penjelasan</th><th>Total Cost</th><th>No. Of Unit</th><th>Unit Cost Per Year</th><th>Per Worker</th></tr><tr><td>1</td><td>Housing</td><td>Cost Per Housing - Benefit in 30 years</td><td>13.736.690.082</td><td>326</td><td>1.404.570</td><td>117.047</td></tr><tr><td></td><td></td><td>Housing Maintenance</td><td>340.631.364</td><td>326</td><td>1.044.881</td><td>87.073</td></tr><tr><td></td><td></td><td>Electricity Supply</td><td>1.720.109.544</td><td>326</td><td>5.276.410</td><td>439.701</td></tr><tr><td></td><td></td><td>Water Supply</td><td>298.409.736</td><td>326</td><td>915.367</td><td>76.281</td></tr><tr><td></td><td></td><td>Community Building Maintenance (Masjid, TPA, dll)</td><td>1.283.603.784</td><td>529</td><td>2.426.472</td><td>202.206</td></tr><tr><td>2</td><td>Health</td><td>Transport (Ambulance)</td><td>123.415.620</td><td>529</td><td>233.300</td><td>19.442</td></tr><tr><td></td><td></td><td>Dokter Visit (include Posyandu Cost)</td><td>203.337.216</td><td>529</td><td>384.380</td><td>32.032</td></tr><tr><td></td><td></td><td>Other Health Cost (extra fooding posyandu, etc)</td><td>125.225.528</td><td>529</td><td>236.721</td><td>19.727</td></tr><tr><td>3</td><td>Social</td><td>Sports & Other Transport</td><td>15.697.260</td><td>529</td><td>29.673</td><td>2.473</td></tr><tr><td></td><td></td><td>Sports Equipment & fascilities</td><td>92.448.132</td><td>529</td><td>174.760</td><td>14.563</td></tr><tr><td></td><td></td><td>School Transport (Bus Sekolah)</td><td>330.136.812</td><td>529</td><td>624.077</td><td>52.006</td></tr><tr><td></td><td></td><td>Bantuan Perayaan Hari Besar (17 Agustus, Tahun Baru, Keagamaan, dll)</td><td>143.460.000</td><td>529</td><td>271.191</td><td>22.599</td></tr><tr><td></td><td></td><td>Guru</td><td>447.743.256</td><td>529</td><td>846.396</td><td>70.533</td></tr><tr><td></td><td></td><td>Penitipan Anak</td><td>261.398.532</td><td>529</td><td>494.137</td><td>41.178</td></tr><tr><td>4</td><td>Transport</td><td>Workers Transport</td><td>596.658.132</td><td>529</td><td>1.127.898</td><td>93.992</td></tr><tr><td></td><td></td><td>total in-kind benefit</td><td>19.718.964.998</td><td></td><td>15.490.234</td><td>1.290.853</td></tr><tr><td></td><td></td><td>Average Monthly THP salary worker</td><td></td><td></td><td></td><td>3.634.451</td></tr><tr><td></td><td></td><td>Total Value of Prevailing Wage</td><td></td><td></td><td></td><td>4.925.304</td></tr></table>	No	Benfit	Penjelasan	Total Cost	No. Of Unit	Unit Cost Per Year	Per Worker	1	Housing	Cost Per Housing - Benefit in 30 years	13.736.690.082	326	1.404.570	117.047			Housing Maintenance	340.631.364	326	1.044.881	87.073			Electricity Supply	1.720.109.544	326	5.276.410	439.701			Water Supply	298.409.736	326	915.367	76.281			Community Building Maintenance (Masjid, TPA, dll)	1.283.603.784	529	2.426.472	202.206	2	Health	Transport (Ambulance)	123.415.620	529	233.300	19.442			Dokter Visit (include Posyandu Cost)	203.337.216	529	384.380	32.032			Other Health Cost (extra fooding posyandu, etc)	125.225.528	529	236.721	19.727	3	Social	Sports & Other Transport	15.697.260	529	29.673	2.473			Sports Equipment & fascilities	92.448.132	529	174.760	14.563			School Transport (Bus Sekolah)	330.136.812	529	624.077	52.006			Bantuan Perayaan Hari Besar (17 Agustus, Tahun Baru, Keagamaan, dll)	143.460.000	529	271.191	22.599			Guru	447.743.256	529	846.396	70.533			Penitipan Anak	261.398.532	529	494.137	41.178	4	Transport	Workers Transport	596.658.132	529	1.127.898	93.992			total in-kind benefit	19.718.964.998		15.490.234	1.290.853			Average Monthly THP salary worker				3.634.451			Total Value of Prevailing Wage				4.925.304	Complied
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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	<p>Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>The company shows a Man Power Analysis document including the following information :</p> <table><tr><th>Estate</th><th>Type</th><th>PKWT</th><th>SKU</th></tr><tr><td rowspan="2">Sekunyir</td><td>FFB Cutter</td><td>36</td><td>37</td></tr><tr><td>FFB Carrier</td><td>4</td><td>23</td></tr><tr><td>Seruyan</td><td>FFB Cutter</td><td>57</td><td>64</td></tr></table> <p>SKF</p> <table><tr><th>Station</th><th>Blue Print</th><th>Budget 2024</th><th>SKU</th><th>PKWT</th><th>Total</th></tr><tr><td>Boiler</td><td>6</td><td>6</td><td>2</td><td>2</td><td>4</td></tr><tr><td>Pressing</td><td>4</td><td>4</td><td>2</td><td>2</td><td>2</td></tr></table> <p><i>Minor Non-conformity:</i> <i>Based on the results of document review and interviews with employee representatives and management representatives, it is known that there is use</i></p>	Estate	Type	PKWT	SKU	Sekunyir	FFB Cutter	36	37	FFB Carrier	4	23	Seruyan	FFB Cutter	57	64	Station	Blue Print	Budget 2024	SKU	PKWT	Total	Boiler	6	6	2	2	4	Pressing	4	4	2	2	2	<p>Non-compliance (2468985-202403-N2)</p>
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		<p><i>of PKWT personnel for the harvest and processing process at PKS. The results of the RSPO Internal Audit on 11 – 15 December 2023 have stated the inappropriateness of the use of PKWT workers for permanent work. Furthermore, in the Management review on 20 February 2024, this issue was also declared closed.</i></p> <p><i>However, based on the employee list updated in February 2024, it is known that there is still use of PKWT in harvesting and processing with the following details:</i></p> <ul style="list-style-type: none"> <i>• SKE: 47 Harvesters and 4 Carriers</i> <i>• SRE: 38 Harvesters and 14 pickers</i> <i>• SKF: 18 process workers</i> <p><i>Employee Appointment Plan</i></p> <ul style="list-style-type: none"> <i>• SKE: Letter Number 004/SKE/I/2024 dated 20 January 2024 to the CEO of KTB for the appointment and extension of PKWT employees, one of which is with the type of work Harvest, 34 people submitted as SKU, 1 person extended PKWT, and 5 people added PKWT</i> <i>• SRE: Letter Number 029/SRE-Int/I/2024 dated 30 January 2024 to the CEO of KTB for the appointment of 31 harvesting employees to SKU.</i> <p><i>The letter has been signed by the CEO of KTB on 7 February 2024, and still waiting approval from the Head of Strategy Innovation and Transformation. There are still three more levels that have not agreed, namely: Head of SIT, Head HR & Corporate Support, and COO Upstream Indonesia.</i></p> <p><i>During this audit, there were still core jobs being carried out by PKWT workers. Apart from that, it was also found that there were still PKWT workers for harvesting and processing at the mill who had just newly joined in January - March 2024.</i></p>	
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		<i>Based on the description above, it can be concluded that the Company has not been able to show sufficient evidence that all core work has been carried out by permanent workers.</i>	
Criteria 6.3: The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			
6.3.1	<p>(C) A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	Unit of certification has established the policy of recognizing freedom of association and right to collective bargaining, which is contained in the Guidelines for Sustainable Plantation Management No. 724/TQEM-SPMS/09. The policy was explained that in order to realize harmonious industrial relations, dynamic and fair company implemented industrial relations of each operational unit to recognizing freedom of association and right to collective bargaining. This policy is publicly available, and stakeholder can access it upon request. Structure of Labor Union (Serikat Pekerja Seluruh Indonesia/SPSI) presented in document of Decree No. 099/PC-FSPP-SPSI/KTB/X/2018 dated 26 October 2018.	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.</p> <p>- Minor compliance -</p>	Record of labour union meeting for example held in 23 February 2023 discussed about implementation of wage adjustment, OHS day, and Zero Accident target.	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.</p> <p>- Minor compliance -</p>	Interview result from worker representative said that Top Management never interfere worker organization. Communication and coordination opportunities are always well facilitated.	Complied
Criteria 6.4: Children are not employed or exploited.			

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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 -	Unit of certification has established and documented policy or the protection of children, including prohibition of child labour as per "Social Policy", signed by Head Plantation since December 2011. Stated in point 6 that Plantation upstream Indonesia prohibits to use forced labour or child labour. In the SOP of Employee Recruitment (No. 394/ITH-SOP-26/11 dated 5 January 2022) also mentioned that Unit of certification will not recruit the candidate under 18 years old.	Complied
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 -	Evidence of no child labour has been implemented shown with following detail: - The job requirements state that the minimum age applicants is 18 years. - Results of employee document verification for the February 2024 update revealed that there were no employees who started working for the first time with the company under the age of 18 years old. - Based on a sampling of work agreement letters, it is known that there were no workers under the age of 18 years old when they first started working at the company. - Interview with worker representative revealed that they aware about child labour policy. - Interview with Labour Agency of Kotawaringin Barat Regency revealed that there is no issue related Child Labour in the company.	Complied
6.4.3	(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work. - Critical (Major) compliance -	There is no young person who work with the company. Minimum age for worker are 18 years old.	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -	No child labour policy has been regularly disseminated to internal and external stakeholder, the latest dissemination for example: - 6 February 2024 to all resident in SKE and SKF. - 23 February 2024 to all worker in SRE (Include for the contractor). Interview result with related stakeholder for example village representative and agencies representative, known that all of company policy has been disseminated at least once a year. Field observation result to the company	Complied

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		activities for example upkeep, manuring, pesticide application, mill processing, and others there is no child labour found. Workers and supervisor also have good knowledge related prohibition of child labour as described in the policy.	
Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p>(C) A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Company has established a policy under Minamas Corporate Group as per "Gender Policy" dated 11 April 2011. In the policy point 1 stated that company commit to prevent the sexual harassment "Endeavour top prevent sexual harassment and all other forms of violence against women, workers and community".</p> <p>Results of interviews with employee representatives and the gender committee revealed that so far there had never been any incidents of sexual harassment or violence in the workplace. If this occurs, the reporting flow is through the gender committee or direct supervisor.</p>	Complied
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>In the company regulation period 2023 – 2025, stated the company strictly protect of reproductive rights to all employees. Implementation of this policy shown by Maternal and Menstrual Leave for worker. Results of interviews with employee representatives and the gender committee revealed that maternal and menstrual leave has been implemented by the company.</p>	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.</p> <p>- Minor compliance -</p>	<p>Interview result with gender committee, known that the Unit of Certification has assessed needs of new mother using direct interview method. The facilities provided by the company to new mothers who have just given birth include daycare, health checks through <i>Posyandu</i> (Integrated Healthcare Center) and consultations at clinics as well as to provide breastfeeding time. Apart from that, an assessment was also carried out regarding access to obtain baby needs such as formula milk and personal care.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.</p>	<p>Company has a procedure No. 01/MPK-OU/XII/21 dated 1 December 2021 which described timing to respond the grievance (max 14 days), to ensure the anonymity of any party if requested, and grievance resolution without any reprisal or intimidation. If the cases cannot be handled at Estate/Mill level, the</p>	Complied

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	- Minor compliance -	cases will be escalated to the next level of management, using mediator, or to be escalated to the court or RSPO website (complaint panel). Interview result with representative of Pembuang Hulu II Village and Amin Jaya Village, known that they have aware about how to submit a complaint and the PIC who will handle it.	
Criteria 6.6: No forms of forced or trafficked labour are used.			
6.6.1	(C) All work is voluntary and the following are prohibited: <ul style="list-style-type: none"> Retention of identity documents or passports; Payment of recruitment fees; Contract substitution without worker's consent Involuntary overtime; Lack of freedom of workers to resign Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement Debt bondage Withholding of wages - Critical (Major) compliance -	All workers who work in the PT Indotruba Tengah based on an agreement between both parties. The company also has a commitment to fostering basic working relationships as can be seen in several documentation as follows: <ul style="list-style-type: none"> There are established procedures and policies relating to employment. There is worker agreement which has been agreed by both parties. There is a Company Regulation period 2023 – 2025 which has been approved by Labour Agencies of Kotawaringin Barat Regency. Interview result of worker representative there is no issue related worker welfare. Company has implemented HR management in accordance with regulations.	Complied
6.6.2	(C) Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available. <ul style="list-style-type: none"> - Critical (Major) compliance - 	Step of Specified Time Work Agreement (PKWT) recruitment at unit of certification refers to corporate procedure for hiring worker, regulated that hiring and promotion of workers based on skill, work experiences, and job evaluation as per document " <i>Standard Operating Procedure – Penerimaan Karyawan</i> " (No. 394/ITH-SOP-26/11 - dated 23 January 2023). The procedure has explained: <ul style="list-style-type: none"> Prepared meet the standard of competence that inferred in the Position Description and Job Profile. 	Complied

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		<ul style="list-style-type: none"> Job opportunities were communicated and given to surrounding villagers as a priority where no discrimination was observed during interviews and related records of workers being employed. All workers have been treated equally in accordance with company regulations including the rights of worker as well. <p>Apart from that, it is also contained in a work agreement for a certain period of time signed by both parties.</p>	
Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>PT Indotruba Tengah – Sekunyir POM has established a P2K3 Structure (Occupational Health and Safety Committee) in accordance with national regulations. The P2K3 Structure has been officially endorsed by the Manpower Agency of Kalimantan Tengah Province, as per Decree No. 226/DISNAKETTRANS/XII/2023 issued on 19 December 2023. The attached document includes details of the P2K3 structure as well as the firefighting team structure.</p> <p>According to national regulation, the P2K3 Secretary must be a licensed OHS Expert. The OHS Expert is Mr. Asmara Hadi with details below:</p> <ul style="list-style-type: none"> OHS Expert Certificate No. 13.2257/AK3/U/VII/2013 dated 4 July 2013. OHS Expert License Reg. No. 6196/PK3/AJ/31/2020/P2 valid thru 20 January 2023 (letter application the license extension: 288/AMU/K3/II/2023 – dated 21 February 2023). <p>There is no change related to the P2K3 structure of PT ITH until this ASA 2_2. Regular meetings involving management and workers have been conducted to implement, discuss, and evaluate the OHS program and incident.</p> <p>Sample seen on the last OHS meeting dated 24 January 2024, sighted agenda:</p> <ul style="list-style-type: none"> Update of P2K3 Organization Structure and Emergency Response Team for period 2024. 	Complied

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		<ul style="list-style-type: none"> - RSPO ISPO refreshment for period 2024. - Activity of national OHS month period February 2024. <p>PT Indotruba Tengah – Sekunyir POM consistently submits Occupational Health and Safety (OHS) reports every three months to the Department of Manpower and Transmigration of Kotawaringin Barat District. This practice is reflected in the document titled "Laporan P2K3 PT Indotruba Tengah – PKS Sekunyir periode October – December 2023." The report was officially received and stamped by the Department of Manpower and Transmigration on 24 January 2024.</p>	
6.7.2	<p>Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>PT Indotruba Tengah – Sekunyir POM has established accident and emergency procedures in Bahasa Indonesia, ensuring clarity and comprehension for all workers. The Emergency Response procedure, outlined in "SOP of Emergency Respond No. 7300/PSQM-ESH/13," encompasses preventive measures, preparation and mitigation strategies, physical readiness and training, communication protocols, and detailed steps for emergency response mitigation. Various emergency scenarios, including accidents, fires, earthquakes, and chemical spillages, have been identified and addressed within these procedures. The procedure described the description of emergency may happen in plantation and mill, roles and responsibilities of each emergency response team include the mechanism how to conduct medical evacuation to near hospital/local health center, also it was available the emergency contact number of each internal emergency team and external related parties. Evacuation route and muster point are available and made known to the employee. There is no change related to the SOP until this ASA 2_2 audit.</p> <p>The structure of Emergency Response Team (ERT) has been established and been approved by Manpower Agency based on Decree No. 226/DISNAKETTRANS/XII/2023 dated 19 December 2023. The attachment is P2K3 structure and firefighting team structure and consisted of: ERT commander, Fire Fighting Commander, Community Team, Fire Fighting Team, Transportation Team, Communication Team, and Evacuation Team. The list of</p>	Complied

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		<p>protection equipment for emergencies was available such as fire extinguisher, fire engine.</p> <p>The awareness of employee was gained with the simulation of emergency response and Fire training conducted annually both for Mill and Estate. Last training conducted on 31 October 2023, location at Sekunyir POM. Data seen: scenario, attendance list, documentation, and evaluation.</p> <p>Evacuation routes and emergency flowcharts have been disseminated during simulation. Emergency signboards were provided in several areas. Muster points for each area such as workshop, warehouse and office were sighted.</p> <p>PT Indotruba Tengah – Sekunyir POM has assigned the first aider on behalf Angga Prasetya. He has been certified as first aider based on Certificate No: Ser.1485-P3K/9/2022 dated 12 September 2022. (Valid until 5 years).</p> <p>As of the year 2024 update, first aid equipment is readily available across the worksites. There are 23 first aid kits stationed in Sekunyir Estate, 8 in Sekunyir Factory/Mill, and 24 in Seruyan Estate. Monthly monitoring of these first aid kits is diligently carried out. Evidence of this monitoring process can be provided during the ASA 2_2 assessment.</p> <p>All accidents are systematically recorded and periodically reviewed during Occupational Health and Safety (OHS) Committee meetings. These records are documented in both Accident Reports and Lost Time Injury (LTI) Reports. The data from these reports will be referenced in indicator 6.7.5.</p>	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>PT. Indotruba Tengah provided PPE for worker free of charge. This is confirmed through interview with sampled worker.</p> <p>Provision of PPE document has verified as follows:</p> <ul style="list-style-type: none"> - Provision of PPE (safety boot) to 9 harvesters, 6 fertilizers, 5 sprayers, dated 3 March 2024 at Sekunyir Estate. - Provision of PPE (safety boot) to 8 harvesters, dated 1 December 2023 at Seruyan Estate. - Provision of PPE (safety boot, helm) to 7 securities, dated 27 February 2024 	<p>Non-compliance (2468985-202403-M2)</p>

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		<p>at Sekunyir POM.</p> <ul style="list-style-type: none"> - Provision of PPE (safety boot, helm, ear plug/ear muff) to 105 workers, dated 28 November 2023 at Sekunyir POM. <p>Monitoring of PPE minimum stock – connected to SAP and alerting Manager for immediate purchase “PPE One Alert System”. Sighted Purchase Request “Permintaan Pembelian Non Kapital No. EST/SKE/I/2023/009” dated 15 January 2023 for rubber boots, helmet, sickle cover knife cover, axe cover, apron, filtered masker, rubber hand glove, goggle, ear plug, safety shoes, welding goggle.</p> <p>Sanitation facilities has available in the Sekunyir and Seruyan Estate, the facilities have been observed by the auditor during ASA 2_2, the facilities were sufficient and suitable for workers to use.</p> <p><i>Critical Non-conformity:</i></p> <p><i>Based on field observations in the factory area (Press Station), it was found that press operators did not use appropriate PPE (ear protection) when working, even though PPE (ear plugs) had been provided by the company. It is known that the worker used earphones that connected to a cell phone device while working.</i></p> <p><i>In the press station area, the organization has posted a warning that workers must wear helmets, safety shoes and ear protection.</i></p> <p><i>Furthermore, the results of noise analysis in the Press Station area in Semesters I and II 2023 (RKL RPL Report) show values of 87 and 89 dB (Threshold Value 85 dB) so that the recommendations from the 2023 RKL RPL report include “every worker who works at the factory are required to use ear protectors (ear plugs/ear muffs) to protect hearing”.</i></p>	
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 covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.	<p>PT Indotuba Tengah – Sekunyir POM provide clinics in each Estate including its paramedic of nurse and midwife. A company doctor also available in regional scope (covering several companies in the group).</p> <p>For annual medical check-up has been conducted in August 2023 in corporation with DNA Laboratory. Sample seen:</p>	Complied

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	<p>- Minor compliance -</p>	<ul style="list-style-type: none"> - Certificate of Examination Results, No. 601/CPK/VIII/2023 dated 28 August 2023 on behalf Ny Sarvina (pesticides applicator – Seruyan Estate). - Certificate of Examination Results, No. 605/CPK/VIII/2023 dated 28 August 2023 on behalf Ny Dwi Lestari (pesticides applicator – Seruyan Estate). - Certificate of Examination Results, No. 603/CPK/VIII/2023 dated 28 August 2023 on behalf Ny Listiana (pesticides applicator – Seruyan Estate). - Certificate of Examination Results, No. 588/CPK/VIII/2023 dated 28 August 2023 on behalf Ny Siti Khomyati (pesticides applicator – Seruyan Estate). - Certificate of Examination Results, No. 604/CPK/VIII/2023 dated 28 August 2023 on behalf Ny Winarni (pesticides applicator – Seruyan Estate). - Certificate of Examination Results, No. 780/CPK/VIII/2023 dated 28 August 2023 on behalf Ny Firna (pesticides applicator – Sekunyir Estate). - Certificate of Examination Results, No. 770/CPK/VIII/2023 dated 28 August 2023 on behalf Ny Dalniyah (pesticides applicator – Sekunyir Estate). - Certificate of Examination Results, No. 771/CPK/VIII/2023 dated 28 August 2023 on behalf Ny Erni Refianti (pesticides applicator – Sekunyir Estate). - Certificate of Examination Results, No. 769/CPK/VIII/2023 dated 28 August 2023 on behalf Ny Dewi Astuti (pesticides applicator – Sekunyir Estate). - Certificate of Examination Results, No. 677/CPK/VIII/2023 dated 28 August 2023 on behalf Ahmad Nur (Sterilizer Operator – Sekunyir POM). - Certificate of Examination Results, No. 702/CPK/VIII/2023 dated 28 August 2023 on behalf Galih Catur (Tippler Operator – Sekunyir POM). - Certificate of Examination Results, No. 696/CPK/VIII/2023 dated 28 August 2023 on behalf Bryan Tara (Press Operator – Sekunyir POM). <p>PT Indotruba Tengah – Sekunyir POM has also provided the employees with employment and health insurance (BPJS Ketenagakerjaan and BPJS Kesehatan) to cover occupational accident and medical insurance in accordance with the</p>	
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		<p>national regulation, which is routinely paid every month for all workers including the dependent for health insurance.</p> <p>Data seen: the employment insurance has been paid, period February 2024. Bank BNI Voucher number 8888xxxx76– subject: Pembayaran Iuran BPJS Ketenagakerjaan and Kesehatan Februari 2024 dated 8 March 2024.</p>																														
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>PT Indotruba Tengah – Sekunyir POM has recorded its occupational injuries using Lost Time Accident (LTA) metrics.</p> <p>LTA report of 2023 has been made by each estate and mill as below:</p> <table><tr><th rowspan="2">Unit</th><th colspan="5">Year to date</th></tr><tr><th>Case</th><th>LTI</th><th>WH</th><th>FR</th><th>SR</th></tr><tr><td>Sekunyir Estate</td><td>0</td><td>-</td><td>848,854</td><td>-</td><td>-</td></tr><tr><td>Seruyan Estate</td><td>0</td><td>-</td><td>731,927</td><td>-</td><td>-</td></tr><tr><td>Sekunyir POM</td><td>0</td><td>-</td><td>277,359</td><td>-</td><td>-</td></tr></table>	Unit	Year to date					Case	LTI	WH	FR	SR	Sekunyir Estate	0	-	848,854	-	-	Seruyan Estate	0	-	731,927	-	-	Sekunyir POM	0	-	277,359	-	-	Complied
Unit	Year to date																															
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Sekunyir POM	0	-	277,359	-	-																											
Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.																																
Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.																																
7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>The unit of certification has planned, implemented and monitored Integrated Pest Management (IPM). PT Indotruba Tengah prepared Integrated Pest Management Plan “Program dan Penanganan Hama dan Penyakit Tanaman serta Pengendalian Hama Terpadu 2024”. There is no change in IPM plans from the previous year.</p> <table><tr><th>Type of Pest & Disease</th><th>Activity</th><th>Time frame</th><th>Remarks</th></tr></table>	Type of Pest & Disease	Activity	Time frame	Remarks	Complied																									
Type of Pest & Disease	Activity	Time frame	Remarks																													

		Bagworm and nettle caterpillar infestation	Monitoring/census for bagworm and nettle caterpillar infestation	Every month	-		
			Nettle caterpillar control		Chemical control implemented when pest infestation surpassed economic threshold.		
			Manual control				
			Handpicking				
			Handpicking the cocoon				
			Chemical control				
			Fogging with insecticide				
			Spraying insecticide with knapsack				
			Biological control		Planting of beneficial plant depends on rainfall condition.		
			Planting and maintenance beneficial plant 20% <i>Antigonon leptopus</i> , 20% <i>Turnera subulata</i> , 60% <i>Cassia tora</i>	January – March; October - December			
		Rat and squirrel infestation	Monitoring barn owl box and the population	Every month	-		
			Monitoring the area and level of rat and squirrel infestation	Every month	-		
		<i>Oryctes</i> / Rhino	Monitoring <i>Oryctes</i> infestation and monitor the area (mapping)	Every month	-		

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		beetle infestation	Installation of Pherotrap		Control implemented when infestation beyond economic threshold.
			Chemical control		
		<i>Ganoderma sp</i> infestation	Monitoring <i>Ganoderma sp</i> infestation and monitor the area (mapping)	Every month	-
			Making isolation ditch and thinning out on palm infested with <i>Ganoderma</i>		Control implemented when infestation beyond economic threshold.

Sample of implementation record verified:
Based on summary of IPM Sekunyir Estate FY 2024:

- Nettle caterpillar and bagworm; no infestation.
- Rat; no infestation.
- Ganoderma; no infestation.
- Termite; no infestation.
- Oryctes; 1.95% of infestation; controlled by application of insecticide, and Pherotrap installation.

Beneficial planting report “Rekapitulasi Sensus dan Pengendalian Ulat Sekunyir Estate – Penanaman Beneficial Plant” period Jan 2024; Field C001 planted with *Turnera subulata* – 350 meters. *Cassia cobanensis*, *Antigonon leptopus*, are not planted in January due to dry season.

Barn owl box monitoring in Seruyan Estate recorded in “Format Sensus Burung Hantu” period February 2024, described there are 110 occupied BOB, 59 unoccupied BOB, and 132 population of Barn-owl.

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		<p>Based on summary of IPM Seruyan Estate FY 2024:</p> <ul style="list-style-type: none"> - Nettle caterpillar and bagworm; YOP 2013, 2014, 2015, 1993, 1994, 2019 and 2023 no infestation; YOP 2021 – 0.07 Ha, YOP 2021 – 0.18 Ha, YOP 2022 – 0.42 Ha; controlled by fogging and hand picking. - Rat; no infestation. - Ganoderma; no infestation. - Termite; no infestation. - Oryctes; YOP 2020 – 0.05 Ha, YOP 2021 – 0.11 Ha, YOP 2022 – 0.12 Ha, YOP 2023 – 0.03; controlled by application of insecticide, Pherotrap installation and Hand Picking of Larvae. <p>Beneficial planting report "Rekapitulasi Sensus dan Pengendalian Ulat Seruyan Estate – Penanaman Beneficial Plant" period Jan 2024; Field E016 planted with <i>Turnera subulata</i> – 350 meters. <i>Cassia cobanensis</i>, <i>Antigonon leptopus</i>, are not planted in January due to dry season.</p> <p>Barn owl box monitoring in Seruyan Estate recorded in "Format Sensus Burung Hantu" period February 2024, described there are 65 occupied BOB, 165 unoccupied BOB, and 129 population of Barn-owl.</p>	
7.1.2	<p>Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>The unit of certification has conducted evaluation of invasive species according to Minister of Environment and Forestry Regulation No. P. 94/MENLHK/SEKJEN/KUM.1/12/2016 and CABI.</p> <p>Species evaluated by the unit of certification such as:</p> <ul style="list-style-type: none"> - <i>Tyto alba</i> (Barn owl) as predator for rat and squirrel. Company made review to CABI list – Invasive Species Compendium. The CABI data list stipulates <i>Tyto alba</i> distribution in Indonesia was origin native and not invasive, based on reference to Bruce, 1999. - <i>Antigonon leptopus</i> (Coral vine) as natural host for caterpillar predator. Company made review to CABI list – Invasive Species Compendium. The CABI data list stipulates <i>Antigonon leptopus</i> distribution in Indonesia was 	Complied

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		<p>introduced and no invasive status, based on reference to Burke and DiTommaso, 2011.</p> <p>Company made review to CABI list – Invasive species Compendium. The CABI data list stipulates <i>Cassia cobanensis</i> and <i>Turnera subulate</i> as – “No matches record found”.</p> <p>The unit of certification regularly implements monitoring and control of the spread of those species.</p>	
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>Based on field visit and document review, there is no use of fire for pest control in whole area of Sekunyir Estate and Seruyan Estate.</p>	Complied
Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>Based on document verification and management interviews, it was revealed that pesticide usage within the company is limited to chemical weeding and pest control only when necessary. The recommendation for pesticide use is outlined in the "Standard Operation Procedure Referensi Manual Agronomi Penanaman Kelapa Sawit No.POLICY:110/EST-ARM/13" dated September 16, 2013. Section 15, "Proteksi Tanaman," Sub-section 2 details the types of pests, active ingredients for control, active ingredient percentages, application rates, and dilution rates for both mature and immature palm trees.</p> <p>The SOP also covers prerequisites for the census process, economic thresholds, application tools, calibration, application dosages, and the use of beneficial plants.</p> <p>Spraying activities are conducted selectively, targeting specific areas such as circles, paths, and TPH (marketplaces) for weed control. Other areas aside from these specific targets are not treated. Furthermore, spraying is prohibited in riparian areas along the river to minimize negative environmental impacts on the river and ecosystem.</p> <p>All pesticides and herbicides used by the company are registered in the pesticide</p>	Complied

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book maintained by the "Komisi Pesticida" and possess permits from the government.

Type of pesticide use by Estates and its weeds target are as follow:

Agro chemical	Active ingredients	Register No.	Weeds target
Ally 20 WP	Methyl metsulfuron	RI.010301198837	<i>Ageratum conyzoides</i> , <i>Mikania sp</i> , <i>Pueraria javanica</i> ;
Basta 150 SL	Amonium Glufosinat 150 g/l	RI.01030119921113	Wide leaf (<i>Ageratum conyzoides</i>); narrow leaf (<i>Axonophus compressus</i> , <i>Imperata cylindrica</i> , <i>Ischaemum timorense</i> , <i>Ottochloa nodosa</i> , <i>Setaria palmifolia</i>).
Capture 50 EC	Cypermethrin	RI.01010120031874	Pest
Centalon 480 EC	Triklopir Butoksi Etil	RI.01030120103716	General weed
Dithane 800 WP	Mankozeb	RI.010201197459	Fungi
Elang 480 SL	Isopropil Amina Glifosat 480 g/l	RI.01030119941170	Narrow leaf weed, <i>Asystasia</i> , <i>Imperata cylindrical</i>
Kencepat 75 SP	Acephate	RI.01010120103756	Pest, caterpillar
Kenlon 480 EC	Trikolopir Butoksi Etil 480 g/l	RI.01030120062433	Wood
Kenlly 20 WG	Methyl metsulfuron	RI.01040120062432	<i>Chromolaena adorata</i> , <i>Ageratum conyzoides</i> , <i>Clidemia hirta</i>
Ken Up 480 SL	Glyphosate	RI. 01030120062435	Wide leaf (<i>chromolaena adorate</i> , <i>Syndrella nodiflora</i> , <i>Mikana micrantha</i>); narrow leaf (<i>Ottochloa nodosa</i>)

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		<table><tr><td>Kenrane 288 EC</td><td>Floroksipir 1- MHE : 288 g/l</td><td>RI.01010120103759</td><td><i>Legume, Asystasia</i></td></tr><tr><td>Lifeline 280 SL</td><td>Amonium Glyphosate</td><td>RI.01030120175849</td><td>Narrow leaf and Wide leaf weed</td></tr><tr><td>Metaprima 20 WG</td><td>Methyl metsulfuron</td><td>RI.01030120031897</td><td><i>Chromolaena adorata,</i> <i>Ageratum conyzoides,</i> <i>Clidemia hirta</i></td></tr><tr><td>Prima Up 480 SL</td><td>Isopropilamina Glyphosate</td><td>RI.01030120031779</td><td>Narrow leaf weed</td></tr></table>	Kenrane 288 EC	Floroksipir 1- MHE : 288 g/l	RI.01010120103759	<i>Legume, Asystasia</i>	Lifeline 280 SL	Amonium Glyphosate	RI.01030120175849	Narrow leaf and Wide leaf weed	Metaprima 20 WG	Methyl metsulfuron	RI.01030120031897	<i>Chromolaena adorata,</i> <i>Ageratum conyzoides,</i> <i>Clidemia hirta</i>	Prima Up 480 SL	Isopropilamina Glyphosate	RI.01030120031779	Narrow leaf weed															
Kenrane 288 EC	Floroksipir 1- MHE : 288 g/l	RI.01010120103759	<i>Legume, Asystasia</i>																														
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Prima Up 480 SL	Isopropilamina Glyphosate	RI.01030120031779	Narrow leaf weed																														
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Document “Rekapitulasi LD50 dan Actual Pemakaian Pestisida” recorded pesticides use including active ingredients, LD50, area treated, amount of active ingredients applied per Ha and per ton FFB.</p> <p>Pesticide use in Sekunyir Estate for period January – December 2023:</p> <table><tr><th>Trademark</th><th>UoM</th><th>Volume</th></tr><tr><td>Kenlon 480 EC</td><td>Liter</td><td>55</td></tr><tr><td>Centalon 480 EC</td><td>Liter</td><td>1,577</td></tr><tr><td>Capture 50 EC</td><td>Liter</td><td>1,000</td></tr><tr><td>Prima Up 480 SL</td><td>Liter</td><td>439</td></tr><tr><td>Metaprima</td><td>Kg</td><td>132</td></tr><tr><td>Dithane 800 WP</td><td>Liter</td><td>3</td></tr><tr><td>Kencepat 75 SP</td><td>Liter</td><td>129</td></tr><tr><td>Basta</td><td>Liter</td><td>367</td></tr><tr><td>Supremo</td><td>Liter</td><td>2,332</td></tr></table>	Trademark	UoM	Volume	Kenlon 480 EC	Liter	55	Centalon 480 EC	Liter	1,577	Capture 50 EC	Liter	1,000	Prima Up 480 SL	Liter	439	Metaprima	Kg	132	Dithane 800 WP	Liter	3	Kencepat 75 SP	Liter	129	Basta	Liter	367	Supremo	Liter	2,332	Complied
Trademark	UoM	Volume																															
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		<div>Pesticide use in Seruyan Estate for period January – December 2023:</div> <table><tr><th>Trademark</th><th>UoM</th><th>Volume</th></tr><tr><td>Centalon 480 EC</td><td>Liter</td><td>150</td></tr><tr><td>Lifeline 280 SL</td><td>Liter</td><td>525</td></tr><tr><td>Capture 50 EC</td><td>Liter</td><td>2,291</td></tr><tr><td>Metaprima</td><td>Kg</td><td>161</td></tr><tr><td>Kenrane 288 EC</td><td>Liter</td><td>48</td></tr><tr><td>Manthene 75 SP</td><td>Liter</td><td>13</td></tr><tr><td>Basta 150 SL</td><td>Liter</td><td>121</td></tr><tr><td>Supremo 480 AS</td><td>Liter</td><td>3,891</td></tr><tr><td>Triester 480 EC</td><td>Liter</td><td>47</td></tr><tr><td>Kencis 260EC</td><td>Liter</td><td>1,205</td></tr></table>	Trademark	UoM	Volume	Centalon 480 EC	Liter	150	Lifeline 280 SL	Liter	525	Capture 50 EC	Liter	2,291	Metaprima	Kg	161	Kenrane 288 EC	Liter	48	Manthene 75 SP	Liter	13	Basta 150 SL	Liter	121	Supremo 480 AS	Liter	3,891	Triester 480 EC	Liter	47	Kencis 260EC	Liter	1,205	
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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 -	Minimizing pesticide usage is integrated into the plan, aligning with Integrated Pest Management (IPM) Plans. No pesticides are applied outside the specified target species and planned intervals. Pesticides are solely employed to mitigate existing pests that have surpassed the economic threshold.	Complied																																	
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines. - Minor compliance -	The prophylactic use of pesticides is absent across Sekunyir Estate and Seruyan Estate. Pesticides and herbicides are exclusively applied to mitigate or eradicate existing pests that have surpassed the economic threshold.	Complied																																	
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence	Analysis of goods in and out of the pesticide store confirms that the unit of certification refrains from utilizing pesticides classified as World Health Organization Class 1A or 1B, or listed by the Stockholm or Rotterdam Conventions. Moreover, the company ceased the use of paraquat dichloride since	Complied																																	

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	<p>process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:</p> <ul style="list-style-type: none"> - Minor compliance - <p>7.2.5a Judgment of the threat and verify why this is a major threat.</p> <p>7.2.5b Why there is no other alternative which can be used.</p> <p>7.2.5c Which process was applied to verify why there is no other less hazardous alternative.</p> <p>7.2.5d Process to limit the negative impacts of the application.</p> <p>7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p>	<p>2019. This meticulous selection and application of pesticides align with the company's commitment to minimizing environmental impact and promoting sustainable agricultural practices.</p> <p>The strict adherence to these guidelines by the unit of certification ensures the use of safe and responsible products while avoiding hazardous materials known to pose significant risks to human health and the environment. This conscientious approach underscores the company's dedication to environmental stewardship and public health.</p> <p>Based on record review, as stipulated in indicator 7.2.1 there was no use of WHO Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat.</p>	
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>A training session titled "Pelatihan Tim Block Spraying System," conducted on 2 January 2024, was attended by assistants, supervisors, sprayers, and applicators. The session took place at the SRE Meeting Room and covered various aspects including the knowledge of spraying tools and pesticides, proper scheduling and dosage, calibration of spraying tools, Material Safety Data Sheets (MSDS), Personal Protective Equipment (PPE), health and safety guidelines, and first aid procedures (Emergency Response Plan). Additionally, discussions included safety protocols for pesticide handling, relevant national regulations, awareness of symbols and labels, and emergency procedures in case of contamination or toxicity.</p> <p>Workers are able to articulate the purpose of PPE usage, the importance of regular medical check-ups, and adherence to safety protocols during work.</p> <p>Field observations at Block C001 Division 1 in Sekunyir Estate and Block E014 Division 1 in Seruyan Estate confirmed that pesticides are handled and applied by adequately trained personnel. The application process follows standard operating procedures and good agricultural practices.</p>	Complied

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7.2.7	<p>(C) Storage of all pesticides in accordance with recognized best practices.</p> <p>- Critical (Major) compliance -</p>	<p>During the ASA 2_2 assessment in 2024, the audit team conducted field observations and interviews with storage keepers at Sekunyir Estate and Seruyan Estate. It was found that the storage facilities for all pesticides were in good condition.</p> <p>A standardized storage system appears to be uniformly implemented throughout the organization. These storage areas are equipped with adequate air ventilation to ensure proper air circulation. Additionally, hazard signs, emergency showers, secondary containment measures, spill kits, and appropriate Personal Protective Equipment (PPE) such as overalls, face shields, impermeable rubber gloves, aprons, and masks are readily available and prepared for use.</p> <p>Furthermore, comprehensive working instructions for pre-mixing, stacking, and storing pesticides are up-to-date. Material Safety Data Sheets (MSDS) are obtained for all chemicals used, and they are readily available in the areas where mixing takes place. These documents are well-controlled and easily accessible. Additionally, First Aid Kits are readily available in these areas to ensure prompt response to any potential incidents.</p>	Complied
7.2.8	<p>All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.</p> <p>- Minor compliance -</p>	<p>All used pesticide containers from the estates are collected and stored in temporary waste storage for a period ranging from 180 to 365 days before disposal to authorized parties. PT Indotruba Tengah – Sekunyir POM has established a procedure for the disposal of waste materials in accordance with the document "SOP Pengelolaan Limbah B3 & Bukan B3" dated 10 January 2022. This procedure outlines the types of hazardous waste, their sources, and the handling procedures involved. Section 5.2.8 of the SOP specifies that waste containing tin and plastic should be sent to a sanitary landfill for disposal.</p> <p>Based on field visit to Sekunyir Estate Landfill, Block C07-C09 during ASA2.2), there was found that domestical waste has managed properly. The landfill mark is clearly visible.</p> <p>PT Indotruba Tengah – Sekunyir POM has sent the hazardous waste produce to licence vendor PT Indo Rudy Jaya have licensed based on Ministry of Environment and Forestry Decree No. S.21/PSLB3-VPLB3/PPLB3/PLB.3/03/2020</p>	Non-compliance (2468985-202403-N3)

		<p>that valid for 5 year since the issuance, (3) hazardous waste is delivered to licensed collector PT Wastec (license based on Ministry of Environment Decree No S.1090/Menlhk/Setjen/PLB.3/12/2019 dated 20 Dec 2019, valid for 5 years), (4) reporting hazardous waste to Local Environmental Agency.</p> <p>The document on handover the hazardous waste as per "Berita Acara Serah terima Pengkutan Limbah B3", dated 21 December 2023.</p> <p>Manifest of hazardous waste has verified, for samples:</p> <ul style="list-style-type: none"> - Nomor KLHK-1710665080, for used batterai 0.345 MT, was send to PT Indo Rudy Jaya (registered number KLH-4584), dated 21 December 2023. - Nomor KLHK-1710665599, for used filters 0.202 MT, was send to PT Indo Rudy Jaya (registered number KLH-4584), dated 21 December 2023. - Nomor KLHK-1710665789, for used rags 0.037 MT, was send to PT Indo Rudy Jaya (registered number KLH-4584), dated 21 December 2023. - Nomor KLHK-171066130, for pesticides container 1.411 MT, was send to PT Indo Rudy Jaya (registered number KLH-4584), dated 21 December 2023. - Nomor KLHK-1710665050, for medical waste 0.052 MT, was send to PT Indo Rudy Jaya (registered number KLH-4584), dated 21 December 2023. - Nomor KLHK-171066642, for used oil 2.85 MT, was send to PT Indo Rudy Jaya (registered number KLH-4584), dated 21 December 2023. <p><i>Minor Non-conformity:</i></p> <p><i>Based on field verification, it was found that there are ex pesticide containers that used for other purposes, for example:</i></p> <ul style="list-style-type: none"> - <i>At the SRE Traction, there are 3 jerry cans of ex pesticide containers (Supremo) used to store diesel fuel.</i> - <i>At the SKE Division I and II housing complex, there are 2 jerry cans of ex pesticide containers (Supremo) used to store Peralite fuel.</i> 	
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		<i>This is not in accordance with the SOP for Management of Hazardous and Non-hazardous Waste, dated 10 January 2022, pages 16-17.</i>	
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	Based on interview and field visit during ASA 2_2, it was known that there is no pesticides applied aerially in whole area of PT. Indotruba Tengah.	Complied
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>PT Indotuba Tengah – Sekunyir POM provide Clinics in each Estate including its paramedic of nurse and midwife. A company doctor also available in regional scope (covering several companies in the group).</p> <p>For annual medical check-up has been conducted in August 2023 was conducted by DNA Laboratory. Sample seen:</p> <ul style="list-style-type: none"> - Certificate of Examination Results, No. 601/CPK/VIII/2023 dated 28 August 2023 on behalf Ny Sarvina (pesticides applicator – Seruyan Estate). - Certificate of Examination Results, No. 605/CPK/VIII/2023 dated 28 August 2023 on behalf Ny Dwi Lestari (pesticides applicator – Seruyan Estate). - Certificate of Examination Results, No. 603/CPK/VIII/2023 dated 28 August 2023 on behalf Ny Listiana (pesticides applicator – Seruyan Estate). - Certificate of Examination Results, No. 588/CPK/VIII/2023 dated 28 August 2023 on behalf Ny Siti Khomyati (pesticides applicator – Seruyan Estate). - Certificate of Examination Results, No. 604/CPK/VIII/2023 dated 28 August 2023 on behalf Ny Winarni (pesticides applicator – Seruyan Estate). - Certificate of Examination Results, No. 780/CPK/VIII/2023 dated 28 August 2023 on behalf Ny Firna (pesticides applicator – Sekunyir Estate). - Certificate of Examination Results, No. 770/CPK/VIII/2023 dated 28 August 2023 on behalf Ny Dalniyah (pesticides applicator – Sekunyir Estate). 	Complied

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		<ul style="list-style-type: none"> - Certificate of Examination Results, No. 771/CPK/VIII/2023 dated 28 August 2023 on behalf Ny Erni Refianti (pesticides applicator – Sekunyir Estate). - Certificate of Examination Results, No. 769/CPK/VIII/2023 dated 28 August 2023 on behalf Ny Dewi Astuti (pesticides applicator – Sekunyir Estate). - Certificate of Examination Results, No. 677/CPK/VIII/2023 dated 28 August 2023 on behalf Ahmad Nur (Sterilizer Operator – Sekunyir POM). - Certificate of Examination Results, No. 702/CPK/VIII/2023 dated 28 August 2023 on behalf Galih Catur (Tippler Operator – Sekunyir POM). - Certificate of Examination Results, No. 696/CPK/VIII/2023 dated 28 August 2023 on behalf Bryan Tara (Press Operator – Sekunyir POM). <p>For Annual medical check-up period 2024 was carried out in February 2024 by DNA Lab – Pontianak. The analysis result of MCU is still in progress in the DNA Laboratory.</p> <p>PT Indotruba Tengah – Sekunyir POM has also provided the employees with employment and health insurance (BPJS Ketenagakerjaan and BPJS Kesehatan) to cover occupational accident and medical insurance in accordance with the national regulation, which is routinely paid every month for all workers including the dependent for health insurance.</p> <p>Data seen: the employment insurance has been paid, period February 2024. Bank Voucher number: 30/BK/SKE/II/2024 – subject: Pembayaran Iuran BPJS Ketenagakerjaan Februari 2024 for PKWT; Bank Voucher number: 31/BK/SKE/II/2024 – subject: Pembayaran Iuran BPJS Ketenagakerjaan Februari 2024 for PKWTT.</p>	
7.2.11	<p>(C) No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives.</p> <p>- Critical (Major) compliance -</p>	<p>During field visit and interview with female spraying workers in Block E014 Div I Seruyan Estate and Block C001 Div I Sekunyir Estate, it was known that there is no spraying worker is carried out by pregnant or breastfeeding women, or people with medical limitations. Workers who are pregnant, breastfeeding, or have medical limitations will be given equivalent work alternatives.</p>	Complied

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Note For 7.2.11

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

Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.

7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.</p> <p>- Minor compliance -</p>	<p>PT Indotruba Tengah – Sekunyir POM has established a procedure for the handling and management of hazardous waste in accordance with the document "SOP Pengelolaan Limbah B3 & Bukan B3" dated 10 January 2022. This procedure outlines the types of hazardous waste, their sources, and the appropriate handling procedures.</p> <p>Additionally, PT. Indotruba Tengah – Sekunyir POM has conducted an identification of waste and pollution sources, as documented in the "Identifikasi Sumber-Sumber Limbah dan Pencemaran PT. Indotruba Tengah," which was updated on 5 January 2024. Below are the findings of this identification:</p> <ul style="list-style-type: none"> • Waste and pollution source, such as from activities from house, workshop, warehouse, laboratory, used-filter, used-rag, old-iron, used-tires, oil can, grease can, used-bulb, paper, used-helmet, chemical bottle, fertilization activity, workshop, chemical warehouse, spraying, office, housing/ mess, polyclinic, public bathroom. • Hazardous waste such as: used-oil, emission from air pollution, used-oil can, used oil-filter, used-spare part, used rag, used-PPE, used-accumulator, used-bulb, used-sack, used-gloves, used-apron, rinse water, pesticide package, used-oil drum, used-chemical can. • Medical hazardous waste, such as: used injection bottle used injection liquid, used-medicine waste, used-injection needle, used-gloves, expired-medicine, and medicine plastic can and abate. <p>Permit for hazardous waste storage "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Kabupaten Kotawaringin Barat No.</p>	Complied
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		<p>553/011/DPMPTSP-III/LH/2018 tentang Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun kepada PT. Indotruba Tengah-PKS Sekunzir, dated 25 September 2018 and valid until 5 years.</p> <p>During ASA2.2 was verified that organization has a new permit of Hazardous Waste Storage as stated in the Document of Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Propinsi Kalimantan Tengah No. 570/12/LH-SKKL/II/DPMPTSP-2024 dated 1 February 2024 related to "Kelayakan Lingkungan Hidup Kegiatan Perkebunan dan Pabrik Pengolahan Kelapa Sawit PT Indotruba Tengah".</p> <p>PT Indotruba Tengah – Sekunzir POM has sent the hazardous waste produce to licence vendor PT Indo Rudy Jaya have licenced based on Ministry of Environment and Forestry Decree No. S.21/PSLB3-VPLB3/PPLB3/PLB.3/03/2020 that valid for 5 year since the issuance, (3) hazardous waste is delivered to licenced collector PT Wastec (license based on Ministry of Environment Decree No S.1090/Menlhk/Setjen/PLB.3/12/2019 dated 20 Dec 2019, valid for 5 years), (4) reporting hazardous waste to Local Environmental Agency.</p> <p>The document on handover the hazardous waste as per "Berita Acara Serah terima Pengkutan Limbah B3", dated 21 December 2023. Manifest of hazardous waste has verified, for samples:</p> <ul style="list-style-type: none"> - Nomor KLHK-1710665080, for used batterai 0.345 MT, was send to PT Indo Rudy Jaya (registered number KLH-4584), dated 21 December 2023. - Nomor KLHK-1710665599, for used filters 0.202 MT, was send to PT Indo Rudy Jaya (registered number KLH-4584), dated 21 December 2023. - Nomor KLHK-1710665789, for used rags 0.037 MT, was send to PT Indo Rudy Jaya (registered number KLH-4584), dated 21 December 2023. - Nomor KLHK-171066130, for pesticides container 1.411 MT, was send to PT Indo Rudy Jaya (registered number KLH-4584), dated 21 December 2023. - Nomor KLHK-1710665050, for medical waste 0.052 MT, was send to PT Indo Rudy Jaya (registered number KLH-4584), dated 21 December 2023. 	
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		<p>- Nomor KLHK-171066642, for used oil 2.85 MT, was send to PT Indo Rudy Jaya (registered number KLH-4584), dated 21 December 2023.</p> <p>Report on monitoring and management the hazardous waste (3 months bases) has been submitted to Environment Agency as per document "Tanda Terima Elektronik – Sistem Informasi Pelaporan Elektronik Lingkungan Hidup dated 11 January 2024.</p>	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>PT Indotruba Tengah – Sekunyir POM has developed a waste disposal procedure in compliance with the document "SOP Pengelolaan Limbah B3 & Bukan B3" dated 10 January 2022. This procedure delineates the types of hazardous waste, their sources, and the appropriate handling protocols. Specifically, Section 5.2.8 specifies that waste containing tin and plastic should be disposed of in a sanitary landfill.</p> <p>Field observation of Sekunyir Estate Landfill, Block C07-C09 during ASA2_2, there was found that domestical waste has managed properly. The landfill mark is clearly visible.</p> <p>PT Indotruba Tengah – Sekunyir POM has sent the hazardous waste produce to licence vendor PT Indo Rudy Jaya have licenced based on Ministry of Environment and Forestry Decree No. S.21/PSLB3-VPLB3/PPLB3/PLB.3/03/2020 that valid for 5 year since the issuance, (3) hazardous waste is delivered to licenced collector PT Wastec (license based on Ministry of Environment Decree No S.1090/Menlhk/Setjen/PLB.3/12/2019 dated 20 Dec 2019, valid for 5 years), (4) reporting hazardous waste to Local Environmental Agency.</p> <p>However, during field verification at the mill employee compound, it was found that there was 1 empty jerry can of ex chemicals (blue jerry can) at the back of employee's compound, this is raised as noncompliance.</p> <p>The document on handover the hazardous waste as per "Berita Acara Serah terima Pengkutan Limbah B3", dated 21 December 2023. Manifest of hazardous waste has verified, for samples:</p>	<p>Non-compliance (2468985-202403-N4)</p>

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		<ul style="list-style-type: none"> - Nomor KLHK-1710665080, for used batterai 0.345 MT, was send to PT Indo Rudy Jaya (registered number KLH-4584), dated 21 December 2023. - Nomor KLHK-1710665599, for used filters 0.202 MT, was send to PT Indo Rudy Jaya (registered number KLH-4584), dated 21 December 2023. - Nomor KLHK-1710665789, for used rags 0.037 MT, was send to PT Indo Rudy Jaya (registered number KLH-4584), dated 21 December 2023. - Nomor KLHK-171066130, for pesticides container 1.411 MT, was send to PT Indo Rudy Jaya (registered number KLH-4584), dated 21 December 2023. - Nomor KLHK-1710665050, for medical waste 0.052 MT, was send to PT Indo Rudy Jaya (registered number KLH-4584), dated 21 December 2023. - Nomor KLHK-171066642, for used oil 2.85 MT, was send to PT Indo Rudy Jaya (registered number KLH-4584), dated 21 December 2023. <p><i>Minor Non-conformity:</i> Based on field verification at the factory employee compound, it was found that there was 1 empty jerry can of ex chemicals (blue jerry can) at the back of employee's compound. This is not in accordance with the SOP for Management of Hazardous and Non-hazardous Waste, dated 10 January 2022, pages 16-17.</p>	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	<p>There is not enough evidence that the company does not use open fire for waste disposal.</p> <p><i>Minor Non-conformity:</i> Based on field verification, it was found that there were traces of domestic waste burning in employee housing and in housing occupied by civil contractors. This is not in accordance with the requirements in indicator 7.3.3 and in SOP 001/SKE-K3/08/15 dated 15 August 2015 "SOP for Management of Domestic Waste" which is explained in Part IV point c. "Waste burning is prohibited."</p>	Non-compliance (2468985-202403-N5)

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Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.</p> <p>- Minor compliance -</p>	<p>At Sekunyir and Seruyan Estate, a procedure has been implemented to manage soil fertility, as outlined in indicator 3.3.1. The application of manure is guided by fertilizer recommendations established by the Minamas Research Centre. Fertilizer dosages are determined based on the soil requirements, referencing Land Suitability Units (LSU) and soil analyses.</p>	Complied
7.4.2	<p>Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.</p> <p>- Minor compliance -</p>	<p>PT Indotruba Tengah has undergone tissue sample analysis as evidenced by the report titled "Laporan Pengujian Analisa Jaringan Tanaman PT. Indotruba Tengah – Sekunyir Estate No.P60/2023," requested through letter No. 07/PN&P-KTB/03/2023 dated 8 March 2023. The sample was received on 17 March 2023, and the analysis was conducted from 31 March 2023 to 1 April 2023. The report, issued on 5 April 2023, includes parameters such as ash content, levels of P, K, Mg, Ca, and N. The analysis was carried out by the Minamas Research Centre in Teluk Siak, Riau Province.</p> <p>Similarly, another report titled "Laporan Pengujian Analisa Jaringan Tanaman PT Indotruba Tengah – Seruyan Estate No.P62/2023" was obtained based on request letter No. 07/PN&P-KTB/03/2023 dated 8 March 2023. The sample was received on 17 March 2023, and the analysis was conducted from 31 March 2023 to 1 April 2023, with the report issued on 5 April 2023. The analysis results include parameters such as ash content, levels of P, K, Mg, Ca, and N. This analysis was also carried out by the Minamas Research Centre in Teluk Siak, Riau Province.</p> <p>During ASA 2_2, leaf sample analysis for 2024 is under process of analysis.</p> <p>PT Indotruba Tengah demonstrates Soil Analysis report "Hasil Analisa Tanah No.020-LHU/UN8.2.1/PL/2023 Universitas Lambung Mangkurat Lembaga Penelitian dan Pengabdian Kepada Masyarakat Pusat Penelitian Lingkungan Hidup", datum 9 February 2023. The soil analysis reflected the condition of C, N, pF, Ca-dd, Mg-dd, Na-dd, K-dd, Al-dd. Pb, Cu, Cd, Zn and Cation Exchange Capacity.</p>	Complied

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7.4.3	<p>A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>EFB application is done as part of nutrient recycling strategy and recorded regularly. All EFB were sourced from Sekunyir POM. The best practice of EFB application is described in the SOP. Records were available for verification. Based on the records, it was noted that the EFB application rate per hectare was around 30-40 mt/ha.</p> <p>Application records of EFB in PT Indotruba Tengah are presented as per “Monitoring Program & Realisasi Janjang Kosong”, as follow:</p> <table><tr><th>Month</th><th>Actual Application 2023 (kg)</th></tr><tr><td>Jan</td><td>1,898,878</td></tr><tr><td>Feb</td><td>1,577,180</td></tr><tr><td>Mar</td><td>1,653,578</td></tr><tr><td>Apr</td><td>1,554,076</td></tr><tr><td>May</td><td>2,467,008</td></tr><tr><td>Jun</td><td>2,309,886</td></tr><tr><td>Jul</td><td>2,693,388</td></tr><tr><td>Aug</td><td>2,873,593</td></tr><tr><td>Sept</td><td>2,975,939</td></tr><tr><td>Oct</td><td>3,205,954</td></tr><tr><td>Nov</td><td>2,660,963</td></tr><tr><td>Dec</td><td>2,482,409</td></tr><tr><td>Total</td><td>28,352,852</td></tr></table>	Month	Actual Application 2023 (kg)	Jan	1,898,878	Feb	1,577,180	Mar	1,653,578	Apr	1,554,076	May	2,467,008	Jun	2,309,886	Jul	2,693,388	Aug	2,873,593	Sept	2,975,939	Oct	3,205,954	Nov	2,660,963	Dec	2,482,409	Total	28,352,852	Complied
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		<div>Application records of POME in PT Indotruba Tengah in 2023 are presented as per “Program & Realisasi Effluent SKE”, as follow:</div> <table><tr><th rowspan="2">Field No.</th><th colspan="2">Application 2023 (m³)</th></tr><tr><th>Plan</th><th>Actual</th></tr><tr><td>D002</td><td>24,486</td><td>24,203</td></tr><tr><td>D003</td><td>41,885</td><td>27,061</td></tr><tr><td>D005</td><td>22,625</td><td>-</td></tr><tr><td>E001</td><td>18,034</td><td>-</td></tr><tr><td>E002</td><td>90,160</td><td>2,050</td></tr><tr><td>E003</td><td>33,817</td><td>11,397</td></tr><tr><td>Total</td><td>231,007</td><td>64,711</td></tr></table>	Field No.	Application 2023 (m³)		Plan	Actual	D002	24,486	24,203	D003	41,885	27,061	D005	22,625	-	E001	18,034	-	E002	90,160	2,050	E003	33,817	11,397	Total	231,007	64,711	
Field No.	Application 2023 (m³)																												
	Plan	Actual																											
D002	24,486	24,203																											
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Total	231,007	64,711																											
7.4.4	<div>Records of fertilizer inputs are maintained.</div> <div>- Minor compliance -</div>	<div>Unit of certification has recorded and maintained fertilizer input as on “Program & Realisasi Pemupukan”.</div> <div>Fertilizer input Sekunyir Estate:</div> <table><tr><th rowspan="2">Fertilizer type</th><th colspan="2">2023</th></tr><tr><th>Program (kg)</th><th>Actual (kg)</th></tr><tr><td>AC</td><td>142,480</td><td>142,479</td></tr><tr><td>Dolomite</td><td>336,177</td><td>336,176</td></tr><tr><td>MOP</td><td>93,455</td><td>93,455</td></tr><tr><td>HGFB</td><td>23,563</td><td>23,563</td></tr><tr><td>RP</td><td>402,042</td><td>402,042</td></tr><tr><td>NK 16-28</td><td>1,487,047</td><td>1,487,047</td></tr></table>	Fertilizer type	2023		Program (kg)	Actual (kg)	AC	142,480	142,479	Dolomite	336,177	336,176	MOP	93,455	93,455	HGFB	23,563	23,563	RP	402,042	402,042	NK 16-28	1,487,047	1,487,047	Complied			
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		<div>Fertilizer input Seruyan Estate:</div> <table><tr><th rowspan="2">Fertilizer type</th><th colspan="2">2023</th></tr><tr><th>Program (kg)</th><th>Actual (kg)</th></tr><tr><td><i>Mature</i></td><td></td><td></td></tr><tr><td>Dolomite</td><td>312,742</td><td>312,742</td></tr><tr><td>MOP</td><td>99,938</td><td>99,938</td></tr><tr><td>HGFB</td><td>21,151</td><td>21,151</td></tr><tr><td>RP</td><td>352,876</td><td>352,876</td></tr><tr><td>NK 16-28</td><td>1,366,807</td><td>1,366,807</td></tr><tr><td>ZA</td><td>155,758</td><td>155,758</td></tr><tr><td><i>Immature</i></td><td></td><td></td></tr><tr><td>RP</td><td>277,363</td><td>276,675</td></tr><tr><td>CCM-45</td><td>437,601</td><td>401,276</td></tr><tr><td>HGFB</td><td>11,458</td><td>11,458</td></tr><tr><td>Dolomite</td><td>118,220</td><td>118,220</td></tr><tr><td>NK 16-28</td><td>614,212</td><td>613,443</td></tr></table>	Fertilizer type	2023		Program (kg)	Actual (kg)	<i>Mature</i>			Dolomite	312,742	312,742	MOP	99,938	99,938	HGFB	21,151	21,151	RP	352,876	352,876	NK 16-28	1,366,807	1,366,807	ZA	155,758	155,758	<i>Immature</i>			RP	277,363	276,675	CCM-45	437,601	401,276	HGFB	11,458	11,458	Dolomite	118,220	118,220	NK 16-28	614,212	613,443	
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Criteria 7.5: Practices minimise and control erosion and degradation of soils.																																															
7.5.1	<p>(C) Maps that identify marginal and fragile soils, including steep sloped land are available.</p> <p>- Critical (Major) compliance -</p>	<p>PT. Indotruba Tengah presented a semi-detailed soil survey conducted in February 2015, titled "Survey Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia." This survey was undertaken by the Statistic Data Processing Minamas Research Centre.</p>	Complied																																												

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		<p>According to the findings of the soil survey, there is no presence of peat soil in the operational areas of PT. Indotruba Tengah, which includes both Sekunyir Estate and Seruyan Estate.</p> <p>Soil type:</p> <ul style="list-style-type: none">• Soil type in Sekunyir Estate comprise of <i>Humic Endoaquept</i> 126.98 Ha; <i>Ultic Haplortod</i> 740.14 Ha, <i>Grossarenic Kandiudults</i> 1,560.47 Ha, <i>Arenic Plinthic Kandiudult</i> 488.71 Ha, <i>Typic Plinthudult</i> 425.81 Ha.• Soil Type in Seruyan Estate comprise of <i>Humic Endoaquept</i> 282.01 Ha; <i>Grossarenic Kandiudults</i> 1,507.38 Ha, <i>Arenic Plinthic Kandiudult</i> 570.22 Ha, <i>Typic Plinthudult</i> 873.86 Ha. <p>Slope classification:</p> <table><tr><th colspan="2">Slope class</th><th colspan="2">Hectarage</th><th colspan="2">Total</th></tr><tr><th>(%)</th><th>(^o/degree)</th><th>Sekunyir</th><th>Seruyan</th><th>Ha</th><th>%</th></tr><tr><td>0 – 4</td><td>0 – 2</td><td>3,342.11</td><td>1,684.21</td><td>5,026.31</td><td>76.44</td></tr><tr><td>4 – 12</td><td>2 – 6</td><td>0</td><td>1,549.26</td><td>1,549.26</td><td>23.56</td></tr><tr><td colspan="2">Total</td><td>3,342.11</td><td>3,233.47</td><td>6,575.57</td><td>100</td></tr></table> <p>Based on slope classification, there is no fragile soil or erosion prone area.</p>	Slope class		Hectarage		Total		(%)	(^o /degree)	Sekunyir	Seruyan	Ha	%	0 – 4	0 – 2	3,342.11	1,684.21	5,026.31	76.44	4 – 12	2 – 6	0	1,549.26	1,549.26	23.56	Total		3,342.11	3,233.47	6,575.57	100	
Slope class		Hectarage		Total																													
(%)	(^o /degree)	Sekunyir	Seruyan	Ha	%																												
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Total		3,342.11	3,233.47	6,575.57	100																												
7.5.2	<p>The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>Based on field visit and slope classification as described in report of semi-detail soil survey “Survey Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia” dated February 2015, carried out by Statistic Data Processing Minamas Research Centre, there is no steep terrain in PT Indotruba Tengah area. There is no replanting conducted in steep terrain area.</p>	Complied																														

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7.5.3	<p>New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>Based on field visit and Area Statement, there was no new planting in PT. Indotruba Tengah – Sekunyir Estate and Seruyan Estate.</p> <p>Planting years in unit of certification are:</p> <ul style="list-style-type: none"> • Sekunyir Estate planting years comprise: 1992, 1993, 1994, 1995, 2013, 2014, 2015, 2018, 2019, 2020, and 2021. • Seruyan Estate planting years comprise: 1992, 1993, 1994, 2013, 2014, 2019, 2020, 2021, and 2022. <p>Oil palm planting after 1995 are replanting.</p>	Complied
Criteria 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	<p>(C) Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations.</p> <p>- Critical (Major) compliance -</p>	<p>PT. Indotruba Tengah presented a semi-detailed soil survey conducted in February 2015, titled "Survey Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia." This survey was undertaken by the Statistic Data Processing Minamas Research Centre.</p> <p>According to the findings of the soil survey, there is no presence of peat soil in the operational areas of PT. Indotruba Tengah, which includes both Sekunyir Estate and Seruyan Estate.</p> <p>Soil type:</p> <ul style="list-style-type: none"> • Soil type in Sekunyir Estate comprise of <i>Humic Endoaquept</i> 126.98 Ha; <i>Ultic Haplortod</i> 740.14 Ha, <i>Grossarenic Kandiudults</i> 1,560.47 Ha, <i>Arenic Plinthic Kandiudult</i> 488.71 Ha, <i>Typic Plinthudult</i> 425.81 Ha. • Soil Type in Seruyan Estate comprise of <i>Humic Endoaquept</i> 282.01 Ha; <i>Grossarenic Kandiudults</i> 1,507.38 Ha, <i>Arenic Plinthic Kandiudult</i> 570.22 Ha, <i>Typic Plinthudult</i> 873.86 Ha. <p>Slope classification</p>	Complied

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		Slope class		Hectarage		Total			
		(%)	(°/degree)	Sekunyir	Seruyan	Ha	%		
		0 – 4	0 – 2	3,342.11	1,684.21	5,026.31	76.44		
		4 – 12	2 – 6	0	1,549.26	1,549.26	23.56		
		Total		3,342.11	3,233.47	6,575.57	100		
		<p>Based on slope classification, there is no fragile soil from steep slope or erosion prone area.</p> <p>Soil Suitability: In general the soil in PT. Indotruba Tengah has suitability level S3 (marginal), the main limiting factors are fertility (dominated by low acidity, low P-total and P-availability), effective medium rooting, climate (average 3-4 raining months per annum).</p>							
7.6.2	<p>Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan.</p> <p>- Minor compliance -</p>	<p>Based on field visit and Area Statement, there was no new planting in PT. Indotruba Tengah – Sekunyir Estate and Seruyan Estate.</p> <p>Planting years in unit of certification are:</p> <ul style="list-style-type: none"> • Sekunyir Estate planting years comprise: 1992, 1993, 1994, 1995, 2013, 2014, 2015, 2018, 2019, 2020, and 2021. • Seruyan Estate planting years comprise: 1992, 1993, 1994, 2013, 2014, 2019, 2020, 2021, and 2022. <p>Oil palm planting after 1995 are replanting.</p> <p>Based on field visit and report of semi-detail soil survey "Survey Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia" dated February 2015, carried out by Statistic Data Processing Minamas Research Centre, there is no marginal and fragile soils in PT Indotruba Tengah area.</p>							Complied

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		There is no extensive planting carried out by the unit of certification.	
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	<p>The unit of certification can provide maps containing information on soil types and topographic conditions of the Estate. As a company, there are no plans for new development. According to the semi-detailed soil survey titled "Survey Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia," conducted in February 2015 by the Statistic Data Processing Minamas Research Centre, no marginal or fragile soil types, including peat and steep areas, were identified within Sekunyir Estate and Seruyan Estate.</p> <p>Periodic soil surveys are conducted to assess soil fertility and nutrient requirements, which are then utilized for manuring recommendations. Planning for drainage, irrigation systems, roads, and other infrastructure is encompassed within Environmental Assessments or AMDAL/UKL-UPL as part of pre-development activities.</p>	Complied
Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas. - Critical (Major) compliance -	<p>The semi-detailed soil survey report titled "Survey Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia," dated February 2015, conducted by the Statistic Data Processing Minamas Research Centre, provides insights. According to this survey, there is no presence of peat soil in the operational areas of PT Indotruba Tengah (Sekunyir Estate and Seruyan Estate).</p> <p>In Sekunyir Estate, the soil types are as follows: <i>Humic endoaquept</i> (126.98 Ha), <i>Ultic Haplortod</i> (740.14 Ha), <i>Grossarenic Kandiudults</i> (1,560.47 Ha), <i>Arenic Plinthic Kandiudult</i> (488.71 Ha), <i>Typic Plinthudult</i> (425.81 Ha).</p> <p>In Seruyan Estate, the soil types are: <i>Humic endoaquept</i> (282.01 Ha), <i>Grossarenic Kandiudults</i> (1,507.38 Ha), <i>Arenic Plinthic Kandiudult</i> (570.22 Ha), <i>Typic Plinthudult</i> (873.86 Ha).</p> <p>There is no new planting conducted by the unit of certification.</p> <p>Thus, this indicator is not applicable.</p>	Not Applicable

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7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018). - Minor compliance -	The semi-detailed soil survey report titled "Survey Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia," dated February 2015, conducted by the Statistic Data Processing Minamas Research Centre, provides insights. According to this survey, there is no presence of peat soil in the operational areas of PT Indotruba Tengah (Sekunyir Estate and Seruyan Estate). In Sekunyir Estate, the soil types are as follows: <i>Humic endoaquept</i> (126.98 Ha), <i>Ultic Haplortod</i> (740.14 Ha), <i>Grossarenic Kandiudults</i> (1,560.47 Ha), <i>Arenic Plinthic Kandiudult</i> (488.71 Ha), <i>Typic Plinthudult</i> (425.81 Ha). In Seruyan Estate, the soil types are: <i>Humic endoaquept</i> (282.01 Ha), <i>Grossarenic Kandiudults</i> (1,507.38 Ha), <i>Arenic Plinthic Kandiudult</i> (570.22 Ha), <i>Typic Plinthudult</i> (873.86 Ha).	Not Applicable
PROCEDURAL NOTE: Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).			
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	The semi-detailed soil survey report titled "Survey Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia," dated February 2015, conducted by the Statistic Data Processing Minamas Research Centre, provides insights. According to this survey, there is no presence of peat soil in the operational areas of PT Indotruba Tengah (Sekunyir Estate and Seruyan Estate). In Sekunyir Estate, the soil types are as follows: <i>Humic endoaquept</i> (126.98 Ha), <i>Ultic Haplortod</i> (740.14 Ha), <i>Grossarenic Kandiudults</i> (1,560.47 Ha), <i>Arenic Plinthic Kandiudult</i> (488.71 Ha), <i>Typic Plinthudult</i> (425.81 Ha). In Seruyan Estate, the soil types are: <i>Humic endoaquept</i> (282.01 Ha), <i>Grossarenic Kandiudults</i> (1,507.38 Ha), <i>Arenic Plinthic Kandiudult</i> (570.22 Ha), <i>Typic Plinthudult</i> (873.86 Ha).	Not Applicable
7.7.4	(C) Availability of implementation evidence of the water and land cover management program.	The semi-detailed soil survey report titled "Survey Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia," dated February 2015, conducted by the Statistic Data Processing Minamas Research	Complied

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	- Critical (Major) compliance -	Centre, provides insights. According to this survey, there is no presence of peat soil in the operational areas of PT Indotruba Tengah (Sekunyr Estate and Seruyan Estate). Implementation evidence of the water and land cover management program evident in monitoring and managing soil erosion and mitigation of cover crop, terrace, frond stacking in "U" shape, good fertilizer application, and maintain soft weed such as <i>Nephrolepis biserrata</i> .	
7.7.5	<p>(C) Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation.</p> <p>- Critical (Major) compliance -</p>	<p>The semi-detailed soil survey report titled "Survey Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia," dated February 2015, conducted by the Statistic Data Processing Minamas Research Centre, provides insights. According to this survey, there is no presence of peat soil in the operational areas of PT Indotruba Tengah (Sekunyr Estate and Seruyan Estate).</p> <p>In Sekunyr Estate, the soil types are as follows: <i>Humic endoaquept</i> (126.98 Ha), <i>Ultic Haplortod</i> (740.14 Ha), <i>Grossarenic Kandiudults</i> (1,560.47 Ha), <i>Arenic Plinthic Kandiudult</i> (488.71 Ha), <i>Typic Plinthudult</i> (425.81 Ha).</p> <p>In Seruyan Estate, the soil types are: <i>Humic endoaquept</i> (282.01 Ha), <i>Grossarenic Kandiudults</i> (1,507.38 Ha), <i>Arenic Plinthic Kandiudult</i> (570.22 Ha), <i>Typic Plinthudult</i> (873.86 Ha).</p>	Not Applicable
<p>PROCEDURAL NOTE: For 7.7.5: Detailed information on the RSPO Drainability Assessment Guide along with related concepts and detailed actions is contained in the Guidelines currently being adjusted / tested by the RSPO Working Group on Peatlands (Peatland Working Group / PLWG). The final version must obtain PLWG approval in January 2019 and will include additional Guide on the steps to be followed after deciding not to replant and the consequences for other stakeholders, farmers, local communities, and the unit of certification concerned. It is recommended that the trial methodology period is proposed to be extended for 12 months for all relevant management units (ie management units that have plantations on peat) to utilize the methodology and provide input to PLWG so that existing procedures can be further refined as needed before January 2020. The unit of certification has the option to delay replanting until the issuance of the revised Guidelines for the guidelines. Additional guidance for alternative commodity crops and rehabilitation of natural vegetation will be regulated by the PLWG.</p>			
7.7.6	(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	The semi-detailed soil survey report titled "Survey Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia," dated February 2015, conducted by the Statistic Data Processing Minamas Research	Not Applicable

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	<p>Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).</p> <p>- Critical (Major) compliance -</p>	<p>Centre, provides insights. According to this survey, there is no presence of peat soil in the operational areas of PT Indotruba Tengah (Sekunyir Estate and Seruyan Estate).</p> <p>In Sekunyir Estate, the soil types are as follows: <i>Humic endoaquept</i> (126.98 Ha), <i>Ultic Haplortod</i> (740.14 Ha), <i>Grossarenic Kandiudults</i> (1,560.47 Ha), <i>Arenic Plinthic Kandiudult</i> (488.71 Ha), <i>Typic Plinthudult</i> (425.81 Ha).</p> <p>In Seruyan Estate, the soil types are: <i>Humic endoaquept</i> (282.01 Ha), <i>Grossarenic Kandiudults</i> (1,507.38 Ha), <i>Arenic Plinthic Kandiudult</i> (570.22 Ha), <i>Typic Plinthudult</i> (873.86 Ha).</p>	
7.7.7	<p>(C) All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non- corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines.</p> <p>- Critical (Major) compliance -</p>	<p>The semi-detailed soil survey report titled "Survey Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia," dated February 2015, conducted by the Statistic Data Processing Minamas Research Centre, provides insights. According to this survey, there is no presence of peat soil in the operational areas of PT Indotruba Tengah (Sekunyir Estate and Seruyan Estate).</p> <p>In Sekunyir Estate, the soil types are as follows: <i>Humic endoaquept</i> (126.98 Ha), <i>Ultic Haplortod</i> (740.14 Ha), <i>Grossarenic Kandiudults</i> (1,560.47 Ha), <i>Arenic Plinthic Kandiudult</i> (488.71 Ha), <i>Typic Plinthudult</i> (425.81 Ha).</p> <p>In Seruyan Estate, the soil types are: <i>Humic endoaquept</i> (282.01 Ha), <i>Grossarenic Kandiudults</i> (1,507.38 Ha), <i>Arenic Plinthic Kandiudult</i> (570.22 Ha), <i>Typic Plinthudult</i> (873.86 Ha).</p>	Not Applicable
Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters:</p> <p>- Minor compliance -</p>	<p>During ASA 2_2, it was observed that PT Indotruba Tengah – Sekunyir POM has a procedure in place titled "SOP Pengelolaan Sempadan Sungai/Waduk, Daerah Aliran Sungai & Areal Konservasi No.HCV-SAA/07/2009," dated June 1, 2009. The purpose of this procedure is to preserve the riparian/buffer zone, lake buffer zone, water spring buffer zone, and waterways buffer zone.</p> <p>The procedure was developed to maintain and protect the water source quality. Procedures were also established for protection and management of riparian</p>	Complied

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	<p>7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.</p>	<p>buffer zones at or before replanting. Procedure mentioned that in area of buffer zones are prohibited to apply agrochemical, used manual manuring and riverbank was planted by erosion barrier crop. The organization has a policy that prohibits estates for planting in the left and right side of riparian buffer zones at or before replanting. A warning board placed regarding prohibition to apply agrochemicals and fertilizer in the buffer zone. Riparian buffers of small natural river were 10 - 15 m wide on both sides of the rivers, depending on the wide of river, lake buffer 50 m: water spring buffer 50 m.</p> <p>PT. Indotruba Tengah – Sekunyir POM have established a water management plan, consist of management water supply for domestic, water consumption and measurement of water quality. Identification water need as regulated in "Peraturan Menteri PU No.14/PRT/M/2010 (domestic consumption is 60 liters/person/day and water needed for mill processing, ground and surface water resources and its permit, management, and monitoring wastewater, included domestic wastewater.</p> <p>Monitoring of water management has been implemented on a regular basis, such as surface water quality monitoring each semester at Upstream Blok D12 river and downstream Blok F10 river. Report of water quality monitoring are available in the report of RKL/RPL period July – December 2023.</p> <p>PT Indotruba Tengah – Sekunyir POM has analyzed water quality each semester to ensure the compliance against PP No. 82 tahun 2001 regarding water quality standard Class II.</p> <p>Based on report of water quality monitoring are available in the report of RKL/RPL period July – December 2023 shows that water quality complies with national regulation. The company does not limit access to clean water or does not pollute the water used by the community.</p>	
	<p>7.8.1b Workers have adequate access to clean water.</p>	<p>PT Indotruba Tengah – Sekunyir Palm Oil Mill has provided clean water to all workers through water treatment with raw water from Pond at Sekunyir and Seruyan Estate. Regular monitoring of water quality has been carried out each</p>	

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		<p>semester to ensure the water use by workers is met with standard Permenkes No. 32 Tahun 2017 regarding clean water quality standard.</p> <p>Sample seen: Water analysis October 2023 – against Permenkes RI No.32 tahun 2017. The testing conducted by Laboratory PT. Mutu Agung Lestari shown that water quality generally is met with the standard.</p>	
7.8.2	<p>(C) Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).</p> <p>- Critical (Major) compliance -</p>	<p>A well-established procedure, titled "SOP Pengelolaan Sempadan Sungai/Waduk, Daerah Aliran Sungai & Areal Konservasi No.HCV-SAA/07/2009," dated 1 June 2009, is in effect. This procedure aims to uphold the integrity of riparian/buffer zones, lake buffer zones, water spring buffer zones, and waterways buffer zones. Its primary objective is to safeguard the quality of water sources.</p> <p>Furthermore, the procedure outlines measures for the protection and management of riparian buffer zones, both during and prior to replanting activities. It explicitly prohibits the application of agrochemicals in these buffer zones, mandates the use of manual manuring, and advocates for the planting of erosion barrier crops along riverbanks. These steps are essential for ensuring the sustained health and resilience of the surrounding ecosystems.</p> <p>The organization has a policy that prohibits estates for planting in the left and right side of riparian buffer zones at or before replanting. A warning board placed regarding prohibition to apply agrochemicals and fertilizer in the buffer zone. Riparian buffers of small natural river were 10 - 15 m wide on both sides of the rivers, depend on the wide of river; lake buffer 50 m; water spring buffer 50 m. Seruyan Estate and Sekunyir Estate made monitoring of buffer zone and report in "Monitoring Area Nilai Konservasi Tinggi (NKT)" period January – December 2023 indicating the signboard for buffer zone, vegetation and tree condition in buffer zone, vegetation in the water way, presence of water life, etc. No signs of pollution of illegal logging in buffer zones.</p> <p>Based on Record of Monitoring Area Nilai Konservasi Tinggi (NKT)" period January – December 2023, shown that, updated water management plan such as:</p>	Complied

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		<ul style="list-style-type: none">- Reduce-reuse-recycle Re-use wastewater from sprayer’s washing shed for spraying activities; use water from last water pond in washing shed for drier box in other (rubber plantation) entity; using water dilution from fresh water to ex-condensate from sterilizer – period Jan-Dec 2023.- Managing water source: identification of water source January 2024; no chemical application surrounding water source in Jan-Dec 2023; install signboard to remind water source protection in Dec 2023; water quality testing on regular basis in June 2023; installation of rainwater container – Jan-Dec 2023.													
7.8.3	<p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>During the ASA 2_2 assessment in 2024, PT Indotruba Tengah – Sekunyir POM demonstrated compliance with regulations regarding the management of mill effluent. The Sekunyir Palm Oil Mill employs an effluent treatment system utilizing treated ponds.</p> <p>To underscore its commitment to effective waste management practices, the unit of certification has obtained a permit for liquid wastewater management for Land Application. This permit was issued by the Head of the Investment and Integrated One-Stop Service Office of Kotawaringin Barat District, as per Decision No. 503/010/LH/DPMPTSP.D dated 10 July 2020. The permit is valid until 30 June 2025.</p> <p>BOD monitoring effluent tested each month by accredited laboratory (Persada Laboratory – PT Graha Mutu Persada, Mojokerto) according to standard threshold <i>PerMenLH No. 29 tahun 2003</i>.</p> <p>Below is the record of effluent monitoring from January– December 2023:</p> <table><tr><th>Month</th><th>pH</th><th>BOD (mg/L)</th></tr><tr><td>January</td><td>7.59</td><td>530</td></tr><tr><td>February</td><td>8.52</td><td>315</td></tr><tr><td>March</td><td>8.85</td><td>501</td></tr></table>	Month	pH	BOD (mg/L)	January	7.59	530	February	8.52	315	March	8.85	501	Complied
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		<table><tr><td>April</td><td>6.58</td><td>290</td></tr><tr><td>May</td><td>7.56</td><td>3,260</td></tr><tr><td>June</td><td>7.64</td><td>551</td></tr><tr><td>July</td><td>7.90</td><td>215</td></tr><tr><td>August</td><td>7.58</td><td>4,741</td></tr><tr><td>September</td><td>7.08</td><td>541</td></tr><tr><td>October</td><td>7.31</td><td>411</td></tr><tr><td>November</td><td>7.26</td><td>521</td></tr><tr><td>December</td><td>7.22</td><td>320</td></tr></table> <p>According to above analysis result shown that pH and BOD parameter met regulation standard "Peraturan Menteri Lingkungan Hidup No. 29 tahun 2003".</p>	April	6.58	290	May	7.56	3,260	June	7.64	551	July	7.90	215	August	7.58	4,741	September	7.08	541	October	7.31	411	November	7.26	521	December	7.22	320	
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7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	<p>In the ASA 2_2 assessment of 2024, Sekunyir Palm Oil Mill provided documentation detailing monthly monitoring of water consumption per tonne of Fresh Fruit Bunches (FFB) processed. These records are documented in the "Rekap Pemakaian Air Tahun 2023" (Water Usage Summary for the Year 2023). Monitoring of mill water use per ton FFB in January – December 2023, as below table:</p> <table><tr><th>Month</th><th>FFB Process (MT)</th><th>Water usage (m³)</th><th>Average (m³/MT)</th></tr><tr><td>January</td><td>7,970</td><td>16,400</td><td>2.06</td></tr><tr><td>February</td><td>6,645</td><td>11,104</td><td>1.67</td></tr></table>	Month	FFB Process (MT)	Water usage (m³)	Average (m³/MT)	January	7,970	16,400	2.06	February	6,645	11,104	1.67	Complied															
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Criteria 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised																																															
7.9.1	Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented. - Minor compliance -	<p>In the ASA 2_2 assessment of 2024, PT Indotruba Tengah demonstrated its commitment to enhancing the efficiency of fossil fuel usage while maximizing the utilization of renewable energy sources.</p> <p>Records of fossil fuel consumption are diligently maintained, allowing for analysis of consumption trends over time. Additionally, energy usage records include precise measurements of renewable energy utilization per ton of Fresh Fruit Bunches (FFB) processed. Notably, all shell and fiber are internally consumed as boiler fuel.</p>	Complied																																												

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Fossil fuel usage is meticulously recorded for operational purposes, facilitating efficiency analyses. To further reduce reliance on fossil fuels for electricity, PT Indotruba Tengah has installed grid electric networks for worker housing since 2020.

Data verified: The usage of shell and fiber use as boiler fuel period January – December 2023, as below:

Month	FFB Process (MT)	Fibre usage (MT)	Shell usage (MT)
January	7,970	1,096	546
February	6,645	914	455
March	7,189	989	492
April	6,757	929	463
May	10,910	1,500	747
June	11,340	1,559	777
July	12,443	1,711	852
August	12,709	1,748	871
September	12,824	1,763	878
October	13,465	1,851	922
November	12,006	1,651	822
December	10,906	1,500	747

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.

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7.10.1	<p>(C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p> <p>- Critical (Major) compliance -</p>	<p>PT Indotruba Tengah – Sekunyir POM has identified the source of greenhouse gas emission – year 2023. The sources of GHG as per GHG Calculation report 2023, as listed below:</p> <ul style="list-style-type: none"> - Methane from POME and composting at mill. - Fossil fuels emissions from vehicles and engines (generator). - Chemical fertilizer. - Electricity usage. - Chemical spraying. <p>Plans to reduce or minimize GHG emissions, such as:</p> <ul style="list-style-type: none"> • Zero burning. • Utilization of waste fibre and shell as boiler fuel and electricity from turbines. • Reduce chemical fertilizer using EFB composting. <p>The records of each programmed were sighted as evident implementation. The program included objectives, targets, and timelines for a year. There was monitoring and evaluation every 6 months to ensure the target was achieved.</p> <p>Sekunyir Palm Oil Mill wastewater was processed through a series of wastewater treatment ponds four anaerobic ponds. Process parameter monitoring and maintenance of the ponds were sighted. Quality of wastewater effluent is monitored monthly in line with the requirements on Kepmen LH 29/2003.</p> <p>The results of monitoring of wastewater effluent were reviewed including measurement of BOD, COD, oil and fat, N total result of discharge effluent conforms to the limits for parameters for period January - December 2023 (see 7.8.3). Wastewater effluent monitoring was conducted by Laboratory PT Persada Mojokerto.</p>	Complied
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		<p>PT Indotruba Tengah – Sekunyir POM already maximize the renewable energy use also to reduction in electricity. All the shell and fiber are consumed internally as boiler fuel. Fossil fuel usage is recorded for operational purpose, including the efficiency analysis.</p> <p>Implementing IPM to reduce pesticides usage. Planting and maintenance beneficial plant 20% <i>Antigonon leptopus</i>, 20% <i>Turnera subulata</i>, 60% <i>Cassia tora</i> programmed in Januariy – December 2023. PalmGHG calculator for year 2023 (January – December 2023) reviewed and approved. See appendix for PalmGHG calculation result.</p>	
7.10.2	<p>(C) Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>Based on document review and field visit during ASA 2_2, it was confirmed that there is no new planting in Sekunyir Estate and Seruyan Estate.</p> <p>PT. Indotruba Tengah has identified the significant pollutants and greenhouse gas (GHG) emissions.</p> <p>Significant pollutants and GHG such as:</p> <ul style="list-style-type: none"> • Emission, • Particulate, • Noise from boiler and generator, • Effluent from mill wastewater, • Fertilizer application, • Chemical applicator, and • Transport of FFB. <p>Monitoring of air emissions and ambient air quality conducted every semester. Emissions test conducted testing by Accreditation Laboratory Laboratory PT Unilab Persada. The results of the analysis have been demonstrated and reported to Environmental Agency every six months, e.g: Subject of analysis for air emission and Air Ambient in Sekunyir Palm Oil Mill and Estate and Seruyan Estate.</p>	Complied

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		Sample seen: Report of Analysis No: LPUP11922 dated 21 September 2023, parameter: air emission, location in: Boiler No 1 Chimney in Sekunyir POM. The result has been complied with "Peraturan Menteri Lingkungan Hidup No 07 tahun 2007", appendix 1.	
7.10.3	<p>(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>The sources of GHG as per GHG Calculation report 2023, as listed below:</p> <ul style="list-style-type: none"> • Methane from POME and composting at mill • Fossil fuels emissions from vehicles and engines (generator) • Chemical fertilizer • Electricity usage • Chemical spraying <p>Plans to reduce or minimize GHG emissions, this plan is a continuation the previous program such as:</p> <ul style="list-style-type: none"> • Zero burning. • Utilization of waste fibre and shell as boiler fuel and electricity from turbines. • Reduce chemical fertilizer using EFB composting. <p>The records of each programmed were sighted as evident implementation. The program was including objectives, targets, and timelines for a year. There was monitoring and evaluation every 6 months to ensure target was achieved.</p> <p>Sekunyir Palm Oil Mill wastewater was processed through a series of wastewater treatment ponds four anaerobic ponds. Process parameter monitoring and maintenance of the ponds were sighted. Quality of wastewater effluent is monitored monthly in line with the requirements on Kepmen LH 29/2003.</p> <p>The results of monitoring of wastewater effluent were reviewed including measurement of BOD, COD, oil and fat, N total result of discharge effluent conforms to the limits for parameters for period January 2023 – January 2024</p>	Complied

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		<p>(see 7.8.3). Wastewater effluent monitoring was conducted by Laboratory PT Persada Laboratory Mojokerto.</p> <p>PT Indotruba Tengah – Sekunyir POM already maximize the renewable energy use also to reduction in electricity. All the shell and fiber are consumed internally as boiler fuel. Fossil fuel usage is recorded for operational purpose, including the efficiency analysis.</p> <p>Implementing IPM to reduce pesticides usage. Planting and maintenance beneficial plant 20% <i>Antigonon leptopus</i>, 20% <i>Turnera subulata</i>, 60% <i>Cassia tora</i> programmed in January – December 2024.</p>	
Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>The planting years of Sekunyir Estate are as follows: 1992, 1993, 1994, 1995, 2013, 2014, 2015, 2018, 2019, 2020, 2021, 2022, and 2023 (with the most recent being replanting). Seruyan Estate's planting years include: 1992, 1993, 1994, 2013, 2014, 2019, 2020, 2021, and 2022.</p> <p>There was no new planting in PT. Indotruba Tengah – Sekunyir Estate and Seruyan Estate. At the current assessment (RAV), unit of certification conducted replanting in Seruyan Estate in 2022. Replanting prepared by felling and chipping, none of the area performed burning for replanting. Contract of replanting was available under "Addendum Surat Perjanjian Kerja Replanting Period 2024 – 2026 No.004/MMTC-AWD/XI/2023/plant dated 8 November 2023, between PT. Indotruba Tengah and PT. Karya Murni Prima. The contract covers work specification, such as: removal of weevil and roots; felling & chipping; digging and re-closing the former boulder and soil; leveling, chambering & compacting harvesting path; mechanical planting hole; plowing & harrowing; terracing; close-ended conservation trenches (CECT) for coastal and lowland area; silt pit; and ridge – for 180 SPH.</p> <p>Based on field visit to estates (C01 Division 2 Seruyan Estate) and interview with replanting contractor, there is no evidence of fire usage on the ground.</p>	Complied

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		Based on field visit to estates (C01 Division 2 Sekunyir Estate) and interview with replanting mandor, replanting using manual method: felling, chipping, CECT, and no use of fire usage on the ground.	
7.11.2	<p>The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>The unit of certification unit has put in place a procedure for Land Fire Prevention and Control outlined in the document "Pedoman Pencegahan dan Penanggulangan Kebakaran" (7302/PSQM-ESH/14 Rev.1 dated February 23, 2018). This procedure outlines the following measures for fire prevention and control:</p> <ol style="list-style-type: none"> 1. Fire Prevention; Team formation increase readiness, tools checking, identification, invention, establish signboard and tower, cooperation with surrounding communities, dissemination to surrounding communities, conduct monitoring, implementation of zero burning during replanting. 2. Fire Control; Identification of location, be aware of fire source, control by patrol team, fire control team, request assistance from nearest company or report to relevant government, evaluation of fire control. <p>Fire Response Team with appropriate resources also provides in all areas and registered by relevant agency. The firefighting tools and equipment have been checked as per regulation "Peraturan Menteri Pertanian No.5/KB.410/1/2018 tentang Pembukaan dan/atau Pengolahan Lahan Perkebunan Tanpa Bakar". Fire watch tower also available in each estate to monitor fire adjacent the plantation.</p> <ul style="list-style-type: none"> - Fire patrol "Form Monitoring Patroli Kebakaran Lahan Seruyan Estate" – period February 2024, no fire incident. - Fire tower monitoring book "Buku Monitoring Menara Api Blok E15/16 Sekunyir Estate" period January 2024 stated no fire incident. 	Complied

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		<p>Report of fire prevention & control to the relevant government body was available:</p> <ul style="list-style-type: none"> - Fire monitoring and fire-fighting report "Laporan Pemantauan Kebakaran Dalam Kebun Periode Juli-Desember 2023 Sekunyir Estate" handed over to Kepala Badan Lingkungan Hidup Kabupaten Kotawaringin Barat" sent in January 2024. Report stated no fire incident inside Seruyan Estate. - Fire monitoring and fire-fighting report "Laporan Pemantauan Kebakaran Dalam Kebun Periode Juli-Desember 2023 Seruyan Estate" handed over to Dinas Kehutanan dan Perkebunan Kabupaten Seruyan" sent in January 2024. Report stated no fire incident inside Seruyan Estate. 	
7.11.3	<p>The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>Information gathered during interviews with local communities indicates that there is active coordination for fire control between the certification unit and neighbouring communities.</p> <p>The company has engaged with surrounding communities and local government authorities to communicate its procedures regarding fire monitoring, prevention, and firefighting. This engagement took place on 31 October 2023, where 110 individuals attended from various areas including Pangkalan Banteng District, Hanau District, Amin Jaya Village, Sungai Pakit Village, ERT structure, and P2K3 Team.</p>	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.

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<p>Procedures will be developed that are adapted to support the development of sustainable palm oil by indigenous peoples and local communities who have legal or customary rights. The procedure will apply in certain HFCC countries and in the High Forest Cover Landscape (HFCL) within it.</p> <p>The development of this procedure will be guided by the No Deforestation Joint Steering Group (NDJSG) between the RSPO and HCSA members. In HFCC countries, RSPO will work with governments, communities and other stakeholders to develop this procedure through participatory processes at national and regional levels. The duration of this activity is specified in the Terms of Reference for NDJSG and is publicly available.</p>			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests.</p> <p>Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).</p> <p>- Critical (Major) compliance -</p>	<p>There is no land cleared since 15 November 2018 without prior HCV-HCS assessment. There is no new planting. Unit of certification has started planting in 1992, no new planting area/developing area since November 2005 and 2014/2018. Replanting has been performed since 2013 - 2015.</p> <p>HCV assessment has been conducted by PT. Indotruba Tengah cooperated with independent Consultant named Aksenta in August 2009. The HCV report documented in the "Laporan Identifikasi High Conservation Value PT. Indotruba Tengah, Kabupaten Kotawaringin Barat & Seruyan Provinsi Kalimantan Tengah, January 2010". HCV Assessment was conducted using HCV Toolkit Indonesia 2008.</p> <p>Based on communication with RSPO Secretariat dated 7 March 2022, BSI obtain statement "The unit has already been disclosed and RaCP is not applicable".</p>	Complied
7.12.2	<p>(C) HCV and HCS forests, and other conservation areas are identified as follows:</p> <p>- Critical (Major) compliance -</p> <p>7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.</p>	<p>No changes on HCV document until this ASA 2_2.</p> <p>HCV assessment has been conducted by PT. Indotruba Tengah cooperated with independent Consultant Aksenta in August 2009. The HCV report documented in the "Laporan Identifikasi High Conservtion Value PT. Indotruba Tengah, Kabupaten Kotawaringin Barat & Seruyan Provinsi Kalimantan Tengah, January 2010".</p> <p>HCV Assessment was conducted using HCV Toolkit Indonesia 2008. The team consist of four members as following:</p> <ol style="list-style-type: none"> 1. Wibowo A. Djatmiko (Team leader: Ecological habitat/wildlife) 2. Bambang Widyatmoko (GIS, Mapping, Environmental Services) 3. Gani Gunawan (Social, economic and cultural) 	Complied

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		<p>4. Erwin Hermawan (GIS expert)</p> <p>All of them list as HCV RSPO approved assessor.</p> <p>Based on the assessment report, in Sekunir and Seruyan Estate there are three (4) types of HCV been identified: HCV 1.2 (Endangered Species), HCV 4.1 & 4.2 (riparian area), and HCV 1.3 (swamp refugia) with total HCV area 76.56 Ha (Seruyan Estate 45.8 Ha + Seruyan Estate 45.48 Ha).</p> <p>There are identify the important RTE species identify (based on information from surrounding community and presence of animal): <i>Pongo pygmaeus</i> (orang utan), <i>Helarctos malayanus</i> (beruang madu), <i>Manis javanica</i> (trenggiling) and <i>Spilornis cheela</i> (Elang ular bido).</p> <p>HCV public consultation was held on 25 August 2009. Attended by local authorities, local communities, and company representative.</p> <p>Assessment conducted on the whole plantation that has been embedded and the areas around the plantation include rivers, forests, and others.</p>	
	7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.	<p>There is no new planting after 15 November 2018. Unit of certification has started planting in 1992, no new planting area/developing area since November 2005 and 2014/2018. Replanting has been performed since 2013 - 2015.</p> <p>This indicator is not applicable.</p>	
7.12.3	<p>(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p> <p>- Critical (Major) compliance -</p>	This indicator is not applicable in Indonesia.	Not Applicable
PROCEDURAL NOTE for 7.12.3:			

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Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.			
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>There is no land cleared since 15 November 2018 without prior HCV-HCS assessment. There is no new planting. Unit of certification has started planting in 1992, no new planting area/developing area since November 2005 and 2014/2018. Replanting has been performed since 2013 - 2015.</p> <p>HCV assessment has been conducted by PT. Indotruba Tengah cooperated with independent Consultant Aksenta in August 2009. The HCV report documented in the "Laporan Identifikasi High Conservtion Value PT. Indotruba Tengah, Kabupaten Kotawaringin Barat & Seruyan Provinsi Kalimantan Tengah, January 2010".</p> <p>HCV Assessment was conducted using HCV Toolkit Indonesia 2008. The team consist of four members as following:</p> <ol style="list-style-type: none"> 1. Wibowo A. Djatmiko (Team leader: Ecological habitat/wildlife) 2. Bambang Widyatmoko (GIS, Mapping, Environmental Services) 3. Gani Gunawan (Social, economic, and cultural) 4. Erwin Hermawan (GIS expert) <p>All of them listed as HCV RSPO approved assesor.</p> <p>Based on the assessment report, in Sekunyir and Seruyan Estate there are three (4) types of HCV been identified: HCV 1.2 (Endangered Species), HCV 4.1 & 4.2 (riparian area), and HCV 1.3 (swamp refugia) with total HCV area 76.56 Ha (Seruyan Estate 45.8 Ha + Seruyan Estate 45.48 Ha).</p> <p>There are identify the important RTE species identify (based on information from surrounding community and presence of animal): Pongo pygmaeus (orangutan), Helarctos malayanus (beruang madu), Manis javanica (trenggiling) and Spilornis cheela (Elang ular bido).</p> <p>HCV public consultation was held on 25 August 2009. Attended by local authorities, local communities, and company representative.</p>	Complied

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		<p>Assessment conducted on the whole plantation that has been embedded and the areas around the plantation include rivers, forests, and others.</p> <p>Management plan contained ongoing monitoring of status of HCV, HCS, other natural ecosystems, peatland conservation areas and RTE species have been developed.</p> <p>Monitoring report of HCV sighted and verified for period January to February 2024. Refer to HCV Assessment Report and Management plan contained ongoing monitoring of status of HCV, HCS, other natural ecosystems, peatland conservation areas and RTE species have been developed.</p> <p>HCV program that implemented by unit of certification is more concern to monitor any threat activities near watercourse/riparian and wildlife animal monitoring.</p> <p>Based on communication with RSPO Secretariat dated 7 March 2022, BSI obtain statement" the unit has already been disclosed and RaCP is not applicable".</p> <p>PT. Indotruba Tengah made communication/socialization of HCV and protected species on 27 June 2023. The meeting also explains the monitoring result, as well as management and monitoring plan. Attended by Pembuang Hulu II villagers, Sungai Pakit villagers, Derangga villagers, Karang Mulya villagers, BPD Pangkalan Banteng.</p>	
7.12.5	<p>Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>There is no new planting after 15 November 2018. Unit of certification has started planting in 1992, no new planting area/developing area since November 2005 and 2014/2018. Replanting has been performed since 2013 - 2015.</p> <p>HCV assessment has been conducted by PT. Indotruba Tengah cooperate with independent Consultant Aksenta in August 2009. The HCV report documented in the "Laporan Identifikasi High Conservtion Value PT. Indotruba Tengah, Kabupaten Kotawaringin Barat & Seruyan Provinsi Kalimantan Tengah, January 2010". HCV Assessment was conducted using HCV Toolkit Indonesia 2008.</p> <p>Based on stakeholder consultation with surrounding community Pembuang Hulu II village and Amin Jaya village; the establishment of HCV assessment 2009</p>	Complied

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		<p>stated all HCV identified inside company permit, has been communicated and no land rights on community land identified as HCV/HCS, thus not affecting their right.</p> <p>PT. Indotruba Tengah made communication/socialization of HCV and protected species on 27 June 2023. Attended by Pembuang Hulu II villagers, Sungai Pakit villagers, Derangga villagers, Karang Mulya villagers, BPD Pangkalan Banteng.</p>	
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>The unit of certification is committed to wildlife protection, ensuring that all individuals, whether employees or villagers, are aware that hunting, trapping, or harming animals is strictly prohibited across the plantation.</p> <p>As per the High Conservation Value (HCV) assessment conducted in 2009, several significant RTE (Rare, Threatened, and Endangered) species were identified based on information gathered from the surrounding community and the presence of these animals. These species include <i>Pongo pygmaeus</i> (orangutan), <i>Helarctos malayanus</i> (sun bear), <i>Manis javanica</i> (Sunda pangolin), and <i>Spilornis cheela</i> (crested serpent eagle).</p> <p>Unit of certification has established Conservation Management Plan to manage and to monitor of RTE's as per "Program pemeliharaan dan monitoring Kawasan HCV dan Buffer zone PT. Indotruba Tengah".</p> <p>The company conducts regular monitoring of Rare, Threatened, and Endangered (RTE) species and High Conservation Value (HCV) areas on a monthly basis. According to the document "Monitoring of Flora and Fauna PT. Indotruba Tengah," several animal species have been identified within the company's premises, categorized as RTE species and protected species according to national regulations. These species include: <i>Felis bengalensis</i> (leopard cat), <i>Elanus hipoleucus</i> (Black-shouldered Kite), <i>Bubulcus ibis</i> (The cattle egret), <i>Dendrocygna javanica</i> (Lesser whistling duck), <i>Alcedo caeruleascens</i> (Cerulean kingfisher).</p> <p>Policy or rules to protect RTE species included in "SOP Pengelolaan Sempadan Sungai/Waduk (DAS) & Areal Konservasi No.01/HCV-SAA/07/2009" dated 1 June 2009. Section O stipulates prohibit to purposely cutting trees or shrub in the</p>	Complied

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		<p>buffer area. Section P, stipulates all activities including felling trees, replanting in buffer area is prohibit. Section U stated prohibit hunting and poaching flora and fauna in buffer area. Section W stated if employees or communities found purposely damaging, taking advantage, or activity adversely impacting the buffer area will be processed against law.</p> <p>Appropriate disciplinary measures imposed in accordance with company rules and national law, should any individual working for Unit of certification is found to have captured, harmed, collected, or killed any RTE species implemented. PT. Indotruba Tengah has "SOP Penanganan Satwa Liar No.01/MAS/-SOP/09" dated 1 June 2009. Section 4.1 stipulates company will perform communication and socialization and convey: employee and contractor are not allowed to capture, pet, or kill RTE species; employee and contractor are not allowed to trade wildlife, sanction will be sacking or contract cancellation. All wildlife found will be seized and sent for rehabilitation, release in local area, hand over to government body for conservation.</p> <p>Programme to regularly educate the workforce about the status of the RTE species is implemented. PT. Indotruba Tengah has "SOP Penanganan Satwa Liar No.01/MAS/-SOP/09" dated 1 June 2009. Section 4.1, stipulates company will perform communication and socialization and convey company will educate and suggest employee and contractor to pet or hunt wildlife through socialization, briefing and signboard no hunting.</p> <p>Inspections conducted as recorded "Form Identifikasi Fauna di Kawasan Perkebunan Kelapa Sawit Seruyan Estate". Period January to February 2024 found monitoring lizard (<i>Varanus salvator</i>), Crested Serpent-eagle (<i>Spilornis cheela</i>), Cobra (<i>Naja</i> sp.), Long tailed macaque (<i>Macaca fascicularis</i>), Greater coucal (<i>Centropus sinensis</i>), common treeshew (<i>Tupaia glis</i>); no traps/snares put up within or nearby areas.</p> <p>PT Indotruba Tengah regularly educated the workforce about the status of RTE through conducted training, example: date 27 June 2023. The dissemination attended by all employees in Sekunyir and Seruyan Estate.</p>	
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7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>There is no new planting after 15 November 2018. Unit of certification has started planting in 1992, no new planting area/developing area since November 2005 and 2014/2018. Replanting has been performed since 2013 - 2015.</p> <p>HCV assessment has been conducted by PT. Indotruba Tengah cooperated with independent Consultant Aksenta in August 2009. The HCV report documented in the "Laporan Identifikasi High Conservtion Value PT. Indotruba Tengah, Kabupaten Kotawaringin Barat & Seruyan Provinsi Kalimantan Tengah, January 2010". HCV Assessment was conducted using HCV Toolkit Indonesia 2008.</p> <p>Management plan contained ongoing monitoring of status of HCV, HCS, other natural ecosystems, peatland conservation areas and RTE species have been developed.</p> <p>Monitoring report of HCV sighted and verified for period January to February 2024. Refer to HCV Assessment Report and Management plan contained ongoing monitoring of status of HCV, HCS, other natural ecosystems, peatland conservation areas and RTE species have been developed.</p> <p>HCV program that implemented by unit of certification is more concern to monitor any threat activities near watercourse/riparian and wildlife animal monitoring.</p> <p>Monitoring RTE's species conducted at determined HCV area in monthly basis using "Form Identifikasi Fauna di Kawasan Perkebunan Kelapa Sawit Seruyan Estate". Period January to February 2024 found monitoring lizard (<i>Varanus salvator</i>), Crested Serpent-eagle (<i>Spilornis cheela</i>), Cobra (<i>Naja</i> sp.), Long tailed macaque (<i>Macaca fascicularis</i>), Greater coucal (<i>Centropus sinensis</i>), common treeshew (<i>Tupaia glis</i>); no traps/snares put up within or nearby areas.</p>	Complied
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>There is no land cleared since 15 November 2018 without prior HCV-HCS assessment. There is no new planting. Unit of certification has started planting in 1992, no new planting area/developing area since November 2005 and 2014/2018. Replanting has been performed since 2013 - 2015.</p>	Not Applicable

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		<p>HCV assessment has been conducted by PT. Indotruba Tengah cooperate with independent Consultant Aksenta in August 2009. The HCV report documented in the "Laporan Identifikasi High Conservtion Value PT. Indotruba Tengah, Kabupaten Kotawaringin Barat & Seruyan Provinsi Kalimantan Tengah, January 2010". HCV Assessment was conducted using HCV Toolkit Indonesia 2008.</p> <p>Based on communication with RSPO Secretariat dated 7 March 2022, BSI obtain statement" The unit has already been disclosed and RaCP is not applicable".</p> <p>This indicator is Not Applicable.</p>	
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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2023** for **Sekunyir POM** and supply base was calculated using the PalmGHG Calculator version 4. 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 **Sekunyir POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.57
PKO	1.57

Extraction	%
OER	22.03
KER	4.38

Production	t/yr
FFB Process	125,214.27
CPO Produced	27,952.40
PKO Produced	5478.25

Land Use	Ha
OP Planted Area	6,481.98
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	99.46
Total	6,581.44

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	43,403.77	0.40	0.00	0.00	0.00	0.00	43,403.77	0.40
CO ₂ Emission from fertilizer	11 712.56	0.11	0.00	0.00	0.00	0.00	11 712.56	0.11
NO ₂ Emission from Peat	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NO ₂ Emission from Fertilizer	10,544.66	0.10	0.00	0.00	0.00	0.00	10,544.66	0.10
Fuel Consumption	1,533.13	0.01	0.00	0.00	0.00	0.00	1,533.13	0.01
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-41,141.01	-0.38	0.00	0.00	0.00	0.00	-41,141.01	-0.38
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	26,053.11	0.24	0.00	0.00	0.00	0.00	26,053.11	0.24

*Note: Includes both estates and smallholders

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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	24,544.12	0.20
Fuel Consumption	63.38	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	24,607.50	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

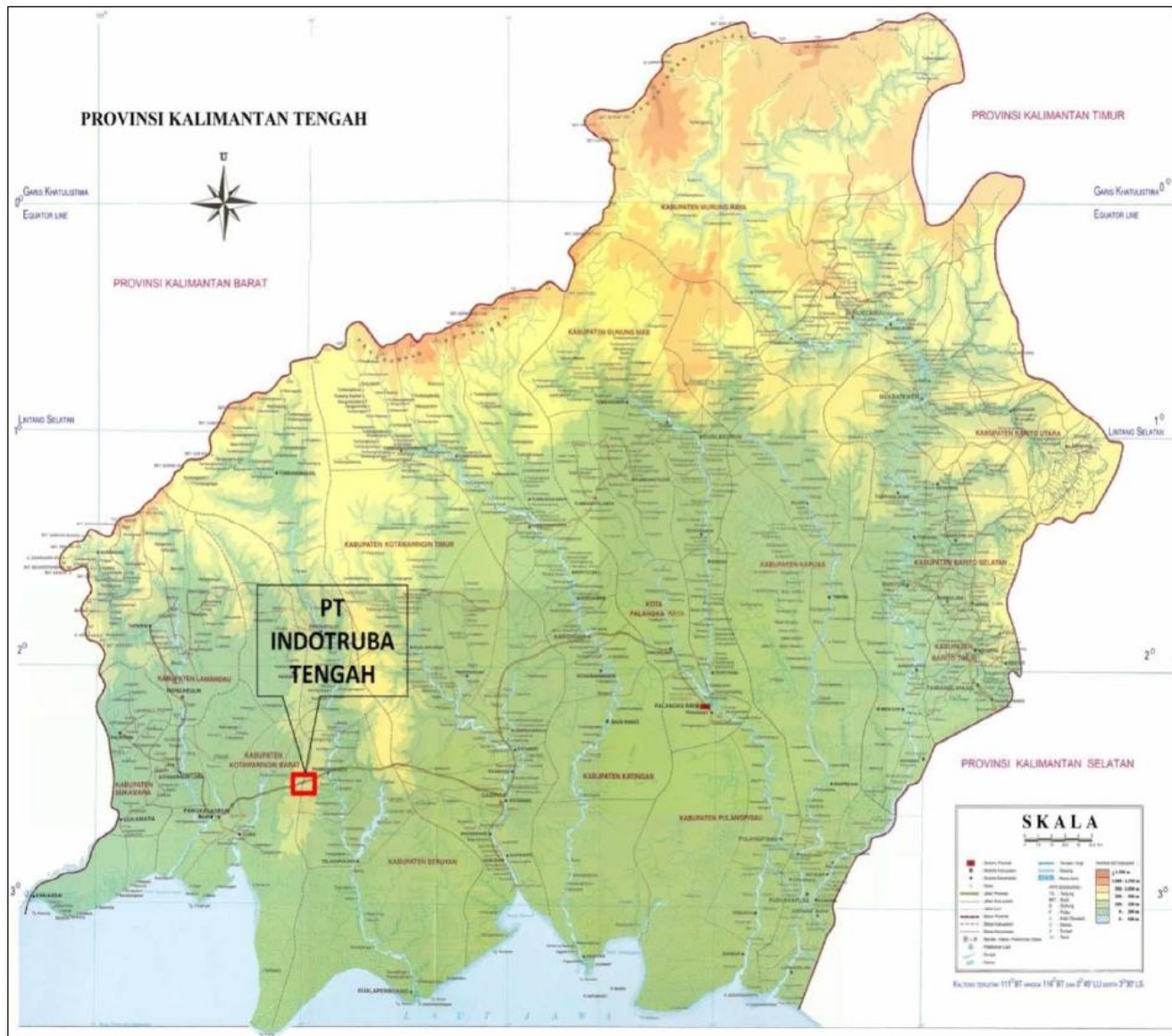
Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

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

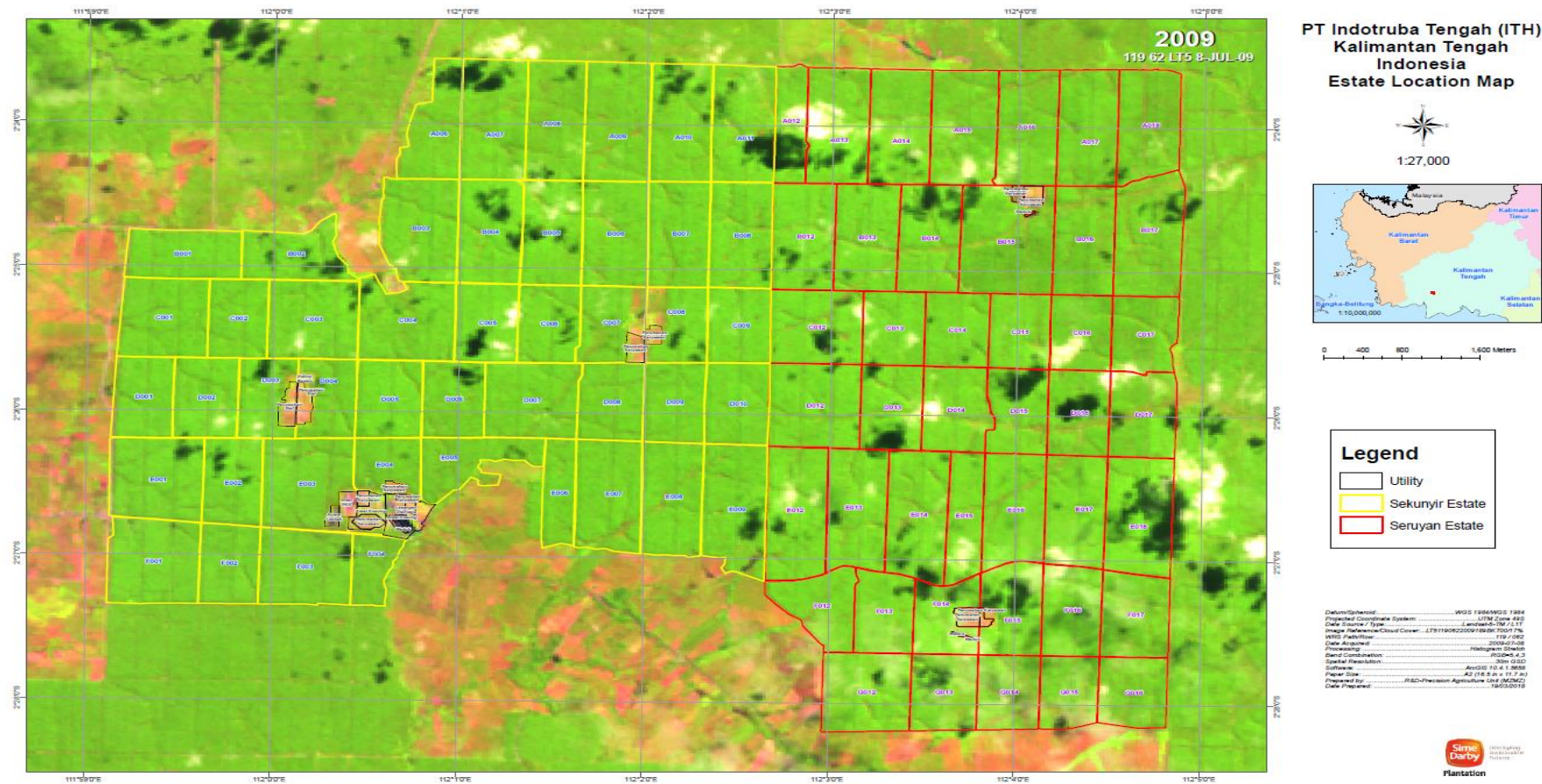
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

Appendix C: Location Map of Certification Unit and Supply bases



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Appendix D: Estate Field Map



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Appendix E: List of Smallholder Registered and/or sampled

Not Applicable

Sampling Group	Current Certification	Scope Extension	Other: <i>Please specify</i>
Risk Factor Applied	Choose an item.	Choose an item.	Choose an item.
Justification of Risk Factor Applied			
Number of samples			
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			
Total									
Note: * are smallholders sampled in this audit.									

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Appendix F: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
ISS	Independent Smallholder Standard
KTB	Kalimantan Tengah and Barat
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tons
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
PKWT	Temporary Worker
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
SKE	Sekunyir Estate
SKF	Sekunyir Factory/POM
SKU	Permanent Worker
SRE	Seruyan Estate
SOP	Standard Operating Procedure