

## RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

☐ Initial Assessment

☒ Annual Surveillance Assessment (2\_3)

☐ Recertification Assessment (Choose an item.)

☐ Extension of Scope

<b>Client Company Name / Parent Company:</b> <b>PT. Inti Indosawit Subur</b>
Client company Address: Head Office: Jl Palembang Kav 35-37, Jakarta 10230, Indonesia
Certification Unit: <b>PT Inti Indosawit Subur – Ukui II Mill</b>  Location of Certification Unit: Ukui Village, Sub-District of Ukui, Pelalawan Regency, 28388 Riau Province, Indonesia
Date of Final Report: 17/08/2024

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### Section 1: Scope of the Assessment

1. Company Details			
Parent Company	PT. Inti Indosawit Subur		
RSPO Membership Number	1-0022-06-000-00	Membership Approval Date	6 February 2006
Address	Jl Palembang Kav 35 – 37, Jakarta 10230, Indonesia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT Inti Indosawit Subur – Ukui II Mill		
Location / Address	Ukui Village, Ukui District, Pelalawan Regency, 28388 Riau Province, Indonesia		
Website	<a href="http://www.asianagri.com">www.asianagri.com</a>		
Management Representative	Mr Ivan Novrizaldie	E-mail	<a href="mailto:Ivan_novrizaldie@asianagri.com">Ivan_novrizaldie@asianagri.com</a>
Telephone	021 2301119	Facsimile	021 2301120

2. Certification Information			
Certificate Number	RSPO 565807	Certificate Start Date	25/08/2021
Date of First Certification	01/03/2011	Certificate Expiry Date	24/08/2026
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	Determination of the conformity of the client's management system, or parts of it, with audit criteria and evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_3) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 of the RSPO P&C 2018		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	Mill Capacity	60 MT FFB/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

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ID05/65250	ISO 14001:2015	SGS	10/06/2026
EU-ISCC-Cert-DE100-02044124	ISCC EU	SGS	02/02/2025
SGS-ID-ISPO-0033	ISPO	SGS	21/03/2029

<b>4. Location(s) of Mill &amp; Supply Bases</b>			
<b>Name (Mill / Supply Base / Group Manager / Smallholders)</b>	<b>Location</b>	<b>GPS Coordinates</b>	
		<b>Latitude</b>	<b>Longitude</b>
Ukui II POM	Ukui Village, Sub-District of Ukui, Pelalawan Regency, Riau Province	0° 16' 37.51" S	102° 06' 57.86" E
Soga Estate	Ukui Dua village, Ukui Sub-District, Pelalawan Regency, Riau Province	0° 12' 47.18" S	102° 09' 13.61" E
Sei Lala Estate	Ukui village, Ukui Sub-District, Pelalawan Regency, Riau Province	0° 16' 39.51" S	102° 07' 03.99" E
KUD Tani Subur (367 smallholders)	Sei Beberas Hilir village, Lubuk Batu Jaya Sub-district, Indragiri Hulu Regency, Riau Province	0° 23' 09.50" S	102° 07' 52.08" E
KUD Karya Tani (367 smallholders)	Sei Beras Beras village, Lubuk Batu Jaya Sub-District, Indragiri Hulu Regency, Riau Province	0° 23' 14.80" S	102° 04' 58.07" E
KUD Tani Bahagia (683 smallholders)	Kulim Jaya village, Lubuk Batu Jaya Sub-District, Indragiri Hulu Regency, Riau Province	0° 22' 50.01" S	102° 07' 31.00" E
KUD Mekar Abadi (287 smallholders)	Tasik Juang village, Lubuk Batu Jaya Sub-District, Indragiri Hulu Regency, Riau Province	0° 22' 37.03" S	102° 05' 01.00" E
KUD Trani Maju (481 smallholders)	Pontian Mekar village, Lubuk Batu Jaya Sub-District, Indragiri Hulu Regency, Riau Province	0° 20' 35.03" S	102° 05' 03.03" E
KUD Usaha Tani (646 smallholders)	Air Putih village, Lubuk Batu Jaya Sub-District, Indragiri Hulu Regency, Riau Province	0° 18' 15.06" S	102° 07' 30.5" E
<b>Note:</b>			

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
Soga Estate	2,926.00	34	28.00	2,988.00	97.92
Sei Lala Estate	3,048.00	82.30	31.70	3,162.00	96.39
KUD Tani Subur	780.00	0	0	780.00	100.00
KUD Karya Tani	732.00	0	0	732.00	100.00
KUD Tani Bahagia	1,360.00	0	0	1,360.00	100.00
KUD Mekar Abadi	574.00	0	0	574.00	100.00
KUD Trani Maju	960.00	0	0	960.00	100.00
KUD Usaha Tani	1,256.00	0	0	1,256.00	100.00
<b>Total</b>	<b>11,636.00</b>	<b>116.30</b>	<b>59.70</b>	<b>11,812.00</b>	<b>98.51</b>
<b>Note:</b> There was reduction of hectareage of certified area in KUD Karya Tani (2ha), KUD Tani Bahagia (6 ha), KUD Trani Maju (2 ha) and KUD Usaha Tani (36 ha) because there are some smallholder members exit the scope of certification voluntarily.					

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Soga Estate	-	-	154	2,772	2,926	0
Sei Lala Estate	495	287	318	1,948	2,553	495
KUD Tani Subur	-	-	44	736	780	0
KUD Karya Tani	-	-	-	732	732	0
KUD Tani Bahagia	558	-	-	802	802	558
KUD Mekar Abadi	462	-	-	112	112	462
KUD Trani Maju	508	-	-	452	452	508
KUD Usaha Tani	696	-	-	560	560	696
<b>Total (ha)</b>	<b>2,719</b>	<b>287</b>	<b>516</b>	<b>8,114</b>	<b>8,917</b>	<b>2,719</b>
<b>Note:</b> Only Mature area is considered as production area						

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Aug 2023 – July 2024)	Actual (May 2023 – April 2024)		Forecast (Aug 2024 – July 2025)
		Previous license period (May 2023-July 2023)	Current license period (Aug 2023 – Apr 2024)	
Soga Estate	72,369.00	16,801.83	48,485.00	68,924.00
Sei Lala Estate	65,700.00	16,266.20	44,446.80	66,629.00
KUD Tani Subur	18,164.00	2,813.40	6,573.30	14,200.00
KUD Karya Tani	17,658.00	3,060.45	5,995.52	4,555.00
KUD Tani Bahagia	26,738.00	2,697.94	6,856.87	14,184.00
KUD Mekar Abadi	13,795.00	2,614.64	2,657.65	-
KUD Trani Maju	8,521.00	1,252.97	2,679.09	10,487.00
KUD Usaha Tani	5,885.00	2,092.27	4,667.79	9,532.00
Total	228,830.00	169,961.72		188,511.00
Note:				

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Aug 2023 – July 2024)	Actual (May 2023 – April 2024)		Forecast (Aug 2024 – July 2025)
		Previous license period (May 2023-July 2023)	Current license period (Aug 2023 – Apr 2024)	
N/A		N/A	N/A	
Total		N/A		
Note:				

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Aug 2023 – July 2024)	Actual (May 2023 – April 2024)		Forecast (Aug 2024 – July 2025)
		Previous license period (May 2023-July 2023)	Current license period (Aug 2023 – Apr 2024)	
N/A	N/A	N/A	N/A	N/A
<b>Total</b>	<b>N/A</b>	<b>N/A</b>		<b>N/A</b>

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**Note:**

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

No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	May - 2023	14,971.03	-	14,971.03
2	June – 2023	15,380.21	-	15,380.21
3	July - 2023	17,248.46	-	17,248.46
4	August – 2023	16,014.11	-	16,014.11
5	September – 2023	15,411.17	-	15,411.17
6	October – 2023	15,401.17	-	15,401.17
7	November – 2023	14,640.73	-	14,640.73
8	December – 2023	13,190.17	-	13,190.17
9	January – 2024	11,889.42	-	11,889.42
10	February – 2024	10,030.70	-	10,030.70
11	March – 2024	10,834.33	-	10,834.33
12	April – 2024	14,950.22	-	14,950.22
<b>TOTAL</b>		<b>169,961.72</b>	<b>-</b>	<b>169,961.72</b>

**Note:**

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

Estimated last year (Aug 2023 – July 2024)	Actual (May 2023 – April 2024)		Forecast (Aug 2024 – July 2025)
	Previous license period (May 2023-July 2023)	Current license period (Aug 2023 – Apr 2024)	
<b>FFB</b>	<b>FFB</b>		<b>FFB</b>
228,830.00 mt	47,599.70 mt	122,362.02 mt	188,511.00mt
	<b>TOTAL</b>	169,961.72 mt	
<b>CPO (OER: 20.11 %)</b>	<b>CPO (OER: 19.93 %)</b>		<b>CPO (OER:20.08 %)</b>
46,022.00 mt	9,546.71 mt	24,332.95 mt	37,855.00mt
	<b>TOTAL</b>	33,879.66 mt	
<b>PK (KER: 5.57 %)</b>	<b>PK (KER: 5.26 %)</b>		<b>PK (KER: 5.80 %)</b>
12,767.00 mt	2,673.01 mt	6,258.77mt	10,934.00mt
	<b>TOTAL</b>	8,931.78mt	

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**Note:**

#### 10A. Monthly Records of Certified CPO & PK since the last audit

No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	May - 2023	3,051.07	841.44
2	June - 2023	3,066.60	858.57
3	July - 2023	3,429.04	973.00
4	August - 2023	3,219.76	785.62
5	September - 2023	3,144.87	845.48
6	October - 2023	3,153.88	852.99
7	November - 2023	2,879.13	748.03
8	December - 2023	2,671.39	652.53
9	January - 2024	2,288.52	540.67
10	February - 2024	1,965.61	489.66
11	March - 2024	2,058.90	558.12
12	April - 2024	2,950.89	785.67
<b>TOTAL</b>		<b>33,879.66</b>	<b>8,931.78</b>

**Note:**

#### 11. Summary of Actual Volume sold

##### Current License period (Aug 2023 – Apr 2024)

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>CPO (MT)</b>	23,284.27	1,852.07	-	-	25,136.34
<b>PK (MT)</b>	6,145.25	-	-	-	6,145.25
<b>Credits</b>	-	-	-	-	

##### Previous License period (May 2023-July 2023)

<b>CPO (MT)</b>	8,601.52	-	-	-	8,601.52
<b>PK (MT)</b>	2,459.71	-	-	-	2,459.71
<b>Credits</b>	-	-	-	-	

**Note:** Conventional is RSPO certified material but sold as non-RSPO.



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11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	PT. IIS – Ukui I KCP		-	8,604.96
2	PT Sari Dumai Sejati		23,284.27	-
3	PT Padang Raya Cakrawala		8,601.52	-
TOTAL			31,885.79	8,604.96
Note:				

11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	AAFZCO	ISCC	1,852.07	-
TOTAL			1,852.07	
Note:				

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

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

12. Independent Smallholders Certified Tonnage (MT) / Volume									
	Estimated last year (Not Applicable)			Actual (Not Applicable)			Forecast (Not Applicable)		
Phase	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPO	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	
IS-CSPKE	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	

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
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 (Not Applicable)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				
Previous License period (Not Applicable)							
Credits				N/A	N/A	N/A	N/A
Physical	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
TOTAL			N/A	N/A	N/A	N/A	N/A
Note:							

## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)  
Suite 29.01 Level 29, The Gardens North Tower,  
Mid Valley City, Lingkaran Syed Putra,  
59200 Kuala Lumpur, Malaysia.  
Tel +60 (3) 9212 9638; Fax +60 (3) 9212 9639  
Representative: Dr. Chaiyaporn Seekao ([Chaiyaporn.Seekao@bsigroup.com](mailto:Chaiyaporn.Seekao@bsigroup.com))  
Website: [www.bsigroup.com](http://www.bsigroup.com)

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 **13 – 18 May 2024**. The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on.

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 **3 August 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.

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re-Certification)	Year 2 (ASA2-1)	Year 3 (ASA2-2)	Year 4 (ASA2-3)	Year 5 (ASA2-4)
Ukui II POM	X	X	X	X	X
Soga Estate	X	X	X	X	X
Sei Lala Estate	X	X	X	X	X
KUD Tani Subur		X		X	
KUD Karya Tani		X	X		
KUD Mekar Abadi		X			X
KUD Trani Maju				X	X
KUD Tani Bahagia	X		X	X	
KUD Usaha Tani	X		X		X

**Tentative Date of Next Visit: May 5, 2025 - May 10, 2025**

**Total Number of Mandays: 25.5**

## 2.2 BSI Assessment Team

Name	Role	Competency
<b>Mujinius Jalaraya (MJ)</b>	Team Leader	<p><b>Education:</b> Holds a Bachelor Degree majoring in Forest Resources Conservation and Ecotourism, Bogor Agricultural University (IPB).</p> <p><b>Work Experience:</b> 6 years working experience in palm oil plantations as SHE Assistant at PT. Astra Agro Lestari Tbk and Sustainability Supervisor at Teladan Prima Group. 8 years working experience as RSPO Auditor / Lead Auditor.</p> <p><b>Training attended:</b> Completed ISO 9001 Lead Auditor course, ISPO Lead Auditor course, Endorsed RSPO P&amp;C Lead Auditor course, Endorsed RSPO SCCS Lead Auditor course, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISO 14001 Internal Auditor Training, ISO 45001 Lead Auditor course, OHS Expert Training, SMETA Requirements Training, Endorsed RSPO ISH Auditor course and Endorsed RSPO Refresher course</p> <p><b>Language proficiency:</b> Fluent in Bahasa Indonesia and English</p>

		<b>Aspect covered in this audit:</b> <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 checked="" 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)
<b>Briyogi Shadiwa (BS)</b>	Team Member	<b>Education:</b> Holds an associate degree in Palm Oil Plantation, Bogor Agricultural University (IPB). <b>Work Experience:</b> He has work experience since 2009 - 2016 in several private oil palm plantation companies in Indonesia as Assistant Agronomy and Agronomy Quality Control. Has participated in many audit activities with certification bodies related to the sustainable palm oil certification system since 2017 with worker welfare, OHS, best management practice, supply chain, social, environmental, GHG, and waste management aspect. <b>Training attended:</b> Completed Endorsed RSPO Lead Auditor Course by Checkmark, ISPO Auditor Training by LPP, ISO 9001: 2015 Lead Auditor Course, Endorsed RSPO Supply Chain Certification Lead Auditor Course by Checkmark, ISO 14001: 2015 CQI & IRCA Lead Auditor Course, SMK3 Awareness, OHSAS 18001:2007 Awareness, SA 8000 Requirement Training, ISO 45001:2018 Awareness, OHS Expert Training ( <i>Ahli K3 Umum</i> ), and Endorsed RSPO Refreshment Trainings. <b>Language proficiency:</b> Fluent in Bahasa Indonesia and English <b>Aspect covered in this audit:</b> <input checked="" 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)
<b>Edy Widodo (EW)</b>	Team Member	<b>Education:</b> Holds a Bachelor Degree majoring Agricultural Technology from University of Padjadjaran, Bandung. <b>Work Experience:</b> 8 years working experience in palm oil industry as Agronomist and Assistant Manager in various companies. 9 year working experience as RSPO/ISPO auditor. <b>Training attended:</b> Completed ISO 9001 Lead Auditor Course, ISPO endorsed auditor course, Understanding ISO 14001 training, Auditing ISO 14001: 2004 training, Endorsed RSPO Supply Chain Certification Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, SMETA Requirements Training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation. <b>Language proficiency:</b> Fluent in Bahasa Indonesia and English <b>Aspect covered in this audit:</b> <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)

<b>Eko Prastio Ramadhan (ER)</b>	Team Member	<p><b>Education:</b> Holds a Bachelor Degree in Forest Resources Conservation and Ecotourism from Forestry Faculty, Bogor Agricultural University (IPB).</p> <p><b>Work Experience:</b> Over 4 years of working experience in biodiversity officer with Birdlife Indonesia and consultant with PT Inoa Konsultindo. Over 2½ years of working experience in palm oil estate with PT Salim Ivomas Pratama Tbk and Capitol Plantation Group implementing sustainability. Over 4½ years of working experience as RSPO P&amp;C Certification Program Manager and auditor covering standard such as RSPO P&amp;C, RSPO SCCS, ISPO, ISO 9001 and ISO 14001.</p> <p><b>Training attended:</b> Completed ISO 14001:2015 Lead Auditor Course, Endorsed RSPO P&amp;C Lead Auditor Course, Social Impact Assessment Training, Endorsed RSPO SCC Auditor Lead Auditor Course, ISPO Auditor Batch 19 Training, ISO 9001 Lead Auditor Course, Endorsed RSPO Refresher Courses, RSPO Independent Smallholder Training by RSPO Secretariat, and Identification of HCV Areas Training.</p> <p><b>Language proficiency:</b> Fluent in Bahasa Indonesia and English</p> <p><b>Aspect covered in this audit:</b></p> <p><input type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
<b>Sansan Suhendar (SS)</b>	Team Member	<p><b>Education:</b></p> <p>Hold a Bachelor Degree in Forest Product Technology from Forest faculty – Bogor Agricultural University (IPB)</p> <p><b>Working experience:</b></p> <p>OHS staff at PT. Astra Agro Lestari (PT. Sumber Kharisma Persada and PT. Sari Aditya Loka 1), RSPO and ISPO Auditor at PT. SAI Global Indonesia, RSPO and ISPO Auditor at PT. Mutuagung Lestari, RSPO and ISPO Lead Auditor at PT. SGS Indonesia, RSPO &amp; ISPO Lead Auditor at PT. TUV Rheinland Indonesia and RSPO &amp; ISPO Lead Auditor at PT. BSI - current.</p> <p><b>Trainings attended:</b></p> <p>RSPO Lead Auditor Training, ISPO Lead Auditor Training (ISPO Commission), ISO 9001 Lead Auditor Training, ISO 45001 Lead Auditor Training, ISO 14001 Lead Auditor Training, HCV training, GHG training, HACCP training, General OHS Expert training and RSPO Lead Auditor Standard 2018 Refreshment Training (2023).</p> <p><b>Language proficiency:</b> Fluent in Bahasa Indonesia and English</p> <p><b>Aspect covered in this audit:</b></p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>

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#### Accompanying Persons:

Name	Role
Nil	Nil

### 2.3 Assessment Plan

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

ASA2.3 Assessment Plan:

Date	Time	Subjects	ER	MJ	SS	BS	EW
Monday, 13 May 2024	08.00 – 09.00	<b>Opening Meeting</b> <ul style="list-style-type: none"> <li>Presentation by PT. IIS – Ukui II POM, Estate and Smallholder</li> <li>Presentation by BSI Indonesia</li> </ul>	√	√	√	√	√
	09.00 – 12.00	<b>Field Visit to Soga Estate</b> <ul style="list-style-type: none"> <li>Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, HCV's, riparian zones, etc.</li> <li>Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, riparian zones, Hazardous Waste, waste management, etc.</li> <li>Boundaries inspection, worker interviews, social amenities, etc.</li> </ul>	√		√		
	09.00 – 12.00	<b>Field Visit to Sei Lala Estate</b> <ul style="list-style-type: none"> <li>Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, HCV's, riparian zones, etc.</li> <li>Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, riparian zones, Hazardous Waste, waste management, etc.</li> <li>Boundaries inspection, worker interviews, social amenities, etc.</li> </ul>		√		√	√
	12.00 – 14.00	<b>BREAK</b>	√	√	√	√	√

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Date	Time	Subjects	ER	MJ	SS	BS	EW
	14.00 – 16.30	<b>Field Visit to Ukui II POM</b> <ul style="list-style-type: none"> <li>Occupational Health and Safety, Environment Aspect.</li> <li>Social Aspect and workers welfare, workers interview</li> <li>Best Management Practice for Mill and supply chain for mill – IP module and rules on market communication and claim.</li> <li>Field implementation for Operation Procedure.</li> <li>Inspection of processing, warehouse, workshop, mill wastes management, Effluent Ponds, OHS, Environment issues, POME application, workers interview, Supply chain for CPO mill, Review on SEIA documents and records, Document review, etc.</li> </ul>	√	√	√	√	
	14.00 – 16.30	<b>Public Consultation (Internal)</b> <ul style="list-style-type: none"> <li>Union Labour</li> <li>Koperasi Karyawan</li> <li>Gender committee</li> </ul>					√
	16.30 – 17.00	<b>Wash-up Meeting</b>	√	√	√	√	√
Tuesday, 14 May 2024	08.00 – 12.00	<b>Field Visit to Scheme Smallholder KUD Trani Maju</b> Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. (22 samples)		√	√		√
	08.00 – 12.00	<b>Field Visit to Scheme Smallholder KUD Tani Subur</b> Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. (18 samples)	√			√	
	12.00 – 14.00	<b>BREAK</b>	√	√	√	√	√



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Date	Time	Subjects	ER	MJ	SS	BS	EW
	14.00 – 16.30	<b>Field Visit to Scheme Smallholder KUD Tani Bahagia</b> Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. (24 samples)	√	√	√	√	√
	16.30 – 17.00	<b>Wash-up Meeting</b>	√	√	√	√	√
Wednesday, 15 May 2024	08.00 – 12.00	Document Review for PT. IIS – Ukui II POM, Estate and Smallholder	√	√	√	√	
	08.00 – 12.00	Public consultation (external) - Governance body - NGO - Local government					√
	12.00 – 14.00	<b>BREAK</b>	√	√	√	√	√
	14.00 – 16.30	Document Review for PT. IIS – Ukui II POM, Estate and Smallholder	√	√	√	√	√
	16.30 – 17.00	<b>Wash-up Meeting</b>	√	√	√	√	√
Thursday, 16 May 2024	08.00 – 12.00	Document Review for PT. IIS – Ukui II POM, Estate and Smallholder	√	√	√	√	√
	12.00 – 14.00	<b>BREAK</b>	√	√	√	√	√
	14.00 – 16.30	Document Review for PT. IIS – Ukui II POM, Estate and Smallholder	√	√	√	√	√
	16.30 – 17.00	<b>Wash-up Meeting</b>	√	√	√	√	√
Friday, 17 May 2024	08.00 – 11.00	Document Review for PT. IIS – Ukui II POM, Estate and Smallholder	√		√	√	√
	11.00 – 14.00	<b>BREAK</b>	√	√	√	√	√
	14.00 – 16.30	Document Review for PT. IIS – Ukui II POM, Estate and Smallholder	√		√	√	√
	16.30 – 17.00	<b>Wash-up Meeting</b>	√		√	√	√
Saturday, 18 May 2024	08.00 – 12.00	Document Review for PT. IIS – Ukui II POM, Estate and Smallholder					
	12.00 – 14.00	<b>BREAK</b>	√	√	√	√	√
	14.00 – 15.30	Auditors meeting / closing meeting preparation	√		√	√	√
	15.30 – 17.00	Closing meeting	√	√	√	√	√
	16.30 – 17.00	Travel to pekanbaru	√		√	√	√

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*ER (Eko Prastio Ramadhan), EW (Edy Widodo), MJ (Mujinius Jalaraya), BS (Briyogi Shadiwa), SS (Sansan Suhendar)*

## NCR Close Out Assessment Plan

Date	Time	Subjects	MJ
Saturday, 3 Augt 2024	08.00 – 08.30	<b>Opening Meeting</b> <ul style="list-style-type: none"><li>Presentation by PT. IIS – Ukui II POM, Estate and Smallholder</li><li>Presentation by BSI Indonesia</li></ul>	✓
	08.30 – 11.30	<b>Verification NCR Close Out Ukui II POM (Field visit, Document Review, Interview)</b> NC# 2496195-202405-M1	✓
	11.30 – 12.00	<b>Closing Meeting</b>	✓

## Section 3: Assessment Findings

### 3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	PT Inti Indosawit Subur has explained the certification plan for all of its subsidiaries; indicating all palm oil mills, company-owned estates and scheme smallholder as the supply base.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	There are remaining mill and estate that has not certified yet: <ul style="list-style-type: none"> <li>• Bahilang Estate (1,019 ha) as Supply base for Tanah Datar Mill, planned in year 2024 due to still in process of RACP Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024;</li> <li>• Topaz Estate (230 ha) as supply bases of Topaz Mill planed in 2026 due to HGU still in the process, to propose to Local Government and BPN Pusat;</li> <li>• Teluk Panjie Estate (801 ha) as supply bases for Teluk Panjie Mill planned in 2026 due to HGU still in process. HGU still on Progress, since the estate under 2 different province, the final approval must come from National Authority (BPN Pusat);</li> <li>• Sentral Estate (2,996 ha) as Supply bases for Gunung Melayu II POM planned in 2024 due to still in process of RACP (recertification 2020). Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024.</li> </ul> Revision of Time bound plan has been approved by RSPO on 19 April 2023. The submission is according to the template as announced by the RSPO Secretariat on 21/12/2021.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021. <i>Note:</i>	No, there is no new acquisition conducted by PT Inti Indosawit Subur and its subsidiary.	Complied

Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Yes, there is time bound plan revision dated 19 April 2023. Justification available and approved by RSPO on 19 April 2023.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Yes, there is time bound plan revision dated 19 April 2023. Justification available and approved by RSPO on 19 April 2023. Justification as below: <ul style="list-style-type: none"> <li>• Bahilang Estate (1,019 ha) as Supply base for Tanah Datar Mill, planned in year 2024 due to still in process of RACP Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024;</li> <li>• Topaz Estate (230 ha) as supply bases of Topaz Mill planed in 2026 due to HGU still in the process, to propose to Local Government and BPN Pusat;</li> <li>• Teluk Panjie Estate (801 ha) as supply bases for Teluk Panjie Mill planned in 2026 due to HGU still in process. HGU still on Progress, since the estate under 2 different province, the final approval must come from National Authority (BPN Pusat);</li> <li>• Sentral Estate (2,996 ha) as Supply bases for Gunung Melayu II POM planned in 2024 due to still in process of RACP (recertification 2020). Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024.</li> </ul> This has been consistent with ACOP reporting.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	No isolated lapses in implementation of the plan.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised	No any fundamental failure to justify delay in planning the assessments.	Complied
<b>Un-Certified Units or Holdings</b>		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	According to internal audit result and HCV assessment for uncertified unit it was confirmed that there is no primary forest or HCV areas replace for plantation. All uncertified unit was existing plantation since 1990 and some of the plantation has been replanting.	Complied
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	No new planting after January 2010. RaCP for Bahilang and Sentral Estate still on-going process, Concept Note still on Progress and submit to RaCP team at Q2 2023.	Complied

Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	<p>According to internal audit result on 14 – 19 August 2023 in Bahilang Estate, 22 – 27 May 2023 in Teluk Panji Estate, 10 – 16 May 2023 in Topaz Estate and 8 – 16 August 2023 in Sentral Estate, there is no land conflict occur in area of uncertified units: Topaz Estate, Bahilang Estate, Teluk Panjie Estate and Sentral Estate.</p> <p>According to the RSPO RaCP tracker (<a href="https://www.rspo.org/certification/remediation-and-compensation/racp-tracker">https://www.rspo.org/certification/remediation-and-compensation/racp-tracker</a>) updated on 25 March 2024, PT Inti Indosawit Subur has:</p> <ul style="list-style-type: none"> <li>• MU's with potential liabilities: 4 units</li> <li>• LUCA Submitted (MUs): 4 units</li> <li>• LUCA review completed (MUs): 4 units</li> <li>• Concept Note required (MUs): 3 units</li> <li>• Concept Note submitted (MUs): 2 units</li> <li>• Concept Note approved (MUs): 2 units</li> <li>• Concept Note submitted (MUs): 0</li> <li>• Concept Note endorsed (MUs): 0</li> <li>• Remediation Plan required (MUs): 4 units</li> <li>• Remediation Plan submitted (MUs): 1</li> <li>• Remediation Plan approved (MUs): 0</li> </ul>	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	Internal audit has conducted for Bahilang Estate on 14 – 19 August 2023, Teluk Panji Estate on 22 – 27 May 2023, Topaz Estate on 10 – 16 May 2023 and Sentral Estate on 8 – 16 August 2023; According to internal audit result confirmed that there is no Labor disputes occur in this management unit.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Internal audit has conducted for Bahilang Estate on 14 – 19 August 2023, Teluk Panji Estate on 22 – 27 May 2023, Topaz Estate on 10 – 16 May 2023 and Sentral Estate on 8 – 16 August 2023; According to internal audit result confirmed that there is no Labor disputes occur in this management unit.	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>Internal audit has conducted for Bahilang Estate on 14 – 19 August 2023, Teluk Panji Estate on 22 – 27 May 2023, Topaz Estate on 10 – 16 May 2023 and Sentral Estate on 8 – 16 August 2023. Report of internal audit are available. Result of internal audit:</p> <ul style="list-style-type: none"> <li>• Bahilang Estate, Teluk Panji Estate and Sentral Estate has complies to relevant regulation, no issue regarding the legal compliance.</li> </ul>	Complied

	<ul style="list-style-type: none"> <li>No complaint or grievances and disputes from stakeholders and affected parties.</li> <li>No labor disputes occur since the latest audit.</li> <li>No land conflict; Documents related to the history of land tenure and the actual legal or customary use of the land are available.</li> <li>No new plantings are established on local peoples land and no HCV area replacement.</li> </ul>	
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	According to internal audit result, there is no Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Stakeholders consultation already conducted during internal audit for Bahilang Estate on 14 – 19 August 2023, Teluk Panji Estate on 22 – 27 May 2023, Topaz Estate on 10 – 16 May 2023 and Sentral Estate on 8 – 16 August 2023. There is no issue from stakeholder consultation.	Complied

### 3.2 Progress of scheme smallholders and/or outgrowers

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

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**Approved Time Bound Plan**

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

					Re-Certified on 1 March 2016
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016
Tungkal Ulu Mill - PT Inti Indosawit Subur	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Tungkal Ulu Estate	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	2012	Certified on 15 August 2012 Re-Certification on August 2017
		Tungkal Ulu (Plasma)	Renah Mendalo, Merlung, Muara Papalik District, Tanjung Jabung Barat Regency,	2012	Certified on 15 August 2012 Re-Certification on August 2017
Muara Bulian Mill - PT Inti Indosawit Subur	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pemayung District, Batang Hari Regency, Jambi	Muara Bulian Estate	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pemayung District, Batang Hari Regency,	2013	Certified on 12 July 2013 Re-Certification on August 2017
		Muara Bulian (Plasma)	Maro Sebo Ilir District, Batanghari Regency, Jambi	2013	Certified on 12 July 2013 Re-Certification on August 2017
Topaz Mill – PT Tunggal Yunus Estate	Petapahan Village, Tapung District, Kampar Regency, Riau	Topaz Estate 1	Petapahan Village, Tapung District, Kampar Regency, Riau	2015	Certified on 30 March 2015
		Topaz Estate 2	Petapahan Village, Tapung District, Kampar Regency, Riau	2026	Planned to be certified in 2026
Taman Raja Mill – PT Dasa Anugrah Sejati	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Village,	Taman Raja, Badang & Bernai Estate*	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh	2015	Certified on 20 February 2015



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	Tungkal Ulu District, Tanjung Jabung Regency, Jambi		Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi		
Segati Mill – PT Mitra Unggul Pusaka	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	Segati Estate	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	2022	Certified on November 2022
		Gondai Estate	Pangkalan Sarik / Baru Village, Langgam / Siak Hulu District, Pelalawan / Kampar Regency, Riau	2022	Certified on November 2022
Penarikan Mill – PT Mitra Unggul Pusaka	Penarikan Village, Langgam District, Pelalawan Regency, Riau	Penarikan Estate*	Penarikan / Tambak Village, Langgam District, Pelalawan Regency, Riau	2022	Certified on November 2022
Tanah Datar Mill – PT Supra Matra Abadi	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	Tanah Datar Estate	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	2015	Certified on 18 May 2015
		Bahilang Estate	Bahilang Village, Tebing Tinggi District, Serdang Bedagai Regency, North Sumatera	2024	*Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024.
Aek Nabara Mill – PT Supra Matra Abadi	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera	Aek Nabara Estate	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera	2015	Certified on 6 March 2015
Teluk Panjie Mill – PT Supra Matra Abadi	Teluk Panjie Village, Kampung Rakyat District,	Teluk Panjie Estate (3,885 Ha)		2015	Certified on 21 April 2015

	Labuhan Batu Regency, North Sumatra	Teluk Panjie Estate (801 Ha)	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatra	2026	HGU still on Progress, since the estate under 2 different province, the final approval must come from National Authority (BPN Pusat)
Peranap Mill – PT Rigunas Agri Utama	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau	Peranap Estate	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau	2015	Certified on 7 January 2015
		Peranap (Plasma)		2016	Certified on 18 August 2016
Bungo Tebo Mill – PT Rigunas Agri Utama	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	Bungo Tebo Estate	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	2015	Certified on 3 December 2015
		Bungo Tebo (Plasma)		2017	Certified on 7 February 2017
Tanjung Selamat Mill – PT Indo Sepadan Jaya	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Tanjung Selamat	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	Certified on 26 May 2015
		Pangkatan	Sennah Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	Certified on 26 May 2015
Gunung Melayu I – PT Saudara Sejati Luhur	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	Pulau Maria Estate	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	2015	Certified on 7 September 2015
Gunung Melayu II – PT Gunung Melayu	Gonting Malaha Village, Bandar Pulau District,	Aek Tarum & Batu Anam Estate		2015	Certified on 8 July 2015

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	Asahan Regency, North Sumatra	Sentral Estate	Gonting Malaha Village, Bandar Pulau District, Asahan Regency, North Sumatra	2024	Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024
Negri Lama II Mill – PT Hari Sawit Jaya	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Negri Lama	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2016	<ul style="list-style-type: none"> <li>• Certified on 23 December 2016 as Independent Mill</li> <li>• Audit in 2016 as Mill and Supply Base</li> </ul>
		Aek Kuo (2,088 Ha)	Aek Korsik Village, Aek Natas District, Labuhan Batu Regency, North Sumatra	2018	Certified on 2018
		Aek Kuo (501 Ha)		2018	
Negri Lama I Mill – PT Hari Sawit Jaya	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	*3rd party which is excluded from scope of certification	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	<ul style="list-style-type: none"> <li>• Certified on 8 April 2015</li> <li>• Audit in 2016 as Independent Mill</li> </ul>

### 3.3 Details of Nonconformities

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

During this Assessment there were 1 (one) Critical; 1 (one) Minor nonconformities and no Opportunity For Improvement raised. The PT Gunung Melayu – Gunung Melayu II POM Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. 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			
<b>NCR Ref #</b>	2496195-202405-M1	<b>Issued Date</b>	18/05/2024
<b>Due Date</b>	17/08/2024	<b>Closure Date</b>	3/8/2024
<b>Indicator &amp; Category (Critical / Minor)</b>	3.6.2 (Critical)		
<b>Statement of Nonconformity:</b>	Certificate holder has not consistently monitor the effectiveness of OHS implementation and monitoring.		
<b>Requirement Reference:</b>	(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.		
<b>Objective Evidence:</b>	<ul style="list-style-type: none"> <li>- Certificate holder can't shown the certificate of qualification for welder who is working in Workshop Sei Lala in accordance with Permenaker No. 2 year 1982 concerning welder qualification in the workplace.</li> <li>- Certificate holder can't shown the SIO of operator powerhouse generator set (Pesawat Tenaga dan produksi) in Ukui II POM in accordance with Permenaker No. 38 year 2016 concerning OHS Pesawat Tenaga dan Produksi.</li> </ul>		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>- Submit an application for Welding Operators who do not have SIO so that training can be carried out.</li> <li>- Create a SIO training program for 5 years</li> </ul>		
<b>Root Cause Analysis:</b>	Lack of understanding from PIC unit regarding compliance with operator SIO in accordance with applicable regulations.		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- Training to PIC unit related to compliance of regulation related to SIO</li> <li>- Monitoring Operator SIO regularly to ensure Operator SIO is available and still valid.</li> <li>- Create a SIO training plan program in stages for plantation and factory units.</li> </ul>		
<b>Assessment Conclusion:</b>	<ul style="list-style-type: none"> <li>- PT IIS – Sei Lala Estate and Soga Estate has register the welder operator on behalf Jon Ridol T Sinaga and Hidca Manapin S. to follow the training of welder operator certification. Training has been conducted by PT Fresh Galang Mandiri (PJK3) on 24 – 29 Juni 2024. Welder operator on behalf Jon Ridol T Sinaga and Hidca Manapin S. has been passed the training according to "Surat Keterangan No. 2096/S.Ket/FGM/ADM/VII/2024" dated 24 July 2024 from PT Fresh Galang Mandiri. Certificate and licence of welder operator under process</li> </ul>		

	<p>of issuance by Indonesia Ministry of Manpower. Evidence of training documentation can be shown during audit.</p> <ul style="list-style-type: none"> <li>- PT IIS – Ukui II POM has register the Genset/Power house operator on behalf Erwin Saputra to follow the training of Class 1 Prime Mover Operator Certification (Genset). Training has been conducted by PT Fresh Galang Mandiri (PJK3) on 8 – 11 July 2024. Operator on behalf Erwin Saputra has been passed the training according to "Surat Keterangan No. 2094/S.Ket/FGM/ADM/VII/2024" dated 23 July 2024 from PT Fresh Galang Mandiri. Certificate and licence of welder operator under process of issuance by Indonesia Ministry of Manpower. Evidence of training documentation can be shown during audit.</li> <li>- PT IIS – Ukui II POM and supply bases has made the monitoring of SIO (licence) of operator to ensure the validity of SIO operator. The licence of SIO operator valid for 3 years.</li> <li>- Sustainability Dept. has deliver the training/socialization to PIC unit PT IIS – Ukui Group regarding the regulation of SIO operator. Training/socialization has been conducted on 28 June 2024. Interview with PIC unit (Mill/Estate Manager and KTU) confirmed that they have aware regarding the regulation of SIO operator.</li> </ul>
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Non-conformity			
<b>NCR Ref #</b>	2496195-202405-N1	<b>Issued Date</b>	18/05/2024
<b>Due Date</b>	Next Assessment	<b>Closure Date</b>	18/08/2024
<b>Indicator &amp; Category (Critical / Minor)</b>	2.1.2 Minor		
<b>Statement of Nonconformity:</b>	Certificate holder has a system for ensuring regulation compliance, however there were several list of regulation has not included in the evaluation system and in addition there is no compliance evaluation of third party contractor.		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	<p>Based on the verification results of the document "Ukui Group Factory/Plantation Compliance Evaluation Status update 2024" it is known that there are several relevant regulations has not included in the compliance evaluation status, such as:</p> <ul style="list-style-type: none"> <li>- Minister of Manpower Decree No. 88 of 2023 concerning Guidelines for Preventing and Handling Sexual Violence in the Workplace</li> <li>- Minister of Manpower Decree No. 2 of 2023 concerning Implementing Regulations of PP No. 66 of 2014 concerning Environmental Health.</li> <li>- Decree of the Governor of Riau Number: Kpts.7618/XI/2023 concerning District/City Minimum Wages in Riau Province in 2024.</li> <li>- Regulation of the Minister of Environment and Forestry No. P.106/MENLHK/SETJEN/KUM.1/12/2018 of 2018 concerning the Second</li> </ul>		

	<p>Amendment to the regulation of the Minister of Environment and Forestry Number P.20/MENLHK/SETJEN/KUM.1/6/ 2018 concerning Protected Types of Plants and Animals.</p> <ul style="list-style-type: none"> <li>- Minister of Manpower Regulation 38 of 2016 concerning Occupational Safety and Health of Power and Production Aircraft</li> <li>- Minister of Manpower Regulation 9 of 2016 concerning Occupational Safety and Health in Work at Height.</li> </ul> <p>Furthermore, evaluation of regulation compliance also does not include evaluation of regulation compliance for third party contractors such as: CV Surya Agung Gemilang (Replanting contractor), PT Admino (Boiler contractor), PT Sumber Kencana and CV Jasa Sahabat Abadi (CPO Transporter).</p>
<b>Corrections:</b>	<p>Assigned a PIC (Responsible Person) Memorandum to update the Legal Compliance Evaluation and conduct a Legal Compliance Evaluation of the Contractor.</p> <p>Update the Legal Compliance Evaluation and including contractor.</p>
<b>Root Cause Analysis:</b>	There is no special PIC available for updating Legal Compliance Evaluation (EKH).
<b>Corrective Actions:</b>	PIC updates and monitors periodically when there are new regulations or changes in legislation.
<b>Assessment Conclusion:</b>	Effectiveness of corrective action will be verify in the next assessment.

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 Minor Non-conformity			
NCR Ref #	2346729-202305-N1	Issued Date	19 May 2023
Due Date	ASA 2-3	Closure Date	17/05/2024
Indicator & Category (Critical / Minor)	3.1.2 Minor		
Statement of Nonconformity:	Plasma Ukui Group (Ukui II) already has and established a replanting program, but during field verification it was found that farmer plots were carrying out replanting		

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	(under planting) independently and not in accordance with the established replanting provisions.
<b>Requirement Reference:</b>	An annual replanting programme projected for a minimum of five years with yearly review, is available.
<b>Objective Evidence:</b>	Based on the results of a field visit to a sample of Ukui II Plasma plots, it was found that farmers carried out independent replanting by means of under planting outside of the replanting program that has been set by the Plasma Management and KUD, namely in the KUD Usaha Tani there was one plot and in KUD Karya Tani there was one plot.
<b>Corrections:</b>	Identify and justify underplanting that occurs in the Ukui plasma plantation
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>The number of farmers who underplanting has not yet been identified.</li> <li>There has been no justification for underplanting to be carried out.</li> </ul>
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>Conduct pre-replanting outreach and ensure that all farmers who will carry out replanting are carried out in accordance with procedures.</li> <li>Outreach to farmers who carry out underplanting to express their willingness to follow the terms and conditions of certification.</li> </ul>
<b>Assessment Conclusion:</b>	<p>Verification during audit ASA2.3:</p> <p>The company has approached and socialized farmers regarding replanting and does not recommend replanting by under planting, however the company cannot force farmers to follow the company's provisions. Farmers who carry out under planting state that they will manage their plantations independently. Therefore, the company excludes member farmers who manage their plantations independently and carry out under planting from the RSPO certified environment.</p> <p>The corrective action made was effectively implemented. This NC can be CLOSED.</p>

Previous Audit Critical (Major) Non-conformity			
<b>NCR Ref #</b>	2340441-202305-M1	<b>Issued Date</b>	19 May 2023
<b>Due Date</b>	18 August 2023	<b>Closure Date</b>	28 July 2023
<b>Indicator &amp; Category (Critical / Minor)</b>	6.2.2 Critical		
<b>Statement of Nonconformity:</b>	At the time of the audit, it was found that workers were doing work without a work contract with the company.		
<b>Requirement Reference:</b>	(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.		
<b>Objective Evidence:</b>	Based on the results of interviews with employees in Ukui II (Sei Lala Estate) with a sample of employees (initial TM, WG) it was confirmed that there were workers who assisted in harvesting activities (Kutip Brondol) who were not registered as workers and did not have work contracts with the company.		

<b>Corrections:</b>	<ul style="list-style-type: none"> <li>The organization makes a policy (memo) from management site regarding the prohibition of bringing workers without a work contract.</li> <li>The organization conducts socialization to harvesters regarding the prohibition to bring workers without a work contract.</li> <li>Organizations install signboards related to the prohibition on bringing in workers without a work contract in every afdeling office</li> </ul>
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>Harvesters bring workers (quote brondol) who do not have a work agreement with the company with the aim of speeding up the work process in the field, while management has strictly stipulated to prohibit bringing in people who help work in the field, each work must carry out a work agreement with the company.</li> <li>The Mandor has already carried out supervision by monitoring in the morning and when working in the field, this can happen because the supervisor does not know that there are harvesters bringing auxiliary workers because monitoring in the field is carried out in stages at each harvester block.</li> </ul>
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>The Mandor monitors during the morning master and when working in the field every day for people who help employees harvest while working.</li> <li>Give warnings to sanctions to harvesters if harvesters are still found bringing harvest assistants who do not have work contracts in the field.</li> </ul>
<b>Assessment Conclusion:</b>	<p><b>Verification</b></p> <p><b>Correction:</b></p> <p>Evidence is available that the organization has made a policy (Memo) from management regarding the prohibition of bringing in workers without a work contract as stated in General Manager Memorandum No. 030/GM-KUK/MEMO/06/23 dated 2 June 2023 regarding "Prohibition on Bringing Children, Wives and Workers without Having a Work Contract with the Company". The memo explains that harvest workers in particular are prohibited from bringing children, wives and workers who do not have a work contract with the company into the field and will be given a warning or warning.</p> <p>There is evidence of socialization to harvesters regarding the prohibition on bringing workers without work contracts in the form of Socialization Minutes, photos and absences, verified documents, for example:</p> <p>Ukui Estate</p> <ul style="list-style-type: none"> <li>Afdeling 1, socialization was held on 05/06/2023, attended by 34 harvesters.</li> <li>Afdeling 2, socialization was held on 05/06/2023, attended by 30 harvesters.</li> <li>Afdeling 3, socialization was held on 08/06/2023, attended by 46 harvesters.</li> <li>Afdeling 4, socialization was held on 05/06/2023, attended by 33 harvesters.</li> </ul> <p>Sei Lala Estate</p> <ul style="list-style-type: none"> <li>Afdeling 1, socialization was held on 06/06/2023, attended by 39 harvesters.</li> <li>Afdeling 2, socialization was held on 06/06/2023, attended by 35 harvesters.</li> <li>Afdeling 3, socialization was held on 05/06/2023, attended by 46 harvesters.</li> <li>Afdeling 4, socialization was held on 05/06/2023, attended by 18 harvesters.</li> </ul>



	<p>There is evidence that the organization has put up warnings/billboards prohibiting bringing workers without work contracts in every divisional office. Verified evidence is the Minutes of Billboard Installation:</p> <p>Ukui Estate</p> <ul style="list-style-type: none"> <li>• Afdeling 1, installation of warnings/billboards will be carried out on 05/06/2023.</li> <li>• Afdeling 2, installation of warnings/billboards will be carried out on 05/06/2023.</li> <li>• Afdeling 3, installation of warnings/billboards will be carried out on 05/06/2023.</li> <li>• Afdeling 4, installation of warnings/billboards will be carried out on 05/06/2023.</li> </ul> <p>Sei Lala Estate</p> <ul style="list-style-type: none"> <li>• Afdeling 1, installation of warnings/billboards will be carried out on 06/06/2023.</li> <li>• Afdeling 2, installation of warnings/billboards will be carried out on 06/06/2023.</li> <li>• Afdeling 3, installation of warnings/billboards will be carried out on 05/06/2023.</li> <li>• Afdeling 4, installation of warnings/billboards will be carried out on 05/06/2023.</li> </ul> <p><b>Corrective Action</b></p> <ul style="list-style-type: none"> <li>• There is evidence that supervision carries out monitoring in the morning and while working in the field every day for people who help employees harvest while working. The verified document is the "Monitoring of Harvest Helpers" document for the period June and July 2023. The monitoring results show that none of the harvesters brought work helpers. The monitoring is made by the Foreman and verified by the Assistant.</li> <li>• Regarding the rules for giving warnings and sanctions to harvesters if workers are found who do not have work contracts in the field, it is regulated in memo No. 030/GM-KUK/MEMO/06/23 dated 2 June 2023 regarding "Prohibition on Bringing Children, Wives and Workers without Having a Work Contract with the Company". Up until the time the NCR Close Out audit was carried out, no letters of reprimand/warning had been issued to harvest workers.</li> </ul> <p>The results of the Field Visit carried out are:</p> <p>Ukui Estate</p> <ul style="list-style-type: none"> <li>• Field verification was carried out at Ukui Estate on harvest activities at Block C89d afdeling IV, harvesters were observed working alone and from the results of interviews it was found that the harvesters had understood the rules prohibiting bringing workers without contracts as stated in the GM Memo. It was also stated that the harvesters did not bring auxiliary workers in the field during harvest activities.</li> <li>• Interviews were conducted with the Foreman and Assistant Afdeling, it was stated that the foreman supervised the morning roll call by filling in the monitoring form, and when carrying out work in the field when checking the harvest patterns. From the monitoring results of the foremen in June and July 2023, which were known to the assistants, it was discovered that there were no more harvest workers who brought auxiliary workers without work ties/contracts to harvest activities.</li> <li>• The results of interviews with afdeling assistants in the field conveyed that socialization continues to be carried out, and checks are carried out randomly during harvest block visits, the result is that in the period June and July 2023</li> </ul>
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	<p>there were no workers who brought auxiliary workers/without work contracts to harvest activities.</p> <ul style="list-style-type: none"><li>Interviews with the Labor Union have also been carried out, it was stated that from the monitoring of the labor union, there are no longer any harvest workers who bring in auxiliary workers/without contractual ties.</li></ul> <p>Sei Lala Estate</p> <ul style="list-style-type: none"><li>Field verification was carried out at Sei Lala Estate on harvest activities in Block C10a afdeling III, harvesters were observed working alone and from the results of interviews it was found that the harvesters had understood the rules prohibiting bringing workers without contracts as stated in the GM Memo. It was also stated that the harvesters did not bring auxiliary workers in the field during harvest activities.</li><li>Interviews were conducted with the Foreman and Assistant Afdeling, it was stated that the foreman supervised the morning roll call by filling in the monitoring form, and when carrying out work in the field when checking the harvest patterns. From the monitoring results of the foremen in June and July 2023, which were known to the assistants, it was discovered that there were no more harvest workers who brought auxiliary workers without work ties/contracts to harvest activities.</li><li>The results of interviews with afdeling assistants in the field conveyed that socialization continues to be carried out, and checks are carried out randomly during harvest block visits, the result is that in the period June and July 2023 there were no workers who brought auxiliary workers/without work contracts to harvest activities.</li><li>Interviews with the Labor Union have also been carried out, it was stated that from the monitoring of the labor union, there are no longer any harvest workers who bring in auxiliary workers/without contractual ties.</li></ul> <p>It was also observed that the organization had done the same thing in other plantations of the same group, namely Soga Estate, namely socialization related to the GM Memo regarding the prohibition on bringing workers without work contracts had also been carried out as well as socialization through the installation of warnings/billboards.</p> <p>Based on the results of the CAP verification, it was concluded that the M1 findings could be closed.</p>																				
<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	<p>During field audit to Soga and Sei Lala Estate it was noted that all workers has a contract with company, no workers without contract who performing job. All workers and company has aware that the workers assistance without contract is prohibited. Monitoring and socialization are conducted regularly by company.</p> <p>Sample of workers contract can be shown during audit.</p> <table><tr><th>No.</th><th>Employee</th><th>Memorandum</th><th>dated</th></tr><tr><td>1</td><td>Bahudin Koncoro</td><td>165/HR-RO2/MEMO/SK/06/2023</td><td>30/06/2023</td></tr><tr><td>2</td><td>Ruslan</td><td>163/HR-RO2/MEMO/SK/06/2023</td><td>30/06/2023</td></tr><tr><td>3</td><td>Ali Boy Sibuaea</td><td>162/HR-RO2/MEMO/SK/06/2023</td><td>30/06/2023</td></tr><tr><td>4</td><td>Riki Handaya</td><td>161/HR-RO2/MEMO/SK/06/2023</td><td>30/06/2023</td></tr></table> <p>Previous critical NC is remained effectively closed.</p>	No.	Employee	Memorandum	dated	1	Bahudin Koncoro	165/HR-RO2/MEMO/SK/06/2023	30/06/2023	2	Ruslan	163/HR-RO2/MEMO/SK/06/2023	30/06/2023	3	Ali Boy Sibuaea	162/HR-RO2/MEMO/SK/06/2023	30/06/2023	4	Riki Handaya	161/HR-RO2/MEMO/SK/06/2023	30/06/2023
No.	Employee	Memorandum	dated																		
1	Bahudin Koncoro	165/HR-RO2/MEMO/SK/06/2023	30/06/2023																		
2	Ruslan	163/HR-RO2/MEMO/SK/06/2023	30/06/2023																		
3	Ali Boy Sibuaea	162/HR-RO2/MEMO/SK/06/2023	30/06/2023																		
4	Riki Handaya	161/HR-RO2/MEMO/SK/06/2023	30/06/2023																		

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Previous Audit Opportunity for Improvement	
OFI#	Description
OFI 1	Nil

### 3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1412038M1	Major	4.6.5	01-11-2016	Closed on 31-01-2017
1412038M2	Major	4.7.2	01-11-2016	Closed on 31-01-2017
1412038M3	Major	4.4.2	01-11-2016	Closed on 31-01-2017
1412038N1	Minor	4.7.6	01-11-2016	Closed on 21-12-2017
1569381-201712-M1	Major	4.7.1	21-12-2017	Closed on 13-02-2018
1569381-201712-M2	Major	6.1.3	21-12-2017	Closed on 13-02-2018
1569381-201712-N1	Minor	5.1.3	21-12-2017	Closed on 19-12-2018
1569381-201712-N2	Minor	5.2.4	21-12-2017	Closed on 19-12-2018
1569381-201712-N3	Minor	5.4.1	21-12-2017	Closed on 19-12-2018
1722078-201812-M1	Major	4.7.2	22-12-2018	Closed on 13-02-2019
1722078-201812-M2	Major	3.2.ii) General CoC requirements for the supply chain.	22-12-2018	Closed on 13-02-2019
1722078-201812-M3	Major	5.8.2 General CoC requirements for the supply chain.	22-12-2018	Closed on 13-02-2019
1722078-201812-M4	Major	5.13.2 General CoC requirements for the supply chain.	22-12-2018	Closed on 13-02-2019
1722078-201812-M5	Major	5.13.3 General CoC requirements for the supply chain.	22-12-2018	Closed on 13-02-2019
1722078-201812-N1	Minor	4.7.5	22-12-2018	Closed on 14-12-2019
1722078-201812-N2	Minor	4.7.7	22-12-2018	Closed on 14-12-2019
1722078-201812-N3	Minor	5.3.3	22-12-2018	Closed on 14-12-2019
1861406-201911-M1	Critical	3.6.2	14-12-2019	Closed on 20-02-2020
1861406-201911-M2	Critical	5.3.2	14-12-2019	Closed on 20-02-2020
1861406-201911-M3	Critical	5.6.1	14-12-2019	Closed on 20-02-2020

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1861406-201911-M4	Critical	4.1.1	14-12-2019	Closed on 20-02-2020
1861406-201911-M5	Critical	4.2.1	14-12-2019	Closed on 20-02-2020
1861406-201911-M6	Critical	6.7.3	14-12-2019	Closed on 20-02-2020
1861406-201911-N1	Minor	6.2.7	14-12-2019	Escalated to Critical NC
2040085-202103-M1	Critical	6.2.7	27-03-2021	Closed on 25-06-2021
2040085-202103-N1	Minor	7.3.2	27-03-2021	Closed on 27-05-2022
2206497-202205-N1	Minor	6.7.2	02-06-2022	Closed on 19-05-2023
2340441-202305-M1	Critical	6.2.2	19-05-2023	Closed on 28-07-2023
2346729-202305-N1	Minor	3.1.2	19-05-2023	Closed on 17/05/2024
2496195-202405-M1	Critical	3.6.2	18-05-2024	Closed on 3/08/2024
2496195-202405-N1	Minor	2.1.2	18-05-2024	Open

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

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss PT Inti Indosawit Subur – Ukui II POM Certification Unit's environmental and social performance, legal and any known dispute issues.

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Internal	Gender Committee	Face to face
Union	Worker Union	Face to face
Governmental Department	Pelalawan Regency Manpower Office Pelalawan Regency Lands Office Pelalawan Regency Agriculture and Plantation Office	By phone

	Pelalawan Regency Environmental Office	
Communities	Kulin Jaya Village Ukui II Village Redang Seko Village Head of Ukui Subdistrict	Face to face
NGO	-	-

### Stakeholders comment

1.	<p><b>Feedbacks:</b> Pelalawan Regency Manpower Office (Mr. Iskandar)</p> <ul style="list-style-type: none"> <li>- Wage determination is in accordance with the 2024 Pelalawan Regency Minimum Wage</li> <li>- Communication including reporting has been carried out well and on time.</li> <li>- There is no information related to child labor, human rights violations and forced labor.</li> <li>- Until now (2023-2024), there have been no industrial relations cases or problems with workers.</li> <li>- The company has included all workers in national social security (BPJS Employment and BPJS Health)</li> <li>- Regarding the previous use of PHL workers, PT IIS-Ukui Group has committed to creating a program to appoint PHL (daily workers) harvesters to become SKUs (Permanent Workers).</li> </ul> <p><b>Audit Team verification and response:</b> Audit team has verified with indicator related to worker welfare, occupational health and safety and found aligned. Regarding PHL (Harvesting) Workers, PT IIS-Ukui Group has a mechanism for recruiting harvester workers as permanent workers with a trial period of 3 months, then they will be evaluated to be designated as permanent workers (SKU). Meanwhile, for PHL (Harvester) workers who had joined before this mechanism was established, a promotion program to become permanent workers (SKU) has been created until the end of 2024. Auditors will always verify the progress of the PHL harvester promotion program to become permanent workers (SKU).</p>
2.	<p><b>Feedbacks:</b> Pelalawan Regency Lands Office</p> <ul style="list-style-type: none"> <li>- There are no issues related to land conflicts.</li> <li>- HGU renewal has been carried out for HGU Certificate no. 4/1989 covering an area of 6,727 Ha has been implemented and is just waiting for the results of the Committee B meeting.</li> </ul> <p><b>Audit Team verification and response:</b> Regarding the progress of renewal HGU No. 4/1989 covering an area of 2,727 Ha:</p> <ul style="list-style-type: none"> <li>• Area on HGU No. 04/1989 covering an area of 6,727 hectares was submitted in 2019 and cadastral measurements were carried out in 2022.</li> <li>• The Committee B meeting was held on April 24 2024, but the results of the meeting have not yet been submitted by the BPN. Invitation to Land Inspection Session B No. HP.01.03/1160-14/IV/2024 dated 22 April 2024. This invitation was also addressed to Amat Ukui, Head of Air Hitam Village, Head of Bagan Limau Village and related government agencies.</li> </ul>
3.	<p><b>Feedbacks:</b></p>

	<p>Pelalawan Regency Agriculture and Plantation Office</p> <ul style="list-style-type: none"> <li>- Communication is well established</li> <li>- Company has obtained IUP permit with a capacity of 70 tons of FFB per hour</li> <li>- There are no land conflicts with surrounding communities or with other companies</li> <li>- There are no issues related to oil palm plantation management at PT IIS – Ukui II</li> <li>- There is the issue of the Plasma Replanting Program using the Government-BPDPKS assistance program which has not been realized, even though the aid funds have been disbursed. Based on temporary observations, there are internal problems in the Farmer Group.</li> </ul> <p><b>Audit Team verification and response:</b> The audit team verified indicators related to legal compliance, support to small farmers, community development and found compliance.</p>
4.	<p><b>Feedbacks:</b> Pelalawan Regency Environmental Office</p> <ul style="list-style-type: none"> <li>• The company has environmental documents related to the construction of a biogas plant and kernel crushing plant.</li> <li>• The company consistently reports on environmental management: RKL-RPL Report, B3 Waste Management Report, Land Allocation Report.</li> <li>• PT Inti Indosawit Subur – POM Ukui II has carried out good environmental management.</li> <li>• Monitoring reports for B3/LB3 Waste at Temporary Storage Sites (TPS) for B3/LB3 Waste have been carried out.</li> <li>• The company has managed B3 waste, obtained a temporary storage permit – in accordance with relevant regulations.</li> <li>• There are no problems related to pollution or environmental damage in the Ukui Group plantation area.</li> <li>• There were no forest and land fires.</li> </ul> <p><b>Audit Team verification and response:</b> Audit team verified against the indicator related to legal compliance, environmental management system, water quality and found in compliance.</p>
5.	<p><b>Feedbacks:</b> Village communities Kulin Jaya Village, Redang Seko Village, Ukui II Village</p> <ul style="list-style-type: none"> <li>- There are no issues related to land conflicts</li> <li>- There are no social issues resulting from plantation activities at the Ukui Group.</li> <li>- There are no violations related to human rights.</li> <li>- The Company's contribution to the Village community has been carried out well through the CSR Program every year.</li> <li>- There is an issue related to the damaged condition of the village road, this has been raised with the management of PT IIS -Ukui Group through the KUD Tani Bahagia plasma plantation unit</li> <li>- The use of labor is prioritized for village communities around the plantation. And the surrounding village community feels helped.</li> <li>- Plasma farmers (KUD Usaha Baru) have planned to replant in 2027 and have chosen to remain with PT IIS-Ukui Group.</li> </ul> <p><b>Audit Team verification and response:</b></p>

	<p>Audit team verified against the indicator related to transparency, legal compliance, support to smallholder, community development and found in compliance.</p> <p>Regarding the damage to the main road in Kulin Jaya Village, this has been submitted through the KUD Tani Bahagia Plasma Plantation, through a letter requesting the loan of heavy equipment in the form of a motor grader and is being proposed to the management for approval.</p>
6.	<p><b>Feedbacks:</b></p> <p>Gender Committee</p> <ul style="list-style-type: none"> <li>- The Gender Committee understands the mechanism for submitting complaints, including protecting anonymity, especially if harassment or violence occurs against female workers</li> <li>- The Gender Committee has an annual work program: meetings, socializing female workers' rights to female workers, holding training or general outreach to new mothers on plantations.</li> <li>- The company has demonstrated efforts to protect the rights of female workers: menstrual leave, maternity leave, special health checks for female workers in high-risk areas, pregnancy tests for sprayers and fertilizers.</li> <li>- To date, there have been no complaints regarding sexual harassment, domestic violence against female workers, and/or violations of women's reproductive rights.</li> </ul> <p><b>Audit Team verification and response:</b></p> <p>The audit team verified indicators related to worker welfare, no discrimination, occupational health and safety, protection of women workers' rights, handling complaints and found compliance.</p> <p>Verify the rights of female workers regarding menstrual leave and maternity leave</p>
7.	<p><b>Feedbacks:</b></p> <p>Worker Union</p> <ul style="list-style-type: none"> <li>- Communication between PT IIS management and the workers' union is maintained through quarterly Bipartite meetings.</li> <li>- There are no practices that violate human rights.</li> <li>- There is no indication that the company discriminated against workers.</li> <li>- The company has provided personal protective equipment (PPE) to all workers.</li> <li>- The company provides adequate facilities for employees, for example housing, water, electricity, toilets, sanitation, school buses, clinics, places of worship.</li> <li>- The company has registered all workers in the BPJS program (BPJS work and health) including PHL (non-permanent employees).</li> <li>- The company has provided wages in accordance with existing regulations.</li> <li>- There is no indication of forced labor or coercive work practices.</li> <li>- There are no cases related to harassment of female workers.</li> <li>- The company has fulfilled workers' rights, for example: menstrual leave, maternity leave and the right to breastfeed children for 1 hour.</li> </ul> <p><b>Audit Team verification and response:</b></p> <p>Audit team verified against the indicator related to worker welfare, no discrimination, occupational health and safety, protection on female worker rights, complaint handling and found in compliance.</p>
8.	<p><b>Feedbacks:</b></p> <p>Head of Ukui Sub-District</p> <ul style="list-style-type: none"> <li>• PT Indosawit did not attend the 2025 Musrembang meeting on February 26 2024.</li> </ul>



	<ul style="list-style-type: none"> <li>After Replanting, many plasma farmers chose to become independent plasma farmers rather than collaborating with PT IIS-Ukui Group. This is because it is easier to maintain and not complicated</li> <li>Can be increased again for CSR programs in the next period.</li> <li>There is an extension of HGU No.01/1989 covering an area of 6,193,957 hectares which expires in 2019. For this reason, we (the sub-district head) representing the people of Ukui Subdistrict are requesting to be given land of approximately 2 hectares from the HGU area owned by PT IIS which will be intended for the construction of community health centers (Puskesmas) and other public facilities</li> </ul>
	<p><b>Audit Team verification and response:</b></p> <p>At the Musrembang meeting for the 2025 period, the company had represented Public Relations to attend the event, however there were obstacles because on February 26 2024 there was busy activity with the police regarding the theft of FFB.</p> <p>Regarding the request for 2 ha land for the construction of a Community Health Center by the Head of Ukui District, it was discussed with PT IIS through the Committee B Meeting at the HGU extension hearing covering an area of 6,193,957 Ha on 22 April 2024 which was also attended by Mr. Joko, Head of Ukui District, it was stated that:</p> <ol style="list-style-type: none"> <li>Area on HGU No. 01/1989 covering an area of 6,193,957 hectares was submitted in 2019 and cadastral measurements were carried out in 2022.</li> <li>PT IIS can fulfill the demand for the 2 Ha area by obtaining it from other areas outside the HGU. PT IIS has obtained a replacement candidate for the 1 ha land in Bukit Jaya Village, but there has been no agreement regarding the land acquisition price.</li> </ol>

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
N/A	-	-	-	-	-
PT Inti Indosawit Subur – Ukui II POM has established since 1985 and has planting palm oil since 1987, 1988, 1989. Currently the palm oil has been replanting since 2017 – 2027.					

Previous land owner / user comment	
	<b>Feedbacks:</b> N/A
	<b>Audit Team verification and response:</b> N/A

### 3.5 Impartiality and conflict of interest

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



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#### Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that PT Inti Indosawit Subur – Ukui II POM has complied with the Indonesia National Interpretation 2020 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that PT Inti Indosawit Subur – Ukui II POM is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
<b>Name:</b> <b>Mujinius Jalaraya</b>	<b>Name:</b> <b>Putu Grhyate Yonata Aksa</b>
<b>Company Name:</b> <b>On behalf of BSI Services Malaysia Sdn. Bhd.</b>	<b>Company Name:</b> <b>PT Inti Indosawit Subur – Ukui II POM</b>
<b>Title:</b> <b>Lead Auditor</b>	<b>Title:</b> <b>Sustainability Manager</b>
<b>Signature:</b> 	<b>Signature:</b> <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
<b>Date: 24 May 2024</b>	<b>Date: 12 August 2024</b>

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#### Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
<b>Principle 1: Behave ethically and transparently</b> Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.			
<b>Criteria 1.1:</b> The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<b>(C)</b> Management documents that are specified in the RSPO P&C are made publicly available.	<p>The Company has a list of documents made publicly available as seen on document '<i>Daftar dokumen dan informasi untuk dapat diakses publik</i>', There are 30 documents that can be accessed by the public such as Government, community, NGOs and cooperatives including: AMDAL documents, RKL-RPL Reports, Social Impact Assessment, HCV Identification Reports, Land permits, Building permits (IMB), Environmental permits, P2K3 Implementation Reports, Plantation business development reports, CSR documents, Company policies, SOPs, Hazardous Waste Reports, Mandatory labour reports, employee MCU reports and so on.</p> <p><u>Scheme Smallholder:</u>            The Smallholder Manager has determined type of documents which can be accessed by public as "<i>Daftar Dokumen yang Dapat Di Akses</i>", that covers:</p> <ul style="list-style-type: none"> <li>• Copies of Sertifikat Hak Milik (SHM) – and ownership certificate.</li> <li>• Group working Program.</li> <li>• HCV</li> <li>• Standard Operational Procedure of Good Agriculture Practices.            Example: Procedure No. AA-APM-OP-1100.09-R3 <i>Pemupukan</i></li> </ul>	Complied

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		<p>(Manuring) dated 20 April 2015 and No. AA-PLASMA-PP-KS-04 <i>Potong Buah</i> (Harvesting)</p> <ul style="list-style-type: none"> <li>• Social Impact Assessment (SIA)</li> <li>• ICS Policy including Human rights policy, man powering, health, and safety - Group Manager has established the ICS Policy under "Kebijakan Group Manager"</li> <li>• Social Activity Documents including CSR Report.</li> <li>• Local Development Documents.</li> <li>• Prices of Fresh Fruit Bunches</li> <li>• Public Summary Report of RSPO</li> <li>• RAT document of Cooperative</li> </ul>	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	<p>The Company has disseminated about type of information available and how to get access to the information to the stakeholders as seen on document '<i>Daftar dokumen dan informasi untuk dapat diakses publik</i>', (see indicator 1.1.1). The Document available in appropriate language (Indonesian language).</p> <p>In addition, the Company also has an SOP related to the handling of requests for documents and information from stakeholders with the number AA-GL-5008.1-R1 (revision 1) and became effective on 22 August 2011.</p> <p>Based on interview with stakeholders (Government, community, NGOs and cooperatives), it was informed that they are aware of the type of information available and how to get access to the information.</p> <p><u>Scheme Smallholder:</u></p> <p>The Smallholder Manager has determined type of documents which can be accessed by public as "<i>Daftar Dokumen yang Dapat Di Akses</i>" as mentioned in 1.1.1.</p>	Complied

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		<p>All the document provided in appropriate languages and accessible to relevant stakeholders.</p> <p>During interview with sample of smallholder member, they understand with the information of Publicly Document.</p> <p>Cooperative sample: KUD Trani Maju, KUD Tani Subur and KUD Tani Bahagia</p>	
1.1.3	<b>(C)</b> Records of requests for information and responses are maintained.	<p>Provision of response to information request regulated in "<i>SOP Penanganan Permintaan Informasi Stakeholder</i>" (SOP No. AA-GL-5008.1-RI, Rev. 1) dated 22 August 2011. The procedure described that information request can be receive by oral or written, or by representative of communities; the company will respond according to respective authorities, starts from Humas (public relation), Estate/Mill manager, Group Manager and Regional Office. The company has set time to respond information request, it is 14 working days.</p> <p>Record of information request and response/information logbook is maintained by company. Records of information are kept for minimum three (3) years.</p> <p>Data verified:</p> <ul style="list-style-type: none"> <li>• Receipt of RKL-RPL report from the Ministry of Environment and Forestry for the first semester of 2023, with a print date of 25 January 2024.</li> <li>• HCV reporting in 2023 has been carried out periodically every year. The last reporting was done on 16 March 2024 with proof of receipt of the report from BKSDA Prov. Riau.</li> <li>• Reporting of plantation business development (PUP) in 2023 has been carried out periodically every semester. The last reporting for semester II was carried out on 7 February 2023 with proof of receipt of the report from DISBUNAK Kab. Pelalawan and DISBUN Prov. Riau.</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• P2K3/OHS reporting in 2023 has been carried out regularly every quarter. The last reporting for the fourth quarter was carried out on 25 March 2024 with proof of receipt of the report from DISNAKER Prov. Riau</li> <li>• Reporting of HGU Utilisation in 2023 has been carried out periodically every year. The last reporting was done on 21 February 2024 with proof of receipt of the report from BPN Pelalawan Regency.</li> <li>• Mandatory Labour Reporting for 2023 was reported online on 18 January 2024 to the Ministry of Manpower.</li> <li>• Reporting of B3 Waste in 2023 has been carried out periodically every 3 months. The last reporting was carried out on 25 March 2024 with proof of receipt of reports from Pusat Pengendalian Ekoregion Sumatera, Disbunnak Kab. Pelalawan, DLH Kab. Pelalawan, DLH Prov. Riau dan DISBUN Prov. Riau</li> </ul> <p><u>Scheme Smallholder:</u>  Group Manager has demonstrated the record of requests for information and response in Logbook of "<i>Catatan Permintaan Informasi dan Tanggapan</i>". In 2023-2024, there were information requests, e.g.:  In KUD Trani Maju</p> <ol style="list-style-type: none"> <li>1. Sample for request for information from Pontian Mekar Villager Head, dated 5 January 2024, regarding request for funding assistance for Volleyball tournament. The response provides by Group Manger on 5 January 2024.</li> <li>2. Sample for request for information from Mr. HMT/Dinas pertanian, dated 21 March 2024, regarding questions related mplementation of working visits. The response provides by Group Manger on 23 March 2024.</li> </ol>	
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		<p>3. Sample for request for information from Air Molek Orphanage, dated 9 April 2024, regarding request for funding assistance. The response provides by Group Manger on 9 April 2024.</p> <p>In KUD Tani Subur</p> <ol style="list-style-type: none"> <li>1. Sample for request for information from Sei Beras-beras Hilir Village Head, dated 12 February 2024, regarding PBB tax notice. The response provides by Group Manger on 12 February 2024.</li> <li>2. Sample for request for information from Sei Beras-beras Hilir Village Head dated 20 March 2024, regarding meeting invitation. The response provides by Group Manger on 20 March 2024.</li> <li>3. Sample for request for information from Small and medium sized community businesses (UMKM), dated 24 April 2024, regarding socialization invitation. The response provides by Group Manger on 24 April 2024.</li> </ol> <p>In KUD Tani Bahagia</p> <ol style="list-style-type: none"> <li>1. Sample for request for information from SMK Pasir Penyu, dated 5 January 2024, regarding internship application. The response provides by Group Manger on 6 January 2024.</li> <li>2. Sample for request for information from staklholder member (name: Mr. SAR), dated 11 April 2024, regarding request for funding for road repairs. The response provides by Group Manger on 11 April 2024.</li> </ol> <p>Sample for request for information from Dinas Perkebunan, dated 18 April 2024, regarding meeting invitation. The response provides by Group Manger on 18 April 2024.</p>	
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1.1.4	<p><b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p>	<p>Procedure for consultation and communication under “<i>Mekanisme Penanganan Permintaan Informasi Stakeholder</i>”, No. SOP; AA-GL-5008F.1-R1) dated 22 August 2011.</p> <p>The procedure described that:</p> <ul style="list-style-type: none"> <li>• Information requests can be received by oral or written, or by representative of communities.</li> <li>• The company will respond according to respective authorities, starts from Humas (public relation),</li> <li>• Estate/Mill manager, Group Manager and Regional Office.</li> <li>• The company responses against all information requests sent by stakeholders including a response time of 14 working days after information request accepted.</li> <li>• Record related to information request and company response kept and maintained for three (3) years.</li> </ul> <p>Socialization of communication and consultation procedure and complaint and grievance handling mechanism to surrounding communities. The socialization dated 3-4 February 2024 attended by 15 communities and officials from Ukui Dua Village, Sei Beras-beras Hilir Village and Tasik Juang Village</p> <p>The company has shown evidence of document requests and submissions recorded in the incoming and outgoing letter books for 2023 and 2024.</p> <ul style="list-style-type: none"> <li>• Receipt of RKL-RPL report from the Ministry of Environment and Forestry for the first semester of 2023, with a print date of 25 January 2024.</li> <li>• HCV reporting in 2023 has been carried out periodically every year. The last reporting was done on 16 March 2024 with proof of receipt of the report from BKSDA Prov. Riau.</li> </ul>	Complied
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		<ul style="list-style-type: none"> <li>• Reporting of plantation business development (PUP) in 2023 has been carried out periodically every semester. The last reporting for semester II was carried out on 7 February 2023 with proof of receipt of the report from DISBUNAK Kab. Pelalawan and DISBUN Prov. Riau.</li> <li>• P2K3/OHS reporting in 2023 has been carried out regularly every quarter. The last reporting for the fourth quarter was carried out on 25 March 2024 with proof of receipt of the report from DISNAKER Prov. Riau</li> <li>• Reporting of HGU Utilisation in 2023 has been carried out periodically every year. The last reporting was done on 21 February 2024 with proof of receipt of the report from BPN Pelalawan Regency.</li> <li>• Mandatory Labour Reporting for 2023 was reported online on 18 January 2024 to the Ministry of Manpower.</li> <li>• Reporting of B3 Waste in 2023 has been carried out periodically every 3 months. The last reporting was carried out on 25 March 2024 with proof of receipt of reports from Pusat Pengendalian Ekoregion Sumatera, Disbunnak Kab. Pelalawan, DLH Kab. Pelalawan, DLH Prov. Riau dan DISBUN Prov. Riau</li> </ul> <p><u>Scheme Smallholder</u></p> <p>The Group Manager has established mechanism for communication and consultation "Prosedur Konsultasi dan komunikasi Didokumentasikan, Diungkap, Diimplementasikan Tersedia dan Dijelaskan Kepada Semua Stakeholder" dated 4 January 2024, shaped flow Chart that describes the process of incoming information requests up to the responses provided. Responsible for the response of information from the stakeholders is done by the Field Assistant then will be arranged to the Estate Manager.</p>	
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		<p>Each smallholder member has "<i>Buku Panduan dan Catatan Petani Plasma</i>", whereas explains the flow process of consultation and communication. Both of communication by written and verbal communication to group management are acceptable.</p> <p>Group Manager has demonstrated the record of requests for information and response in Logbook of "<i>Catatan Permintaan Informasi dan Tanggapan</i>". In 2023-2024, there are example information requests, e.g.:</p> <p>In KUD Trani Maju</p> <ol style="list-style-type: none"> <li>1. Sample for request for information from Pontian Mekar Villager Head, dated 5 January 2024, regarding request for funding assistance for Volleyball tournament. The response provides by Group Manger on 5 January 2024.</li> <li>2. Sample for request for information from Mr. HMT/Dinas pertanian, dated 21 March 2024, regarding questions related mplementation of working visits. The response provides by Group Manger on 23 March 2024.</li> <li>3. Sample for request for information from Air Molek Orphanage, dated 9 April 2024, regarding request for funding assistance. The response provides by Group Manger on 9 April 2024.</li> </ol> <p>In KUD Tani Subur</p> <ol style="list-style-type: none"> <li>1. Sample for request for information from Sei Beras-beras Hilir Village Head, dated 12 February 2024, regarding PBB tax notice. The response provides by Group Manger on 12 February 2024.</li> <li>2. Sample for request for information from Sei Beras-beras Hilir Village Head dated 20 March 2024, regarding meeting invitation. The response provides by Group Manger on 20 March 2024.</li> <li>3. Sample for request for information from Small and medium</li> </ol>	
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		<p>sized community businesses (UMKM), dated 24 April 2024, regarding socialization invitation. The response provides by Group Manger on 24 April 2024.</p> <p>In KUD Tani Bahagia</p> <ol style="list-style-type: none"> <li>1. Sample for request for information from SMK Pasir Penyu, dated 5 January 2024, regarding internship application. The response provides by Group Manger on 6 January 2024.</li> <li>2. Sample for request for information from stakholder member (name: Mr. SAR), dated 11 April 2024, regarding request for funding for road repairs. The response provides by Group Manger on 11 April 2024.</li> <li>3. Sample for request for information from Dinas Perkebunan, dated 18 April 2024, regarding meeting invitation. The response provides by Group Manger on 18 April 2024.</li> </ol>	
1.1.5	An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.	<p>PT Inti Indosawit SUBur – Ukui Group updates the list of contacts and detailed stakeholders. The list comprises of different stakeholders. The stakeholder list completed with name of chairman, address and contact number.</p> <p>List of stakeholders provided at “Daftar Stakeholder”, last updated in Januatry 2023. The list consisted of 40 stakeholders, 2 category of stakeholders i.e.:</p> <ul style="list-style-type: none"> <li>• Internal: <ul style="list-style-type: none"> <li>- Worker Union:</li> <li>- Committee Gender:</li> </ul> </li> <li>• External <ul style="list-style-type: none"> <li>- Government institution, consist of Surrounding villages, District Head, and related agency of Pelalawan Regency (Dinas Lingkungan Hidup, Dinas, Perkebunan, Dinas Tenaga Kerja,</li> </ul> </li> </ul>	Complied

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		<p>BPN).</p> <ul style="list-style-type: none"> <li>- Chairman of Koperasi Unit Desa (KUD) which under company scheme smallholder, Kebun Masyarakat (20 smallholders)</li> <li>- Informal institution around the company, e.g., FK-KPPS, GWKAK, Worker Union and WKAK.</li> <li>- NGO around the company e.g., WWF, Scale Up.</li> <li>- NGO (WWF, Scale Up)</li> </ul> <p><u>Scheme Smallholder:</u>  The updated the list of stakeholder's year 2024, sample seen:</p> <ul style="list-style-type: none"> <li>• Stakeholders from PT Inti Indosawit Subur – Ukui Group</li> <li>• Stakeholders from local government → District Head</li> <li>• Stakeholders related agency in Pelalawan Regency → Pelalawan Regency (Dinas Lingkungan Hidup, Dinas, Perkebunan, Dinas Tenaga Kerja, BPN).</li> <li>• Stakeholder from banks (6 stakeholders)</li> <li>• Stakeholder from KUD → Chairman of Koperasi Unit Desa (KUD) which under company scheme smallholder, Kebun Masyarakat (20 smallholders).</li> </ul> <p>Cooperative sample → KUD Trani Maju, KUD Tani Bahagia and KUD Tani Subur</p>	
<b>Criteria 1.2:</b> The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	Based on the results of this ASA2.3 audit, there are no document changes related to the ethical conduct policy. The documents are still the same as the previous year.	Complied

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		<p>PT Inti Indosawit Subur - Ukui Group has revised the company policy by including commitment to a code of ethical business conduct, it was signed by Managing Director on 1 December 2019.</p> <p>The code of conduct standards are the company internal guidelines for work ethics, commitment, and the enforcement of company internal guideline for work ethics, commitment and the commitment and the enforcement of company regulations for individuals when conducting business and other activities, as well as interacting with stakeholders. Basic attitudes of individuals, company employees will demonstrate: Compliance with company regulations, an ethical approach to their work, honesty and discipline at work, openness, and willingness to improve themselves, mutual respect and courtesy towards others, egalitarian attitudes and behaviour, willingness to be placed anywhere according to company requirements and prevailing conditions.</p> <p>The policy has been disseminated to all employees by installing signboard of company policy and by direct dissemination. In addition, the policy was conveyed at the employees' morning assembly at the Mill and in the Estate. Sample seen for socialization of policy on 3 – 4 February 2024 in Soga Estate, Sei lala Estate and Ukui II POM by sustainability team.</p> <p>To ensure the implementation of the code of ethics, the auditor team conduct interviewed to labour union chairman and village heads around the companies operational. Based on the interviews obtained information that the employee recruitment process has been openly informed. The results of the recruitment procedure can be accessed by prospective employees and there is no charge for the whole process.</p> <p><u>Scheme Smallholder</u></p> <p>The Smallholder Manager already has a Code of Ethical Business Policy that included on "<i>Kebijakan Manajer Group ICS</i>" signed on 11 August</p>	
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		<p>2020, and has been disseminated to each member through the "Kegiatan Refresh Pelatihan P&amp;C RSPO" was performed on 11 August 2020 attended by 83 farmers where in point 2 stated "<i>Committed to ethical conduct in business in overall transactions and business operations, prohibition all forms of corruption, bribery and fraud in the use of funds and resources</i>". And for refresh has been carried out on 3-4 February 2024.</p> <p>Document verification shows that all farmer members have stated approval of all policy issued by Smallholder Manager, including policy related to code of ethic which described in the Agreement Letter.</p> <p>Document seen Cooperative sample → KUD Trani Maju, KUD Tani Subur and KUD Tani Bahagia have signed Cooperation.</p> <p>Separately, the policy of the business code of conduct is stated in the cooperation contract with the second party. Statements relating to business ethics are mentioned in Article 8; About Prohibition: that: The owner of the fleet (Transporter) is charged with fraud, theft and embezzlement of TBS.</p> <p>Based on interview with smallholders shows that they have a good understanding of the Code of Business Conduct policy issued by the Smallholder Manager.</p>	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	<p>PT Inti Indosawti Subur – Ukui Group has shown the document to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>The implementation through carried out internal audit against RSPO P&amp;C on annual basis, covering indicator related to code of ethical conduct implementation in company operation and contractor:</p> <ul style="list-style-type: none"> <li>Internal Audit Report as per document Laporan Internal Audit ISPO &amp; RSPO dated 26 February – 2 March 2024 including Scheme smallholders/Plasma Ukui II.</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• Management review for Soga Estate &amp; Sei Lala Estate dated 9 March 2024 and POM II dated 10 March 2024.</li> <li>• Implemented business conduct policy to all employees, it is repeated an in-employment contract with PKB employees' period 2021 – 2023. Describes on article XXII about "<i>Kewajiban Perusahaan dan Pekerja</i>"; these included: <i>Pengusaha dan pekerja berkewajiban memelihara budi pekerti yang baik dan tidak bertentangan dengan norma hukum dan nilai susila, Pengusaha dan pekerja berkewajiban mematuhi dan menjalankan segala peraturan.</i></li> </ul> <p>PT Inti Indosawit Subur – Ukui Group (Including Scheme Smallholder) has mechanism regarding reporting guarantees and case disclosures; from the case report referring to procedure AA-GL/510.1-R0, Public Relations will convey the information to GM and keep the reporting party confidential. GM and Public Relations provide a maximum response of 14 days for a whistle-blower case referring to the related procedure: refer to the AA-GL-5009.1 R0 procedure for settlement with the local community and resolution of employee complaints related to employment referring to the AA-HR-308.5-R0 procedure.</p>	
<b>Principle 2: Operate legally and respect rights</b> Implement legal requirements as the basic principles of operation in any jurisdiction.			
<b>Criteria 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<b>(C)</b> The unit of certification complies to relevant regulations.	<p>In complying with applicable laws and regulations relating to company operations, PT Gunung Melayu has procedure of identification and evaluation of legal requirements "<i>Prosedur Pemenuhan Peraturan Perundang - undangan dan Perubahannya</i>" (SOP AA-GL-5001.1-R0), dated 5 December 2009. Person in charge to identify and evaluate was legal staff in coordinate with unit head.</p> <p>Apart from that, the Company has an evaluation document regarding regulatory compliance which is carried out once a year (January-</p>	Complied

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		<p>December).</p> <p>The company has implemented compliance with government regulations, here is some evidence:</p> <ol style="list-style-type: none"> <li>1. <i>Laporan Pelaksanaan Izin Lingkungan Periode Januari – Juni 2023 dan Juli – Desember 2023</i> to Environmental Agency Pelalawan Regency, Environmental Agency Riau Province and Sumatra Ecoregion Control Center on 3 August 2023 and 21 Feb 2023/25 March 2023.</li> <li>2. Water retribution payment period March 2024 according to <i>Peraturan Daerah Provinsi Riau No. 16 Tahun 2002</i>.</li> <li>3. Waste Water Analysis period January – Feb 2024, <i>Laporan hasil uji No. D.01.1815/LHU/2024, Laporan hasil uji No. D.02.513/LHU/2024, Laporan hasil uji No. D.02.513/LHU/2024</i></li> <li>4. Surface water quality and water biota monitoring to prevent and control the physic and chemist quality of surface water comply to PP RI No 22 tahun 2021. Water surface analysis result No. D.07.2242-1/LHU/2023 dated 30 July 2023; D.02.611/LHU/2024 dated 20 Feb 2024.</li> <li>5. Land application permit "<i>Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Kabupaten Pelalawan Nomor: 503/DPMTSP-LA/2019/07 Tentang Izin Pemanfaatan Air Limbah Kepada PT Inti Indosawit Subur – PMKS Ukui II</i>" in accordance with "<i>Keputusan Menteri Negara Lingkungan Hidup No. 29 Tahun 2003</i>".</li> <li>6. Hazardous waste permit "Surat Keputusan Badan Penanaman Modal dan Pelayanan Perijinan Terpadu nomor: KPTS-503/DPMTSP-LB3/2020/33, dated 29 December 2020, the license valid for 5 years.</li> <li>7. Plantation business licenses/Surat Pendaftaran Usaha Perkebunan-SPUP based on Decree of Ministry Forestry and Plantation No.</li> </ol>	
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		<p>185/Mentanhut/VII/2000 dated 3 November 2000 and IUP B PT IIS No. KPTS.525.3/DISHUTBUN/2013/446 dated 29 May 2013.</p> <p>8. Land title: SK Ka. BPN No: 156/HGU/BPN/2004, dated 11 November 2004.</p> <p>9. Land Title certificate (HGU) No. 01/1989 for area 6,727.64 Ha located in Ukui Village. Signed by Head of National Land Agency of Pelalawan District on 18 December 1989 valid until 31 December 2019. Currently in the process of renewal of HGU by National Land Agency (since the new HGU still in process, previous HGU remain valid according to Land Agency statement during interview in this audit ASA2.3). HGU renewal has been carried out for HGU Certificate no. 4/1989 covering an area of 6,727.64 Ha has been implemented and is just waiting for the results of the Committee B meeting.</p> <ul style="list-style-type: none"> <li>• Area on HGU No. 04/1989 covering an area of 6,727 hectares was submitted in 2019 and cadastral measurements were carried out in 2022.</li> <li>• The Committee B meeting was held on April 24 2024, but the results of the meeting have not yet been submitted by the BPN. Invitation to Land Inspection Session B No. HP.01.03/1160-14/IV/2024 dated 22 April 2024. This invitation was also addressed to Amat Ukui, Head of Air Hitam Village, Head of Bagan Limau Village and related government agencies.</li> </ul> <p>10. BPJS Ketenagakerjaan and BPJS Kesehatan Payment period January – April 2024, in accordance with national regulation related to Jaminan Sosial Tenaga Kerja <i>PP No. 49 tahun 2023 tentang JKK dan JKM</i>.</p> <p>The organization has provided a list of relevant laws and regulations and its compliance evaluation. The evaluation was conducted annually as per, the latest was updated in February 2024.</p>	
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		<p><b>Scheme Smallholders:</b></p> <p>Compliance with laws and regulations, especially related to scheme smallholder oil palm plantations, has been carried out through several obligations or permits that must be fulfilled, such land legality, organization establishment deed, tax ID and etc. In this surveillance audit, the samples of scheme smallholder were KUD Tani Bahagia, KUD Tani Subur, and KUD Trani Maju where all of them have their legal document.</p> <ol style="list-style-type: none"> <li>1. KUD Tani Bahagia: Akta Perubahan Susunan Pengurus KUD Bukit Potalo No. 14 tanggal 24 Desember 2021; Pengesahan dan Pencatatan KemenkumHam Nomor: AHU-0005591.AH.01.28.TAHUN 2021 tanggal 28 Desember 2021; Sertifikat Nomor Induk Koperasi Nomor 1404021050021 tanggal 13 April 2018; Perizinan Usaha Berbasis Resiko NIB No: 0220106700068; Izin Usaha Perkebunan, KBLI No. 10262; izin lokasi KUD Tani Bahagia NIB 0220106700068; Izin Lingkungan NIB 0220106700068; Izin Operasional/komersial NIB 0220106700068.</li> <li>2. KUD Tani Subur: Akta Perubahan KUD Tani Subur No. 10 tanggal 11 Oktober 2023; Pengesahan dan Pencatatan KemenkumHam Nomor: AHU-0002935.AH.01.38.Tahun 2023 tanggal 20 November 2023; Sertifikat Nomor Induk Koperasi Nomor 1404021070004 tanggal 19 Oktober 2020; Perizinan Usaha Berbasis Resiko NIB No: 0220308891824; Izin Usaha Perkebunan, KBLI No. 10262; izin lokasi KUD Tani Bahagia NIB 0220106700068; Izin Lingkungan NIB 0220106700068; Izin Operasional/komersial NIB 0220106700068</li> <li>3. KUD Trani Maju: Akta Perubahan KUD Trani Maju dan Pengesahan Menteri Koperasi No. 717b/BH/PAD/IV/2/PERINDAGKOP.UKM/VI/2008 tanggal 2 Juni 2008; Perizinan Usaha Berbasis Resiko NIB No: 8120216052241; NPWP No. 01.488.585.9-213.000;</li> </ol>	
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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>The organization has provided a list of relevant laws and regulations and its compliance evaluation. The evaluation was conducted annually as per "Status Evaluasi Kepatuhan Pabrik/Kebun Group Ukul", the latest was updated in February 2024.</p> <p>An evaluation of the latest legal compliance was carried out by Humas Group Buatan on Document "Status Evaluasi Kepatuhan Pabrik/Kebun Group Ukul" with the result that all regulations has been implemented by the company. The list of regulations is available for all levels of management and can be given at any time to all levels of management in the form of hardcopy or softcopy.</p> <p>The document also contains the latest regulations that have been ratified and implemented by the company, for example:</p> <ul style="list-style-type: none"> <li>- Peraturan Pemerintah No. 49 tahun 2023 tentang JKK dan JKM.</li> <li>- Permenaker No 11 Tahun 2023 Tentang Keselamatan dan Kesehatan Kerja di Ruang Terbatas</li> <li>- Peraturan Pemerintah Nomor 51 Tahun 2023 Tentang Perubahan Atas Peraturan Tentang Pengupahanpemerintah Nomor 36 Tahun 2021.</li> </ul> <p><b>Non conformity raised during audit:</b></p> <p>According to the applicable regulation, there are several regulation has not included in the list of evaluation such as:</p> <ul style="list-style-type: none"> <li>- Kepmenaker No 88 tahun 2023 tentang Pedoman Pencegahan dan Penanganan Kekerasan Seksual di Tempat Kerja</li> <li>- Kepmenaker No 2 tahun 2023 tentang Peraturan Pelaksanaan PP Nomor 66 tahun 2014 tentang Kesehatan Lingkungan.</li> <li>- Keputusan Gubernur Riau Nomor: Kpts.7618/XI/2023 Tentang Upah Minimum Kabupaten/Kota di Provinsi Riau tahun 2024.</li> <li>- Peraturan Menteri Lingkungan Hidup dan Kehutanan No P.106/MENLHK/SETJEN/KUM.1/12/2018 Tahun 2018 tentang</li> </ul>	Non-compliance
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		<p>Perubahan Kedua atas peraturan Menteri Lingkungan Hidup dan Kehutanan Nomor P.20/MENLHK/SETJEN/KUM.1/6/2018 tentang Jenis Tumbuhan dan Satwa yang Dilindungi.</p> <ul style="list-style-type: none"> <li>- Permenaker 38 tahun 2016 tentang Keselamatan dan Kesehatan Kerja Pesawat Tenaga dan Produksi</li> <li>- Permenaker 9 tahun 2016 tentang Keselamatan dan Kesehatan Kerja dalam Pekerjaan pada Ketinggian.</li> </ul> <p>In addition there is no evidence evidence on evaluation of legal compliance of all contracted third parties such as: CV Surya Agung Gemilang (Replanting contractor), PT Admindro (Boiler contractor), PT Sumber Kencana and CV Jasa Sahabat Abadi (Transporter CPO).</p>	
2.1.3	Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.	<p>According to the national regulation, land title (HGU) holder shall maintain the condition of boundary poles and report the use of land title every semester. Based on field visit in Soga and Sei Lala Estate concluded that the boundary poles area well maintained.</p> <p>The boundary poles recorded in document "<i>Monitoring Pemeriksaan Patok Batas</i>". The poles monitored twice a year. The last monitoring held on 7 December 2023. All poles (63 unit in Soga and 42 unit in Sei lala Estate) reported in good condition. During field visit to HGU poles it was observed that HGU poles in good condition and the position in accordance with HGU maps. Sample seen in Sei Lala Estate:</p> <ul style="list-style-type: none"> <li>- BPN 36 (0° 17' 15.16" S and 102° 08' 36.14" E)</li> <li>- BPN 33 (0° 16' 46.82" S and 102° 08' 48.63" E)</li> <li>- BPN 30 (0° 16' 48.25" S and 102° 09' 02.79" E)</li> <li>- BPN 40 (0° 16' 48.78" S and 102° 09' 06.38" E)</li> </ul> <p>Soga Estate:</p> <ul style="list-style-type: none"> <li>- BPN 37 (0° 14' 31.20" S and 102° 07' 12.00" E)</li> <li>- BPN 38 (0° 14' 16.80" S and 102° 08' 31.19" E)</li> </ul>	Complied

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		For the scheme smallholders, during field visit has known that the boundaries poles are available. The KUD has carried out monitoring of boundary poles, the last monitoring 2023 was carried out in September 2023, sample seen for boundary poles monitoring KUD Trani Maju, KUD Tani Subur and KUD Tani Bahagia. There is no indication of dispute among the plots as well with external parties.	
<b>Criteria 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is available.	<p>In the 2022-2023 period No additional contractors (vendors and suppliers), PT IIS- Ukui II has updated the list of contractors working with PT IIS, including:</p> <p>Ukui II POM:</p> <ol style="list-style-type: none"> <li>1. CV Jaya Pertama is a contractor/transporter of CPO, PK and CPKO.</li> <li>2. PT Buana Jaya Bersama is a transporter of CPO, PK and CPKO.</li> <li>3. CV Jasa Sahabat Abadi is a CPO, PK and CPKO transporter.</li> <li>4. CV Sumber Kencana is a CPO, PK and CPKO transporter.</li> </ol> <p>Soga Estate dan Sei Lala Estate:</p> <ol style="list-style-type: none"> <li>1. Kuntaryadi is a school bus contractor located in Air Putih Village</li> <li>2. PT Teknik Jaya Abadi is a road maintenance contractor (supplier of stone for paving) located in Jalan Siak II Rumbai.</li> </ol> <p>This list of contractors has been verified through the Cooperation contract documents and minutes of payment for the latest work.</p> <p>Based on document verification and interview with Create Share Value (CSV) staff obtained information that both suppliers have been verified and visited by FFB purchasing staff. By visited the suppliers land and tagged the coordinate, mill expected the FFB source comes from traceable and responsible area. The list of legal documents verified as follows:</p>	Complied

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		<ol style="list-style-type: none"> <li>1) List of supplier member,</li> <li>2) Coordinate and its overlay RTRW map,</li> <li>3) Personal tax identification,</li> <li>4) Business permit ID,</li> <li>5) Trading permit ID,</li> <li>6) Environmental permit,</li> <li>7) Location permit</li> <li>8) Registration of health insurance (BPJS Kesehatan)</li> <li>9) Copy of bank account</li> </ol> <p><b>Scheme Smallholder:</b></p> <p>There are several local contractors working with Plasma Ukui II, two TBS sports contractors. Based on documents verification and interviews with farmers and group managers, there are several contractors who have collaborated for plantation operations, for example:</p> <ol style="list-style-type: none"> <li>1. Letter of Work Agreement for Plasma Plantation FFB Transportation between KUD Usaha Tani and FFB Transporter on behalf of Okta (Air Putih Village, Lubuk Batu Jaya District, Indragiri Hulu Regency), no. 012/SPK/KUD-UT/TBS/I/2023 dated January 2, 2023</li> <li>2. Letter of Work Agreement for Plasma Plantation FFB Transportation between KUD Tani Bahagia and FFB Transporter on behalf of Wira (Kulim Jaya Village, Lubuk Batu Jaya District, Indragiri Hulu Regency), no. 009/SPK/KUD-TB/TBS/I/2023 dated 9 January 2023.</li> </ol> <p>The contractor above is a resident / community of the village where the cooperative is located.</p>	
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2.2.2	All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.	<p>Based on the document contractors verification, sample contract cooperation documents and interviews with some contractors, that in general contractors quite understand related to the legal requirements that must be met as well as related to the use of child labor (under age), forced labor and also trafficking labor. Certificate holder was disallowing of child labour, forced labour and trafficking labour.</p> <p>From interview of the sample contractor replanting CV Rahayu Transindo Sejahtera (Mr. Apriyono), He have been able to explain related to the legal requirements, disallowing the use of child workers and forced labor. Based on interviews, it is known that: Wage 4 operators excavator (about 4 – 4.5 million per month) still above the UMK Pelalawan Regency, Province of Riau period in 2024 (IDR 3,395,359 Per month), age of operator between 30-40 years. 4 units of heavy equipment (excavators) has had permission to use heavy equipment and SIO (Surat Izin Operator) operators of the Department of Labour Services Pelalawan Regency.</p> <p>Related to these terms have been required in the contract document, taken example:</p> <ol style="list-style-type: none"> <li>1. Replanting Work Agreement between PT IIS –Sei Lala Estate and CV Rahayu Transindo Sejahtera No. 160/P2KSL/02/24 dated February 20, 2024 and ends on May 31, 2024</li> <li>2. The Replanting Work Agreement between PT IIS- Sei Lala Estate and PT Harmoni Indah Lestari dated December 20, 2023 and ends on May 31, 2024.</li> </ol> <p>Regarding legal requirements, the contract has been explained and agreed, i.e. in Article 9; Responsibilities, in letter [i]: "to ensure that the parties have permits for all (facilities and infrastructure) in accordance with applicable laws..."</p>	Complied
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		<p>Meanwhile, related to FFB suppliers, the Ukui II Mill is an IP type supply chain, so there is no FFB supply from outside, only FFB from the core (Sei Lala Estate and Soga Estate) and Plasma.</p> <p>There is no FFB third party supplier contracted since Ukui II POM is implementing IP for supply chain model.</p> <p><b>Scheme Smallholder:</b></p> <p>In the Ukui plasma plantation (Schem smallholder) there are activities carried out in collaboration with local contractors, namely FFB transport work, such as:</p> <ul style="list-style-type: none"> <li>- <i>Surat Perjanjian Kerja</i> - Work Agreement Letter between KUD Trani Maju no. 05/SPK/KUD-TM/TBS/I/2024 dated 2 January 2024 for cooperation in transporting FFB from KUD Trani Maju Plasma Plantation.</li> <li>- <i>Surat Perjanjian Kerja</i> - Work Agreement Letter between KUD Tani Maju no. 04/SPK/KUD-TM/TBS/I/2024 dated 4 January 2024 for cooperation in transporting FFB from KUD Tani Subur Plasma Plantation.</li> <li>- <i>Surat Perjanjian Kerja</i> - Work Agreement Letter between KUD Tani Bahagia no. 10/SPK/KUD-TM/TBS/I/2024 dated 4 January 2024 for cooperation in transporting FFB from KUD Tani Bahagia Plasma Plantation.</li> </ul> <p>Regarding cooperative policies concerning the legal requirements, it is explained in the contract document and has been agreed upon by both parties, i.e.: Article 9; KUD policy, mentions:</p> <p>[2] Other obligations and legal requirements deemed necessary to be integrated into implementation, ethical behavior, prohibition of all forms of corruption, bribery and fraud in carrying out business practices and transactions.</p>	
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		Based on interviews with sample farmers (KUD Tani Subur: 5 farmers and cooperatives at the time of the field visit, it was stated that there they have fulfilled the required legal requirements, for example: vehicle registration requirements (STNK) and driver's license for drivers.	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.	<p>Based on the document contractors verification, sample contract cooperation documents and interviews with some contractors, that in general contractors quite understand related to the legal requirements that must be met as well as related to the use of child labor (under age), forced labor and also trafficking labor. Certificate holder was disallowing of child labour, forced labour and trafficking labour.</p> <p>From interview of the sample contractor replanting CV Rahayu Transindo Sejahtera (Mr. Apriyono), He have been able to explain related to the legal requirements, disallowing the use of child workers and forced labor. Based on interviews, it is known that: Wage 4 operators excavator (about 4 – 4.5 million per month) still above the UMK Pelalawan Regency, Province of Riau period in 2024 (IDR 3,395,359 Per month), age of operator between 30-40 years. 4 units of heavy equipment (excavators) has had permission to use heavy equipment and SIO (Surat Izin Operator) operators of the Department of Labour Services Pelalawan Regency.</p> <p>Related to these terms have been required in the contract document, taken example:</p> <ol style="list-style-type: none"> <li>1. Replanting Work Agreement between PT IIS –Sei Lala Estate and CV Rahayu Transindo Sejahtera No. 160/P2KSL/02/24 dated February 20, 2024 and ends on May 31, 2024</li> <li>2. The Replanting Work Agreement between PT IIS- Sei Lala Estate and PT Harmoni Indah Lestari dated December 20, 2023 and ends on May 31, 2024.</li> </ol> <p>Regarding legal requirements, the contract has been explained and agreed, i.e. in Article 9; Responsibilities, in letter [i]: "to ensure that the</p>	Complied



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		<p>parties have permits for all (facilities and infrastructure) in accordance with applicable laws...".</p> <p>Meanwhile, related to FFB suppliers, the Ukui II Mill is an IP type supply chain, so there is no FFB supply from outside, only FFB from the core (Sei Lala Estate and Soga Estate) and Plasma.</p> <p><b>Scheme Smallholder:</b></p> <p>In the Ukui plasma plantation (Schem smallholder) there are activities carried out in collaboration with local contractors, namely FFB transport work, such as:</p> <ul style="list-style-type: none"> <li>- <i>Surat Perjanjian Kerja</i> - Work Agreement Letter between KUD Trani Maju no. 05/SPK/KUD-TM/TBS/I/2024 dated 2 January 2024 for cooperation in transporting FFB from KUD Trani Maju Plasma Plantation.</li> <li>- <i>Surat Perjanjian Kerja</i> - Work Agreement Letter between KUD Tani Maju no. 04/SPK/KUD-TM/TBS/I/2024 dated 4 January 2024 for cooperation in transporting FFB from KUD Tani Subur Plasma Plantation.</li> <li>- <i>Surat Perjanjian Kerja</i> - Work Agreement Letter between KUD Tani Bahagia no. 10/SPK/KUD-TM/TBS/I/2024 dated 4 January 2024 for cooperation in transporting FFB from KUD Tani Bahagia Plasma Plantation.</li> </ul> <p>Regarding cooperative policies concerning the prohibition of child labor and forced labor, it is explained in the contract document and has been agreed upon by both parties, i.e.: Article 9; KUD policy, mentions:</p> <p>[8] Prohibit children from working in any plantation operational activities</p> <p>[9] Prohibits the acceptance of workers under 18 years of age</p>	
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		Based on interviews with sample farmers of KUD Tani Subur: 5 farmers and cooperatives at the time of the field visit, it was stated that there was no child labor or under 18 years of age or forced labor practices.	
<b>Criteria 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<b>(C)</b> For all directly sourced FFB, Palm Oil Mill (POM) requires: <ul style="list-style-type: none"> <li>Information regarding the geolocation of FFB origins;</li> <li>Proof of ownership status, right/claim of the land by grower/smallholder;</li> <li>If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB.</li> </ul>	Based on the records of FFB receipts, the company has a list of FFB suppliers originating from main estate (Sei Lala and Soga Estate) and smallholders plantations that are part of the Asian Agri group. Following are the details for suppliers who send to Ukui II POM: <ul style="list-style-type: none"> <li>Sei Lala Estate</li> <li>Soga Estate</li> <li>Scheme Smallholder (KUD Usaha Tani, Tani Subur, Tani Bahagia, Karya Tani, Trani Maju and Mekar Abadi)</li> </ul> The list of supplier already completed with full information, such as geolocation, land status and address.	Complied
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1.	Based on the explanation of indicator 2.3.1, there is no FFB collecting agent (indirect source) who sends FFB to Ukui II POM.	Complied
<b>Principle 3: Optimise productivity, efficiency, positive impact and resilience</b> Implement plans, procedures and systems for continuous improvement.			
<b>Criteria 3.1:</b> There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.			
3.1.1	<b>(C)</b> A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.	The company has a long-term plan in the Business Plan Document Estimate year 2024-2028 (5 years period) which was approved by the estate/mill manager. This document contains information related to long-term plans for each unit and various indicators, for example production targets, use of upkeep & harvesting costs, planting area, and cost allocation. The following is an example of a long-term unit plan:	Complied

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		<table><tr><td>Indicator</td><td>2024</td><td>2025</td><td>2026</td><td>2027</td><td>2028</td></tr><tr><td>FFB Process (ton)</td><td>222,553</td><td>209,786</td><td>198,012</td><td>187,138</td><td>177,085</td></tr><tr><td>CPO Production (Ton)</td><td>44,691</td><td>42,167</td><td>39,760</td><td>37,652</td><td>35,682</td></tr><tr><td>Kernel Production (ton)</td><td>12,908</td><td>11,748</td><td>11,088</td><td>10,479</td><td>9,916</td></tr></table> <p>The projection program has been integrated with palm oil mill program which received supply base from many sources (as described on indicators 2.3.1).</p>	Indicator	2024	2025	2026	2027	2028	FFB Process (ton)	222,553	209,786	198,012	187,138	177,085	CPO Production (Ton)	44,691	42,167	39,760	37,652	35,682	Kernel Production (ton)	12,908	11,748	11,088	10,479	9,916		
Indicator	2024	2025	2026	2027	2028																							
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Kernel Production (ton)	12,908	11,748	11,088	10,479	9,916																							
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	<p>The company has a replanting plan for each management unit (including all unit scheme smallholder). Replanting is carried out by considering plant age, productivity, and plant density. The following are details of replanting projections for the next 4 years:</p> <table><tr><td>Estate/unit</td><td>2024</td><td>2025</td><td>2026</td><td>2027</td></tr><tr><td>Sei Lala</td><td>333 ha</td><td>401 ha</td><td>364 ha</td><td>383 ha</td></tr><tr><td>Soga</td><td>-</td><td>552 ha</td><td>525 ha</td><td>575 ha</td></tr><tr><td>KUD Trani Maju</td><td>1,490 ha</td><td>724 ha</td><td>1,732 ha</td><td>-</td></tr><tr><td>KUD Tani Bahagia</td><td>-</td><td>400 ha</td><td>402 ha</td><td>-</td></tr></table>	Estate/unit	2024	2025	2026	2027	Sei Lala	333 ha	401 ha	364 ha	383 ha	Soga	-	552 ha	525 ha	575 ha	KUD Trani Maju	1,490 ha	724 ha	1,732 ha	-	KUD Tani Bahagia	-	400 ha	402 ha	-	Complied
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		KUD Tani Subur	432 ha	-	348 ha	-	
3.1.3	The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.	<p>Management review has shown through several documents, for example as follows:</p> <ul style="list-style-type: none"><li>- Management review records at Soga Estate on 9 March 2024.</li><li>- Management Review records at Sei Lala Estate on 10 March 2024.</li></ul> <p>This management review activity discusses all matters related to the company's operational dynamics, for example internal audit results, process performance, consumer feedback, production achievements and continuous improvement (corrective action plan from internal audit). This activity was attended by all management representative from assistants and unit managers (attendant records available).</p> <p>Sample outcome from management review: improvement in harvesting manage to reduce the losses, increasing crop productivity by implementing kaizen, road maintenance improvement.</p>					Complied
<b>Criteria 3.2:</b> The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.							
3.2.1	<b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification.	<p>Based on document review and interview to the management during ASA2.3, it was known that to increase work productivity, the company always creates new improvements with the hope that the company's operational activities will be more efficient.</p> <p>The company has a record of implementing continuous improvement. This is a note in Kaizen Event Frame Work 2023. The document which contains, among others:</p> <p><b>Soga &amp; Sei Lala Estate:</b></p> <p>One of the efforts to increase crop productivity and decrease the losses in 2023 is by "Sharing pengangkutan EFB dan pengangkutan TBS yang</p>					Complied

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		<p>terintegrasi dengan sistem AACP" – EFB and FFB transport integrated using AACP (Asian Agri Connected Plantation) system. "Improving Road Quality by Modifying Cross Drain" The objective is All Paths Accessible, longer cross drain replacement/repair lifetime and longer cross drain replacement/repair lifetime.</p> <p>Continual improvement implementation can be demonstrated during Audit.</p> <p>Continuous improvement program related to preventing road dust pollution by watering roads around employee housing and surrounding community housing and planting <i>Terminalia catapa</i> and <i>Paraserianthes</i> sp. trees to absorb dust pollution.</p> <p>Increasing community income through productive business programs for the surrounding community, such as providing assistance with goat livestock and fish seeds for the surrounding community; recruit local workers.</p> <p><b>Ukui II POM:</b></p> <p>Ukui II POM has compiled improvements to Increase OER and prevent losses. Several important points related to this improvement include:</p> <ul style="list-style-type: none"> <li>• Streamline work time by cleaning the sorting floor to separate rubbish from loose fruit.</li> <li>• Reduces waste and sand that is processed in the process.</li> <li>• Rubbish is the main enemy for pumps and clarified pipes.</li> <li>• The oil in the press is absorbed by spikelet waste and becomes losses.</li> <li>• The separation of waste and loose concrete is still done manually so that the sand is not collected optimally.</li> </ul>	
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		<p><b>Scheme smallholder:</b></p> <p>Management of scheme smallholder (Plasma Ukui II) has develop the continual improvement program for scheme smallholder 2023/2024 such as:</p> <ul style="list-style-type: none"> <li>- Improvement of smallholder block and harvesting quality by socialization to harvester to pick-up loose fruit after harvesting FFB. Field foreman regularly checked the smallholder plots during harvesting to ensure the loose fruit picked up.</li> <li>- Road maintenance and improvement by provide the split stone material for road repair, road grading and schedule for road maintenance.</li> </ul> <p>The organization has also conducted continues improvement which based on consideration of the main social and environmental impact and opportunities of the unit of certification. The activity namely maintenance of village roads on a priority scale with "batu perun", not waiting for requests for assistance from the community. This is to prevent social and environmental impacts from the company's operational activities.</p>	
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.	<p>RSPO Annual Communication of Progress 2023 of PT Inti Indosawit Subur has been available in RSPO website under membership number 1-0022-06-000-00. PT IIS has submitted the annual communication of progress (ACOP) year 2023 to RSPO on 30 April 2024. At the time of the audit, the RSPO Metrics template was submitted by PT Inti Indosawit Subur – Ukui II POM and Supply bases.</p> <p>The company has shown the auditor regarding the RSPO metric template Version 2.1 that has been filled in according to the facts and data in the company's record documents, such as the number of workers, the area of production to the record of work accidents. Based on team auditor's review, the information has been matched with others document, such as supply chain record, demographic workers, etc.</p>	Complied

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<b>Criteria 3.3:</b> Operating procedures are appropriately documented, consistently implemented and monitored.			
3.3.1	<b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.	<p>To practice the best management of oil palm plants, the company has procedure and guidelines which are contained in the following procedures.</p> <ul style="list-style-type: none"> <li>- Soga Estate and Sei Lala Estate has documented and implemented procedures for oil palm plantation from land preparation up to replanting, documented in Agricultural Policy manual, as follow: AA-APM-OP-1100.01.R5 <i>Pembibitan</i></li> <li>- AA-APM-OP-1100.02.R3 <i>Persiapan Lahan</i></li> <li>- AA-APM-OP-1100.03.R2 <i>Pembuatan dan Perawatan Jalan dan Jembatan</i></li> <li>- AA-APM-OP-1100.04.R3 <i>Pembuatan dan Pemeliharaan Parit</i></li> <li>- AA-APM-OP-1100.05.R3 <i>Konservasi Tanah Air</i></li> <li>- AA-APM-OP-1100.06.R5 <i>Menanam Kacangan</i></li> <li>- AA-APM-OP-1100.07.R6 <i>Menanam Kelapa Sawit</i></li> <li>- AA-APM-OP-1100.08.R6 <i>Pengendalian gulma</i></li> <li>- AA-APM-OP-1100.09.R8 <i>Pemupukan</i></li> <li>- AA-APM-OP-1100.10.R10 <i>Pengendalian HPT</i></li> <li>- AA-APM-OP-1100.11.R1 <i>Pestisida dan Pengolahannya</i></li> <li>- AA-APM-OP-1100.12.R4 <i>Kastrasi</i></li> <li>- AA-APM-OP-1100.13.R3 <i>Tunas Pokok</i></li> <li>- AA-APM-OP-1100.14.R3 <i>Sensus dan Identifikasi Pokok</i></li> <li>- AA-APM-OP-1100.15.R2 <i>Sensus Produksi</i></li> <li>- AA-APM-OP-1100.16.R1 <i>Konsolidasi Pokok Tumbang</i></li> <li>- AA-APM-OP-1100.17.R1 <i>Pengelolaan Air</i></li> <li>- AA-APM-OP-1100.18.R3 <i>Potong Buah</i></li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>- AA-APM-OP-1100.19.R1 <i>Pengelolaan Transport</i></li> <li>- AA-APM-OP-1100.20.R8 <i>Peremajaan (Replanting)</i></li> <li>- AA-APM-OP-1100.21.R2 <i>Riparian</i></li> <li>- AA-APM-OP-1100.22.R0 <i>Pengelolaan Areal Nilai Konservasi Tinggi (NKT).</i></li> </ul> <p>Ukui II POM has documented and implemented procedure related to process of FFB to become CPO and PK, starts from FFB receiving to dispatch of CPO and PK:</p> <ul style="list-style-type: none"> <li>- AA-MPM-OP-1400.02-R2: Stasiun Penerimaan (FFB receiving station).</li> <li>- AA-MPM-OP-1400.03-R1: Stasiun Rebusan (Sterilizer station).</li> <li>- AA-MPM-OP-1400.04-R1: Stasiun Pemisahan Berondolan (Threshing station).</li> <li>- AA-MPM-OP-1400.05-R1: Stasiun pengadukan dan pengempaan (Pressing station).</li> <li>- AA-MPM-OP-1400.06-R1: Stasiun pemurnian (Clarification station).</li> <li>- AA-MPM-OP-1400.07-R1: Stasiun pemisahan nut dan fiber (Depericarper station).</li> <li>- AA-MPM-OP-1400.08-R1: Stasiun kernel (Kernel station).</li> <li>- AA-MPM-OP-1400.09-R1: Stasiun boiler (Boiler station).</li> <li>- AA-MPM-OP-1400.10-R1: Stasiun engine room (Engine room station).</li> <li>- AA-MPM-OP-1400.11-R1: Stasiun water treatment (Water treatment station).</li> <li>- AA-MPM-OP-1400.12-R1: Laboratorium (Laboratory station).</li> </ul>	
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		<ul style="list-style-type: none"> <li>- AA-MPM-OP-1400.13-R1: Stasiun pengelolaan limbah (Palm oil mill effluent treatment).</li> <li>- AA-MPM-OP-1400.14-R2: Stasiun penimbunan dan pengiriman CPO dan kernel (CPO and PK bulking and dispatch operation).</li> <li>- AA-MPM-OP-1400.15-R1: Perawatan (Preventive maintenance).</li> <li>- AA-MPM-OP-1400.19-R2: Manajemen dan Metode Menghitung Emisi Gas rumah kaca (GHG management and mitigation).</li> <li>- AA-MPM-OP-1400.18-R4: Book keeping.</li> <li>- AA-MPM-OP-1400.17-R6: Traceability.</li> </ul> <p>Based on procedure documents review, field visit at harvesting Block and process activity in mill, it could be concluded that the oil palm agronomy, processing, and safety procedures are still relevant with current situation and covers all main aspects from the field to the mill. All procedures are available in Bahasa. Based on interview results with estates and mill employees understanding towards technical and safety matters is considered very satisfactory.</p> <p><b>Scheme Smallholder:</b>  Kebun Plasma Ukui has documented SOP as guidance for best agriculture practices and best management practices. The SOP was following the procedure of PT Inti Indosawit Subur. The procedure were sighted, for example:</p> <ol style="list-style-type: none"> <li>1. SOP AA-Plasma-PP-KS-01 dated 1 September 2011: <i>Pembibitan</i> - Procedure of Nursery.</li> <li>2. SOP AA-Plasma-PP-KS-02 dated 1 September 2011: <i>Pengendalian Hama dan Penyakit</i> - Procedure of Pest and Disease Control.</li> <li>3. SOP AA-Plasma-PP-KS-03 dated 1 September 2011: <i>Pemupukan</i> - Procedure of Fertilizing.</li> </ol>	
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		<p>4. SOP AA-Plasma-PP-KS-04 dated 1 September 2011: <i>Potong Buah</i> - Procedure of Harvesting.</p> <p>5. SOP 007/ DOK/SOP/AA2016: Procedure of Internal Communication Group Certification.</p> <p>6. SOP 013/DOK/SOP/AA/2016: Procedure of Assessment and Inspection Member Group Plantation.</p> <p>7. SOP 020/DOK/SOP/AA/2016: FFB Sale Mechanism.</p> <p>To ensure the SOP implementation, Smallholder Manager has determined the mechanism which described in SOP No. 028/DOK/SOP/AA/2016 - Internal Inspection. All smallholder member was follow the SOP which established by Ukui Smallholder management.</p>	
3.3.2	A mechanism to check consistent implementation of procedures is in place.	<p>The company has a mechanism related to checking implementation of company procedure and policy on internal audit activities and supervisor/manager daily routine inspection. Internal audit activities based on company procedure in the name of "SOP Audit Internal" (AA-SOP-ES-6001-R5, dated 19 August 2020). The procedure aims that internal audits are carried out correctly and appropriately with a plan, so that the company can continue to make improvements and continuous improvement of the effectiveness of the management system.</p> <p>Based on field observation, the procedures can be shown to auditor in estate office.</p>	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available.	<p>There are record of the activities which has been done on each management, for examples:</p> <ul style="list-style-type: none"> <li>- VE report of Ukui Dua POM on 8 – 15 March 2021 (VE-PUD-MAR-FULL-01-2021).</li> <li>- VA report of Soga Estate on 15 – 21 August 2022 (VA-KSA-AUG-FULL-15082022).</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>- VA report of Sei Lala Estate on 13 – 17 February 2023 (VA-KSL-FEB-FULL-13022023).</li> <li>- Integrated Sustainability Internal Audit of Sei Lala and Soga Estate (26 February – 2 March 2024).</li> </ul> <p>From the visit and internal audit visit, management unit has conducted corrective action plan for all conformities, for examples:</p> <ul style="list-style-type: none"> <li>- Action plan from non-conformities from internal audit of Sei Lala and Soga Estate on May 2024 regarding to P2K3.</li> <li>- Action plan form non-conformities from internal audit of Ukui II POM on May 2024 regarding to grievance record.</li> </ul>	
<b>Criteria 3.4:</b> A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	<b>(C)</b> SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.	<p>There are no changes regarding EIA and SIA assessment document compared to last year audit. Updating data or information about the monitoring report and its reporting to government.</p> <p><b><u>Environmental Impact Assessment:</u></b></p> <p>The environmental impact analysis documented in ANDAL, RKL RPL has included consultation with relevant stakeholders to identify impacts and to develop any mitigation measures. PT Inti Indosawit Subur – Ukui group is able to demonstrate environmental impact assessment in AMDAL document (<i>Studi Analisis Dampak Lingkungan/ANDAL Perkebunan Kelapa Sawit Pola PIR – Transmigrasi dan Pabrik Minyak Kelapa Sawit/PMKS di Kabupaten Kampar, Indragiri Hulu dan Bengkalis Propinsi Riau</i>). AMDAL document has approval as per “SK Menteri Pertanian No.013/ANDAL/HA/V/95” dated 05/05/1995. In addition, environmental management and monitoring plan - RKL/RPL as per “Surat Keputusan Menteri Pertanian No.03/RKL-RPL/BA/IV/1996” dated 04/04/1996. Initial EIA was performed by independent consultant PT</p>	Complied

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		<p>Swastika Aryindo Buana, consist of the professional and competent assessor.</p> <p>EIA document has included the impacts of any smallholder/outgrower scheme. PT Inti Indosawit Subur – Ukui Group has increased the mill capacity in 2009, Social Environmental Impact Assessment for mill capacity increase has been conducted and presented in “<i>Dokumen Pengelolaan dan Pemantauan Lingkungan Hidup (DPPL) Peningkatan kapasitas PMKS dan Sarana Pendukung PT Inti Indosawit Subur Kebun Ukui</i>”. DPPL document has been approved by Riau Governor as per “<i>Surat Keputusan Gubernur Riau No.976/X/2009 tentang Dokumen Pengelolaan dan Pemantauan Lingkungan (DPPL) untuk Peningkatan Kapasitas PMKS dan sarana pendukung PT Inti Indosawi – Kebun Ukui untuk Kebun Inti dan Kebun Plasma dengan Kapasitas Ukui I POM (90 ton TBS/jam) dan Ukui I (75 ton TBS/jam)</i>”, dated 28/10/2009. SEIA for mill capacity increase was performed by independent consultant PT Holistika Primagrahita, consist of the professional and competent assessor.</p> <p>In 2012, the company added a Kernel Crushing Plant (KCP) at the Ukui I POM so that there were additional documents besides AMDAL, namely “<i>Dokumen Upaya Pengelolaan Lingkungan dan Upaya Pemantauan Lingkungan Kegiatan Pabrik Pengolahan Kernel Pada Pabrik PMKS Ukui I</i>” approval letter No : 660/BLH-AM/2012/180 dated 22 February 2012. In this document also covered the planning of Biogas Plant construction Environmental impact assessment covered in ANDAL, RKL RPL document and environmental aspect and impact, e.g.:</p> <p><u>Preconstruction:</u></p> <ul style="list-style-type: none"> <li>• Employee recruitment.</li> <li>• Construction.</li> <li>• Nursery.</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Land clearing and planting preparation.</li> <li>• Infrastructure and supporting facility construction and development.</li> <li>• Land preparation.</li> <li>• Imature Palm oil plant upkeeping.</li> <li>• Mill location planning.</li> <li>• Palm Oil Mill construction.</li> </ul> <p><u>Operation:</u></p> <ul style="list-style-type: none"> <li>• Mature plantation upkeeping.</li> <li>• Soil and water conservation.</li> <li>• Land application (wastewater application to palm oil plantation) and EFB application.</li> <li>• Harvesting and collecting FFB.</li> <li>• FFB transportation to Palm Oil Mill.</li> <li>• FFB Processing in Palm Oil Mill.</li> <li>• Transportation facility providing and maintenance.</li> <li>• CPO and PK transportation.</li> <li>• Wastewater processing.</li> <li>• Replanting.</li> <li>• Partnership cooperation.</li> </ul> <p><b><u>Social Impact Assessment:</u></b></p> <p>Social Impact Assessment was conducted by independent consultant from "Fakultas Kehutanan Institut Pertanian Bogor" in July 2010.</p> <p>The SIA method was taken by participatory ways and involving the affected stakeholder at study location in 19 villages consist of 11 villages at Pelalawan Regency and 8 Villages at Indragiri Hulu Regency.</p>	
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		<p>Social Environmental impact assessment was conducted through regular environmental monitoring, e.g. river water quality, mill effluent quality, air emission, economical condition, social and culture of community and wildlife conservation.</p> <p>Social Environmental monitoring and management report reported in regular basis each semester in "<i>Laporan Pelaksanaan Izin Lingkungan</i>". Report semester I (Period January – June 2023) and Semester II (Period July – December 2023) has been send to the government. Evidence of report submission can be demonstrated in "<i>Tanda terima Elektronik Sistem Informasi Pelaporan Elektronik Lingkungan Hidup (SIMPEL) KLHK</i>" with ID <b>1706161721-1745</b> for Semester 1/2023 and ID <b>1715745950-1745</b> for Semester II/2023.</p> <p><b><u>Scheme Smallholder</u></b></p> <p>Social Environmental Impact Assessment of Ukui Plasma has included in AMDAL document (<i>Studi Analisis Dampak Lingkungan/AMDAL Perkebunan Kelapa Sawit Pola PIR – Transmigrasi dan Pabrik Minyak Kelapa Sawit/PMKS di Kabupaten Kampar, Indragiri Hulu dan Bengkalis Propinsi Riau</i>).</p> <p>SEIA identified the significant potential environmental impacts deriving from operational activities such as land clearing, land development and road construction at palm oil plantations.</p> <p>Smallholder management also provide update SEIA for smallholder operation as per "<i>Penilaian Dampak Sosial dan Lingkungan (SEIA) Kebun Plasma Ukui Tahun 2024</i>" dated 3 January 2024. Smallholder manager has identified the social aspect and impact has identified such as:</p> <ul style="list-style-type: none"> <li>• Consistency of company for infrastructure and social activities</li> <li>• Road/bridge maintenance passed by FFB transport trucks</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Replanting activities</li> <li>• Harvesting and FFB quality</li> <li>• FFB pricing</li> <li>• Labour</li> <li>• Safety and PPEs</li> <li>• Land legality</li> <li>• MoU of FFB sales</li> </ul> <p>Another Environmental aspect and impact evaluation was also conducted as per "Evaluasi Aspek – Dampak Lingkungan" EMS-431-002-LT updated in 3 January 2024.</p>	
3.4.2	For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.	<p>There are no changes regarding EIA and SIA assessment document compared to last year audit. Updating data or information about the monitoring report and its reporting to government.</p> <p>Social Environment management and monitoring plan document is available in Environmental management plan (<i>RPL-Rencana Pengelolaan Lingkungan</i>) document. Document was approved by Governor Riau as per "Surat Keputusan Gubernur Riau No.976/X/2009 dated 28 October 2009 tentang <i>Dokumen Pengelolaan dan Pemantauan Lingkungan</i>. Environmental management based on document includes:</p> <ul style="list-style-type: none"> <li>• Air quality and noisy management from FFB processing performed by installing the emission monitoring facility in the boiler and genset stack; installing safety in boiler stack, install the cyclone and dust trap in boiler stack, control the emission, controlling fuel efficiency, emission measurement of vehicle, boiler and generator, standard muffler usage, reduce the vehicle speed in emplacement, road maintenance and signboard installation, OHS implementation in Palm Oil Mill.</li> <li>• Surface water quality and water biota management performed in order to prevent and control the physic and chemist quality of surface</li> </ul>	Complied

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		<p>water comply to PP No. 82 tahun 2001. Performed by create terracing, land cover crop planting in open area and sloping area, organic fertilizer usage, natural predator usage for pest control, operating IPAL, land application, flat bed maintenance in land application area, housekeeping implementation and proper waste handling.</p> <ul style="list-style-type: none"> <li>• Soil quality management performed by land application management according to KepMen LH No. 28 Tahun 2003, groundwater quality check, flat bed maintenance, vegetation planting around waste water pond and maintenance of waste water pond, domestic and hazardous waste management.</li> <li>• Erosion and sedimentation management performed by creating and maintenance the individual terrace (tapak kuda) in area with slope 3 – 15% and maintain the land cover crop (Leguminosae), frond stacking and EFB application.</li> <li>• Flora fauna management performed by signboard installation regarding prohibition of plant destruction in conservation area, vegetation enrichment in conservation area, wildlife protection and maintain the conservation area.</li> <li>• Community perception management performed in order to prevent and control the negative perception and potential conflict from community against employee recruitment process. Company has conducted workers recruitment transparently, each vacancy was publish to surrounding village, FFB purchasing from local plantation surrounding company, coaching and conseling to plasma member, CSR programme implementation.</li> </ul> <p>Social Environmental monitoring and management report reported in regular basis each semester in "<i>Laporan Pelaksanaan Izin Lingkungan</i>". Report semester I (Period January – June 2023) and Semester II (Period July – December 2023) has been sent to the government. Evidence of</p>	
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		<p>report submission can be demonstrated in “<i>Daftar Distribusi Eksternal</i>” and “<i>Tanda terima Elektronik Sistem Informasi Pelaporan Elektronik Lingkungan Hidup (SIMPEL) KLHK</i>” with ID <b>1706161721-1745</b> for Semester 1/2023 and ID <b>1715745950-1745</b> for Semester II/2023.</p> <p><b><u>Scheme Smallholder:</u></b></p> <p>Ukui Smallholder has developed the social environment management and monitoring plan as per “Rencana Kelola Sosial Terkait Aspek Permasalahan Sosial Kebun Plasma Ukui”, covering:</p> <ul style="list-style-type: none"> <li>• Company consistency in infrastructure development and social activities</li> <li>• Maintenance of roads/bridges traversed by plasma FFB transport trucks</li> <li>• Replanting</li> <li>• FFB quality</li> <li>• TBS theft</li> <li>• Employment (occupational health and safety, PPE)</li> <li>• FFB sale and purchase agreement and land legality</li> </ul>	
3.4.3	<b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.	<p>There are no changes regarding EIA and SIA assessment document compared to last year audit. Updating data or information about the monitoring report and its reporting to government. This document shall be revised if there are additional area of plantation, change of mill capacity &gt; 30%, additional mill processing such as KCP or biogas station. Based on Government Regulation No. 27/2012 concerning Environmental Permits Article 53 (1) and (2) states that the person in charge of business must prepare a report and submit a report on the implementation of environmental management activities every 6 months. This reporting period is still in accordance with the latest</p>	Complied

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		<p>regulations (Government Regulation No. 22 of 2021 concerning Implementation of Environmental Protection and Management, Article 49 (6.f.6)).</p> <p>Social Environment management and monitoring plan as per RKL – RPL document has been implemented by PT Inti Indosawit Subur – Ukui Group. The evidence Lingkungan”. Based on verification on Environmental management and monitoring report, confirmed that the management and monitoring plan has been well implemented accordingly. Data verified during audit:</p> <ul style="list-style-type: none"> <li>• Air quality and noisy monitoring from FFB processing performed by emission measurement against Boiler and generator each semester, ambient air quality measurement each semester, noisy measurement (indoor and outdoor) each semester, odor measurement each semester.</li> <li>• Air emission quality in Ukui II POM analyze by PT. ITEC Soution Indonesia for Semester I (January – June 2023) and Semester II (July – December 2023). The analysis results since January – December 2023 shown comply with regulation.</li> <li>• Surface water quality and water biota monitoring to prevent and control the physic and chemist quality of surface water comply to PP RI No 22 tahun 2021. Perfomed by wastewater quality monitoring each month, hazardous waste monitoring, land application monitoring, surface water quality monitoring each semester. Wastewater quality monitoring analyse by PT. ITEC Soution Indonesia. Wastewater analysis result since January – December 2023 shown comply with regulation.</li> <li>• Surface water quality test (Sungai Pematang River and Air hitam river upstream and downstream) analyze by PT. ITEC Soution Indonesia for Semester I (January – June 2023) and Semester II (July –</li> </ul>	
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		<p>December 2023). The analysis result from January – December 2023 shown comply with regulation.</p> <ul style="list-style-type: none"> <li>• Soil quality monitoring performed by soil sampling analysis in “rorak, antar rorak and lahan control”, EFB application monitoring, groundwater analysis each year. Analysis conducted by PT Bumi Ventila Indonesia, Report of Analysis No. LHU/BVI/VIII/2023/B-23-141 dated 29 August 2023.</li> <li>• Erosion and sedimentation monitoring performed by erosion measurement according to USLE method. Measurement result since January – December 2023 shown erosion level average below 6 (1.7 – 5.82) ton/ha/year for Estate categorized as very good criteria.</li> <li>• Flora fauna monitoring performed by wildlife monitoring and monitoring the conservation area each month. Based on monitoring shown that there were species of mammal presence such as <i>Macaca fascicularis</i>, <i>Macaca nemestrina</i>, <i>Calosciurus notatus</i>, <i>Sus crofa</i>, <i>Rattus sp</i>, <i>Felis bengalensis</i> and <i>Paradoxurus sp</i>, species of birds (such as: <i>Halcyon smyrnensis</i>, <i>Rhipidura javanica</i>, <i>Centropus bengalensis</i> and <i>Pycnonotus aurigaster</i> and species of reptile such as <i>Varanus salvator</i>, <i>fejevarya sp</i>, <i>Mabouya sp</i> and <i>Denrelaphis caudolineatus</i>.</li> <li>• Community perception monitoring performed by community interview, employee data monitoring, interview with village head or public figure regarding their perception to company. Company has monitored the public perception through questioner each year. Questioner to public perception regarding the impact of company presence has been disseminated to surrounding community. Latest monitoring of public perception has been performed in 2023, questioner of public perception can be demonstrated and well documented in RKL-RPL report semester II 2023. Generally public</li> </ul>	
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		<p>perception was positive regarding the company presence and contribution to the surrounding community.</p> <p>All management and monitoring plan have been implemented well by company according to RKL-RPL document. The implementation report has been reviewed and reported to government agency per semester (six monthly).</p> <p>During document verification and interview with management, it can be demonstrated that all the environmental monitoring plan was implemented as per the RKL-RPL document. The evaluation of environmental monitoring plan effectiveness was carried out and presented in RKL-RPL report semester II 2023 (July – December 2023). Evaluation consists of:</p> <ul style="list-style-type: none"> <li>• Trend evaluation of air ambient quality, air emission, odour, ground water quality, waste water quality, surface water quality, soil erosion shown that the result of monitoring are all parameter is met with the standard of regulation. Trend evaluation of water usage still under the budget/standard; biodiversity trend evaluation shown that there were still found the presence of animal including protected animal; Social economic trend evaluation shown increasing each year. Overall, the trend evaluation shown the consistency and increasing in environmental performance.</li> <li>• Critical evaluation, the critical point in environmental monitoring is wastewater quality and surface water usage. Based on analysis result for period January - December 2023, it was met with regulation (BOD &lt; 5,000 mg/l and pH 6 – 9).</li> <li>• Compliance evaluation to regulation. According to evaluation of impact against soil erosion, water quality, soil quality, air quality, biodiversity, surrounding social and economic, health and safety, indicated that PT Inti Indosawit Subur – Ukui I and II POM has complied with all relevant regulation.</li> </ul>	
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		<ul style="list-style-type: none"> <li>Public perception monitoring for 2023 has been carried out and there is no negative perception occurred.</li> </ul> <p>Certificate of environmental analysis in Semester II 2023 for Ukui II POM, such as:</p> <ul style="list-style-type: none"> <li>Surface water quality, location Upstream Sungai Bengkarai, Report of analysis D.07.2242-1/LHU/2023, Analyze No: D.07.2242-1.a-AP.23 dated 16 August 2023, the result complied to PP RI No. 22 tahun 2021 (Lampiran VI)</li> <li>Water biota (Zooplankton), report of analysis D.07.2242-1/LHU/2023, Analyze No: D.07.2242-1.c-BT.23 dated 16 August 2023.</li> <li>Boiler No. 1 emission, report of analysis D.07.2182/LHU/2023, Analyze No: D.07.2182.k-UEiso.23 dated 16 August 2023, the result complied to PerMenLH No 7 Tahun 2007 (Lampiran I)</li> </ul>	
<b>Criteria 3.5:</b> A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.	<p>There are no changes related to employee recruitment, hiring and promotion procedures, namely: Procedure no. SDM-A-001-00. In addition, certificate holders also have procedures regarding employee appraisal; HRD No. C-002-00 on annual employee assessment, mentioned there was no discrimination treatment during recruitment and promotion process. Promotion of worker will be done based on work period, annual evaluation result, and availability of position. This procedure is accordance with the Law no. 13/2003 related to the Employment and Perpu No. 2 / 2022 regarding Cipta Kerja.</p> <p>In the recruitment process, the company has set the standard of competence that inferred in the Position Description and Job Profile. Recruitment selection, hiring and promotion has based on skills, capabilities, qualities, and medical fitness.</p>	Complied

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3.5.2	Employment procedures are implemented and records are maintained.	<p>Consistently, the company has implemented recruitment procedures (HR-A-001-00). Based on an interview with KTU/Personnel Ukui II, that until this Surveillance audit there was no employee recruitment. However, there are several promotions of class and employee status in Ukui II (Mill and Estate), document was reviewed during this surveillance audit.</p> <p>According to SOP: AA-HR-305.2-R0 dated 1 February 2009 related to Recruitment and Selection of Employee, Unit of Certification will accept new employee based on their capabilities and qualifications. Although in the 2023 period there will be no recruitment of new workers.</p>	Complied
<b>Criteria 3.6:</b> An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<b>(C)</b> All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.	<p>PT Inti Indosawit Subur – Ukui Group have been established a health and safety policy under “Kebijakan Perusahaan”, updated 1<sup>st</sup> December 2019, was signed by Managing Director.</p> <p>The procedure has explained that:</p> <ul style="list-style-type: none"> <li>• In point 3, the company commit to implement and maintain occupational health and safety management system in compliance with national and international applicable regulation.</li> <li>• Point 5. Integrating social, environmental, food security, occupational health, and safety issues into operational activities, adopting best technology available, and maintain trained manpower, with skills, and motivated to improve performance through continuous improvement program.</li> </ul> <p>The policy has been disseminated to all employees by installing signboard of company policy and by direct dissemination.</p> <p>The Company has a Hazard Identification, Risk Assessment and Control Document (HIRADC) for all operational activities of the Estate and Mill which was reviewed and endorsed on 5 January 2024 by the</p>	Complied

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		<p>Occupational Safety and Health Expert. There were no changes in the HIRAC during 2023.</p> <p>Record verification:</p> <ul style="list-style-type: none"> <li>• Ukui II POM POM – has defined risk assessment (HIRADC), last review on 5 January 2024, cover processes and activities related to production of CPO, such as: weighbridge, boiler, engine room, loading ramp, sterilizer, threshing, pressing, kernel operation, clarification, office, lab, CPO dispatch, firefighting simulation, POME installation/IPAL, water treatment, chemical warehouse.</li> <li>• Soga and Sei Lala Estate has prepared HIRADC year 2024, last review on 5 January 2024. Hazard and risk identification and assessment are covering all activity at Ukui Estate such as: Office, Housing, Material storage (fertilizer, fuel, agrochemical, spare part, building material, etc.), upkeeping (manual upkeeping and chemical upkeeping), harvesting, FFB transportation, hazardous and domestic waste handling, road maintenance, vehicle maintenance. The risk analysis and assessment has been performed according to procedure.</li> <li>• The risk assessment has been communicated to all employee at the employees' morning assembly at the Mill and in the Estate.</li> </ul> <p><u>Scheme smallholder</u></p> <p>Each Cooperative (KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama, KUD Usaha Baru have established the policy related to EHS as per “Kebijakan Koperasi”, dated 1 February 2021. In point 3 mentioned: to pay attention and implementing health and safety culture, using personnel protective equipment, if necessary, in performing daily work and to maintain the work premises.</p> <p>Smallholder manager has prepared hazard identification and risk assessment as per “Document Hazard Identification Risk Assessment</p>	
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		<p>and Control (HIRAC), last review on 13 January 2024. Risk assessment has calculation of impact value, consequences value, possibility value. All activities, all areas have been evaluated.</p> <p>Mitigation plans to eliminate or reduce the hazard and risk have been develop according to HIRAC as per "Alternatif Kontrol Resiko untuk Tindakan Perbaikan".</p> <p>Risk Assessment for all operations regarding health and safety was available within the scope of oil palm mill processes activities and agricultural estate activities. As it was considered the stages of OHS risk control hierarchy, that is elimination, substitution, engineering, administrative and PPE (Personnel Protective Equipment).</p>	
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</p>	<p>PT Inti Indo Sawit Subur – Ukui Group (include Scheme Smalholder) has prepared OHS plan to address health and safety as per "Program Kerja P2K3" updated on January 2024, consisted of:</p> <ul style="list-style-type: none"> <li>• OHS inspections (staff and employee personal protective equipment)</li> <li>• Safety talk to workers and employees</li> <li>• Hyperkes certification for paramedics</li> <li>• Certification for first aid officers</li> <li>• First Aid, Basic fire, and basic safety training</li> <li>• MCU</li> <li>• Pregnancy test</li> <li>• Fire drill and hazardous chemical spill</li> </ul> <p>Sample record on implementation the OHS program, such as:</p> <ul style="list-style-type: none"> <li>• The OHS Committee (P2K3) regular meeting has been performed monthly, discussed regarding OHS program achievement and corrective actions to achieve target and improve the program. Notes of Safety Committee Regular Meeting (mill and estate) with workers</li> </ul>	Non-compliance



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		<p>were evident. Sample seen → last meeting was carried out on 8 December 2023 with agenda: discussed regarding OHS plan achievement and corrective actions to achieve target and improve the program, personal protective equipment (PPE), and accident review and report.</p> <ul style="list-style-type: none"> <li>• Report on training of emergency response and preparedness (fire drill), dated 10 January 2024. Location in "Lapangan Ukui Estate". The training was attended by OHS Committee and 20 personnels. Data verified: scenario, attendance list, evaluation, and photograph.</li> <li>• Record of training for first aider dated 2 May 2024, location in Ukui II POM. Data verified: Training material, attendance list and photograph.</li> <li>• MCU for pesticide/chemical handling was conducted on semester II 2023 carried out by Asian Agri Sehat Buatan Clinic. Data seen: MCU for Soga Estate 53 workers, Sei Lala Estate 76 workers, and Ukui POM II 33 workers with the result that all employees are fit for work.</li> <li>• Report of OHS Inspection, e.g., availability of fire extinguisher and hydrant, PPE and first aid kit, dated 15 April 2024.</li> <li>• Record of PPE provision for workers as per "Formulir Berita Acara Serah Terima APD", dated 22 November 2023.</li> </ul> <p>Non conformity raised during audit:</p> <ul style="list-style-type: none"> <li>- Certificate holder can't shown the certificate of qualification for welder who is working in Workshop Sei Lala in accordance with Permenaker No. 2 year 1982 concerning welder qualification in the workplace.</li> <li>- Certificate holder can't shown the SIO of operator powerhouse generator set (Pesawat Tenaga dan produksi) in Ukui II POM in accordance with Permenaker No. 38 year 2016 concerning OHS Pesawat Tenaga dan Produksi.</li> </ul>	
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<b>Criteria 3.7:</b> All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.			
3.7.1	(C) A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender- specific needs, and which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training.	<p>PT Inti Indosawit – Ukui Group has a department which is responsible for the training program, which is the Asian Agri Learning Institute.</p> <p>Through its employee data (master of employees) and training data personal records, the Asian Agri Learning Institute Department will recommend the Estate and Mill to participate in a training program annually and will also evaluate the effectiveness of the training that has been followed.</p> <p>The training program is divided into several aspects: technical, Administration, Environments &amp; Sustainability and special certifications and there are also training involving vendors or operational suppliers.</p> <p>Training program has shown as per "<i>Program Management K3 KUK tahun 2024: emergency response training, Basic fire training, Basic safety training, petugas P3K training</i>", updated on January 2024.</p>	Complied
3.7.2	Records of training are maintained, where appropriate on an individual basis.	<p>During ASA 2_3, there was verified sample records of training implementation, consist of attendance list, training material and post training evaluation, such as:</p> <ul style="list-style-type: none"> <li>• Report on training of emergency response and preparedness (fire drill), dated 10 January 2024. Location in "Lapangan Ukui Estate". The training was attended by OHS Committee and 28 personnel. Data verified: scenario, attendance list, evaluation, and photograph.</li> <li>• Record of training for first aider dated 2 May 2024, location in Ukui II POM. Data verified: Training material, attendance list and photograph.</li> <li>• Periodic training of pesticide applicators conducted on 27 February 2024</li> <li>• Refreshing OHS fertiliser training was conducted on 19 March 2024.</li> <li>• Basic Fire training conducted on 10 January 2024.</li> </ul>	Complied

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		<p>PT Inti Indosawit Subur – Ukui Group has also made recording for all trainings that have been attended by employees in the recording of "Personal Data Training". Some documents can be shown at the time of the audit for example: The Calendar Training document period 2023-2024, the list of participants attending the trainees, and some photographs of the activities at the time of training.</p> <p>Sample seen for record training of scheme smallholder: pest and disease handling on 28 March 2023, fertilizer application procedure training on 6 May 2023, OHS training on 28 February 2024, pesticide handling training on 27 February 2024.</p>	
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.	<p>PT IIS – Ukui II POM has provided training for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) including Mill manager, weighbridge clerk, production clerk, administration head.</p> <p>Latest SCCS training has been carried out on 11 May 2024 by Sustainability Dept, PO previous training conducted on Oct 2023.</p> <p>Evidence of training can be demonstrated during audit such as attendance list, training material and photo documentation.</p> <p>During interview with weighbridge Clerk and Mill Manager, confirmed that they have understanding on RSPO supply chain.</p>	Complied
<b>Criteria 3.8:</b> Supply chain requirements for mills. Procedure note: all requirements are classified as <b>Critical Indicators</b> . 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.	During this audit ASA 2.3, PT Inti Indosawit Subur – Ukui II POM remain implement Identity Preserved for supply chain models. Management described PT Inti Indosawit Subur – Ukui II POM to implement RSPO Supply Chain Identity Preserved Module. Ukui II POM only received and processed FFB from certified company-owned estate and certified scheme smallholder. There was no received FFB from third-party or non-certified FFB supplier.	Complied

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	<p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>PT Inti Indosawit Subur - Ukui II Palm Oil Mill currently holds a valid RSPO P&amp;C certificate, as certificate number RSPO 565807 with supply chain model is Identity Preserved.</p> <p>All FFB are received from certified supply bases, which are from:</p> <ul style="list-style-type: none"> <li>• Company-owned estates, e.g.: Soga Estate and Sei Lala Estate;</li> <li>• Scheme smallholders consist of 6 (six) smallholder cooperatives (KUD), e.g.: KUD Tani Subur, KUD Karya Tani, KUD Mekar Abadi, KUD Tani Maju, KUD Tani Bahagia and KUD Usaha Tani.</li> </ul>	
3.8.2	<p><b>Mass Balance Module</b></p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Not applicable.</p> <p>Management described PT Inti Indosawit Subur – Ukui II POM to implement RSPO Supply Chain Identity Preserved Module. Ukui II POM only received and process FFB from certified company-owned estate and certified scheme smallholder. There was no received FFB from third-party or non-certified FFB supplier.</p>	Not Applicable
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&amp;C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of certified CPO and PK that could potentially be produced by PT. Inti Indosawit Subur – Ukui II POM is recorded in RSPO Public Summary report, certificate and RSPO IT Platform.</p> <p>The estimated annual tonnage for certified FFB, CPO and PK are available in the Estate and Mill annual production budget for 12 months since last surveillance assessment. The FFB tonnage received from all certified supply bases.</p> <p>Below is the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year 2023/2024: <u>Forecast volume (August 2023 – July 2024)</u></p> <p>FFB: 228,830 MT CPO: 46,022 MT (OER: 20.11%) PK: 12,676 (KER: 5.57%)</p>	Complied

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		<p><u>Actual production volume (August 2023 – April 2024)</u>            FFB: 122,362.03 MT            CPO: 24,332.95 MT, stock 960.15 MT            PK: 6,258.77 MT, stock 300.26 MT  <u>Actual sold volume as RSPO certified (August 2023 – April 2024)</u>            CPO: 23,284.27            PK: 6,145.25 MT</p>	
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<p>Ukui II POM is a subsidiary of PT. Inti Indosawit Subur, a member of RSPO, with RSPO membership No.1-0022-06-000-00 since 6 February 2006.</p> <p>PT Inti Indosawit Subur – Ukui II POM has meet all registration and reporting requirements.</p> <p>RSPO IT Platform/PalmTrace account number RSPO_ PO1000002491.</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> <ol style="list-style-type: none"> <li>Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard.</li> </ol>	<p>During audit ASA 2.3 there is no changing in the documented procedure related to RSPO Supply chain.</p> <p>PT. Inti Indosawit Subur – Ukui II POM can demonstrate procedures as follow:</p> <ul style="list-style-type: none"> <li>Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R7) dated 1 October 2019. The procedures cover traceability of CPO and PK, since FFB receiving from Ukui Estate and Smallholder, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years.</li> <li>Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4). The procedure explains method to check only certified product received. The book keeping mass balance stated every 3 months: January-March, April-June, July-September, and October-</li> </ul>	Complied

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	<p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill.</p>	<p>December each year. Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction.</p> <ul style="list-style-type: none"> <li>SOP for mill operation Mill Policy Manual: <ul style="list-style-type: none"> <li>SOP AA-MPM-OP-1400.02.R2 Stasiun Penerimaan for FFB receiving station;</li> <li>SOP AA-SOP-OP-101.5-R0 Grading;</li> <li>SOP AA-MPM-OP-1400.03.R1 Stasiun Rebusan for sterilizer;</li> <li>SOP AA-MPM-OP-1400.04.R1 Stasiun Pemisahan Berondolan for loose fruit separation;</li> <li>SOP AA-MPM-OP-1400.05-R1 Stasiun Pengadukan dan Pengempaan for pressing station;</li> <li>SOP AA-MPM-OP-1400.06-R1 Stasiun Pemurnian for clarification;</li> <li>SOP AA-MPM-OP-1400.07-R1 Stasiun Pemisahan Nut dan Fiber for nut and fiber separation;</li> <li>SOP AA-MPM-OP-1400.08-R1 Stasiun Kernel for kernel station;</li> <li>SOP AA-MPM-OP-1400.09-R1 Stasiun Boiler;</li> <li>SOP AA-MPM-OP-1400.10-R1 Stasiun Engine Room;</li> <li>SOP AA-MPM-OP-1400.11-R1 Stasiun Water Treatment;</li> <li>SOP AA-MPM-OP-1400.12-R1 Laboratorium;</li> <li>SOP AA-MPM-OP-1400.13-R1 Stasiun Pengelolaan Limbah for palm oil mill effluent treatment;</li> <li>SOP AA-MPM-OP-1400.14-R2 Stasiun Penimbunan dan Pengiriman CPO dan Kernel for CPO and PK bulking and despatch operation;</li> <li>SOP AA-MPM-OP-1400.15-R1 Perawatan for preventive maintenance;</li> </ul> </li> </ul>	
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		<ul style="list-style-type: none"> <li>- SOP AA-MPM-OP-1400.18-R4 Book Keeping</li> <li>- SOP AA-MPM-OP-1400.17-R7 Traceability</li> </ul> <p>PT. Inti Indosawit Subur – Ukui II 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 Procedure of Traceability (AA-MPM-OP-1400.17-R7), the responsible person in charge to the supply chain system is Mill Manager. During audit, the mill manager is able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill. PT IIS – Ukui II POM also assigned Mill Manager as PIC for RSPO supply chain implementation as per "Memorandum No. 020/GM-PUS/MEMO/01/24" dated 20 January 2024, appointed person Javen Tarigan (Mill manager) as PIC for RSPO SCCS implementation.</p> <p>PT IIS Ukui II POM has a procedure for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill, as described in SOP AA-MPM-OP-1400.17-R7 Traceability, dated 1 October 2019.</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p> <p>a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b) Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management</p>	<p>PT. Inti Indosawit Subur – Ukui II POM has a procedure to conduct internal audit RSPO, including RSPO SCCS as per Procedure SOP Internal Audit Nomor: AA-SOP-ES-6001-R5 dated 1 August 2020; Chapter 4.0 stated that Internal audit conducted minimum once a year considering the critical area.</p> <p>Last internal audit conducted on 26 February - 2 March 2024. The report available under document "Internal Audit Sustainability Integrasi". The internal audit was conducted for RSPO P&amp;C including supply chain and RSPO market and communication and claims. During internal audit, it was raised 1 nonconformity related to grievance follow up implementation; corrective action and follow up action has been taken to address the non-conformity.</p>	Complied

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	review at least annually. The mill shall maintain the internal audit records and reports.	<p>Management review has been conducted on dated 11 March 2024, was attended by Production Controller, POM Manager, Mill assistant and Sustainability Staff. Document of Management Review available and recorded in minutes of meeting:</p> <ul style="list-style-type: none"> <li>- Internal audit result</li> <li>- Customer feedback</li> <li>- Proses performance and product conformity</li> <li>- Status of Corrective and Preventive Action</li> <li>- Follow up previous management review</li> <li>- Change that could effect to the management system</li> <li>- Output of management review has include:</li> <li>- Recommendation for improvement</li> </ul> <p>Resources needed.</p>	
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>PT Inti Indosawit Subur - Ukui II POM use supply chain model Identity Preserved, therefore the mill did not receive and processed non-certified FFB.</p> <p>Procedure of Traceability (AA-MPM-OP-1400.17.R7) with latest revision dated 1 Oct 2019 described that KTU (Head of Administration) who verify and documented tonnage and source of certified FFB in "Laporan Harian Pabrik", then Mill Manager who verify and approve it. The procedure also stipulates handling of nonconforming FFB and or documents.</p> <p>All FFB are received from certified supply bases, which are from:</p> <ul style="list-style-type: none"> <li>• Company-owned estates, e.g.: Soga Estate and Sei Lala Estate.</li> <li>• Scheme smallholders consist of 6 (six) smallholder cooperatives (KUD), e.g.: KUD Tani Subur, KUD Karya Tani, KUD Mekar Abadi, KUD Tani Maju, KUD Tani Bahagia and KUD Usaha Tani.</li> </ul>	Complied



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		<p>PT Inti Indosawit Subur – Ukui II POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R7), chapter 5.1 indicates the Weighbridge Clerk has responsibility to input data and print weighbridge card based on Delivery note (use barcode for estate) or “Surat Pengantar TBS” (for scheme smallholder), covering information e.g. estate name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number.</p> <p>Document FFB Delivery Note (with barcode) and Kartu Timbangan (Weighbridge Card) described identity and location of FFB source and other item required e.g.</p> <p>Certified FFB:</p> <p><u>Soga Estate</u></p> <ul style="list-style-type: none"> <li>• Weighbridge ticket “Kartu Timbangan No.PUDA124106352” dated 30 April 2024, for 260 FFB bunches; nett weight 6,870 kg; from Soga Estate, Afdeling 1, block A80a, ID KSA-1; vehicle number BM9972TE; Driver: Hernanto; Transporter: Internal, Delivery note number KSAPM0320240430192804, RSPO certificate No.RSPO565807.</li> <li>• Weighbridge ticket “Kartu Timbangan No.PUDA124106345” dated 30 April 2024, for 241 FFB bunches; nett weight 6,370 kg; from Soga Estate, Afdeling 2, block B96d, ID KSA-2; vehicle number BM9973TE; Driver: Hotdiman Nanik; Transporter: Internal, Delivery note number KSAPM0420240430184404, RSPO certificate No.RSPO565807.</li> <li>• Weighbridge ticket “Kartu Timbangan No.PUDA124105698” dated 20 April 2024, for 228 FB bunches; nett weight 6,410 kg; from Sei Lala Estate, Afdeling 1, block A80a; vehicle number BM9972TE; Driver: Hernanto; Transporter: Internal, Delivery note number KSAPM0220240420223109, RSPO certificate No.RSPO565807.</li> <li>• Weighbridge ticket “Kartu Timbangan No.PUDA124105651” dated 20 April 2024, for 499 FB bunches; nett weight 5,820 kg; from Sei Lala</li> </ul>	
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		<p>Estate, Afdeling 2, block B21b; vehicle number BM9968TE; Driver: Ekaman Putra; Transporter: Internal, Delivery note number KSAPM0320240420170107, RSPO certificate No.RSPO565807.</p> <p><u>Ukui Plasma (Scheme Smallholder):</u></p> <ul style="list-style-type: none"> <li>• FFB delivery note: "Bon Pengantar TBS No. 14/PLASMA" dated 29/04/2024 from KUD Trani Maju, KT 257 Sari Kencana, FFB amount 295 bunches, Vehicle Number BM9438BO, Driver: Ujang; Weighbridge Ticket "Kartu Timbangan" No. PUDA224101305 dated 29/04/2024, From KT - 257 Sari Kencana, ID KPU, FFB amount 295 bunches, nett weight 7,987 kg, vehicle number BM9438BO, driver: Ujang, RSPO Certificate No: RSPO565807.</li> <li>• FFB delivery note: "Bon Pengantar TBS No. 05/PLASMA" dated 29/04/2024 from KUD Trani Maju, KT 210 Bangun Sejahtera, FFB amount 280 bunches, Vehicle Number BM9793BU, Driver: Saher; Weighbridge Ticket "Kartu Timbangan" No. PUDA224101296 dated 29/04/2024, From KT - 210 Bangun Sejahtera, ID KPU, FFB amount 280 bunches, nett weight 9,026 kg, vehicle number BM9793BU, driver: Saher, RSPO Certificate No: RSPO565807.</li> <li>• FFB delivery note: "Bon Pengantar TBS No. 01/PLASMA" dated 30/04/2024 from KUD Tani Subur, KT 290 Tekad Bersama, FFB amount 375 bunches, Vehicle Number BH8688VU, Driver: Santoso; Weighbridge Ticket "Kartu Timbangan" No. PUDA224101312 dated 30/04/2024, From KT - 375 Tekad Bersama, ID KPU, FFB amount 375 bunches, nett weight 8,438 kg, vehicle number BH8688VU, driver: Santoso, RSPO Certificate No: RSPO565807.</li> <li>• FFB delivery note: "Bon Pengantar TBS No. 11/PLASMA" dated 30/04/2024 from KUD Tani Subur, KT 234 Tani Makmur, FFB amount 330 bunches, Vehicle Number BM9074BO, Driver: Jaya; Weighbridge Ticket "Kartu Timbangan" No. PUDA224101323 dated 30/04/2024,</li> </ul>	
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		<p>From KT – 234 Tani Makmur, ID KPU, FFB amount 330 bunches, nett weight 8,497 kg, vehicle number BM9074BO, driver: Jaya, RSPO Certificate No: RSPO565807.</p> <ul style="list-style-type: none"> <li>FFB delivery note: "Bon Pengantar TBS No. 08/PLASMA" dated 30/04/2024 from KUD Tani Bahagia, KT 220 Tani Sepakat, FFB amount 220 bunches, Vehicle Number BM9858DU, Driver: Budi; Weighbridge Ticket "Kartu Timbangan" No. PUDA224101319 dated 30/04/2024, From KT – 221 Tani Sepakat, ID KPU, FFB amount 220 bunches, nett weight 8,320 kg, vehicle number BM9858DU, driver: Budi, RSPO Certificate No: RSPO565807.</li> </ul> <p>Since latest audit recertification there is no overproduction reported to CB, it is also confirmed during this surveillance assessment that there is no overproduction according to production data of estate and mill.</p> <p>Ukui II POM monitors the status of supplied raw material from certified and non-certified sources through Book Keeping Mass Balance system in three-monthly balance. In case on non-conforming raw material entering the process, Ukui II POM has the mechanism to handle non-conforming material and/or document. Ukui II POM demonstrated the simulation on recall of non-conforming material.</p> <p>Up to this audit ASA 2.3, there has been no case of non-conforming material and/or documents entering the process.</p>	
3.8.8	<p><b>Sales and Goods Out</b></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> <p>a) The name and address of the buyer;</p>	<p>PT IIS Ukui II POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.17.R7), chapter 5.2 indicates the Marketing Manager issued Delivery Order (DO) with information: name and address of production unit, name and address of buyer, contract number, type of product transportation (land/sea), distance, type of product (CPO or PK, certified or non-certified), quantity of product, delivery date, product qualification specification (CPO or PK: FFA, water content, dirt, etc.), Supply chain model (Mass Balance).</p>	Complied

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	<p>b) The name and address of the seller;</p> <p>c) The loading or shipment / delivery date;</p> <p>d) The date on which the documents were issued;</p> <p>e) RSPO certificate number;</p> <p>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</p> <p>g) The quantity of the products delivered;</p> <p>h) Any related transport documentation;</p> <p>i) A unique identification number.</p>	<p>At the Mill, weighbridge operator printed out CPO or PK weighbridge card, based on DO from marketing which indicates type of commodity, CPO or PK certified or not-certified; source and destination address; Supply Chain model: (Mass Balance); Certificate number of the Mill; date of delivery, Product quality specification (moisture, FFA, dirt); Contract number/DO number; Quantity, Transport detail (driver name, vehicle number); Buyer address.</p> <p>Sample of Sales Documents are verified during audit and information available are complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products: delivery notes/delivery order, shipping documents, weighbridge card, sales contract.</p>	
3.8.9	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p>	<p>PT. Inti Indosawit Subur – Ukui II POM does not outsource its milling activities, however operate subcontractor for CPO and PK transporter. The transporter for RSPO certified sustainable CPO delivery were carried out by several contractors. These contractors were appointed, contracted and instructed by PT Inti Indosawit Subur – Ukui II POM.</p> <p>PT Inti Indosawit Subur – Ukui II POM controls the outsourced transporter by "Surat Perintah Kerja (SPK)" and "Daftar Periksa Kesiapan Kerja Pengiriman". SPK covered information as explain in indicator 5.5.2 b. while "Daftar Periksa Kerja" is the tool to control the transporter:</p> <ul style="list-style-type: none"> <li>• Before shipping (completeness of vehicle including legality and safety, tank condition, faucet out, main hole tank, hinge/key lock faucet out);</li> <li>• After shipping (completeness of vehicle including legality and safety, tank condition, faucet out, main hole tank, hinge/key lock faucet out, seal number and seal condition);</li> <li>• The quantity of CPO monitored by Weighbridge Card and SPK (with 0.20% tolerance).</li> </ul>	Complied

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	<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>PT. Inti Indosawit Subur – Ukui II POM having legal ownership of material being transported by appointed outsourced companies.</p> <p>PT. Inti Indosawit Subur – Ukui II POM have a contract agreement with transporter as below:</p> <ul style="list-style-type: none"> <li>- “Perjanjian Pengangkutan Nomor: 03/VI/JSA-IIS/2020” dated 4 June 2020 between PT Inti Indosawit Subur and CV Jasa Sahabat Abadi. Contract transport for CPO and PK.</li> <li>- “Perjanjian Pengangkutan Nomor: 04/VI/SKI-IIS/2020” dated 4 June 2020 between PT Inti Indosawit Subur – Ukui I POM and PT Sumber Kencana. Contract transport for CPO.</li> <li>- “Perjanjian Pengangkutan Nomor: 03/VI/BJB-IIS/2020” dated 4 June 2020 between PT Inti Indosawit Subur and PT Buana Jaya Bersama. Contract transport for CPO &amp; PK.</li> <li>- “Perjanjian Pengangkutan Nomor: 04/IV/PAT-IIS/2024” dated 25 April 2024 between PT Inti Indosawit Subur and PT Palma Abadi Transindo. Contract transport for CPO &amp; PK. PT Palma Abadi Transindo previously was namely CV Teman Setia.</li> </ul> <p>Contract agreements are signed and enforceable by both parties. According to contract agreement article 7 point 1.m stated that “Transporter bersedia memenuhi persyaratan system sertifikasi rantai pasok saat pengangkutan bahan baku dan bersedia untuk diaudit oleh auditor internal perusahaan dan auditor pihak eksternal dari badan sertifikasi yang ditunjuk oleh pihak kedua jika diperlukan” – Transporter are willing to comply with certification system of RSPO Supply Chain during transport material and willing to be audit by internal auditor company (PT IIS – Ukui II POM) and external auditor from Certification Body if necessary.</p> <p>PT IIS Ukui II POM has a procedure to control the outsourced transporter through “SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019”</p>	
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		<p>Internal control for CPO and PK delivery by transporter has made as well with administration control before and during transport the CPO and PK. Document for transport CPO and PK was sighted during audit:</p> <ul style="list-style-type: none"> <li>✓ Surat Izin Muat CPO dan Kernel, contain information of Driver name, Identity number, Car/Truck Number, CPO/PK Dispatch time, netto, incoming and outgoing time.</li> <li>✓ Delivery Order Slip from Transporter, contain information of sales contract number, Truck number, destination, driver name, port destination.</li> <li>✓ Daftar Periksa Kesiapan Pengiriman CPO/Kernel contain information of Truck number, driver name, date of inspection, item inspection including: driver identity and completeness of vehicle legality, completeness of physical standard of vehicle, number of seal.</li> </ul> <p>During audit can be demonstrated that internal control has been implemented accordingly.</p>																					
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	<p>PT Inti Indosawit Subur – Ukui II POM has recorded name and contact detail of all contractors, as follows:</p> <table border="1"> <thead> <tr> <th>Name of Transporter</th><th>Address</th><th>Contact Person</th><th>Phone Number</th></tr> </thead> <tbody> <tr> <td>PT Sumber Kencana</td><td>Jl Veteran No 77, Rengat, Riau</td><td>Atun/Hendra</td><td>08127580***/085278043***</td></tr> <tr> <td>CV Jasa Sahabat Abadi</td><td>Jl Besar Kisaran, Medan</td><td>Darmin Tanudjaja</td><td>085372344***</td></tr> <tr> <td>PT Buana Jaya Bersama</td><td>Pekanbaru, Riau</td><td>Eltono</td><td>082169511***/082170430***</td></tr> <tr> <td>PT Palma Abadi Transindo</td><td>Jl. Cemara No. 138, Ruko Great</td><td>Rusmin</td><td>08*****</td></tr> </tbody> </table>	Name of Transporter	Address	Contact Person	Phone Number	PT Sumber Kencana	Jl Veteran No 77, Rengat, Riau	Atun/Hendra	08127580***/085278043***	CV Jasa Sahabat Abadi	Jl Besar Kisaran, Medan	Darmin Tanudjaja	085372344***	PT Buana Jaya Bersama	Pekanbaru, Riau	Eltono	082169511***/082170430***	PT Palma Abadi Transindo	Jl. Cemara No. 138, Ruko Great	Rusmin	08*****	Complied
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			Arcade, Kode Deli Serdang			
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	<p>The site committed to inform CB related name and contact details of any new contractors as mentioned in Procedure "SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019".</p> <p>There is no new contractor or transporter since the latest audit until audit ASA 2.3. In this audit ASA 2.3 CV Teman Setia as CPO transporter has change the name to become Palma Abadi Transindo.</p>				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</p>	<p>Based document review, PT Inti Indosawit Subur – Ukui II POM able to demonstrate complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain Certification Standard requirements.</p> <p>Records and report verified are as follows:</p> <ul style="list-style-type: none"> <li>• Sample of Mill Daily Report; dated 31<sup>st</sup> December 2023 and 30<sup>th</sup> April 2024.</li> <li>• Sample of Weighbridge Card for FFB</li> <li>• Sample of Weighbridge Card for CPO</li> <li>• Sample of Weighbridge Card for PK</li> <li>• Delivery Order CPO and PK</li> <li>• Sales contract</li> <li>• Shipping Announcement</li> <li>• Mass balance report</li> <li>• Internal audit RSPO SCCS and Management review</li> </ul> <p>Based on procedure of Traceability (AA-MPM-OP-1400.7.R7) dated 1 Oct 2019, section 6.9 requires that all records and reports related to traceability and book keeping are retained for a period of 10 years.</p>				Complied

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	(3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).	<p>PT Inti Indosawit Subur – Ukui II POM is able to provide estimate volume of CPO and PK in a year period as in “Distribusi Produksi Bulanan Anggaran Tahun 2024” consists estimate of FFB receiving from certified source (Soga Estate, Sei Lala Estate and Ukui Plasma), extraction rates, processing capacity, working hour and utilization.</p> <p>PT Inti Indosawit Subur – Ukui II POM record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis as per “Bookkeeping CPO &amp; PK”.</p> <p>Ukui II POM has also keep an up-to-date record of the FFB volume received, CPO and PK produced over a period of twelve (12) months.</p>	
3.8.13	<p><b>Extraction Rate</b></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 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.</p>	<p>PT Inti Indosawit Subur – Ukui II POM is able to provide estimate volume of CPO and PK in a year period as in “Distribusi Produksi Bulanan Anggaran Tahun 2023/2024” consists estimate of FFB receiving from certified source (Soga Estate, Sei Lala Estate and Ukui Plasma), extraction rates, processing capacity, working hour and utilization.</p> <p>The actual conversion ratio is monitored on a daily basis through sounding results and documented in daily reports. PT Inti Indosawit Subur – Ukui II POM able demonstrate the work instruction for analysis of oil content.</p> <p>OER and KER are estimated based on associated inputs and upon past experience (previous year FFB, CPO and PK production).</p> <p>The site has set OER for budget 2024 (Jan - Dec) as 20.08% (average) and KER as 5.80% (average).</p> <p>Budget FFB process 2024: certified 222,553.267 MT, non-certified: 0 MT</p> <p>Budget CPO production 2024: certified 44,691.284 MT, non-certified 0 MT.</p> <p>Budget PK production 2024: certified 12,908.089 MT, non-certified 0 MT.</p> <p>Budget vs realization ytd April 2024 are as below:</p>	Complied



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		<table><tr><th>Description</th><th>Budget</th><th>Realization</th></tr><tr><td>FFB Certified</td><td>222,553.267 MT</td><td>47,647.979 MT</td></tr><tr><td>CPO Certified</td><td>44,691.284 MT</td><td>9,263.920 MT</td></tr><tr><td>PK Certified</td><td>12,908.089 MT</td><td>2,374.120</td></tr><tr><td>OER</td><td>20.08 %</td><td>19.44 %</td></tr><tr><td>KER</td><td>5.80 %</td><td>5.01 %</td></tr></table>	Description	Budget	Realization	FFB Certified	222,553.267 MT	47,647.979 MT	CPO Certified	44,691.284 MT	9,263.920 MT	PK Certified	12,908.089 MT	2,374.120	OER	20.08 %	19.44 %	KER	5.80 %	5.01 %	
Description	Budget	Realization																			
FFB Certified	222,553.267 MT	47,647.979 MT																			
CPO Certified	44,691.284 MT	9,263.920 MT																			
PK Certified	12,908.089 MT	2,374.120																			
OER	20.08 %	19.44 %																			
KER	5.80 %	5.01 %																			
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	<p>The actual conversion ratio is monitored on a daily basis through sounding result and documented in daily report. PT Inti Indosawit Subur – Ukui II POM able demonstrate the work instruction for analysis of oil content.</p> <p>PT. Inti Indosawit Subur – Ukui II POM is able to demonstrate the work instruction for analysis of oil content.</p> <p>Based on Laporan Harian Produksi dated 31 December 2023, the sounding result and production report shows that actual conversion ratios from FFB into CPO (Jan – Dec 2023) are:</p> <ul style="list-style-type: none"><li>a. OER For FFB from Soga Estate: 21.37%</li><li>b. OER For FFB from Sei Lala Estate: 20.90%</li><li>c. OER For FFB from Ukui II Plasma: 17.986%</li><li>d. OER Average: 20.20%</li></ul> <p>And actual conversion ratios from FFB into PK are:</p> <ul style="list-style-type: none"><li>a. KER For FFB from Soga Estate: 5.56%</li><li>b. KER For FFB from Sei Lala Estate: 5.58%</li><li>c. KER For FFB from Ukui II Plasma: 5.59%</li><li>d. KER Average: 5.58 %</li></ul>	Complied																		

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		<p>Actual conversion ratios year 2024 to date 30 April 2024 from FFB into CPO are:</p> <ul style="list-style-type: none"> <li>a. OER For FFB from Soga Estate: 20.52% (budget 21.75%)</li> <li>b. OER For FFB from Sei Lala Estate: 19.40.14% (budget 20.55%)</li> <li>c. OER For FFB from Ukui II Plasma: 17.42% (budget 18.40%)</li> <li>d. OER Average: 19.44 % (budget 20.08%)</li> </ul> <p>And actual conversion ratios from FFB into PK are:</p> <ul style="list-style-type: none"> <li>a. KER For FFB from Soga Estate: 4.97% (budget 5.80%)</li> <li>b. KER For FFB from Sei Lala Estate: 4.98% (budget 5.80%)</li> <li>c. KER For FFB from Ukui II Plasma: 5.01% (budget 5.80%)</li> <li>d. KER Average: 4.98 % (budget 5.80%))</li> </ul>	
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>PT IIS – Ukui II POM has assure and verify through documented procedures Traceability (AA-MPM-OP-1400.7.R7) dated 1 Oct 2019 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. During audit it was noted that Ukui II POM only receive FFB from own certified source (supply bases) and there is no non certified FFB receive. All FFB are received from certified supply bases, which are from:</p> <ul style="list-style-type: none"> <li>• Company-owned estates, e.g.: Soga Estate and Sei Lala Estate;</li> <li>• Scheme smallholders consist of 6 (six) smallholder cooperatives (KUD), e.g.: KUD Tani Subur, KUD Karya Tani, KUD Mekar Abadi, KUD Tani Maju, KUD Tani Bahagia and KUD Usaha Tani.</li> </ul> <p>Storage tank available in Ukui II POM and dedicated only for certified CPO and PK from Ukui II POM, no other source of CPO store in the Ukui II POM storage tank. It was also confirmed that during transport of CSPO and CSPK there is no contamination from non-certified oil palm products.</p>	Complied

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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>PT. Inti Indosawit subur – Ukui II POM has made shipping announcement inside PalmTrace transaction, sample seen for period April 2023 – March 2024:</p> <table><tr><th>Transaction ID</th><th>Buyer</th><th>Product</th><th>Supply Chain Model</th><th>Volume</th><th>Status</th></tr><tr><td>TR-8554ab9c-c382</td><td>Ukui I Kernel Crushing Plant</td><td>CSPK</td><td>Identity Preserved</td><td>1,669.81</td><td>Confirmed</td></tr><tr><td>TR-74d3e735-6536</td><td>PT. Sari Dumai Sejati</td><td>CSPO</td><td>Identity Preserved</td><td>9,501.77</td><td>Confirmed</td></tr><tr><td>TR-43d396c1-b0ac</td><td>Ukui I Kernel Crushing Plant</td><td>CSPK</td><td>Identity Preserved</td><td>2,617.01</td><td>Confirmed</td></tr><tr><td>TR-ef57d02e-88bf</td><td>PT. Sari Dumai Sejati</td><td>CSPO</td><td>Identity Preserved</td><td>8,411.16</td><td>Confirmed</td></tr><tr><td>TR-61d72341-dfd8</td><td>Ukui I Kernel Crushing Plant</td><td>CSPK</td><td>Identity Preserved</td><td>3,046.28</td><td>Confirmed</td></tr><tr><td>TR-add9b2f2-28ac</td><td>Apical Middle East FZCO</td><td>CSPO</td><td>Identity Preserved</td><td>500</td><td>Confirmed</td></tr><tr><td>TR-89dd7b39-6506</td><td>PT Padang Raya Cakrawala</td><td>CSPO</td><td>Identity Preserved</td><td>799.98</td><td>Confirmed</td></tr><tr><td>TR-4c6b3e83-f260</td><td>PT Padang Raya Cakrawala</td><td>CSPO</td><td>Identity Preserved</td><td>300</td><td>Confirmed</td></tr><tr><td>TR-5e71f4ed-9e68</td><td>PT Padang Raya Cakrawala</td><td>CSPO</td><td>Identity Preserved</td><td>500</td><td>Confirmed</td></tr><tr><td>TR-1faea41b-5f56</td><td>PT Padang Raya Cakrawala</td><td>CSPO</td><td>Identity Preserved</td><td>2400</td><td>Confirmed</td></tr><tr><td>TR-1d9b7c14-1458</td><td>PT. Sari Dumai Sejati</td><td>CSPO</td><td>Identity Preserved</td><td>2,629.74</td><td>Confirmed</td></tr></table>	Transaction ID	Buyer	Product	Supply Chain Model	Volume	Status	TR-8554ab9c-c382	Ukui I Kernel Crushing Plant	CSPK	Identity Preserved	1,669.81	Confirmed	TR-74d3e735-6536	PT. Sari Dumai Sejati	CSPO	Identity Preserved	9,501.77	Confirmed	TR-43d396c1-b0ac	Ukui I Kernel Crushing Plant	CSPK	Identity Preserved	2,617.01	Confirmed	TR-ef57d02e-88bf	PT. Sari Dumai Sejati	CSPO	Identity Preserved	8,411.16	Confirmed	TR-61d72341-dfd8	Ukui I Kernel Crushing Plant	CSPK	Identity Preserved	3,046.28	Confirmed	TR-add9b2f2-28ac	Apical Middle East FZCO	CSPO	Identity Preserved	500	Confirmed	TR-89dd7b39-6506	PT Padang Raya Cakrawala	CSPO	Identity Preserved	799.98	Confirmed	TR-4c6b3e83-f260	PT Padang Raya Cakrawala	CSPO	Identity Preserved	300	Confirmed	TR-5e71f4ed-9e68	PT Padang Raya Cakrawala	CSPO	Identity Preserved	500	Confirmed	TR-1faea41b-5f56	PT Padang Raya Cakrawala	CSPO	Identity Preserved	2400	Confirmed	TR-1d9b7c14-1458	PT. Sari Dumai Sejati	CSPO	Identity Preserved	2,629.74	Confirmed	Complied
Transaction ID	Buyer	Product	Supply Chain Model	Volume	Status																																																																						
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		<p>PT. Inti Indosawit Subur – Ukui II POM has made remove RSPO certified CSPO from their PalmTrace account due to CSPO sold as ISCC:</p> <ul style="list-style-type: none"> <li>- Transaction ID ST-TR-412fc22a-9bf7, volume to remove 1,852.07 MT, available volume 28,109.07 MT, remove date 13/05/2024.</li> </ul> <p>There is no CSPK sold as other certification scheme.</p>	
3.8.17	<p><b>Claims</b></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. Inti Indosawit Subur – Ukui I POM has not made claims regarding the support of RSPO certified oil palm products. However, the organization aware about the RSPO Rules on Market Communications and Claims.</p>	Complied
<b>General corporate communications</b>			
4.1	<p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p>	<p>PT. Inti Indosawit Subur (with the brand Asian Agri), the parent company of Ukui I POM is highlighting its commitment to the principles of RSPO, and directly referring to RSPO website. The corporate communication can be found at <a href="http://www.asianagri.com">http://www.asianagri.com</a>.</p>	Complied
4.2	<p>In corporate communications, a member is allowed to:</p> <ul style="list-style-type: none"> <li>A. display its RSPO membership status</li> <li>B. display the RSPO web address (www.rspo.org)</li> <li>C. state that the member supports the work of RSPO</li> <li>D. state the member's history with regard to RSPO</li> <li>E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership</li> </ul>	<p>Corporate communication in Asian Agri website:</p> <ul style="list-style-type: none"> <li>• Display its RSPO membership status: On the website of Asian Agri, it was stated the company is RSPO Member since February 2006.</li> <li>• Display the RSPO web address: Not in direct manner. In Asian Agri website, company made a link to RSPO website.</li> <li>• State the member supports the work of the RSPO: Not in direct manner. In the website, Asian Agri wrote "In 2006, Asian Agri became a member of the Roundtable of Sustainable Palm Oil (RSPO), a global multi-stakeholder certification system to develop and implement global standards for sustainable palm oil production. We received our 1<sup>st</sup> RSPO certification for our estate in 2010, and in 2012, the certification for our smallholder scheme."</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>State the member's history with regards to the RSPO: In the website of Asian Agri, it was stated the company is RSPO Member since February 2006.</li> </ul> <p>Use of RSPO Trademark to promote its membership of the RSPO: in the website, the company display RSPO Trademarks with valid trademark licence number 1-0022-06-100-00.</p>	
4.3	Members are <b>not allowed</b> to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	Asian Agri website did not display the RSPO Corporate Logo.	Complied
4.4	In corporate communications, RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products.	In the Asian Agri website, stated that the company is RSPO Member since February 2006. However, it is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied
4.5	<p>Additionally, RSPO certified members are allowed to make statements that highlight their RSPO certification status and product-related claims in their corporate communication tools. Some permitted examples include:</p> <ul style="list-style-type: none"> <li>"We have been sourcing RSPO certified palm oil since (YEAR)."</li> <li>"We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year."</li> <li>"We have been RSPO certified since (YEAR)."</li> <li>"We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil."</li> <li>"In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified."</li> <li>"Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits."</li> <li>"We are RSPO certified. Ask us for our RSPO certified products."</li> </ul>	In the Asian Agri website, stated that the company is RSPO Member since February 2006. However, it is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied

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4.6	<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> <ul style="list-style-type: none"> <li>i. "The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR)."</li> <li>ii. X% of palm oil sourced by our organisation are certified through the Roundtable on Sustainable Palm Oil (RSPO) supply chains as (a) Identity Preserved, (b) Segregated, (c) Mass Balance, or (d) Book and Claim.</li> </ul> <p>C. In cases wherein an organisation/member would like to indicate their commitment to sourcing RSPO certified volumes, the statement shall be accompanied with a disclaimer: "This reported figure is not audited through RSPO Certification".</p>	<p>PT Inti Indosawit Subur – Ukui II POM is a certified member as a subsidiary of RSPO registered member PT Inti Indosawit Subur. The corporate communication of PT Inti Indosawit Subur can be seen in the company website, under brand Asian Agri at the address <a href="http://www.asianagri.com">www.asianagri.com</a>. Asian Agri website display RSPO Trademarks with valid trademark licence number 1-0022-06-100-00. Therefore, this is not applicable.</p>	Not Applicable
<b>Product-specific communications</b>			
<b>5.1 General</b>			
5.1.1	<p>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.</p>	<p>PT Inti Indosawit Subur – Ukui II POM Product-specific communications made under sales contract, DO and weighbridge ticket/delivery note. Stated in sales documents that the product they sold is RSPO Certified model IP.</p>	Complied
5.1.2	<p>Product-specific communications are voluntary.</p>	<p>PT Inti Indosawit Subur – Ukui II POM stated the supply chain model and certificate number, e.g. in sales contract, DO and weighbridge ticket/delivery note.</p>	Complied

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5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself.	PT Inti Indosawit Subur – Ukui II POM did not display the RSPO label for product-specific communications.	Complied
5.1.4	Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication.	PT Inti Indosawit Subur – Ukui II POM did not use RSPO trademark or any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products	Complied
5.1.5	<p>If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders or distributors, enters into any agreement whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO Trademark licence number, the following conditions shall be met as shown below</p> <ul style="list-style-type: none"> <li>• RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field.</li> <li>• Both parties shall inform their certification body in writing about the agreement.</li> <li>• 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.</li> </ul>	PT Inti Indosawit Subur – Ukui II POM is a palm oil mill; thus, this indicator is not applicable.	Not Applicable
5.1.6	Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain	PT Inti Indosawit Subur – Ukui II POM is a palm oil mill; thus, this indicator is not applicable.	Not Applicable

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<b>5.2 Off pack claims</b>			
5.2.1	Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made.	PT Inti Indosawit Subur – Ukui II POM did not use RSPO trademark or logo in the product specific communication.  PT Inti Indosawit Subur – Ukui II POM Product-specific communications made under sales contract, DO and weighbridge ticket/delivery note. Stated in sales documents that the product they sold is RSPO Certified model IP.  PT Inti Indosawit Subur – Ukui II POM stated the supply chain model and certificate number, e.g. in sales contract, DO and weighbridge ticket/delivery note.	Complied
5.2.2	When confirming the sale of certified palm oil products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	It was verified that when selling certified oil palm product, PT Inti Indosawit Subur – Ukui II POM stated the supply chain model and certificate number, e.g. in sales contract, DO and weighbridge ticket/delivery note.	Complied
5.2.3	Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the requirements of the RSPO SCCS can follow either one of these two options: <ul style="list-style-type: none"> <li>• 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.</li> <li>• If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2.</li> </ul>	PT Inti Indosawit Subur – Ukui II POM is a palm oil mill; thus, this indicator is not applicable.	Not Applicable
<b>5.3 On pack claims</b>			



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5.3.1	Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.	PT Inti Indosawit Subur – Ukui II POM sold its oil palm product in bulk, there was no on-pack claim used.	Complied
5.3.2	<p>In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:</p> <p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p> <ul style="list-style-type: none"> <li>• RSPO IP/SG CERTIFIED*</li> <li>• Contains RSPO IP/SG palm oil*</li> <li>• Contains RSPO certified palm oil (IP/SG)*</li> </ul> <p>*Add RSPO TM Licence Number below or next to the claim.</p>	PT Inti Indosawit Subur – Ukui II POM sold its oil palm product in bulk, there was no on-pack claim used.	Complied
	<p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> <li>• RSPO MIXED*</li> <li>• Contributes to the production of RSPO certified palm oil*</li> <li>• Contains RSPO certified palm oil (MB)*</li> </ul> <p>*Add RSPO TM Licence Number below or next to the claim.</p>	PT Inti Indosawit Subur – Ukui II POM sold its oil palm product in bulk, there was no on-pack claim used.	Complied
	<p>C) For Partially Certified Products:</p> <ul style="list-style-type: none"> <li>• RSPO 50% MIXED*</li> <li>• Contains at least 50% RSPO certified palm oil*</li> </ul> <p>*Add RSPO TM Licence Number below or next to the claim.</p>	PT Inti Indosawit Subur – Ukui II POM sold its oil palm product in bulk, there was no on-pack claim used.	Complied

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	<p>D) For Products covered with Book and Claim (B&amp;C):</p> <ul style="list-style-type: none"> <li>• RSPO CREDITS*</li> <li>• Supports the production of RSPO certified palm oil*</li> <li>• Contains palm oil covered by the purchase of RSPO Credits*</li> </ul> <p>*Add RSPO TM Licence Number below or next to the claim.</p>	PT Inti Indosawit Subur – Ukui II POM sold its oil palm product in bulk, there was no on-pack claim used.	Complied
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	PT Inti Indosawit Subur – Ukui II POM sold its oil palm product in bulk, there was no on-pack claim used.	Complied
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	The communication of PT Inti Indosawit Subur – Ukui II POM has not mentioned to consumers information about their suppliers' RSPO membership status.	Complied
5.3.5	Use of the RSPO Label is restricted to claims about RSPO certified sustainable palm oil contained in products and is not authorised for use in relation to any other ingredient.	PT Inti Indosawit Subur – Ukui II POM sold its oil palm product in bulk, up to this moment, PT Inti Indosawit Subur has not use RSPO label or trademark.	Complied
5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	PT Inti Indosawit Subur – Ukui II POM sold its oil palm product in bulk, up to this moment, PT Inti Indosawit Subur has not use RSPO label or trademark.	Complied
<b>MODULE A – IDENTITY PRESERVED</b>			
	95% or above of the oil palm content must be IP certified.	<p>PT Inti Indosawit Subur – Ukui II POM is producing and selling CPO and PK; All certified product sold are 100 % content oil palm RSPO IP-certified.</p> <p>No such cases as the certified material is bulk intermediate product.</p> <p>By default, the material is either 100% claimed under RSPO or not RSPO.</p>	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	<p>There is no percentage of non-certified oil palm within the certified product. All certified product produced and sold are 100% IP.</p> <p>PT Inti Indosawit Subur – Ukui II POM was not produce end consumer goods. The production are CPO and PK.</p>	Complied

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	palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.		
<b>Messaging</b>			
	<p>Messaging ALLOWED in storytelling in product-specific communications includes:</p> <ul style="list-style-type: none"> <li>• [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.</li> <li>• 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.</li> </ul>	PT Inti Indosawit Subur – Ukui II POM was not use storytelling in product-related communications.	Complied
<b>Product-Specific Communications Labelling</b>			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• The RSPO Label can also include the statement: "[The palm oil contained in this product] contributes to the production of certified sustainable palm oil".</li> </ul>	No product related communications are found. Information provided in Cooperate website includes the total certified units, traceability of the supply chain and commitment to have all units certified.	Complied
<b>Principle 4: Respect community and human rights and deliver benefit</b> Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.			
<b>Criteria 4.1:</b> The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.			

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4.1.1	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p>	<p>There are no changes related to the Policy to respect human rights. This corporate policy was issued by the Managing Director of Asian Agri on 1 December 2014. Point 13 of the policy states that "The company respects human rights by treating all employees fairly, in recruitment, performance appraisal, working conditions and environment and representation regardless of ethnicity, caste, nationality, religion, disability, gender, sexual orientation, union membership, political affiliation and/or age".</p> <p>As for the Policy on Human Rights Defenders (HAM) issued through PT Inti Indosawit Subur Group Manager Memorandum No. 005/GM-KUK/MEMO/02/20 dated 10 February 2020, the policy stated that: "It is prohibited to retaliate, intimidate and deceive human rights reporters/defenders"..., this policy has been disseminated to all workers.</p> <p>The company policy mentioned above was conveyed/socialized to all workers (Ukui II POM, Soga Estate and Sei Lala Estate) on 9 January 2024, to the surrounding community (through village community representatives) on 10 January 2024 and to other related parties (contractors, suppliers and partners) on 11 January 2024.</p> <p>Based on interviews with several workers (harvesters, sprayers and fertilization workers) and also several stakeholders that to date there have been no cases related to human rights violations.</p> <p><b>Scheme Smallholder:</b></p> <p>There is no change in Cooperative policy related to respecting human rights.</p> <p>Based on interviews with samples of farmers during field visits at KUD Tani Bahagia, KUD Trani Maju and KUD Tani Subur that in general, farmers have understood the policies to respect human rights. Up to now, there were no cases related to human rights violations.</p>	Complied
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4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.	Based on the interview with stakeholder and documents review with the head of Ukui Village, Redang Seko Village, Kulim Jaya Village, Labour Union and Chief of Gender committee that PT IIS - Ukui Group, there is no any use of employees from mercenaries and paramilitaries use in the operations.  Up to this Surveillance audit, there is no issue or case related to the acts of violence against the employees of the company.	Complied
<b>Criteria 4.2:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
4.2.1	<b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	PT Inti Indosawit Subur has been establish since the 1985s and most of its employees come from nearby villages. Based on interviews with local village heads, since the company was founded, there have been no cases of violence or harassment in its operations. The company also does not use mercenaries or paramilitaries to protect plantations, that security is carried out by patrols carried out by the surrounding village community or also called "Centeng."	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	Unit of Certification has established a mechanism to handle complaint from external party, as written in " <i>Mekanisme Penanganan Keluhan</i> " – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under " <i>Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i> " – Employee' complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05). The procedure is how to handling complaint and grievances, the company keeps confidential complainer and whistleblower. Complaint and grievances is recorded in log Book and in " <i>Formulir Pencatatan Keluh Kesah dan Ketidakpuasan</i> ". The company will endeavor to resolve complaints within 15 working days. Any grievance or illegal action within Unit of Certification also is available through hotline (call) and email to <a href="mailto:whistleblow@rgei.com">whistleblow@rgei.com</a> .	Complied

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		<p>These mechanisms has been communicated to external parties at the time conducting of communication and consultation with stakeholder, contractor and local communities. While for the internal parties (all level employees at PT IIS Ukui II has been communicated through master morning. Through this communication, the company explained about the mechanism of submission of complaints in detail and lasts in two directions (ask-answer/discussion), so if there are illiterate parties can understood.</p> <p>According to interview with management representatives and sustainability staff and also several of employees during the audit, there is no illiterate parties in estate or mill.</p>	
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	<p>There were no changes related to the mechanism to handle complaint from external party, as written in "<i>Mekanisme Penanganan Keluhan</i>" – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under "<i>Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i>" – Employee' complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05).</p> <p>These mechanisms have communicated to external parties at the time conducting of communication and consultation with stakeholder, contractor and local communities.</p> <p>Through this communication, PT IIS – Ukui II POM explained about the mechanism of submission of complaints in detail and lasts in two directions (ask-answer/discussion),</p> <p>The procedure on handling complaint and grievances, Unit of Certification keeps confidential complainer and whistleblower. Complaint and grievances were recorded in LogBook and in "<i>Formulir Pencatatan Keluh Kesah dan Ketidakpuasan</i>".</p> <p>Based on the interview with stakeholder and documents review with the internal stakeholder (labour union, gender committee and random worker in field) and external stakeholder (village head and previous</p>	Complied

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		landowners) all policy/procedures are in place and understood by all stakeholders.	
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	There were no changes related to the mechanism to handle complaint from external party, as written in " <i>Mekanisme Penanganan Keluhan</i> " – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under " <i>Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i> " – Employee' complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05). During this audit ASA2.3 there is no conflict occurred.	Complied
<b>Criteria 4.3:</b> The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local community are demonstrated. - Minor compliance -	Based on interviews with the Management of PT IIS - Ukui Group and the surrounding local communities, that the preparation of the CSR program was carried out in discussions during the discussion /MUSREMBANG (Development Planning Meeting) in the village. So that the CSR program is expected to be right on target needed by the village community.  In 2023 period, PT IIS – Ukui Group has established CSR program where in 2023 budget is IDR 392,760,567 covered social aspect, education aspect, economy aspect, infrastructure aspect and environment aspect.  The realization of the CSR program in 2023 is as follows: <ul style="list-style-type: none"> <li>• 16 April 2023, road maintenance in Desa Air Hitam</li> <li>• 21 May 2023, heavy equipment in Desa Bagan Air Limau</li> <li>• June 2023, health inspection in Desa Bagan Limau (blood donors)</li> <li>• 18 July 2023, road maintenance in Desa Silikuan Hulu</li> <li>• 14 August 2023, education training for teacher and headmaster</li> </ul>	Complied

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		<ul style="list-style-type: none"><li>29 August 2023, school uniforms for 4 schools (SDN 002 Ukui Dua, SDN 011 Bukit Gajah, MI Radiatul Ulum and SDIT Muhammadiyah Bukit Gajah)</li><li>8 September 2023, delivery of goats to Kelompok Ternak Kambing Desa Silikuan Hulu as part of alternative livelihoods program</li></ul>										
<b>Criteria 4.4:</b> Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.												
4.4.1	<b>(C)</b> 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>There are no changes of compliance statement compared to last year audit.</p> <p><b>Estate:</b></p> <p>Unit of certification within this scope are UKUI-II Mill supplied by Soga Estate, Sei Lala Estate and 6 Smallholders Cooperatives. Legal requirements of land use rights in Indonesia is recognize as "Hak Guna Usaha" or Land Title. Where the Land Title issued by National Land Department. The legal land use-rights for this scope as follow:</p> <table><tr><th>Estates</th><th>Area (Ha)</th><th>Land Title</th></tr><tr><td>Soga</td><td>2,988</td><td>HGU Certificate No. 013, 6 Jul 2009. Exp: 9 Jun 2044. Total area: 2,988 Ha. SK. Ka. BPN RI No: 78-HGU-BPN RI-2008, dated 19 Dec 2008.</td></tr><tr><td>Sei Lala</td><td>3,178</td><td>HGU Certificate No. 016, 3 Nov 2010. Exp: 3 Nov 2045. Total area: 299.51 Ha. (remain area is from HGU certificate No. 01 Year 1989 with area 6,727.40 Ha) SK Ka. BPN No: 156/HGU/BPN/2004, dated 11 November 2004.</td></tr></table>	Estates	Area (Ha)	Land Title	Soga	2,988	HGU Certificate No. 013, 6 Jul 2009. Exp: 9 Jun 2044. Total area: 2,988 Ha. SK. Ka. BPN RI No: 78-HGU-BPN RI-2008, dated 19 Dec 2008.	Sei Lala	3,178	HGU Certificate No. 016, 3 Nov 2010. Exp: 3 Nov 2045. Total area: 299.51 Ha. (remain area is from HGU certificate No. 01 Year 1989 with area 6,727.40 Ha) SK Ka. BPN No: 156/HGU/BPN/2004, dated 11 November 2004.	Complied
Estates	Area (Ha)	Land Title										
Soga	2,988	HGU Certificate No. 013, 6 Jul 2009. Exp: 9 Jun 2044. Total area: 2,988 Ha. SK. Ka. BPN RI No: 78-HGU-BPN RI-2008, dated 19 Dec 2008.										
Sei Lala	3,178	HGU Certificate No. 016, 3 Nov 2010. Exp: 3 Nov 2045. Total area: 299.51 Ha. (remain area is from HGU certificate No. 01 Year 1989 with area 6,727.40 Ha) SK Ka. BPN No: 156/HGU/BPN/2004, dated 11 November 2004.										



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		Smallholders	Area (Ha)	Land Title	
		KUD Tani Subur	780	SHM (Certificate of Land Ownership)	
		KUD Karya Tani	734	SHM (Certificate of Land Ownership)	
		KUD Mekar Abadi	574	SHM (Certificate of Land Ownership)	
		KUD Trani Maju	962	SHM (Certificate of Land Ownership)	
		KUD Tani Bahagia	1,366	SHM (Certificate of Land Ownership)	
		KUD Usaha Tani	1,292	SHM (Certificate of Land Ownership)	
		<b>TOTAL</b>	<b>11,874</b>		
		<p>PT. Inti Indosawit Subur – Ukui II POM has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) “Prosedur Penyelesaian Sengketa Lahan No. AA-GL-5003-1-R2”, dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p><b>Scheme Smallholders:</b>  Based on interview with sampled smallholder member (farmer) and relevant authority, Plantation Agency of Indra Giri Hulu Regency; there</p>			

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		<p>was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary.</p> <p>Cooperatives have a conflicts resolution mechanism in “Mekanisme Penanganan Konflik” dated 1<sup>st</sup> August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.</p> <p><b>Sampled of smallholder land legal document (SHM)</b></p> <p><b>KUD Tani Subur</b></p> <ul style="list-style-type: none"> <li>• On behalf of Kusnun, SHM No. 1080 dated 25 October 1993</li> <li>• On behalf of Memet, SHM No. 755 dated 25 October 1993</li> <li>• On behalf of Poniran, SHM No. 00893 dated 25 October 1993</li> <li>• On behalf of Moengit Supardi, SHM No. 1077 dated 25 October 1993</li> <li>• On behalf of Aswad, SHM No. 01029 dated 25 October 1993</li> </ul> <p><b>KUD Tani Bahagia</b></p> <ul style="list-style-type: none"> <li>• On behalf of Boiman, SHM No. 1340 dated 14 November 1994</li> <li>• On behalf of Ngajio, SHM No. 0913 dated 14 November 1994</li> <li>• On behalf of Supei, SHM No. 1379 dated 14 November 1994</li> <li>• On behalf of Ali, SHM No. 1304 dated 14 November 1994</li> <li>• On behalf of Suliyanto, SHM No. 1377 dated 14 November 1994</li> </ul> <p><b>KUD Trani Maju</b></p> <ul style="list-style-type: none"> <li>• On behalf of Nurman, SHM No. 1522 dated 14 November 1994</li> <li>• On behalf of Suprpto, SHM No. 1537 dated 14 November 1994</li> <li>• On behalf of Lukito, SHM No. 1560 dated 14 November 1994</li> <li>• On behalf of Sarmin, SHM No. 1561 dated 14 November 1994</li> </ul>	
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		<ul style="list-style-type: none"> <li>On behalf of Aryadi, SHM No. 00657 dated 14 November 1994</li> </ul>	
4.4.2	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p> <p>4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;</p> <p>4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities. Including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p>	<p>In this audit ASA2.3, there are no changes of compliance statement compared to last year audit.</p> <p>PT. Inti Indosawit Subur is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. The land status is clear, and no land disputes raised. Copies of documents evidencing agreement-making processes and negotiated agreement detailing the FPIC process are obsolete.</p>	Complied
4.4.3	<p><b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p><b>Estate:</b></p> <p>Maps of an appropriate scale (1:50.000) showing the extent of recognised legal, customary or user rights are available within HGU map namely "Peta Gambar Situasi Khusus". This map is attached within HGU certificate.</p>	Complied

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		<b>Scheme Smallholder:</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are available within Certificate of Land Ownership or "Sertipikat Hak Milik" in each smallholder.	
4.4.4	All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.	<p>There are no changes of compliance statement compared to last year audit.</p> <p><b>Estate:</b>  PT Inti Indosawit Subur – Ukui Group is not acquiring any new land for oil palm plantation. The company does not restrict local people's access through the main Estate roads. This was confirmed during an interview with company representative and stakeholder consultation with local community. Based on area statement documents of Soga Estate and Sei Lala Estate, interview with communities (village representatives of Bagan Limau and Ukui village) and stakeholder consultation (local governance consist of Environment Agency, Manpower Agency and Plantation Agency; sampled smallholder consists of 64 smallholder), there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Scheme Smallholder:</b>  During field observation and interview with sample of smallholders (64 smallholders) obtained information that there is no land dispute within smallholder's area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plot already have legal use rights.</p>	Complied
4.4.5	<b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	There are no changes of compliance statement compared to last year audit.	Complied

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		<p><b>Estate:</b>  PT Inti Indosawit Subur – Ukui Group is not acquiring any new land for oil palm plantation. The company does not restrict local people's access through the main Estate roads. This was confirmed during an interview with company representative and stakeholder consultation with local community. Based on area statement documents of Soga Estate and Sei Lala Estate, interview with communities (village representatives of Bagan Limau and Ukui village) and stakeholder consultation (local governance consist of Environment Agency, Manpower Agency and Plantation Agency; sampled smallholder consists of 64 smallholder), there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Scheme Smallholder:</b>  During field observation and interview with sample of smallholders (64 smallholders) from KUD Trani Maju, KUD Tani Subur and KUD Tani Bahagia, obtained information that there is no land dispute within smallholder's area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plot already have legal use rights.</p>	
4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.	<p>There are no changes of compliance statement compared to last year audit.</p> <p><b>Estate:</b>  PT Inti Indosawit Subur – Ukui Group is not acquiring any new land for oil palm plantation. The company does not restrict local people's access through the main Estate roads. This was confirmed during an interview with company representative and stakeholder consultation with local</p>	Complied

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		<p>community. Based on area statement documents of Soga Estate and Sei Lala Estate, interview with communities (village representatives of Bagan Limau and Ukui village) and stakeholder consultation (local governance consist of Environment Agency, Manpower Agency and Plantation Agency; sampled smallholder consists of 64 smallholder), there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Scheme Smallholder:</b></p> <p>During field observation and interview with sample of smallholders (64 smallholders) from KUD Trani Maju, KUD Tani Subur and KUD Tani Bahagia, obtained information that there is no land dispute within smallholder's area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plot already have legal use rights.</p>	
<b>Criteria 4.5:</b> No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	<b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	<p>During this audit ASA 2.3 there are no changes of compliance statement compared to last year audit.</p> <p><b>Estate:</b></p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquiring of new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Ukui Estate area statement documents, interview with communities and</p>	Complied

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		<p>stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities. PT Inti Indosawit Subur – Soga and Sei Lala Estate has own legal ownership for land title in the form of HGU since 2004 based on SK Ka. BPN No: 156/HGU/BPN/2004, dated 11 November 2004 and SK. Ka. BPN RI No: 78-HGU-BPN RI-2008, dated 19 Dec 2008. Land Title certificate (HGU) No. 01/1989 for area 6,727.64 Ha located in Ukui; HGU Certificate No. 013, 6 Jul 2009. Exp: 9 Jun 2044. Total area: 2,988 Ha; HGU Certificate No. 016, 3 Nov 2010. Exp: 3 Nov 2045.</p> <p>Currently land title HGU Sei Lala Estate is on process of renewal, latest progress of renewal process:</p> <ul style="list-style-type: none"> <li>- Field inspection dated 3 April 2024 by "Panitia Pemeriksaan Tanah B" BPN Provinsi Riau according to Letter BPN No. HP.01.03/1042-14/III/2024.</li> <li>- <i>Sidang Panitia Pemeriksaan Tanah B</i> (BPN Provinsi Riau) – Committee B meeting dated 24 April 2024 according to letter No. HP.01.03/1160-14/IV/2024.</li> </ul> <p><b>Scheme Smallholder:</b></p> <p>During field observation and interview with sample of smallholders at KUD Tani Bahagia, KUD Tani Subur and KUD Trani Maju, there is no land dispute within smallholders' area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders' plots already have legal use rights.</p>	
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions. All the relevant information and documents are made available, and community have option of resourced access to independent third-party advice through a	<p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquiring of new land for oil palm plantation. The company does not restrict local peoples access through the main Estate</p>	Complied

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	documented, long-term and two- way process of consultation and negotiation.	roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Estate area statement documents, interview with communities and stakeholder consultation, there is no issue of land conflict noted and/or reported between company and surrounding communities.	
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.	Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquiring of new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Estate area statement documents, interview with communities and stakeholder consultation, there is no issue of land conflict noted and/or reported between company and surrounding communities.	Complied
4.5.4	To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of land allocations process.	Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquiring of new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Estate area statement documents, interview with communities and stakeholder consultation, there is no issue of land conflict noted and/or reported between company and surrounding communities.  The social environmental impact analysis has been conducted since 1995 and documented in ANDAL, RKL RPL. SEIA has included consultation with relevant stakeholders to identify impacts and to	Complied



		<p>develop any mitigation measures. PT Inti Indosawit Subur – Ukui group is able to demonstrate environmental impact assessment in AMDAL document (<i>Studi Analisis Dampak Lingkungan/AMDAL Perkebunan Kelapa Sawit Pola PIR – Transmigrasi dan Pabrik Minyak Kelapa Sawit/PMKS di Kabupaten Kampar, Indragiri Hulu dan Bengkalis Propinsi Riau</i>). AMDAL document has approval as per “SK Menteri Pertanian No.013/AMDAL/HA/V/95” dated 05/05/1995. In addition, environmental management and monitoring plan - RKL/RPL as per “Surat Keputusan Menteri Pertanian No.03/RKL-RPL/BA/IV/1996” dated 04/04/1996. Initial SEIA was performed by independent consultant PT Swastika Aryindo Buana, consist of the professional and competent assessor. SEIA document has included the impacts of any smallholder/outgrower scheme.</p>	
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.	<p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquiring of new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Estate area statement documents, interview with communities and stakeholder consultation, there is no issue of land conflict noted and/or reported between company and surrounding communities.</p>	Complied
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.	<p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquiring of new land for oil palm plantation. The company does not restrict local peoples access through the main Estate</p>	Complied

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		roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Estate area statement documents, interview with communities and stakeholder consultation, there is no issue of land conflict noted and/or reported between company and surrounding communities.	
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.	There is no land acquisition after 15 Nov 2018. Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquiring of new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Estate area statement documents, interview with communities and stakeholder consultation, there is no issue of land conflict noted and/or reported between company and surrounding communities.	Complied
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation.	There is no land acquisition after 15 Nov 2018. Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is no acquiring of new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Estate area statement documents, interview with communities and stakeholder consultation, there is no issue of land conflict noted and/or reported between company and surrounding communities.	Complied

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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.	<p>There are no changes compared to last year audit.</p> <p><b>Estate:</b></p> <p>PT Inti Indosawit Subur – Ukui Group is not acquiring any new land for oil palm plantation. The company does not restrict local people’s access through the main Estate roads. This was confirmed during an interview with company representative and stakeholder consultation with local community. Based on area statement documents of Soga Estate and Sei Lala Estate, interview with communities (village representatives of Bagan Limau and Ukui village) and stakeholder consultation (local governance consist of Environment Agency, Manpower Agency and Plantation Agency; sampled smallholder consists of 57 smallholder), there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Scheme Smallholder:</b></p> <p>During field observation and interview with sample of smallholders obtained information that there is no land dispute within smallholder’s area since the plantation developed. Smallholders land obtained based on government program “Transmigrasi” in early 1980’s, therefore all smallholders plot already have legal use rights.</p>	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.	<p>The Certificate Holder has a procedure to resolve land conflict, Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the HRC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant</p>	Complied

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		<p>parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether or not customary, legal or other rights and its compensation calculation.</p> <p><b>Estate:</b></p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Estate (Soga Estate and Sei Lala Estate) area statement documents, interview with communities (village representatives of Bagan Limau and Ukui village) and stakeholder consultation (local governance consist of Environment Agency, Manpower Agency and Plantation Agency; sampled smallholder consists of 57 smallholders, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Scheme Smallholder:</b></p> <p>During field observation and interview with sample of smallholders (57 smallholders) obtained information that there is no land dispute within smallholder's area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plot already have legal use rights.</p>	
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).	<p>The Certificate Holder has a procedure to resolve land conflict, Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the RPO guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land</p>	Complied

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		<p>measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether or not customary, legal or other rights and its compensation calculation.</p> <p><b>Estate:</b></p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Estate (Soga Estate and Sei Lala Estate) area statement documents, interview with communities (village representatives of Bagan Limau and Ukui village) and stakeholder consultation (local governance consist of Environment Agency, Manpower Agency and Plantation Agency; sampled smallholder consists of 57 smallholders, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Scheme Smallholder:</b></p> <p>During field observation and interview with sample of smallholders (57 smallholders) obtained information that there is no land dispute within smallholder's area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plot already have legal use rights.</p>	
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.	The Certificate Holder has a procedure to resolve land conflict, Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the	Complied

		<p>SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether or not customary, legal or other rights and its compensation calculation.</p> <p><b>Estate:</b></p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Estate (Soga Estate and Sei Lala Estate) area statement documents, interview with communities (village representatives of Bagan Limau and Ukui village) and stakeholder consultation (local governance consist of Environment Agency, Manpower Agency and Plantation Agency; sampled smallholder consists of 57 smallholder), there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Scheme Smallholder:</b></p> <p>During field observation and interview with sample of smallholders (57 smallholders) obtained information that there is no land dispute within smallholder's area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plot already have legal use rights.</p>	
<p><b>Criteria 4.7:</b> Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			

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4.7.1	<b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.	Company refer to mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighbouring parties – in the boundary of the conflicted area (if any).	Complied
4.7.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	Company refer to mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighbouring parties – in the boundary of the conflicted area (if any).	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	Unit of certification is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear. Based on stakeholder consultation show that the surrounding communities feels company provide job vacancy to absorb manpower from surrounding village. In addition, company developed CSV program to assist oil palm planter to organized and strive for independent smallholder organization.	Complied
<b>Criteria 4.8:</b> The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.			
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	Unit of certification is an existing plantation company since 1970s, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in	Complied

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	<p>is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p>	<p>step of replanting period and all legal document and status are clean and clear.</p> <p>Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or legal rights within the company and scheme smallholder's areas.</p> <p>All company plantation and scheme smallholder areas were issued with valid land title in the form of "Hak Guna Usaha/HGU" for company and "Sertifikat Hak Milik" – ownership certificate for smallholder. HGU since 1989 based on SK Ka. BPN No: 156/HGU/BPN/2004, dated 11 November 2004. Land Title certificate (HGU) No. 01/1989 for area 6,727.64 Ha located in Ukui Village. Signed by Head of National Land Agency of Pelalawan District on 18 December 1989 valid until 31 December 2019. Currently land title HGU Soga/Sei lala Estate is on process of renewal, latest progress of renewal process:</p> <ul style="list-style-type: none"> <li>- Field inspection dated 3 April 2024 by "Panitia Pemeriksaan Tanah B" BPN Provinsi Riau according to Letter BPN No. HP.01.03/1042-14/III/2024.</li> <li>- <i>Sidang Panitia Pemeriksaan Tanah B</i> (BPN Provinsi Riau) – Committee B meeting dated 24 April 2024 according to letter No. HP.01.03/1160-14/IV/2024.</li> </ul> <p>According to interview with BPN confirmed that since the HGU renewal still in progress, PT IIS – Ukui II remain valid to operate the plantation activity, in addition company has hold valid plantation business permit (Izin Usaha Perkebunan) which still valid until this moment. Plantation Permit (IUP: Izin Usaha Perkebunan-Budidaya (IUP-B) based on Surat Keputusan Bupati Pelalawan No.Kpts.525.3/Dishutbun/2013/446 dated 05/29/2013 for 3,003.73 Ha. Ijin Usaha Perkebunan-Pengolahan (IUP-P) for PT Inti Indosawit Subur dated 05/29/2013.</p>	
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		Based on interview with sampled smallholder at KUD Tani Bahagia, KUD Tani Subur dan KUD Trani Maju, informed that the boundary markers between smallholder block, as well as boundary markers with neighboring farmer group has been established. There was no land dispute noted.	
4.8.2	<b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.	Based on stakeholder consultation, document verification and field visit during audit ASA2.3 it was noted that there is no land conflict present in PT Inti Indosawit Subur – Ukui II POM and its supply bases.  The Certificate Holder has a procedure to resolve land conflict, Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling/resolution. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether customary, legal or other rights and its compensation calculation.	Complied
4.8.3	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).	There is no new land acquisition by PT Inti Indosawit Subur – Ukui II POM and its supply bases. Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquiring of new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation,	Complied

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		there is no land conflict noted and/or reported between company and surrounding communities.	
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).	<p>Based on stakeholder consultation, document verification and field visit during audit ASA2.3 it was noted that there is no land conflict present in PT Inti Indosawit Subur – Ukui II POM and its supply bases.</p> <p>The Certificate Holder has a procedure to resolve land conflict, Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling/resolution. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether customary, legal or other rights and its compensation calculation.</p>	Complied
<b>Principle 5: Support smallholder inclusion</b> Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.			
<b>Criteria 5.1:</b> 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.	<p>The company has a mechanism for determining the price of external FFB in the SOP for Purchasing External FFB (AA-MM-506.1-R4). The procedure informs the following:</p> <ul style="list-style-type: none"> <li>- FFB purchase manager will create a price list for local POM and other sources for price comparison. Then the FFB Purchase Manager will calculate the price of FFB that can be purchased based on the CPO and PK prices from the marketing party obtained from the CPO and PK tender.</li> <li>- From the CPO and PK prices obtained, transport costs to the nearest port will be deducted along with tax calculations. After</li> </ul>	Complied

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		<p>that, the CPO and PK prices will be multiplied by the OER produced by POM.</p> <ul style="list-style-type: none"> <li>- From the results of this multiplication, processing costs from the factory will be deducted which at the end of the month will be adjusted again according to the recorded processing cost realization.</li> <li>- The price approved by the Head of FFB Purchase will be conveyed to the FFB supplier.</li> </ul> <p>For a scheme smallholder, the price of FFB determined by local government regulation as stipulated on "<i>Berita Acara Hasil Rapat Penetapan Harga Pembelian TBS Kelapa Sawit Produksi Pekebun Mitra Plasma</i>" (No. 13/TPH TBS-IV/2024) by Riau Governance on 23 April 2024.</p>	
5.1.2	<b>(C)</b> Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	Based on document verification, certificate holder not received FFB from other source such as outgrower or independent smallholders. Ukui II POM only receive FFB from main estate dan scheme smallholder. For scheme smallholder, the FFB price referenced to local government regulation (as mentioned in indicators 5.1.1).	Complied
5.1.3	<b>(C)</b> Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	As informed on indicators 5.1.2, for scheme smallholder, the FFB price referenced to local government regulation (as mentioned in indicators 5.1.1).	Complied
5.1.4	<b>(C)</b> Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and repayments through FFB price reductions for replanting and/or, other support mechanisms where applicable.	<p>Based on Partnership agreement with scheme smallholder document review, the agreement has included all right and obligation for all parties such as FFB price, agreement period, loans/credit and force majeure. Based on smallholder list of supplier, there's also representative from smallholder with women gender.</p> <p>Here's the list of agreement record for scheme smallholder sampled:</p> <ul style="list-style-type: none"> <li>- Karya Mukti Farmer Group (No. 26/SPKB/UKUI/XI/1993)</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>- Maju Perkasa Farmer Group (No.18/SPKB/UKUI/XI/1993)</li> <li>- Tani Lestari Farmer Group (No.36/SPKB/UKUI/XI/1994)</li> </ul>	
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	<p>The company has a contract with scheme smallholder supplier as informed on indicators 5.1.4 The contract states several things:</p> <ul style="list-style-type: none"> <li>• Term of the contract</li> <li>• FFB unit price</li> <li>• Terms of payment</li> <li>• Sanction and force majeure</li> <li>• Grievance Mechanism</li> <li>• Transportation mechanism</li> </ul> <p>This agreement was agreed upon by company representatives and also the FFB supplier.</p>	Complied
5.1.6	<b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.	<p>The company (certificate holder) showed latest record of FFB payment for FFB supplier from many sources (scheme smallholder and outgrower), for examples:</p> <ul style="list-style-type: none"> <li>- Record of payment for Harapan Kita Farmer Group for 22 – 28 April 2024 (Payment Doc. 500012967).</li> <li>- Record of payment for Abadi Farmer Group for 22 – 28 April 2024 (Payment Doc. 1500013057).</li> </ul> <p>In the proof of payment, the FFB price refers to the FFB price determination mechanism determined by local government price (as mentioned in indicators 5.1.1).</p>	Complied
5.1.7	Weighing equipment is verified by an independent third party on a regular basis.	PT IIS Ukui II POM have 2 (two) weighing bridges, the weighbridge has been verified by government agency annually. Latest verification was performed on 10 May 2024 by UPTD Metrologi Legal Dinas Perindustrian dan Perdagangan, Kabupaten Pelalawan. According to certificate it was	Complied

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		<p>noted that verification results were comply to requirement, endorsed based on UU RI No. 2 Year 1981 concerning Metrology Legal.</p> <p>Field visit was also carried out, it was known that the weighing equipment was in good condition.</p>	
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>The company supports independent smallholders in the CSV (Create Share Value) program. The program was created in the context of coaching independent smallholders to develop their palm oil plantation management skills so that they can achieve optimal FFB production results with good quality and meet standards, while still paying attention to aspects of sustainable and sustainable palm oil plantation management. The following are some of the Collaboration records shown:</p> <ul style="list-style-type: none"> <li>- Partnership Agreement with Asosiasi Petani Sawit Swadaya Amanah (No. 01/PDKDPS/VIII/2012).</li> <li>- Partnership Agreement with Asosiasi Petani Sawit Swadaya Anugrah (dated 28 October 2016).</li> </ul> <p>Based on document verification, the two CSV smallholder program already RSPO certified.</p>	Complied
5.1.9	<p><b>(C)</b> The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.</p>	<p>Since 2019, the complaint mechanism has not changed, both internal complaints and complaints from external parties (stakeholders), namely: "Stakeholder Complaint Handling Mechanism" dated 22 April 2019 including smallholder farmers (scheme smallholders or independent smallholders).</p> <p>The Company has also provided a channel to report violations of the principles and objectives, by sending an email to <a href="mailto:whistleblow@rgei.com">whistleblow@rgei.com</a> or calling (+62) 81 2755 2528.</p> <p>Based on document review and interview to the smallholder sample members and cooperative official of KUD Bina Sejahtera, KUD Usaha</p>	Complied

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		Baru and KUD Bukit Potalo during ASA2.3, it was known that there is no complaint from smallholders raised since latest audit.	
<b>Criteria 5.2:</b> The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	<p>PT IIS-Ukui Group always communicates with interested smallholders including women farmers to support their livelihoods especially those related to RSPO certification.</p> <p>Based on field visits and interviews with smallholder representatives, each KUD's has been supported in IPM program. They are equipped with beneficial plants and barn owl boxes. PT Inti Indosawit Subur Ukui Group also conducted training in order to ensure the smallholder's competency. For example:</p> <ul style="list-style-type: none"> <li>• Integrated Pest Management training on 27 February 2024</li> <li>• Manuring training on 2 March 2024</li> <li>• Harvesting training on 3 February 2024</li> <li>• Safety and PPE training on 8 January 2024</li> </ul> <p>Annual review of progress of the smallholder support by Asian Agri's can be see and downloaded in Asian Agri's website : <a href="https://www.asianagri.com/en/sustainability/sustainability-reports/">https://www.asianagri.com/en/sustainability/sustainability-reports/</a> . That document is publicly available.</p> <p>The auditor has been reviewed the Asian Agri Sustainability Report 2022, which published on May 2023. The report was prepared in accordance with the Global Reporting Initiative (GRI) Standards, covering GRI 1: Foundation 2021, GRI 2: General Disclosures 2021, GRI 3: Material Topics 2021, GRI 13: Agriculture, Aquaculture and Fishing Sectors 2022, and the latest GRI Topic Standards.</p> <p>Topics about Smallholders Empowerment available in page 38 - 49 of the report. There are two types of smallholder which is Scheme</p>	Complied

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		Smallholder and Independent Smallholders. For independent smallholder, the company helped them to achieve RSPO Certification through Corporate Shared Value (CSV) Program. As of 2022, the company has work with 27,082 scheme smallholder with coverage area of 52,899 hectar; and, 8,525 independent smallholders with coverage area of 39,116 hectares.	
5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	<p>PT IIS-Ukui Group always communicates with interested smallholders including women farmers to support their livelihoods especially those related to RSPO certification.</p> <p>Based on field visits and interviews with smallholder representatives, each KUD's has been supported in IPM program. They are equipped with beneficial plants and barn owl boxes. PT Inti Indosawit Subur Ukui Group also conducted training in order to ensure the smallholder's competency. For example:</p> <ul style="list-style-type: none"> <li>• Integrated Pest Management training on 27 February 2024</li> <li>• Manuring training on 2 March 2024</li> <li>• Harvesting training on 3 February 2024</li> <li>• Safety and PPE training on 8 January 2024</li> </ul> <p>Annual review of progress of the smallholder support by Asian Agri's can be see and downloaded in Asian Agri's website : <a href="https://www.asianagri.com/en/sustainability/sustainability-reports/">https://www.asianagri.com/en/sustainability/sustainability-reports/</a> . That document is publicly available.</p> <p>The auditor has been reviewed the Asian Agri Sustainability Report 2022, which published on May 2023. The report was prepared in accordance with the Global Reporting Initiative (GRI) Standards, covering GRI 1: Foundation 2021, GRI 2: General Disclosures 2021, GRI 3: Material Topics 2021, GRI 13: Agriculture, Aquaculture and Fishing Sectors 2022, and the latest GRI Topic Standards.</p>	Complied

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		<p>Topics about Smallholders Empowerment available in page 38 - 49 of the report. There are two types of smallholder which is Scheme Smallholder and Independent Smallholders. For independent smallholder, the company helped them to achieve RSPO Certification through Corporate Shared Value (CSV) Program. As of 2022, the company has work with 27,082 scheme smallholder with coverage area of 52,899 hectar; and, 8,525 independent smallholders with coverage area of 39,116 hectares.</p>	
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	<p>Ukui II Mill supplied by own estates (Soga and Sei Lala Estate) and smallholder from 6 KUD's with total 2,854 smallholders. Based on interview with smallholder representatives from KUD Trani Maju, KUD Tani Subur and KUD Tani Bahagia, obtained information that entire land has been granted by government (private land title/SHM).</p> <p>Asian Agri's through his subsidiary PT. Inti Indosawit Subur fully supported their smallholder to be certified by ensuring all FFB come from legal sources and comply with national regulation. They also conducted good engagement to demonstrated best management practices in agronomy, environmental handling and safety procedures. For example, each plot received 6 units barn owl box to help them control rat population.</p> <p>During the ASA2_3 audit, auditor also obtain information that PT. Inti Indosawit Subur are now assisting the smallholders on replanting project in collaborated with local government. This is an ongoing process; they designed a 2-stage program for replanting activities based on approval received from the central government. At the moment, they are entering a 2-stage for several Koperasi.</p> <p>This aims to ensure that farmers produce palm oil sustainably. In other, PT IIS Ukui Group also assisting the Independent Smallholder – Asosiasi Petani Sawit Swadaya Anugrah for RSPO Certification.</p>	Complied



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5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	<p>Certificate Holder has assigned chemical weeding team (<i>Tim Unit Semprot/TUS</i>) in each estate/unit to handling chemical weeding activity. The team member originated from own workers (for own estate) and local communities (for smallholder). They regularly attended training on pesticide handling that conducted by the pesticide supplier in collaboration with local pesticide committee.</p> <p>Based on document review and interview during ASA2_3 with random pesticide applicator known that they were attending the last training on pesticide handling on 27 February 2024. Some topics that discuss such as pesticide handling, national regulation related to pesticide, symbol and label awareness and emergency procedure if any contamination or poisonous.</p> <p>During the audit, auditor also interviewed some smallholder representatives and obtain information that the company has provide training session for them on how to be handling pesticide safely. For example, pesticide applicator shall use appropriate PPE during application, no smoke, avoid the direction of wind blows and cleaned their body after application to reduce contamination.</p>	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	<p>Annual review of progress of the smallholder support by Asian Agri's can be see and downloaded in Asian Agri's website : <a href="https://www.asianagri.com/en/sustainability/sustainability-reports/">https://www.asianagri.com/en/sustainability/sustainability-reports/</a> . That document is publicly available.</p> <p>The auditor has been reviewed the Asian Agri Sustainability Report 2022, which published on May 2023. The report was prepared in accordance with the Global Reporting Initiative (GRI) Standards, covering GRI 1: Foundation 2021, GRI 2: General Disclosures 2021, GRI 3: Material Topics 2021, GRI 13: Agriculture, Aquaculture and Fishing Sectors 2022, and the latest GRI Topic Standards.</p> <p>Topics about Smallholders Empowerment available in page 38 - 49 of the report. There are two types of smallholder which is Scheme</p>	Complied

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		<p>Smallholder and Independent Smallholders. For independent smallholder, the company helped them to achieve RSPO Certification through Corporate Shared Value (CSV) Program.</p> <p>As of 2022, the company has work with 27,082 scheme smallholder with coverage area of 52,899 hectare; and, 8,525 independent smallholders with coverage area of 39,116 hectares.</p> <p>Based on field visits and interviews with smallholder representatives, each KUD's has been supported in IPM program. They are equipped with beneficial plants and barn owl boxes (6 units each plot). Certificate Holder also conducted training in order to ensure the smallholder's competency. For example:</p> <ul style="list-style-type: none"> <li>• Integrated Pest Management training on 27 February 2024</li> <li>• Manuring training on 2 March 2024</li> <li>• Harvesting training on 3 February 2024</li> <li>• Safety and PPE training on 8 January 2024</li> </ul>	
<b>Principle 6: respect workers' rights and conditions</b> Protect workers' rights and ensure safe and decent working conditions.			
<b>Criteria 6.1:</b> Any form of discrimination is prohibited.			
6.1.1	<b>(C)</b> 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.	Policies related to non-discrimination in PT IIS – Ukui Group are still the same or there are no changes, namely "Kebijakan Perusahaan", dated 1 <sup>st</sup> December 2019: " <i>Memperlakukan seluruh karyawan secara adil, baik dalam hal penerimaan, penilaian kondisi dan lingkungan kerja, serta keterwakilan tanpa memandang suku, kasta, asal Negara, agama/kepercayaan, cacat, gender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan atau umur</i> " - to treat all member of cooperative in fair manner, and respect human rights, and representative without any discrimination on tribe, race, caste, country	Complied

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		<p>of origin, religion/belief, disability, gender, sexual orientation, union affiliation, political affiliation or age.</p> <p>The policy was communicated to all workers in Soga Estate and Sei Lala Estate and according to the interview with several of workers during visit observation, that in general, they have understood about this non-discrimination policy. The company has consistently implemented this policy, this can be seen by the promotion program of daily workers and the increase in the class of permanent workers (see criterion 3.5.2). Based on the Employee Master for the 2024 period, it also shows that the Company – PT IIS Ukui II has provided opportunities to all workers without distinction of origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>Based on interviews with management and document verification, that there is no discrimination against employees in the recruitment process and also the promotion of positions or the appointment of employees as permanent employees.</p> <p><b><u>Scheme smallholders:</u></b></p> <p>There is no change related to the ICS Policy of “Kebijakan Group Manager” dated 3<sup>rd</sup> January 2020, that was signed by Manajer Group ICS Ukui Group, in point 9 was mentoned “<i>Menghormati HAM, serta keterwakilan tanpa memandang suku, kasta, asal negara, agama/kepercayaan, cacat, jender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan atau umur</i>” – to treat all member of cooperative in fair manner, and respect human rights, and representative without any discrimination on tribe, race, caste, country of origin, religion/belief, disability, gender, sexual orientation, union affiliation, political affiliation or age.</p> <p>The Policy has communicated to all smallholder members.</p>	
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		Based on field visit and interview with sample of smallholder member in KUD Tani Bahagia, KUD Tani Subur and KUD Trani Maju, they have understood of the ICS Policy.	
6.1.2	<b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.	<p>During this audit, evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated</p> <p>According to the latest employee's data as per April 2024. Those workers come from different gender, religion, originated area (local or outsiders) and races. Based on interview with labour representative (labour union, gender committee) and random workers that interviewed during field visit obtained information that there is no discrimination between them. Since latest audit until audit ASA2.3 there was no migrant worker hired in estate or mill.</p>	Complied
6.1.3	The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	<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 result.</p> <p>up to April 2024, unit of certification is focussed on promoting daily workers to be permanent workers. There is no new recruitment is hire in Estate and Mill.</p> <p>Based on promoting workers as above mentioned, the skills, capabilities, qualities and medical fitness is already tested and qualified to be promoted.</p>	Complied
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.	<p>Unit of certification is prohibiting pregnant or breast-feeding women to perform chemical spraying. In order to mitigate, estate performed monthly pregnancy test.</p> <p>Estate management has kept the record that spraying is not conducted by pregnant or breast-feeding women. Female workers is voluntary to own test for menstrual cycle and informed Policlinc to be review by nurse and recorded in monthly basis.</p>	Complied

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		The last pregnancy test was carried out "Monitoring Pregnancy Tests for Workers or Spraying Workers" in January - April 2024. All female sprayers are in good condition and are not pregnant or breastfeeding.	
6.1.5	<b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	<p>A gender committee was available in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>PT Inti Indosawit Subur – Ukui Group has implemented the policy related to protection reproductive right; such as not hiring female for work activity with high risk; monthly pregnancy test for sprayer and fertilizer applicator; 6-monthly check up for sprayer and fertilizer applicator.</p> <p>Implemented policy on prevention of sexual harassment and violence against women, the policy is prominently displayed on notice boards at the Ukui II Mill and Estates.</p> <p>Based on interviews with female staff, Head of gender committee (Mrs. Yuliana Sarifah) and union representatives confirmed that the company implemented the sexual harassment policy.</p> <p>The program of Gender Committee of PT Inti Indosawit Subur - Ukui Group year 2024, these included:</p> <p>a. Special activities:</p> <ul style="list-style-type: none"> <li>• Conduct clean Friday activities.</li> <li>• Posyandu activities (integrated services post for toddlers).</li> <li>• Healthy activities for employees who are mothers.</li> <li>• Socialization related to sexual harassment and violence against the women.</li> </ul> <p>b. Communication with the management related company employees' complaints (especially female employees):</p> <ul style="list-style-type: none"> <li>• Conduct regular meetings at least 2 times a year with company management.</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• If there is a case related to employees, communication will be carried out with company management in order to find a solution (discussion).</li> <li>• Socialization</li> </ul> <p>c. Strengthening organizational institutions: Coordinating with trade unions to assist with female employee complaints.</p> <p><b>Scheme Smallholders</b></p> <p>Plasma Ukui Group has demonstrated the policy to prevent sexual harassment and violence against women in "Kebijakan ICS Group Manager" issued dated 3<sup>rd</sup> January 2020, in chapter 11 was stated "<i>Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya</i> (prevent sexual harassment and violence as well as protect reproductive rights for women)".</p> <p>The policy has communicated to all scheme smallholders' members and displayed in publication board in each KUDs office. Based on interview with management, there is no issues raised related gender, discrimination and/or harassment since year 2023 and ytd 2024 (audit ASA2.3 conducted).</p>	
6.1.6	There is evidence of equal pay for the same work scope.	<p>The application of wages is based on Decree of Keputusan Gubernur Riau No. Kpts.7618/XI/2023 dated 30 November 2023 for Upah Minimum Kabupaten/Kota in Province of Riau on 2024 is IDR 3,395,359.03 /month.</p> <p>The company composes the structure and scale of the 2024 wage period based on Permenaker No. 1 of 2017. This wage scale structure is a determination of the number of wages for permanent workers (SKU-B) based on class, rank/position.</p>	Complied

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		<p>The Company has already set wage standard based on wages set by the government recorded on Memorandum Memorandum No. 002/HR-R02/MEMO/01/2024, dated 2 January 2024; regarding: "<i>Kenaikan Upah Pekerja Golongan SKUH - SKUB</i>" and the determination of the daily wage for BHL (Daily workers) and PKWT employees (certain time workers). This memorandum is also determined regarding structure of wage for each level worker (SKU-H and AKU-B). The company also issues salary slips to employees before salary is given, salary slip also contains basic salary, allowances, premium, labor health coverage (BPJS Ketenagakerjaan and Kesehatan) and deduction as well.</p> <p>Taken sample of salary slip for period Maret – April 2024. Based on sample salary slip, confirmed that the company has paid wages employees salary according to the working days and it is applied in a fair to all employees. Please see 6.2.2. Payment are equal for the same work scope.</p>	
<b>Criteria 6.2:</b> Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	<b>(C)</b> 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>Determination of wages for the 2024 period at Ukui Group is based on Decree of the Governor of Riau No. Kpts.7618/XI/2023 dated 30 November 2023 concerning the District/City Minimum Wage in Riau Province for 2024, namely the UMK of Pelalawan Regency of IDR. 3,395,359.03 per month. Furthermore, Uui Group Management through Regional Head Plt-2 AAS issued Memorandum No. Kpts.7618/XI/2023 dated November 30, 2023, stipulates:</p> <ol style="list-style-type: none"> <li>1. Wage for PHL Employees (Daily Worker): IDR 3,395,359 per month or IDR 135,814 per day.</li> <li>2. SKU-H employee wages (permanent workers): IDR 3,395,359 per month.</li> <li>2. SKU-B employee wages (Permanent Monthly Employee):</li> </ol>	Complied

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		<ul style="list-style-type: none"> <li>- The increase in wages is adjusted to the 2024 wage table.</li> <li>- Increase in wages based on an assessment adjusted to the applicable wage table.</li> </ul> <p>The Company already has Collective Work Agreement (PKB) period 2022-2024. PKB is binding for all SKU-H and SKU-B levels. The PKB is valid for 2 years and build in Indonesian language.</p> <p>The PKB document regulates provisions regarding working time, wage system, assistance for sick days, absenteeism, tour of external services, overtime work, and payment of allowances while in the hold of state equipment. PKB is also provisions regarding premiums, payment of holiday allowances and bonuses, guarantees Social and Social Assistance, Work Equipment and Occupational Safety, Acceptance, Transfer of Promotions and Layoffs, Provisions for motorized vehicles for workers and educators, Company and Worker Obligations, Manpower Settlement Methods and the Termination of Company Regulations.</p> <p>Article V (Wages) regulates:</p> <ul style="list-style-type: none"> <li>▪ Wages</li> <li>▪ Rice / Natura Supply Allowances</li> <li>▪ Provisions concerning who is entitled to receive a rice supply, and</li> <li>▪ Dependent of workers.</li> </ul> <p>The Company has already set wage standard based on wages set by the government recorded on Memorandum No. 002/HR-R02/MEMO/01/2024, dated 2 January 2024; regarding: "<i>Kenaikan Upah Pekerja Golongan SKUH - SKUB</i>" and the determination of the daily wage for BHL (Daily workers) and PKWT employees (certain time workers). This memorandum is also determined regarding the structure of wage for each level worker (SKU-H and AKU-B). The company also issue salary slip to employees before salary is given, salary slip also contains</p>	
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		<p>basic salary, allowances, premium, labor health coverage (BPJS Ketenagakerjaan and Kesehatan) and deduction as well.</p> <p>As for the period of 2022: wage determination based on the Decree of the Governor of Riau Year 2023, No. Kpts.7618/XI/2023 dated November 30, 2023. The amount of basic wage based on the decision letter for Pelalawan Regency year 2024 amounted to IDR 3,395,359.03 per month.</p> <p>The company makes payments to workers by transferring accounts to each worker, before the payday, the company will make and give payslips to the foreman to be given to workers.</p> <p>The salary slip contains information in Indonesian, containing among others:</p> <ul style="list-style-type: none"> <li>• Basic salary</li> <li>• Allowances / premiums</li> <li>• Overtime pay</li> <li>• BPJS Kesehatan and Ketenagakerjaan membership fees.</li> <li>• Pension</li> <li>- And other deductions (if any)</li> </ul> <p>During this surveillance audit, performed payslip/payroll documents period January – April 2024.</p> <p>Based on document verification can be shown that the wages paid by company has aligned with current regulation.</p> <p><u>Scheme smallholders:</u></p> <p>All operational activities in KUD lands/plots were performed by workers from Soga Estate and Sei Lala Estate. They hired a worker for administration duties in the office.</p>	
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6.2.2	<p><b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.</p>	<p>Employment contracts and related documents detailing payments and conditions of employment described in <i>the Collective Labor Agreement (PKB period 2022-2024)</i> and <i>the daily labour contract of the wage was presented in Bahasa Indonesia</i>.</p> <p><i>Collective Labour Agreement</i> are contain the detail of working condition among others: responsibility each parties, recognition of company and trade union rights, work relationship, workers admission and requirement, job placement and transfer, working days and working hour, overtime, weekly rest and official holidays, annual leave, menstruation leave pregnancy and pregnancy loss, prevention of sexual harassment, permission to leave work of worship and permission of illness, wage component and wage system, wage increase, holiday allowance (THR), care and medication, occupational safety and health, work equipment, education, sports &amp; entertainment facilities, school children's facilities, work rules, etc.</p> <p>Meanwhile, PHL and PKWT workers use separate work agreements. This Employment Agreement also explains related to wages, working hour, jobs and responsibility, Holiday allowances, work safety, regulations and rules regarding the despicable deeds / actions of ape workers.</p> <p>Based on the verification of the workers contract documents, the details related to regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. are in accordance with the rules and regulations. Meanwhile, the salary slip has been verified as 6.2.1 above and is in accordance with applicable regulations and legislation.</p>	Complied
6.2.3	<p><b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p>	<p>The Collective Labor Agreement (PKB Periode tahun 2022-2024) document regulates provisions regarding working time, wage system, assistance for sick days, absenteeism, tour of external services, overtime work, and payment of allowances while in the hold of state equipment.</p>	Complied

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		<p>PKB is also provisions regarding premiums, payment of holiday allowances and bonuses, guarantees Social and Social Assistance, Work Equipment and Occupational Safety, Acceptance, Transfer of Promotions and Layoffs, Provisions for motorized vehicles for workers and educators, Company and Worker Obligations, Manpower Settlement Methods and the Termination of Company Regulations.</p> <p>Based on verification of documents and interviews with workers stated that each worker has a Work Agreement with companies made in Indonesian as a language understood by all ethnic groups in PT IIS - Ukui Group. The Work Agreement Letter regulates Position, validity period and expiration of employment agreement, Obligations of workers, Placement/Transfer/Transfer, Payroll, Treatment, Annual leave, Worker Guarantee, Termination of employment, termination of employment and others.</p> <p>Document sample taken:</p> <ul style="list-style-type: none"> <li>- Employee contract Soga and Sei Lala Estate</li> <li>- Payslip Soga and Sei lala Estate period January – April 2024</li> <li>- Overtime Letter - Surat Perintah Lembur (SPL) period January – April 2024</li> </ul> <p>Based on the verification of the documents above, that the company has implemented regular working hours, deductions, overtime, sickness, holiday entitlement and also maternity leave in accordance with applicable labor regulations.</p>	
6.2.4	<p><b>(C)</b> The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p>	<p>The company has prepared facilities for the workers, including the basic needs such as electricity and water. Detail of company facilities for employees are as follows:</p> <ul style="list-style-type: none"> <li>- Ukui II Mill Housing, consist of: Type B (2 units), type C (5 units), type D (14 units), Type E (86 units),</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>- Estate (Soga Estate and Sei Lala Estate) Housing, consist of: Type B (3 units), Type C 22 units), type D (26 units), type E (454 units)</li> <li>- Polyclinic (1 unit), including 1 doctor and 2 nurses</li> <li>- Mosque (1 units),</li> <li>- Church (1 unit),</li> <li>- Community hall (1 unit),</li> <li>- Kindergarten (1 units)</li> <li>- Elementary School (2 units)</li> <li>- Sport Centre (1 unit)</li> <li>- School bus (2 units),</li> </ul> <p>Estate and Mill have provided clean water supply for all employees. Water quality is being checked and monitored on regular basis.</p> <p>The company has provided clean water facilities and electricity supplier (from PLN) by giving subsidies. Subsidies financing for electricity of IDR 50,000 per month per house.</p> <p>Clean water checking has been made by the company through the laboratory checking and cooperation with UPT Laboratorium Bahan Konstruksi Dinas Pekerjaan Umum, Penataan Ruang, Perumahan Kawasan Pemukiman dan Pertanahan Prov. Riau. Last examination was done on October 2023 at Ukui II Mill and Estate refer to Permenkes No. 492/MENKES/Per/IV/2010 regarding The Quality of Clean Water (drinking water) Requirement.</p> <p>Based on visits to the housing sites of Mill, Sei Lala Estate and Soga Estate employees, in general housing conditions are still decent and some periodic improvements are being carried out.</p> <p>Periodic repairs are based on the housing maintenance budget/emplacement for the 2023/2024 period which has been</p>	
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		surveyed and inventoried the homes of employees who must receive maintenance. At the time of the visit, there was housing maintenance in the form of painting the walls of the house n and repairing the roof of the house.	
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	<p><b>Estate and Mill</b></p> <p>During this audit, company is remain consistent to make effort to improve in providing access to adequate, sufficient and affordable food: provision of rice allowance – aside from monthly salary to all eligible workers, provide cooperative organization for employee providing basic food necessities (waserda, Koperasi Karya Bersama). Druing field visit to housing area it was noted that cooperative sjop remain provide the adequatet basic necessity with affordable price. Company is also accommodating weekly market for each estate; Sunday for Estate.</p> <p>Based on interviews with the head of the trade union and the chair of the gender committee that the company has facilitated easy access to food and daily necessities and so far, there have been no difficulties.</p> <p><b>Scheme Smallholder:</b></p> <p>The farmer member villages are a developed Transmigration Village. Provision of food can be obtained from existing markets in the village. Based on the results of field visits to the sample villages indicate that in the village was available weekly markets and stalls that provide necessities.</p> <p>Based on interview with KUD official and smallholder member sampled at KUD Tani Bahagia, KUD Tani Subur and KUD Trani Maju, their necessities can be obtain in the village and there are Cheap Bazaar from the company (usually per semester) where they can get daily needs with low price.</p>	Complied

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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.	<p>PT IIS – Ukui Group company including scheme smallholder has set and implemented wages based on Regulation from Riau Governor “Keputusan Gubernur Riau Nomor: Kpts.7618/XI/2023 Tentang Upah Minimum Kabupaten/Kota di Provinsi Riau tahun 2024”.</p> <p>UKUI Group including smallholders have calculated the Decent Living Needs using the calculation method as set out in the "RSPO Guidance for Implementing a Decent Living Wage", June 1, 2019. The company has conducted an account of the DLW for the 2023 period with data drawn from each Estate and POM.</p> <p>Based on the verification of documents the results of the 2023 DLW calculation shows that total cost and kind benefits for average is IDR 993,688, average monthly take home salary per worker is IDR 3,327,367 and total value of prevailing wage is IDR 4,321,055.</p>	Complied
<p><b>PROCEDURAL NOTE:</b></p> <p>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.</p> <p>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:</p> <ol style="list-style-type: none"> <li>1. Payment of minimum wages in accordance with applicable regulations</li> <li>2. Assessment of wages paid (prevailing wages) and in-kind benefits.</li> </ol> <p>Once the DLW benchmark is available, this procedural note is no longer applicable.</p>			
6.2.7	Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal	PT IIS Ukui II POM and supply bases use permanent fulltime employment for all core work such as: harvesting and mill process. The use of daily workers (PHL) workers at UKUI II Group still exist, this is because there are still tall oil palm plantations that have not been replanted, so that the “turnover” of harvesters is quite high (reaching 60% -70%). However, PT IIS – Ukui II Group has carried out a program for recruiting PHL harvesters to become SKUs (permanent workers) until 2023/2024. Meanwhile, in the 2024 period based on interview with HRD	Complied

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		<p>Staff Mr. Julvandi, that a mechanism for recruiting harvesters as permanent workers with a probationary period of 3 months is carried out. This is in accordance with applicable laws and regulations. exist in Indonesia, namely Law No. 11 of 2021 the Job Creation Law and Permenaker No. 6 of 2023.</p> <p>Company has continue to promote the daily workers of harvester to become permanent workers. Several promotions of class and employee status in Ukui II (Mill and Estate), document has reviewed during this surveillance audit.</p>	
<b>Criteria 6.3:</b> The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			
6.3.1	<p><b>(C)</b> 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>PT Inti Indosawit Subur – Ukui Group has company policy signed by Managing Director on 1<sup>st</sup> December 2019. The policy stated the company guarantees freedom of association or be part of worker union as well as collective bargaining.</p> <p>The policy has been disseminated to all employees by installing signboard of company policy and by direct dissemination.</p> <p>In 2023 to 2024, PT Inti Indosawit Subur - Ukui Group was communicating the policy to worker, village communities and contractors, such as:</p> <ul style="list-style-type: none"> <li>• In Ukui II POM – the socialization was on 3-4 February 2024 – subject: training for company policy.</li> <li>• In Sei Lala Estate – the socialization was on 3-4 February 2024 – subject: training for company policy.</li> <li>• In Soga Estate – the socialization was on 3-4 February 2024 – subject: training for company policy.</li> </ul> <p>PT Inti Indosawit Subur – Ukui Group have labour union, namely "Pengurus Unit Kerja (PUK) Serikat Pekerja Pertanian dan Perkebunan-</p>	Complied

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		<p><i>Serikat Pekerja Seluruh Indonesia (PUK-SPPP-SPSI) PT Inti Indosawit Subur Kebun Ukui dan Pabrik Ukui Satu</i> as per "Surat Keputusan Pengurus Cabang Federasi SPPP-SPSI Kabupaten Pelalawan No. Kep. 18-A/PC-FSP.PP/K-SPSI/PLLW/9/2022" dated 9 March 2023 - and valid for 5 years.</p> <p>Based on interview with Labour Union (obtained information that the company's policy above has been disseminated in Bahasa Indonesia to all of workers during morning briefing or through the signboard that installed in public area (office, housing complex, store, and morning briefing station).</p> <p><b><u>Scheme Smallholder:</u></b></p> <p>Ukui scheme smallholder has had organization's policy: "<i>Kebijakan Manajer Group ICS</i>" dated 11 August 2020. Related the freedom of association, it has mentioned on point 12: "<i>Menghormati setiap karyawan KUD atau petani untuk membentuk atau menjadi anggota serikat pekerja serta berkumpul dan berserikat atau berorganisasi</i>". This policy is made in Bahasa Indonesia, this is to facilitate understanding by all farmers.</p> <p>The policy has been disseminated to all smallholder members.</p>	
6.3.2	Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.	<p>PT Inti Indosawit Subur – Ukui II POM has shown the commitment that management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including contract workers.</p> <p>Based on interview with representative of worker union during this 3rd surveillance audit, there is declare that the company does not interfere with the formation or operation of registered labor organizations/unions. The worker freely to choose and form union elected representatives for all workers.</p>	Complied



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		<p>Labour Union has regularly met with company representative. Minutes of the meeting for the meeting on 15 September 2023, a meeting to discuss related:</p> <ul style="list-style-type: none"> <li>- Obligation to use PPE.</li> <li>- Mandatory fingerprint</li> <li>- Base for all company workers</li> </ul>	
6.3.3	Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.	Based on interview with sample of employees at Mill and Estate, informed that management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers operation of registered labour organizations/unions, or other freely elected representatives for all workers.	Complied
<b>Criteria 6.4:</b> Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	<p>PT Inti Indosawit Subur – Ukui Gorup has established a formal policy for the protection of children, including prohibition of child labour and remediation as per “<i>Kebijakan Perusahaan</i>”, was signed by management on 01 December 2019, in point 14 was stated: It is not allowed all children to work in each activity in operational.</p> <p>The policy has been disseminated to all employees by installing signboard of company policy and by direct dissemination.</p> <p>In 2023/2024, PT Inti Indosawit Subur - Ukui Group was communicating the policy to worker, village communities and contractors, such as:</p> <ul style="list-style-type: none"> <li>• In Ukui II POM – the socialization was on 3-4 February 2024 – subject: training for company policy.</li> <li>• In Sei Lala Estate – the socialization was on 3-4 February 2024 – subject: training for company policy.</li> <li>• In Soga Estate – the socialization was on 3-4 February 2024 – subject: training for company policy.</li> </ul>	Complied

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		<p>Based on verification of employee data, updated in April 2024 there was shown that no indication of workers with age below 18 years old during recruitment or at the present time.</p> <p><b><u>Scheme Smallholders:</u></b></p> <p>Group Manager has established the formal policy for the protection of children, including prohibition of child labour and remediation as per Cooperative Policy – “<i>Kebijakan Koperasi</i>” date 11 August 2020, in point 10 was stated “<i>Melarang anak-anak bekerja dalam setiap kegiatan operasional kebun</i>” – prohibit the children to works in operational smallholders.</p> <p>Based on document verification has shown that no indication of using child labour or worker under 18 years old.</p>	
6.4.2	<p><b>(C)</b> Documented evidence on the fulfilment of worker’s minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.</p>	<p><b>Ukui II POM and Estate:</b></p> <p>PT Inti Indosawit Subur – Ukui Group has established the Company Policy dated 1 December 2019, that stated there is not allowed all children to work in every activities/processes in company.</p> <p>The verification of worker/s age are by checking their ID Card and Family Card, their Tax personal identification and if the worker/s came from the surrounding village, sometime supported with Head of Village letter that informed the applicant was not underage worker.</p> <p>Based on verification of employee data, updated in April 2024 there was shown that no indication of workers with age below 18 years old during recruitment or at the present time.</p> <p>Based on interviews with sampled workers at Ukui II Mill, Soga and Sei Lala Estate, that until now there are no underage workers (under 18 years old), this is because the company management strictly applies the requirement of workers at least 18 years old.</p> <p><b>Scheme Smallholder:</b></p>	Complied

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		Based on verification of employees register (harvester and manuring workers) and document of employments agreement (Surat Perjanjian Bersama) of KUD Trani Maju, KUD Tani Bahagia and KUD Tani Suburi, there were found that a minimum age is met (the youngest of harvester born year 1984 – based on ID verification).	
6.4.3	<b>(C)</b> Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.	<p><b>Ukui II POM and Estate and Scheme Smallholder:</b></p> <p>As outlined in indicator 6.4.1, the company has a policy on the Prohibition of Child Labor as outlined in the company's.</p> <p>Based on verification of worker documents for period April 2024 in each Estate and Mill, there are no workers who are less than 18 years of age when hired as workers.</p>	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.	<p>PT Inti Indosawit Subur – Ukui Group has established the Company Policy dated 1 December 2019, that stated there is not allowed all children to work in every activities/process in company.</p> <p>The policy has been disseminated to all employees by installing signboard of company policy and by direct dissemination.</p> <p>The policy also has been communicated to all smallholder and external parties by displaying in publication board in each KUDs office and Village Office.</p> <p>Based on interview with stakeholders gender committee and worker union leader, company has communicated no child labour policy. Interview with surrounding village communities, shows company has communicated that recruitment policy is not for worker under 18 years old.</p> <p>Based on document review of list of workers as per April 2024, interview with workers and observation during field visit, workers hired with less than 18 years old is not found.</p> <p>In 2023/2024, PT Inti Indosawit Subur - Ukui Group was communicating the policy to worker, village communities and contractors, such as:</p>	Complied

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		<ul style="list-style-type: none"> <li>• In Ukui II POM – the socialization was on 3-4 February 2024 – subject: training for company policy.</li> <li>• In Sei Lala Estate – the socialization was on 3-4 February 2024 – subject: training for company policy.</li> <li>• In Soga Estate – the socialization was on 3-4 February 2024 – subject: training for company policy.</li> </ul>	
<b>Criteria 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<b>(C)</b> 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>PT Inti Indosawit Subur – Ukui Group has established a policy to protect the reproductive rights as it is found in Company Policy that's signed by Managing Director, dated 1<sup>st</sup> December 2019 the policy was state that to prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights).</p> <p>The policy has been disseminated to all employees by installing signboard of company policy and by direct dissemination.</p> <p>In 2022 to 2023, PT Inti Indosawit Subur - Ukui Group was communicating the policy to worker, village communities and contractors, such as:</p> <ul style="list-style-type: none"> <li>• In Ukui II POM – the socialization was on 3-4 February 2024 – subject: training for company policy.</li> <li>• In Sei Lala Estate – the socialization was on 3-4 February 2024 – subject: training for company policy.</li> <li>• In Soga Estate – the socialization was on 3-4 February 2024 – subject: training for company policy.</li> </ul> <p>PT Inti Indosawit Subur – Ukui Group have a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention.</p> <p>Implemented policy on prevention of sexual harassment and violence against women, the policy is prominently displayed on notice boards at</p>	Complied

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		<p>the Mills and the Estates muster areas. Interviews of female staff, workers and union representatives confirmed that the company implemented the sexual harassment policy.</p> <p>Based interview with Gender Committee, in 2023 – 2024 there was no cases of sexual harassment and violence against women reported.</p> <p><b><u>Scheme Smallholders:</u></b></p> <p>Plasma Ukui Group has demonstrated the policy to prevent sexual harassment and violence against women in “<i>Kebijakan ICS Group Manager</i>” issued dated 11 August 2020, in chapter 11 was stated “<i>Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak hak reproduksinya</i> (prevent sexual harassment and violence as well as protect reproductive rights for women)”.</p> <p>The policy has communicated to all scheme smallholder’s member and displayed in publication board in each KUDs office. Sample seen → KUD Trani Maju, KUD Tani Bahagia and KUD Tani Subur</p>	
6.5.2	<p><b>(C)</b> 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>PT Inti Indosawit Subur – Ukui Group has established a policy to protect the reproductive rights as it is found in Company Policy that’s signed by Managing Director, dated 1<sup>st</sup> December 2019, the policy was state that to prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights).</p> <p>The policy has been disseminated to all employees by installing signboard of company policy and by direct dissemination.</p> <p>In 2023 to 2024, PT Inti Indosawit Subur - Ukui Group was communicating the policy to worker, village communities and contractors, such as:</p> <ul style="list-style-type: none"> <li>• In Ukui II POM – the socialization was on 3-4 February 2024 – subject: training for company policy.</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• In Sei Lala Estate – the socialization was on 3-4 February 2024 – subject: training for company policy.</li> <li>• In Soga Estate – the socialization was on 3-4 February 2024 – subject: training for company policy.</li> </ul> <p>PT Inti Indosawit Subur – Ukui Group have a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention.</p> <p>Implemented policy on prevention of sexual harassment and violence against women, the policy is prominently displayed on notice boards at the Mills and the Estates muster areas. Interviews of female staff, workers and union representatives confirmed that the company implemented the sexual harassment policy.</p> <p>PT Inti Indosawit Subur – Ukui Group regularly performs monitoring of pregnancy on a monthly basis. Sample seen → Report of pregnancy test month April 2024, there were reported no workers in pregnant condition (negative detection) both in Sei Lala Estate and Soga Estate.</p> <p><b><u>Scheme Smallholders:</u></b></p> <p>Plasma Ukui Group has demonstrated the policy to prevent sexual harassment and violence against women in “<i>Kebijakan ICS Group Manager</i>” issued dated 11 August 2020, in chapter 11 was stated “<i>Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak hak reproduksinya</i> (prevent sexual harassment and violence as well as protect reproductive rights for women)”.</p> <p>The policy has communicated to all scheme smallholder’s member and displayed in publication board in each KUDs office. Sample seen → KUD Trani Maju, KUD Tani Bahagia and KUD Tani Subur.</p>	
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6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.	<p><b>Ukui II POM and Estate and Scheme Smallholder:</b></p> <p>For breastfeeding mothers and has children under 5 years, the company has provided childcare (TPA: Tempat Penitipan Anak) which is located in each division/Afdeling. In childcare as well as the company provides a special space and time for 1 hour for breastfeeding mothers in need time to nursing their baby.</p> <p>The company has conducted a survey of several mothers who are still breastfeeding regarding their wishes and expectations as employees who have babies under 5 years of age. This survey was carried out in collaboration between the head of the gender committee and the company's polyclinic (doctors and nurses). The survey was conducted on around 1 women employee who had just had babies and were still breastfeeding (Mrs. DIN). From the results of the survey, several things were found to be the hopes of these new mothers, including:</p> <ul style="list-style-type: none"> <li>• Health insurance for babies and their mothers.</li> <li>• Monitoring / monitoring of babies every month.</li> <li>• Counseling related to maternal and child health.</li> <li>• Improved maternal and child nutrition.</li> </ul>	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.	<p>Based on the results of this 3rd surveillance audit, there are no document changes related to the mechanism to handle complaint and grievances. The documents are still the same as the previous year.</p> <ul style="list-style-type: none"> <li>• "SOP Penanganan Keluhan dari Eksternal No. AA-GL-5005-R0 01" explains mechanism to resolve external complaint.</li> <li>• "SOP Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan No. AA-HR-308 0.5R0" related to internal grievance mechanism for employee.</li> <li>• SOP Penanganan Keluhan Masyarakat No: AA-GL-510.1-R0, dated 1 January 2013.</li> </ul>	Complied

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		<p>Mechanism for complaints management where it needs to protect its confidentiality for complaint submitter was found in the company policy's draft as in one of the points of this policy stated that:</p> <p><i>"To provide appropriate information for those who inquire about it and to protect its confidentiality for whistle blower cases in accordance with law regarding environmental and social issues, food safety, health and work safety, so that it enables them to more participate in the decision-making processes for improving company's performance".</i></p> <p>Based on interviews with several village heads, government agencies and other stakeholders, that until the surveillance audit was carried out, there were no external complaints from stakeholders including related to sexual harassment.</p>	
<b>Criteria 6.6:</b> No forms of forced or trafficked labour are used.			
6.6.1	<p><b>(C)</b> All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports;</li> <li>• Payment of recruitment fees;</li> <li>• Contract substitution without worker's consent</li> <li>• Involuntary overtime;</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul>	<p>PT IIS - Ukui II POM and supply bases has employee recruitment and selection procedures (SOP-AA-HR-305-7-RO); regarding <i>Seleksi, Penerimaan dan Pengangkatan Tenaga Kerja Non Staff</i> effective since 14 September 2021. Based on those procedure, there is no specific request to bonding the employee (especially the new employee).</p> <p>During audit and according to work contract, confirmed that all work is voluntary and there is no:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports;</li> <li>• Payment of recruitment fees;</li> <li>• Contract substitution without worker's consent</li> <li>• Involuntary overtime;</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement</li> </ul>	Complied



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		<ul style="list-style-type: none"> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>No form of forced labor occurs in PT IIS – Ukui Group, it was also confirmed during interview with sampled workers. Company has a policy to comply with manpower regulation UU No. 13 Tahun 2003 and UU no. 11 Tahun 2021 relate to UU Cipta Kerja.</p> <p>Company also has a policy to prevent and prohibit the forced labor as per “Kebijakan Perusahaan” signed by Managing Director on 1st December 2019. Stated in Company Policy point 17 “<i>Tidak memberikan pekerjaan dibawah ancaman, sanksi atau hukuman dimana pekerja tidak memiliki kebebasan untuk menyepakati pelaksanaan pekerjaan</i>”.</p>	
6.6.2	<b>(C)</b> Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.	<p>There is no migrant workers in PT IIS – Ukui Group and there are no PKWT workers.</p> <p>For permanent workers, term and condition Company has agreement in PKB which contain term and condition for workers.</p> <p>For casual workers contract available in “<i>Perjanjian Kerja Harian Lepas</i>”.</p> <p>Labour policy is provided in “Kebijakan Perusahaan” and procedure to manage the workers are available in SOP AA-HR-305.2 – RO Rekrutmen dan Seleksi Karyawan, dated 1 February 2009.</p> <p>PT IIS – Ukui Group PT Inti Indosawit Subur has issued Memorandum No. 085/EXT-PUS/08/2020 dated 12 August 2020 concerning Policy for the acceptance and appointment of employees of PT Inti Indosawit Subur – Ukui Group; where in the memorandum explained related to the acceptance of employees with PHL status, while workers who are directly related to production (harvesting, FFB loader, CPO and PK processing operators) are declared with PKWT status and will be evaluated and if feasible will be promoted to become permanent workers.</p>	Complied
<b>Criteria 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			

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6.7.1	<p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	<p>PT Inti Indosawit Subur – Ukui Group has appointed responsible person for Health and Safety as per P2K3 (Safety Committee). P2K3 has been validated by Manpower Office of Riau Province.</p> <p>Sample seen during ASA 2_3, such as:</p> <p><b>Ukui POM II:</b></p> <ul style="list-style-type: none"> <li>• OHS Committe based on Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Provinsi Riau, No. KEP.146/Disnakertrasn-PK/SK-P2K3/IV/2023 regading “Pengesahan Panitia Pembinaan Keselamatan dan Kesehatan Kerja (P2K3) PT Inti Indosawit Subur PMKS Ukui II, dated 17 April 2023 with Mr. Deo Asindo P Pardede as secretary.</li> <li>• Decree of the Minister of Manpower of the Republic of Indonesia Number 5/478/AS.01.03/I/2023 concerning Appointment of General Occupational Safety and Health Expert on behalf of Mr. Deo Asindo P Pardede” dated 31 January 2023, valid for 3 year (until 31 January 2026)</li> <li>• The OHS Committee (P2K3) regular meeting has been performed monthly, discussed regarding OHS program achievement and corrective actions to achieve target and improve the program. Notes of Safety Committee Regular Meeting (mill and estate) with workers were evident. Sample seen → last meeting was carried out on 8 December 2023 with agenda: discussed regarding OHS plan achievement and corrective actions to achieve target and improve the program, personal protective equipment (PPE), and accident review and report.</li> <li>• Report of OHS Performance and Monitoring (Laporan P2K3) was submitted to Manpower Agency in Riau → sample seen: Laporan P2K3 October-December 2023 PT Inti Indosawit Subur – Ukui Group, was reported on 25 March 2024.</li> </ul> <p><b>Soga Estate:</b></p>	Complied
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		<ul style="list-style-type: none"> <li>• OHS Committe based on Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Provinsi Riau, No. KEP.147/Disnakertrasn-PK/SK-P2K3/IV/2023 regading "Pengesahan Panitia Pembinaan Keselamatan dan Kesehatan Kerja (P2K3) PT Inti Indosawit Subur - Kebun Soga, dated 17 April 2023 with Mrs. Lisbetty as secretary.</li> <li>• Decree of the Minister of Manpower of the Republic of Indonesia Number 5/483/AS.01.03/I/2023 concerning Appointment of General Occupational Safety and Health Expert on behalf of Mrs. Lisbetty dated 31 January 2023, valid for 3 year (until 31 January 2026)</li> <li>• The OHS Committee (P2K3) regular meeting has been performed monthly, discussed regarding OHS program achievement and corrective actions to achieve target and improve the program. Notes of Safety Committee Regular Meeting (mill and estate) with workers were evident. Sample seen → last meeting was carried out on 8 December 2023 with agenda: discussed regarding OHS plan achievement and corrective actions to achieve target and improve the program, personal protective equipment (PPE), and accident review and report.</li> <li>• Report of OHS Performance and Monitoring (Laporan P2K3) was submitted to Manpower Agency in Riau → sample seen: Laporan P2K3 October-December 2023 PT Inti Indosawit Subur – Ukui Group, was reported on 25 March 2024.</li> </ul> <p><b>Sei Lala Estate:</b></p> <ul style="list-style-type: none"> <li>• OHS Committe based on Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Provinsi Riau, No. KEP.145/Disnakertrasn-PK/SK-P2K3/IV/2023 regading "Pengesahan Panitia Pembinan Keselamatan dan Kesehatan Kerja (P2K3) PT Inti Indosawit Subur - Kebun Sei Lala, dated 17 April 2023 with Mr. Reski Jarwono as secretary.</li> </ul>	
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		<ul style="list-style-type: none"> <li>Decree of the Minister of Manpower of the Republic of Indonesia Number 5/489/AS.01.03/I/2023 concerning Appointment of General Occupational Safety and Health Expert on behalf of Sahat Mulia Artha Silalahi" dated 31 Januari 2023, valid for 3 year (until 31 January 2026)</li> <li>The OHS Committee (P2K3) regular meeting has been performed monthly, discussed regarding OHS program achievement and corrective actions to achieve target and improve the program. Notes of Safety Committee Regular Meeting (mill and estate) with workers were evident. Sample seen → last meeting was carried out on 8 Desember 2023 with agenda: discussed regarding OHS plan achievement and corrective actions to achieve target and improve the program, personal protective equipment (PPE), and accident review and report.</li> <li>Report of OHS Performance and Monitoring (Laporan P2K3) was submitted to Manpower Agency in Riau → sample seen: Laporan P2K3 October-December 2023 PT Inti Indosawit Subur – Ukui Group, was reported on 25 March 2024.</li> </ul> <p><b><u>Scheme smallholders:</u></b></p> <p>Each KUD has established a team who has been responsible on implementation and implementation the OHS program, e.g., the structure of emergency responses in each KUD., sample seen -&gt; KUD Trani Maju, KUD Tani Bahagia and KUD Tani Subur</p>	
6.7.2	Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.	<p>During ASA 2_3, PT Inti Indosawit Subur – Ukui Group has defined the procedure for emergency response under Standar Operatonal Procedure – Environmental Field Procedure, such as:</p> <ul style="list-style-type: none"> <li>No. AA-KL-11-EFP tentang Penanganan Tumpahan di Laboratorium</li> <li>No. AA-KL-14-EFP tentang Pengendalian Kebakaran Lahan</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• <i>No. AA-KL-16-EFP tentang Pengendalian Tumpahan B3 dan Limbah B3</i></li> <li>• <i>No. AA-KL-17-EFP tentang Pengendalian Ledakan Boiler, Tabung Gas dan Lainnya</i></li> <li>• <i>No. AA-KL-18-EFP tentang Pengendalian Gempa Bumi, Banjir dan Tanah Longsor</i></li> <li>• <i>No. AA-KL-19-EFP tentang Tanggap Darurat Kabut Asap</i></li> </ul> <p>PT Inti Indosawit Subur – Ukui Group has also prepared the procedure on work accident under “Standard Operasional Prosedur – Investigasi Kecelakaan Kerja nomor AA-SMK3-18001.02-R0”, revision 0 dated 1<sup>st</sup> April 2018. The procedure described that:</p> <ul style="list-style-type: none"> <li>• The roles and responsibilities of each emergency response team personnel, include the mechanism how to conduct medical evacuation to nearest hospital/local health centre.</li> <li>• Emergency contact number of each internal emergency team and external related parties were evident.</li> <li>• Evacuation route and muster point are available and made known to the employee.</li> </ul> <p>The training record related to emergency response, such as:</p> <ul style="list-style-type: none"> <li>• Report on training of emergency response and preparedness (fire drill), dated 10 January 2024. Location in “Lapangan Soga dan Sei Lala Estate”. The training was attended by OHS Committee and 20 personnel. Data verified: scenario, attendance list, evaluation, and photograph.</li> <li>• Record of training for first aider dated 2 May 2024, location in Ukui II POM. Data verified: Training material, attendance list and photograph.</li> </ul> <p>The audit team has field observation to harvesting, spraying and upkeep activities in estates and to FFB processing activities at mill as well, first</p>	
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		aid equipment are available and sufficient. At field, first aid kit brought by the Mandor (supervisor), whilst at mill, first aid kit located at office and processing station.	
6.7.3	<b>(C)</b> 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>PT Inti Indosawit Subur – Ukui Group has demonstrated that workers use appropriate Personal Protective Equipment (PPE) which is provided free of charge to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities called "<i>Rumah Bilas</i>" for those applying pesticides are available, so that workers can change out of PPE, wash, and put on their personal clothing.</p> <p>Based on field visits to all Ukui II POM and Estate (Soga and Sei Lala) operations (spray, fertiliser, harvest, land application, workshop) employees have used PPE in accordance with the hazards present such as using safety shoes, boots, helmets, masks, aprons, rubber gloves, leather gloves and glasses.</p> <p>In addition, the company has also shown evidence of PPE handover for all employees, here are examples of PPE handover verified, namely the handover of ADP for fertiliser and sprayer employees in the form of masks, aprons, and rubber gloves on 22 November 2023, the handover of ADP for harvest employees in the form of helmets, boots, face shields, and cloth gloves on 22 November 2023.</p>	Complied
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 Inti Indosawit Subur – Ukui Group provide all workers will medical care, and covered by accidents insurance, covered all normative rights for employee, such as salary as lined out in minimum wage for province level, leave entitlement, employees registered with social insurance for worker (BPJS), benefit for religious festival, provision of facilities (housing, electricity, clean water, medical clinic, school/school bus, worship house, personal protective equipment and working tools.</p> <p>Based on interview with sample workers during field visit and consultation with labor union, they were stated all workers are provided</p>	Complied

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		<p>with medical care and accident under BPJS Kesehatan and BPJS Ketenagakerjaan. An accident insurance is covered under "BPJS Ketenagakerjaan" with Accident and Life Program (JKK and JK).</p> <p>According to Employee Database March 2023:</p> <ul style="list-style-type: none"><li>• Ukui II POM: total employees covered by accident insurance (BPJS Ketenagakerjaan) is 100 employees (including PHL). Status PAID. Proof of payment in full from BPJS Ketenagakerjaan on 22 March 2024 with a contribution code number: 416022662000 and 400000070284.</li><li>• Ukui II POM: total employees covered by health insurance (BPJS Kesehatan) is 100 employees (including PHL). Status PAID. Proof of payment in full from BPJS Kesehatan on 7 March 2024 with virtual account 8988890000692541.</li><li>• Soga Estate: total employees covered by health insurance (BPJS Kesehatan) is 368 employees (including PHL). Status PAID. Proof of payment in full from BPJS Kesehatan on 7 March 2024 with virtual account 8988890000692543.</li><li>• Soga Estate: total employees covered by accident insurance (BPJS Ketenagakerjaan) is 368 employees (including PHL). Status PAID. Proof of payment in full from BPJS Ketenagakerjaan on 24 April 2024 with contribution code number: 416022645000 and 400000070282.</li><li>• Sei Lala Estate: total employees covered by health insurance (BPJS Kesehatan) is 453 employees (including PHL). Status PAID. Proof of payment in full from BPJS Kesehatan on 05 April 2024 with virtual account 8888890080065240</li><li>• Sei Lala Estate: total employees covered by accident insurance (BPJS Ketenagakerjaan) is 453 employees (including PHL). Status PAID. Proof of payment in full from BPJS Kesehatan on 24 April 2024 with contribution code number: 419055821000 and 419055461000</li></ul>	
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		<p>In addition, the company has also provided a clinic to treat all employees who are sick and work accidents, as for employees with severe illnesses and accidents will be directly referred to the nearest hospital to the company without charge.</p> <p><b><u>Scheme smallholders:</u></b></p> <p>The government covers medical insurance for smallholders, and it is optional. Based on interview with smallholders, most of farmers/smallholders have had insurance (BPJS Kesehatan Mandiri).  Cooperative sample → KUD Trani Maju, KUD Tani Bahagia, KUD Tani Subur</p>	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	<p>PT Inti Indosawit Subur – Ukui Grup has shown the record of injuries using lost time accident (LTA) metrics as in "Rekapitulasi Kejadian Kecelakaan Kerja– LTA" year 2023 and 2024.</p> <ul style="list-style-type: none"> <li>• Ukui II POM, there was 0 accidents reported year 2023 and 2024 (until April). Lost time accidents were 2 mandays or less.</li> <li>• Soga Estate, there was 0 accidents reported year 2023 and 2024 (until April). Lost time accidents were 2 mandays or less.</li> <li>• Sei Lala Estate, there was 0 accidents reported year 2023. Lost time accidents were 2 mandays or less and there was 14 accidents reported 2024 (until April) with Frequensi Rate/FR is 103.494 and Severity Rate/SR is 62.997</li> </ul> <p>The Lost Time accidents and injuries were determined according to Decree of the Minister of Manpower and Transmigration No. 609 year 2012. In 2023 there was no accident occurred, in 2024 there was 14 accidents occurred. This accident report has been reported to Manpower Agency through OHS Committee report. Last reporting was reported on 25 March 2024.</p>	Complied



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		<p>All the accidents have been followed up with investigation record and recommendation. The investigation has completed with accident insurance claims records. Those cases already reported and claim to accident insurance services (BPJS Ketenagakerjaan).</p> <p><b><u>Scheme Smallholders</u></b></p> <p>The record of injuries is shown under document of "Monitoring Kecelakaan Kerja 2023", in 2023 up to May 2024 there were no injuries cases.</p> <p>Based on interview with sample of smallholder member, there was no injuries cases occurred.</p>	
<b>Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.</b>			
<b>Criteria 7.1:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	<b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.	<p>The company has a program for integrated pest control. In this program, the company carries out initial identification of the existence of beneficial plants as an initial step in control. If during the detection process a pest attack is found, the company will carry out a census of pest attacks. Control using chemicals is only carried out if the pest attack has crossed the threshold.</p> <p>The auditor also carried out field observations, it was discovered that the company had installed barn owl box as a form of biological control for rat attacks.</p> <p>The following are several monitoring records of census attacks and biological control for several units, including:</p> <ul style="list-style-type: none"> <li>- Rat census at Division I of Sei Lala Estate on March 2024 with results 2.7% (below threshold).</li> <li>- Rat census at Division II of Sei Lala Estate on March 2024 with results 0.7% (below threshold).</li> </ul>	Complied

		<ul style="list-style-type: none"><li>- Recapitulation of Leaf-eating caterpillar census record at Division I of Sei Lala Estate on March 2024 with result 1.40% (nettle caterpillar) and 0.68% (bag worm). This result is below the threshold (&lt;4%).</li><li>- Rat census at Division II of Soga Estate on March 2024 with results 0.08% (below threshold).</li><li>- Recapitulation of Leaf-eating caterpillar census record at Division III of Soga Estate on January 2024 with result 1.80% (nettle caterpillar) and 0% (bag worm). This result is below the threshold (&lt;4%).</li></ul> <p>Based on that detection and census record, the company does not carry out chemical pest control.</p>							
7.1.2	Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.	Based on field observation and document verification, the company does not plant or maintain useful plants that include into the invasive category in accordance with Minister of Environment Regulation No. 96/2016 about Invasive Types.	Complied						
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	Based on the results of document reviews and also field observations in Sei Lala Estate, Soga Estate, KUD Triani Maju and KUD Tani Bahagia, it is known that there was no use of fire in controlling pesticides. This is in line with the results of public consultation with the District Agriculture Service of Pelalawan Regency, that the local community did not find or see the company using fire to control pests.	Complied						
Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.									
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.	<p>The company shows records of the list of pesticides used along with justification for their use, consisting of herbicides. Following is some information on the pesticide brands used by the company:</p> <p>Sei Lala Estate</p> <table><tr><td>Name</td><td>Active Ingredients</td><td>Justification</td></tr><tr><td></td><td></td><td></td></tr></table>	Name	Active Ingredients	Justification				Complied
Name	Active Ingredients	Justification							

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		<table><tr><td>Metaprima</td><td>Metil metsulfuron</td><td>Herbicide</td></tr><tr><td>Basis 150 SL</td><td>Amonium Glufosinat</td><td>Herbicide</td></tr><tr><td>Supremo</td><td>Isopropil Amina Glifosat</td><td>Herbicide</td></tr></table> <p>Soga Estate</p> <table><tr><td>Name</td><td>Active Ingredients</td><td>Justification</td></tr><tr><td>Metaprima</td><td>Metil metsulfuron</td><td>Herbicide</td></tr><tr><td>Biolon</td><td>Triklopir</td><td>Herbicide</td></tr><tr><td>Kenlon</td><td>Triklopir</td><td>Herbicide</td></tr><tr><td>Supremo</td><td>Isopropil Amina Glifosat</td><td>Herbicide</td></tr></table> <p>The results of field observation on Sei Lala and Soga Estate and interviews with pesticide applicators showed that all pesticide applicators had understood the procedures for spraying and proper use of spray equipment, targeting weeds, prohibiting spraying in river border areas and the actions taken when poisoning occurs in the area.</p>	Metaprima	Metil metsulfuron	Herbicide	Basis 150 SL	Amonium Glufosinat	Herbicide	Supremo	Isopropil Amina Glifosat	Herbicide	Name	Active Ingredients	Justification	Metaprima	Metil metsulfuron	Herbicide	Biolon	Triklopir	Herbicide	Kenlon	Triklopir	Herbicide	Supremo	Isopropil Amina Glifosat	Herbicide	
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Kenlon	Triklopir	Herbicide																									
Supremo	Isopropil Amina Glifosat	Herbicide																									
7.2.2	<b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided.	<p>The company has records related to pesticide use in the document "Quantity and LD50 of Hazardous Chemical Period 2023". In this document, the company records pesticide use starting from total solution use, total active ingredients, total active ingredients per area and total active ingredients per production. Here are some sampled recording notes for management units:</p> <p>Sei Lala Estate</p>	Complied																								

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		<table><tr><td>Name</td><td>Total Application</td><td>Total Active Ingredient</td><td>Total Area Application (per hectare)</td></tr><tr><td>Kenlon 480 EC</td><td>4 litter</td><td>0.80 litter</td><td>0.001</td></tr><tr><td>Supremo 480 SL</td><td>3104 litter</td><td>1489.92 litter</td><td>1.422</td></tr><tr><td>Basis 150 SL</td><td>435 litter</td><td>87 litter</td><td>0.083</td></tr></table> <p>Soga Estate</p> <table><tr><td>Name</td><td>Total Application</td><td>Total Active Ingredient</td><td>Total Area Application (per hectare)</td></tr><tr><td>Biolon</td><td>1.057 kg</td><td>211.40 gr</td><td>0.202</td></tr><tr><td>Supremo 480 SL</td><td>75 litter</td><td>36 litter</td><td>0.034</td></tr><tr><td>Metaprima</td><td>150 gr</td><td>73 gr</td><td>0.069</td></tr></table> <p>The document for each estate describes the type of pesticide, the active ingredient, LD50, active ingredient content, amount of pesticide used, area of pesticide use, and pesticide use per hectare.</p>	Name	Total Application	Total Active Ingredient	Total Area Application (per hectare)	Kenlon 480 EC	4 litter	0.80 litter	0.001	Supremo 480 SL	3104 litter	1489.92 litter	1.422	Basis 150 SL	435 litter	87 litter	0.083	Name	Total Application	Total Active Ingredient	Total Area Application (per hectare)	Biolon	1.057 kg	211.40 gr	0.202	Supremo 480 SL	75 litter	36 litter	0.034	Metaprima	150 gr	73 gr	0.069	
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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.	<p>The company shows evidence of a reduction in pesticide use for estate each year. Here are some examples:</p> <p>Soga Estate</p> <table><tr><td>Pestiside Name</td><td>2022</td><td>2023</td></tr><tr><td>Metaprima 20 WG</td><td>689.951 kg</td><td>552.202 kg</td></tr></table>	Pestiside Name	2022	2023	Metaprima 20 WG	689.951 kg	552.202 kg	Complied																										
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7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.	<p>In the context of integrated pest control, the company has related procedures in:</p> <ul style="list-style-type: none"><li>SOP Weed Control (AA-APM-OP-1100.08-R6)</li><li>SOP Pest and Disease Control (AA-APM-OP-1100.10-R8)</li><li>SOP for Pesticides and Their Management (AA-APM-OP-1100.11-R1)</li></ul> <p>In this procedure, the company establishes an early warning system in carrying out control actions. The company also prioritizes biological control by planting useful plants. Chemical action is only carried out if the census results exceed the threshold. Based on this evidence (as</p>	Complied												

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		mentioned in indicators 7.1.1), the company does not carry out pest control by preventive means (prophylactic). The use of pesticides is always based on the needs and field conditions. Based on the results of field observation and interviews with spraying workers, workers explained that spraying was carried out selectively.																			
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to: 7.2.5a Judgment of the threat and verify why this is a major threat.</p>	<p>In line with the explanation in indicator 7.2.1, the company shows a recorded list of pesticides used in operational areas, as follows:</p> <table><tr><td>Name</td><td>Active Ingredients</td><td>Class</td></tr><tr><td>Kenlon 480 EC</td><td>Trychlopyr: 480 gr/ltr</td><td>II</td></tr><tr><td>Gulmaron 80 WP</td><td>Diuron</td><td>III</td></tr><tr><td>Polydor 25EC</td><td>Lambda Silahotrin</td><td>II</td></tr><tr><td>Basis</td><td>Amonium Glufosinat</td><td>II</td></tr><tr><td>Supremo</td><td>Isopropil Amina Glifosat</td><td>III</td></tr></table> <p>Based on document verification and field visit to pesticide storage, there is no paraquat and WHO Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions application from period 2022/2023.</p>	Name	Active Ingredients	Class	Kenlon 480 EC	Trychlopyr: 480 gr/ltr	II	Gulmaron 80 WP	Diuron	III	Polydor 25EC	Lambda Silahotrin	II	Basis	Amonium Glufosinat	II	Supremo	Isopropil Amina Glifosat	III	Complied
Name	Active Ingredients	Class																			
Kenlon 480 EC	Trychlopyr: 480 gr/ltr	II																			
Gulmaron 80 WP	Diuron	III																			
Polydor 25EC	Lambda Silahotrin	II																			
Basis	Amonium Glufosinat	II																			
Supremo	Isopropil Amina Glifosat	III																			
	7.2.5b Why there is no other alternative which can be used.	Based on document verification and field visit to pesticide storage, there is no paraquat and WHO Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions application from period 2022/2023.																			
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	Based on document verification and field visit to pesticide storage, there is no paraquat and WHO Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions application from period 2022/2023.																			

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	7.2.5d Process to limit the negative impacts of the application.	Based on document verification and field visit to pesticide storage, there is no paraquat and WHO Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions application from period 2022/2023.	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	Based on document verification and field visit to pesticide storage, there is no paraquat and WHO Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions application from period 2022/2023.	
7.2.6	<b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.	Based on the results of interviews with members of the spraying team for Sei Lala and Soga estate, it is known that the Company has provided a special mixing chamber for mixed pesticides before they applied to field. In addition, based on the review of documents and records of pesticide application, the company also provides clean water, soap and a first aid kit to support the sanitation and OHS aspects required by the spraying team.  The spraying team also said that they already done medical checkup on December 2023 as a regulation before doing spraying activities again.	Complied
7.2.7	<b>(C)</b> Storage of all pesticides in accordance with recognized best practices.	The company has procedures related to pesticide management in the Pesticides and Management SOP (AA-APM-OP-1100.11-R1). The procedure informs the following things: <ul style="list-style-type: none"> <li>• Classification of pesticides based on target, chemical properties and mode of action.</li> <li>• Safety instructions for using pesticides.</li> <li>• Pregnant and breastfeeding women are prohibited from applying pesticides.</li> <li>• Empty pesticide packaging must be returned to the warehouse and then sent to hazardous waste temporary storage.</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• Pesticides must be stored in a special place and separately according to their respective groups.</li> <li>• First aid for pesticide poisoning</li> <li>• Occupational safety and health equipment.</li> </ul> <p>It is known that pesticide storage activities have been carried out in accordance with best practice, including the availability of MSDS according to the type of pesticide, the pesticide warehouse is equipped with adequate ventilation, the pesticide mixing place is equipped with bunds, the warehouse staff has PPE was given in the form of rubber gloves and masks, and warehouse staff also received special health checks.</p>	
7.2.8	All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.	<p>From the results of field visit in housing area at Soga and Sei Lala Estate and Ukui II MIII, it was found that there were no traces of chemical packaging used as water reservoirs or other housing activities. From the results of documents review, in the form of waste manifests and Hazardous Waste Processing Data for washing log book and management purposes, it is used as a water container for spray activities.</p> <p>All pesticides container is sent to the registered collector/transporter which approved by Environmental Ministry, namely PT Hazmat Techno Indonesia as mentioned in the indicator 7.3.2 below.</p> <p>The verified manifest document are as follows:</p> <p>Transported on 28 March 2024</p> <ul style="list-style-type: none"> <li>• Manifest Festronik No. KLHK-1720280846 – used chemical containers; hazardous waste code: B104d.</li> <li>• Manifest Festronik No. KLHK-1720283297 – medical waste; hazardous waste code: A337-1.</li> <li>• Manifest Festronik No. KLHK-172081307 – used battery; hazardous waste code: A102d.</li> </ul>	Complied



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		<p>Transported on 31 October 2023</p> <ul style="list-style-type: none"> <li>• Manifest Festronik No. KLHK-1707393080 – used rags; hazardous waste code: B110d.</li> <li>• Manifest Festronik No. KLHK-1707391900 – used chemical containers; hazardous waste code: B104d.</li> <li>• Manifest Festronik No. KLHK-1707391551 – used oil; hazardous waste code: B105d.</li> <li>• Manifest Festronik No. KLHK-1707392847 – medical waste; hazardous waste code: A337-1.</li> <li>• Manifest Festronik No. KLHK-1707392682– used battery; hazardous waste code: A102d.</li> <li>• Festronik Nomor KLHK-1707392541 – used filter; hazardous waste code: B109d.</li> </ul> <p><b><u>Scheme smallholders:</u></b></p> <p>Group manager has a policy and mechanism to manage the waste from fertilizer sack according to procedure of “Prosedur Pemusnahan Wadah Bekas Bahan Kimia dan Diagram Alur Pembuangan Wadah Bekas Agrokimia”. The fertilizer sack must be handled by triple rinse and use as loose fruit sack, the inner bag of fertilizer was delivered to collector. During field observation and interview with sample of smallholders at KUD Trani Maju, KUD Tani Subur and KUD Tani Bahagia, they were well aware of the to manage the waste from ex fertilizer sack and empty chemical.</p>	
7.2.9	<b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is	Based on the results of document reviews and also field observations in Sei Lala and Soga Estate, KUD Triani Maju and KUD Tani Bahagia it is known that no aerial pesticide control was found. This is in line with the results of public consultation with the District Agriculture Service of	Complied

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	provided to affected local communities at least 48 hours prior to application of aerial spraying.	Pelalawan Regency that the local community did not find or see the company applying air spraying.	
7.2.10	<b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	<p>PT Inti Indosawit Subur – Ukui Group has conducted the special annual medical surveillance for pesticides operators.</p> <p>Scheme smallholder's: Special medical check-up for smallholder's pesticide operator is include with Estate, because those chemical/spraying operators are work at Estate and Smallholders area. Sample: KUD Trani Maju, KUD Tani Bahagia and KUD Tani Subur</p> <p>MCU for pesticide/chemical handling was conducted on semester II 2023 carried out by Asian Agri Sehat Buatan Clinic. Data seen: MCU for Soga Estate 53 workers, Sei Lala Estate 76 workers, and Ukui POM II 33 workers with the result that all employees are fit for work.</p> <p>Special Medical Check-Up was covered to cholinesterase test, spirometry, and phisicaly test. The result of MCU has communicated to all related workers in morning assembly.</p> <p>Based on interviews with female pesticide sprayers and fertilisers, they stated that periodic health checks are conducted every 6 months.</p>	Complied
7.2.11	<b>(C)</b> No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives.	<p>Based on "Daftar Karyawan TUS Kebun Sei Lala" there are 44 women workers/sprayers. And, for Kebun Soga based on "Daftar Karyawan TUS Kebun Soga" there are 39 women workers/sprayers.</p> <p>The company has prohibited pregnant or breast-feeding women to perform chemical spraying. In order to mitigate, estate performed monthly pregnancy test.</p> <p>The organization has kept the record that spraying is not conducted by pregnant or breast-feeding women. The company has been conducting PP Test (pregnant test) every month.</p> <p>The last of pregnancy test conducted in April 2024. All the female sprayer in well condition and not being pregnant nor breast feeding.</p>	Complied

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		<p>Based on interview with clinic staff (nurse), the pregnant test was conducted in order to ensure there are no pregnant workers in spraying activities.</p> <p>Based on interviews with female pesticide sprayers and female fertilisers, they stated that routine pregnancy checks are conducted every month.</p>	
<p><b>Note For 7.2.11</b></p> <p>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.</p>			
<p><b>Criteria 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.</p>	<p>PT Inti Indosawit Subur – Ukui Group has a procedure to handle hazardous waste titled “Prosedur Penanganan Limbah B3” No.AA-KL-06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third party transporter.</p> <p>PT Inti Indosawit Subur – Ukui Group has stored the hazardous waste in temporary storage with permit. The temporary hazardous waste storage has a valid permit based on “Surat Keputusan Badan Penanaman Modal dan Pelayanan Perijinan Terpadu nomor: KPTS-503/DPMTSP-LB3/2020/33, dated 29 December 2020, the license valid for 5 years. The hazardous waste is sent to the registered collector/transporter which is approved by the Environmental Ministry.</p> <p>A documented waste management plan to avoid or reduce pollution and its implementation available under document of Environmental Aspect-Impacts (<i>Evaluasi Aspek-Dampak Lingkungan</i>) updated on January 2024. The document covered all operation in mill, estate and its smallholders.</p>	Complied

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		<b>Scheme Smallholder</b> All operational activities including spraying was conducted by TUS Team from Sei Lala Estate so no hazardous waste management in scheme smallholder.	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	<p>The hazardous waste is sent to the registered collector/transporter which is approved by the Environmental Ministry. Document of agreements and third parties' licenses:</p> <ul style="list-style-type: none"> <li>• SPK for Transport and Management of LB3 between PT Inti Indosawit Subur and PT Hazmat Techno Indonesia and PT Pengolahan Limbah Industri Bekasi No. 06/SPJ/LEG-IIS/I/23 dated 2 January 2023. The agreement period starts from 1 January 2023 – 31 December 2024.</li> <li>• SPK for Transport and Management of LB3 between PT Inti Indosawit Subur and PT Hazmat Techno Indonesia and PT Muhtomas No. 07/SPJ/LEG-IIS/XII/22 dated 2 January 2023. The agreement period starts from 1 January 2023 – 31 December 2024.</li> <li>• PT Hazmat Techno Indonesia – B3 Transportation (special operation permit to transport dangerous goods (B3)) based on the Decree of the Director General of Land Transportation No. 91201085303790003 dated 1 March 2023 and valid until 1 March 2028.</li> <li>• NIB : 91201085303790003 dated 1 March 2023 with KBLI Code 49432 "Angkutan Bermotor Untuk Barang Khusus"</li> <li>• SPK for Transport and Management of LB3 between PT Inti Indosawit Subur and PT Hazmat Techno Indonesia and PT Putra Restu Ibu Abadi No. 08/SPJ/LEG-IIS/I/23 dated 2 January 2023. The agreement period starts from 1 January 2023 – 31 December 2024.</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• PT Pengolahan Limbah Industri Bekasi – B3 waste management services based on the Decree of the Minister of LHK RI No. S.31/Menlhk/Setjen/PLB.3/1/2019 dated January 21, 2019.</li> <li>• PT Putra Restu Abadi – B3 waste management services based on the Decree of the Minister of LHK RI No. S.575/Menlhk/Setjen/PLB.3/8/2020 dated 31 August 2020.</li> <li>• SPK for Transport and Management of LB3 between PT Inti Indosawit Subur with PT Hazmat Techno Indonesia and PT Trigunapratama Abadi No. 09/SPJ/LEG-IIS/I/23 dated 2 January 2023. The agreement period starts from 1 January 2023 – 31 December 2024</li> <li>• PT Trigunapratama Abadi – B3 waste management services based on the Decree of the Minister of LHK RI No S.1097/Menlhk/Setjen/PLB.3/12/2019 dated 23 December 2019.</li> </ul> <p>The verified manifest document are as follows:</p> <p>Transported on 28 March 2024</p> <ul style="list-style-type: none"> <li>• Manifest Festronik No. KLHK-1720280846 – used chemical containers; hazardous waste code: B104d.</li> <li>• Manifest Festronik No. KLHK-1720283297 – medical waste; hazardous waste code: A337-1.</li> <li>• Manifest Festronik No. KLHK-172081307 – used battery; hazardous waste code: A102d.</li> </ul> <p>Transported on 31 October 2023</p> <ul style="list-style-type: none"> <li>• Manifest Festronik No. KLHK-1707393080 – used rags; hazardous waste code: B110d.</li> <li>• Manifest Festronik No. KLHK-1707391900 – used chemical containers; hazardous waste code: B104d.</li> </ul>	
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		<ul style="list-style-type: none"> <li>Manifest Festronik No. KLHK-1707391551 – used oil; hazardous waste code: B105d.</li> <li>Manifest Festronik No. KLHK-1707392847 – medical waste; hazardous waste code: A337-1.</li> <li>Manifest Festronik No. KLHK-1707392682– used battery; hazardous waste code: A102d.</li> <li>Festronik Nomor KLHK-1707392541 – used filter; hazardous waste code: B109d.</li> </ul> <p>Based on interview with workers who handles pesticides, they understood the disposal of empty pesticides containers, such as: Empty chemical containers re-used only for mixing purposes, unusable are triple rinsed, punctured and disposed to the approval collector.</p>	
7.3.3	The unit of certification does not use open fire for waste disposal.	<p>There is no change of compliance statement compared to last year's audit.</p> <p>All waste products have been identified and documented under the "Evaluasi Aspek- Dampak Lingkungan" (Environmental Aspect impacts). Domestic waste is the main concern to be managed. Both Mill and Estate, has periodically schedule to manage the domestic waste. The document of "Jadwal Pengangkutan Sampah 2022 untuk Karyawan Ukui Estate". Regulation of domestic waste management refer to "UU No. 18 Tahun 2008 tentang Pengelolaan Sampah".</p> <p>Group Manager of Plasma Ukui has defined the procedure "Pengelolaan Kemasan Ex (Bekas) Pupuk di Kebun" No. 035/DOK/SOP/PT.IIS KLB-AA/2016 dated 2 December 2016. All fertilizer bags were prohibited to dispose in plantation and housing area. All the fertilizer bags usage must be identified and reported to Group Manager.</p> <p>Based on field observation in Ukui Estate and sampled smallholder (64 smallholder) at KUD Trani Maju, KUD Tani Subur and KUD Tani Bahagia, it was found no use of open fire for waste disposal.</p>	Complied

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<b>Criteria 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.	<p>PT Inti Indosawit Subur – Soga Estate has procedures to maintain soil fertility. The procedures comprise of fertilizer application and cover crop planting. Leaf samplings are taken annually to accurately capture palm nutrient requirement (both macro and micro nutrient) and serve as source for fertilizer recommendation. Fertilizer application (anorganic, compost, POME application, empty fruit bunch) follows fertilizer recommendation and procedure of manuring "AA-APM-OP-1100.09.R8 <i>Pemupukan</i>"</p> <p>The scope of fertilizing activities in the SOP covers all activities related to fertilizing oil palms in nurseries, Immature Producing Plants and Producing Plants both inorganic fertilizing and by oil palm products based on the results of soil and leaf analysis.</p> <p><b>Scheme Smallholder:</b></p> <p>Kebun Plasma Ukui (scheme smallholder) has established SOP AA-Plasma-PP-KS-03 dated 1 September 2011: Pemupukan - Procedure of Fertilizing. Kebun Plasma Ukui management has regulated that the basis of fertilizer dosage determination is based on leaf sampling analysis conducted annually and soil analysis.</p>	Complied
7.4.2	Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.	<p>The company carries out soil analysis activities in the context of planning follow-up plant maintenance, including recommendations for fertilizer to be used for each land block. For example, the company carried out a leaf analysis examination for Sei Lala and Soga Estate:</p> <ul style="list-style-type: none"> <li>- Code Sample P1 of Soga Estate (No.22S0904, Depth 0-15 cm) with results: N 0.10%; C 1.13%; P 88.13 ppm.</li> <li>- Code Sample P2 of Soga Estate (No.22S0912, Depth 100-130 cm) with results: N 0.06%; C 0.11%; P 105.79 ppm.</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>- Code Sample P1 of Sei Lala Estate (No.22S0927, Depth 0-15 cm) with results: N 0.25%; C 2,86%; P 317.77 ppm.</li> <li>- Code Sample P2 of Sei Lala Estate (No.22S034, Depth 70-130 cm) with results: N 0.04%; C 0.27%; P 57.03 ppm.</li> </ul> <p>In addition, there are also leaf analysis records for each company unit, for example Records of soil testing at Sei Lala and Soga Estate carried out in April 2023 by Research and Development Asian Agri Group in the many location. Here's the examples:</p> <ul style="list-style-type: none"> <li>- Division 4 of Sei Lala Estate sample Block D21a with results: N 2.697%; P 0.154%; K 1.32%; Mg 0.25%; Ca 0.64%.</li> <li>- Division 4 of Sei Lala Estate sample Block D21i with results: N 2.597%; P 0.154%; K 1.18%; Mg 0.32%; Ca 0.70%.</li> <li>- Division 2 of Soga Estate sample Block B97a with results: N 2.41%; P 0.167%; K 0.99%; Mg 0.26%; Ca 0.64%.</li> <li>- Division 2 of Soga Estate sample Block B97f with results: N 2.46%; P 0.165%; K 0.99%; Mg 0.23%; Ca 0.60%.</li> </ul>	
7.4.3	A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	<p>The company has procedures and policies regarding the use of organic fertilizer in Procedure AA-APM-OP-1100.09.R8. This procedure explains the technicalities related to organic fertilization such as the application of EFB, Ash, Solid Decanter, compost, and Palm Oil Effluent. This procedure contains application techniques starting from dosage, application method, occupational health and safety equipment and recording.</p> <p>The company carries out nutrient recycling strategy activities by implementing empty bunches in the field as a substitute for inorganic fertilizer. Here are some of the recordings:</p> <ul style="list-style-type: none"> <li>- FFB application records period 2023 on Sei Lala Estate with total 10,974 ton.</li> </ul>	Complied



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		<ul style="list-style-type: none"><li>- POME application record period 2023 on Block C90b period 2023 with total 4,860 m3.</li><li>- POME application record period 2023 on Block C89c period 2023 with total 17,874 m3.</li></ul>					
7.4.4	Records of fertilizer inputs are maintained.	<p>The certificate holder showed manuring record for al management unit, including scheme smallholder:</p> <ul style="list-style-type: none"><li>- Kieserite Application on March 2024 for Sei Lala Estate with amount as 4,658 kg.</li><li>- Hi-kay Application on February 2024 for Sei Lala Estate with amount as 29,387 kg.</li><li>- MOP Application on January 2024 for Soga Estate with amount as 91,815 kg.</li><li>- AC Application on March 2024 for Soga Estate with amount as 7,268 kg.</li></ul> <p>For KUD Trani Maju &amp; KUD Tani Bahagia there’s no fertilizer application due to preparation for replanting on 2024/2025.</p> <p>Based on record verification, all application based on early recommendations which already stated by company. The record stored in Estate and Scheme Smallholder office.</p>	Complied				
Criteria 7.5: Practices minimise and control erosion and degradation of soils.							
7.5.1	(C) Maps that identify marginal and fragile soils, including steep sloped land are available.	<p>There are no changes related to the suitability map and land types in the company's operational area. Apart from that, there is no addition/expansion of land from the previous assessment. In general, the types of land displayed on a land map with a scale of 1:30,000 are as follows:</p> <p>Soga Estate</p> <table><tr><td>Soil Classification</td><td>Description</td></tr><tr><td></td><td></td></tr></table>	Soil Classification	Description			Complied
Soil Classification	Description						

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		Typic Dystrudepts	Clay loam soil texture spreads across most areas with wavy topography - hilly, sticky and plastic, angular block structure, good drainage and low natural fertility.
		Typic Endoaquepts	The soil texture is sand, spread on low land with flat topography, made from paired rock deposits, granular block structure, very obstructed drainage and low natural fertility.
		Typic Hapludults	The soil texture is dusty clay, spread in small area on flat - hilly topography, sticky and plastic, angular blocky structure, good drainage and low natural fertility.
		Sei Lala Estate	
		Soil Classification	Description
		Typic Dystrudepts	Clay loam soil texture spreads across most areas with wavy topography - hilly, sticky and plastic, angular block structure, good drainage and low natural fertility.
		Typic Haplosaprists	The organic layer is black, the organic material has been

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			completely weathered, the fiber texture is no longer visible and the organic material already resembles soil.	
		Typic Placaquods	Sand texture, spread over low-lying areas with flat topography, made from sandstone deposits, granular block structure, very obstructed drainage and low natural fertility.	
		Typic Endoaquepts	The soil texture is sand, spread on low land with flat topography, made from paired rock deposits, granular block structure, very obstructed drainage and low natural fertility.	
		Typic Hapludults	The soil texture is dusty clay, spread in small area on flat - hilly topography, sticky and plastic, angular blocky structure, good drainage and low natural fertility.	
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.	From the results of field observations at the Sei Lala and Soga Estate, it is known that replanting activities are not carried out with slopes above $\geq 25^\circ$ as stipulated in Minister of Agriculture Regulation No. 131 of 2013 concerning Guidelines for Good Palm Oil Cultivation.		Complied
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.	Based on the results of field observations, currently there are no new planting activities at Sei Lala and Soga Estate. As informed in indicators 7.5.2, there's only replanting activities on certification scope area.		Complied

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<b>Criteria 7.6:</b> Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	<b>(C)</b> 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>The company has done latest soil semi detail survey on April 2022, here the detail summary:</p> <p><b>Soga Estate</b></p> <p>The physiography of the survey area is plain to hilly with formations Estuary Beliti, Aur River, and Sikladipanjang. Parent material (lithology parent material) survey areas are alluvium, old sands, old clays, mudstone, siltstone, sandstone, tuffite and fine-grained tephra. The overall topography of the survey area is flat to hilly.</p> <p>Dominant soil classification in Soga Estate based on USDA 2014 are: Typic Endoaquepts (15.9%), Typic Dystrudepts (6.8%) and Typic Hapludults (77.3%).</p> <p><b>Sei Lala Estate</b></p> <p>The physiography of the survey area is plain to hilly with the Muara Belit, Aur River and Sikladipanjang formations. The parent materials (lithology parent material) of the survey area are alluvium, old sands, old clays, mudstone, siltstone, sandstone, tuffite and fine-grained tephra. Overall, the topography of the survey area is flat to hilly.</p> <p>Dominant soil classification in Sei Lala Estate based on USDA 2014 are: Typic Haplosaprists (1.2%), Typic Placaquods (3.6%), Typic Endoaquents (0.6%), Typic Endoaquepts (22.5%), Typic Dystrudepts (63.4%), and Typic Hapludults (8.7%)</p>	Complied
7.6.2	Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan.	<p>Company has an SOP for land clearing including land preparation which is stated in the SOPs as follows:</p> <ul style="list-style-type: none"> <li>- New Planting Procedure (AA-APM-OP-1100.02-R3)</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>- Establish and Maintenance Road and Bridge (AA-APM-OP-1100.03-R2)</li> <li>- Establish and Maintenance Drainage (AA-APM-OP-1100.04-R3)</li> <li>- Land and Water Conservation (AA-APM-OP-1100.05-R3)</li> </ul> <p>These procedures contain technical guidance for soil conservation work in the context of land preparation before planting by considering slope, soil type, and planting media.</p> <p>There's a program from research department regarding to soil condition for each Estate:</p> <ul style="list-style-type: none"> <li>- Providing empty bunches between trees in areas with sandy soil and high clay in the top layer (topsoil).</li> <li>- Construction of drainage ditches accompanied by good water management to maintain the stability of ground water levels and soil moisture in low land areas.</li> <li>- Making terraces and planting cover crops or light weeds which can prevent erosion in areas between terraces with a slope of &gt; 12°.</li> <li>- Placement of fronds between trees to prevent run off and as a medium for organic fertilizer application.</li> <li>- Maintain riparian sustainability for ecosystem balance.</li> </ul> <p>Based on a review of documents and field observation, company does not use fire/burning in land clearing activities. Land condition for planting is influenced by topography (flat or hilly which requires terraces) as well as the presence of low areas which require ridges (platforms).</p>	
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	The results of a semi-detailed land survey conducted by the company in April 2022 which contains information related to soil types and slope levels in the company's operational area and serves as a guide for	Complied

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		determining the location of roads and infrastructure in the company's operational areas												
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.	<p>There is no new planting conducted by Soga and Sei Lala Estate after november 2018. In addition there is no peatlands/peat soil. Based on field observation and review document of Soil Profile Update analysis in April 2022 by Research &amp; Development Asian Agri, here’s the detail of soil classification for each Estate:</p> <p><b>Soga Estate</b></p> <table><tr><td><b>Soil Classification</b></td></tr><tr><td>Typic Dystrudepts</td></tr><tr><td>Typic Hapludults</td></tr><tr><td>Typic Endoquepts</td></tr></table> <p><b>Sei Lala Estate</b></p> <table><tr><td><b>Soil Classification</b></td></tr><tr><td>Typic Dystrudepts</td></tr><tr><td>Typic Haplosaprists</td></tr><tr><td>Typic Placaquods</td></tr><tr><td>Typic Endoaquepts</td></tr><tr><td>Typic Hapludults</td></tr><tr><td>Typic Placaquods</td></tr></table>	<b>Soil Classification</b>	Typic Dystrudepts	Typic Hapludults	Typic Endoquepts	<b>Soil Classification</b>	Typic Dystrudepts	Typic Haplosaprists	Typic Placaquods	Typic Endoaquepts	Typic Hapludults	Typic Placaquods	Complied
<b>Soil Classification</b>														
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Typic Endoaquepts														
Typic Hapludults														
Typic Placaquods														

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		Based on that document there's no land classified as peat land in the company's operational area.	
7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).	As explained in indicators 7.7.1, there's no land classified as peat land in the company's operational area. Therefore, this is not applicable.	Not Applicable
<b>PROCEDURAL NOTE:</b> 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	<b>(C)</b> Subsidence of peat is monitored, documented and minimised.	As explained in indicators 7.7.1, there's no land classified as peat land in the company's operational area. Therefore, this is not applicable.	Not Applicable
7.7.4	<b>(C)</b> Availability of implementation evidence of the water and land cover management program.	As explained in indicators 7.7.1, there's no land classified as peat land in the company's operational area. Therefore, this is not applicable.	Not Applicable
7.7.5	<b>(C)</b> 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.	As explained in indicators 7.7.1, there's no land classified as peat land in the company's operational area. Therefore, this is not applicable.	Not Applicable
<b>PROCEDURAL NOTE:</b> 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.			

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7.7.6	<b>(C)</b> All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).	As explained in indicators 7.7.1, there's no land classified as peat land in the company's operational area. Therefore, this is not applicable.	Not Applicable
7.7.7	<b>(C)</b> All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building 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.	As explained in indicators 7.7.1, there's no land classified as peat land in the company's operational area. Therefore, this is not applicable.	Not Applicable
<b>Criteria 7.8:</b> Practices maintain the quality and availability of surface and groundwater.			
7.8.1	A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters: 7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.	There are no changes regarding water management plan because it was stated in document "Rencana Pengelolaan Lingkungan" and "Rencana Pemantauan Lingkungan" PT Inti Indosawit Subur – Ukui Group. The EIA will be revised if there any additional process in POM or increase of mill capacity or there are new plantation area included in company area. PT Inti Indosawit Subur Ukui Group has also prepared the procedure on protection of water courses under "SOP Pengendalian Riparian" number AA-APM-OP-1100.21-R2, dated 25 <sup>th</sup> February 2016. All of KUD has programs on water management as in "Rencana dan Realisasi Penyusunan Pelapah Letter "U", frond stacking. "Rencana dan Realisasi Perawatan Teresan sebagai Sarana Konservasi Tanah dan Air serta Upaya Pencegahan Erosi" PT Inti Indosawit Subur – Ukui Group has established a management plan to protect water courses and wetlands, including securing and maintaining appropriate riparian. • Riparian restoration with forest vegetation plant/tree.	Complied



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		<ul style="list-style-type: none"><li>• Establish zone for zero chemical. No spraying and fertilizing along riparian zone.</li><li>• Conserve natural vegetation in riparian zone</li><li>• Restricted to conduct replanting palm oil in riparian area.</li></ul> <p>Ukui II POM also paid the water retribution each month to "UPT Pengelolaan Pendapatan, Badan Pendapatan daerah Pemerintah Provinsi Riau". Sample: SPPD (Surat Setoran Pajak Daerah) Pajak Pengambilan dan Pemanfaatan Air Permukaan for period January – March 2024.</p>																																				
	7.8.1b Workers have adequate access to clean water.	<p>The company has prepared infrastructure and facility for worker’s welfare such as: housing, clean water, electricity, medical facility, education, etc.</p> <p>Clean water analysis conduct by accredited laboratory which is PT ITEC Solution Indonesia, certificate of analysis for Clean Water No. D.03.786/LHU/2023, analysis No : D.03.786cd-AM.23 dated 4 April 2023, shown comply to Permenkes No 2/2023, such as:</p> <table><tr><td>No</td><td>Parameter</td><td>Quality Std</td><td>Unit</td><td>Result</td></tr><tr><td>1</td><td>Total Coliform</td><td>0</td><td>Amount/100 mL</td><td>0</td></tr><tr><td>2</td><td>E. Coli</td><td>0</td><td>Amount/100 mL</td><td>0</td></tr><tr><td>3</td><td>Zn</td><td>3</td><td>mg/L</td><td>&lt;0.02</td></tr><tr><td>4</td><td>pH</td><td>6.5-8.5</td><td>-</td><td>7.10</td></tr><tr><td>5</td><td>Colour</td><td>TCU</td><td>10</td><td>0.50</td></tr><tr><td>6</td><td>TDS</td><td>mg/L</td><td>&lt;300</td><td>44</td></tr></table>	No	Parameter	Quality Std	Unit	Result	1	Total Coliform	0	Amount/100 mL	0	2	E. Coli	0	Amount/100 mL	0	3	Zn	3	mg/L	<0.02	4	pH	6.5-8.5	-	7.10	5	Colour	TCU	10	0.50	6	TDS	mg/L	<300	44	
No	Parameter	Quality Std	Unit	Result																																		
1	Total Coliform	0	Amount/100 mL	0																																		
2	E. Coli	0	Amount/100 mL	0																																		
3	Zn	3	mg/L	<0.02																																		
4	pH	6.5-8.5	-	7.10																																		
5	Colour	TCU	10	0.50																																		
6	TDS	mg/L	<300	44																																		
7.8.2	<b>(C)</b> 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	PT Inti Indosawit Subur –Ukui Group has established a management plan to protect water courses and wetlands, including securing and maintaining appropriate riparian.	Complied																																			

	Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).	<ul style="list-style-type: none"> <li>– Riparian restoration with forest vegetation plant/tree.</li> <li>– Establish zone for zero chemical. No spraying and fertilizing along riparian zone.</li> <li>– Conserve natural vegetation in riparian zone.</li> <li>– Restricted to conduct replanting palm oil in riparian area.</li> </ul> <p>There is no change of management plan compared to last year audit because this management plan effective to maintain the riparian.</p>	
7.8.3	Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.	<p>There are no changes in effluent treatment.</p> <p>Ukui II POM</p> <p>There were 11 ponds in effluent treatment system (WWTP), which consists of Colling Pond, Primary Anaerobic Pond, Secondary Anaerobic Pond, Acidification Pond, and Buffering Pond. Procedure of WWTP operation available in Mill Policy Manual (MPM) dated February 1, 2013, chapter AA-MPM-OP-1400.13-R1.</p> <p>Ukui II POM has been undergoing Biogas power plant construction since April 2015 to generate electrical power by using wastewater treatment. The biogas system has Anaerobic MBR system through digester Thermophilic fermentation, and anaerobic membrane tank.</p> <p>According to effluent monitoring data, all produced mill effluent is used for land application. Mill holds permit to discharge wastewater into land application from local authority through Decree number No. 503/DPMPTSP-LA/2019/06 dated 10 September 2019 valid for 5 years.</p> <p>As required by LA permit, Mill conducts monthly check on discharged effluent in cooperation with accredited Laboratory (PT ITEC Solution Indonesia). According to recent testing result, BOD level of applied effluent has met the applicable threshold of KepmenLH No.28/2003 regarding BOD limits of effluent discharge for land application. The level is maintained consistently less than 5,000 mg/L and debit &lt;600 m3 per day.</p>	Complied

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		<p>Based on result of monitoring January – December 2023 and also January – December 2023 shown comply with legal requirement “PermenLHK No P.68/Setjen/Kum1/8/2016”.</p> <p>Analysis period January – December 2023</p> <table><tr><th>Parameter</th><th>Unit</th><th>Threshold</th><th>Jan</th><th>Feb</th><th>Mar</th><th>Apr</th><th>May</th><th>Jun</th></tr><tr><td>pH</td><td>-</td><td>6-9</td><td>7.35</td><td>8.06</td><td>6.70</td><td>7.30</td><td>7.60</td><td>7.20</td></tr><tr><td>BOD</td><td>mg/l</td><td>&lt;5,000</td><td>649.17</td><td>1495.63</td><td>942.15</td><td>1274.16</td><td>1092.75</td><td>3376.42</td></tr><tr><td>COD</td><td>mg/l</td><td>-</td><td>1485.21</td><td>3504.73</td><td>2846.17</td><td>3756.11</td><td>3167.82</td><td>7905.11</td></tr><tr><td>Fat and Oil</td><td>mg/l</td><td>-</td><td>10.82</td><td>12.10</td><td>16.90</td><td>20.10</td><td>15.43</td><td>20.45</td></tr><tr><td>Cd</td><td>mg/l</td><td>-</td><td>&lt;0.01</td><td>&lt;0.010</td><td>&lt;0.010</td><td>&lt;0.016</td><td>&lt;0,010</td><td>&lt;0.010</td></tr><tr><td>Cu</td><td>mg/l</td><td>-</td><td>&lt;0.01</td><td>&lt;0.010</td><td>&lt;0.010</td><td>&lt;0.016</td><td>&lt;0.010</td><td>&lt;0.010</td></tr><tr><td>Pb</td><td>mg/l</td><td>-</td><td>&lt;0.060</td><td>&lt;0.060</td><td>&lt;0.060</td><td>&lt;0.080</td><td>&lt;0,060</td><td>&lt;0.060</td></tr><tr><td>Zn</td><td>mg/l</td><td>-</td><td>&lt;0.02</td><td>&lt;0.02</td><td>&lt;0.02</td><td>&lt;0.02</td><td>&lt;0.02</td><td>&lt;0.02</td></tr></table> <table><tr><th>Parameter</th><th>Unit</th><th>Threshold</th><th>Jul</th><th>Aug</th><th>Sep</th><th>Oct</th><th>Nov</th><th>Dec</th></tr><tr><td>pH</td><td>-</td><td>6-9</td><td>7.50</td><td>7.70</td><td>7.20</td><td>7.60</td><td>7.40</td><td>7.50</td></tr><tr><td>BOD</td><td>mg/l</td><td>&lt;5,000</td><td>2614.83</td><td>2317.09</td><td>2585.41</td><td>2941.17</td><td>2173.11</td><td>2266.43</td></tr></table>	Parameter	Unit	Threshold	Jan	Feb	Mar	Apr	May	Jun	pH	-	6-9	7.35	8.06	6.70	7.30	7.60	7.20	BOD	mg/l	<5,000	649.17	1495.63	942.15	1274.16	1092.75	3376.42	COD	mg/l	-	1485.21	3504.73	2846.17	3756.11	3167.82	7905.11	Fat and Oil	mg/l	-	10.82	12.10	16.90	20.10	15.43	20.45	Cd	mg/l	-	<0.01	<0.010	<0.010	<0.016	<0,010	<0.010	Cu	mg/l	-	<0.01	<0.010	<0.010	<0.016	<0.010	<0.010	Pb	mg/l	-	<0.060	<0.060	<0.060	<0.080	<0,060	<0.060	Zn	mg/l	-	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	Parameter	Unit	Threshold	Jul	Aug	Sep	Oct	Nov	Dec	pH	-	6-9	7.50	7.70	7.20	7.60	7.40	7.50	BOD	mg/l	<5,000	2614.83	2317.09	2585.41	2941.17	2173.11	2266.43	
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Zn	mg/l	-	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020																																																	
7.8.4	Mill water use per tonne of FFB is monitored and recorded.	<p>Ukui II POM has recorded the mill water use per ton FFB, includes monitoring of water usage for mill processing and domestic usage. Result of water usage monitoring is recorded under “Mill Operation Summary” year 2023, updated in December 2023.</p> <table><tr><td>Month</td><td>Water use (M³)</td><td>FFb (tonnes)</td><td>Ratio (M³/tonnes)</td></tr><tr><td>January</td><td>19,680</td><td>15,416</td><td>1.28</td></tr><tr><td>February</td><td>12,758</td><td>12,667</td><td>1.01</td></tr><tr><td>March</td><td>14,372</td><td>13,556</td><td>1.06</td></tr><tr><td>April</td><td>15,659</td><td>11,526</td><td>1.36</td></tr><tr><td>May</td><td>21,032</td><td>15,000</td><td>1.40</td></tr><tr><td>June</td><td>14,714</td><td>15,312</td><td>0.96</td></tr><tr><td>July</td><td>19,330</td><td>17,301</td><td>1.12</td></tr><tr><td>August</td><td>15,852</td><td>16,035</td><td>0.99</td></tr><tr><td>September</td><td>14,974</td><td>15,377</td><td>0.97</td></tr><tr><td>October</td><td>17,822</td><td>15,437</td><td>1.15</td></tr><tr><td>November</td><td>15,441</td><td>14,599</td><td>1.06</td></tr></table>	Month	Water use (M³)	FFb (tonnes)	Ratio (M³/tonnes)	January	19,680	15,416	1.28	February	12,758	12,667	1.01	March	14,372	13,556	1.06	April	15,659	11,526	1.36	May	21,032	15,000	1.40	June	14,714	15,312	0.96	July	19,330	17,301	1.12	August	15,852	16,035	0.99	September	14,974	15,377	0.97	October	17,822	15,437	1.15	November	15,441	14,599	1.06	Complied						
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		December	6,421	13,235	0.49																																	
		TOTAL	188,055	175,461	1.07																																	
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	To improving efficiency of the use of fossil fuels such monitoring on use of fossil fuels. Fossil fuel records was maintenance and the trends shown. Energy use records include accurate measurements of renewable energy use per ton of FFB processed. All the shell and fiber are consumed internally as boiler fuel. Fossil fuel usage is recorded for operational purpose, including the efficiency analysis. Records of EFB, fiber and shell in 2023 <table><tr><td>No</td><td>By-product</td><td>Amount (Ton)</td><td>Use for</td></tr><tr><td>1</td><td>EFB</td><td>21,438</td><td>Application in estate</td></tr><tr><td>2</td><td>Fiber</td><td>21,950</td><td>Boiler fuel</td></tr><tr><td>3</td><td>Shell</td><td>5,656</td><td>Boiler fuel</td></tr></table> Fossil fuel consumption in 2021-2023 <table><tr><td>No</td><td>Year</td><td>Fuels (ltr)</td><td>Use for</td></tr><tr><td>1</td><td>2021</td><td>93,973</td><td>Operational activities</td></tr><tr><td>2</td><td>2022</td><td>60,569</td><td>Operational activities</td></tr><tr><td>3</td><td>2023</td><td>42,741</td><td>Operational activities</td></tr></table>				No	By-product	Amount (Ton)	Use for	1	EFB	21,438	Application in estate	2	Fiber	21,950	Boiler fuel	3	Shell	5,656	Boiler fuel	No	Year	Fuels (ltr)	Use for	1	2021	93,973	Operational activities	2	2022	60,569	Operational activities	3	2023	42,741	Operational activities	Complied
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Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.																																						

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7.10.1	<b>(C)</b> 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>There are no changes regarding GHG identification and reduction plan. PT Inti Indosawit Subur – Ukui I POM has identified the emission sources and pollution under document of “Enviromental Aspect-Impacts (Evaluasi Aspek-Dampak Lingkungan) year 2024”.</p> <p>Identification of greenhouse gas (GHG) emissions sources both of Mill, Estate and Smallholders consist of emission from boiler and generator, effluent from mill wastewater, particulate from boiler stack, noise, fertilizer application, fossil fuels usage, transport of FFB.</p> <p>The assessment of pollution activities was documented in “Mitigasi Gas Rumah Kaca”. All the activities of mill and estate as well as the waste generated has been well documented, for examples the operational activity from generator is generates air emissions, the company conducts periodic generator maintenance and perform quality measurement of exhaust emissions each semester to ensure air quality is comply with standard regulation.</p>	Complied
7.10.2	<b>(C)</b> 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).	There is no new planting within certified area of PT Inti Indosawit Subur – Sei Lala and Soga Estate and Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.	Not Applicable
7.10.3	<b>(C)</b> Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.	<p>PT Inti Indosawti Subur – Ukui II POM has identified the significant pollutants and greenhouse gas (GHG) emissions. Significant pollutants and GHG such as: Emission, particulate, noise from boiler and generator, effluent from mill wastewater, fertilizer application, chemical applicator and transport of FFB.</p> <p>Monitoring of air emissions and ambient air quality conducted every semester. Emissions test conducted testing by Accreditation Laboratory. The results of the analysis have been demonstrated and reported to Environmental Agency every six months.</p>	Complied

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<b>Criteria 7.11:</b> Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	<b>(C)</b> Land for new planting or replanting is not prepared by burning.	<p>PT Inti Indosawit Subur – Ukui II POM has developed an early warning system, to monitor the risk of fire. The system “Sistem Peringkat Bahaya Kebakaran 1 &amp; 2”. The monitoring system calculating the field condition, ignition risk, potential drought and smoke, fire handling, firefighting difficulty and weather index. Patrol report indicating any fire incident.</p> <p>Based on field visit in Sei Lala Estate Block D24e Div 4, the land preparation is using mechanical method. No open burning was noted for land preparation. It can also demonstrate in the agreement contract between company and subcontractor that all activity of replanting is performed manual and mechanically.</p> <p><b>Scheme Smallholder:</b></p> <p>There was not any open burning was noted for land preparation. Replanting plan has been drawn up in the near future. The replanting plan was available under “Pelaksanaan Replanting Kebun Plasma Ukui Group”. During field visit in sampled smallholder (64 smallholder), there was no replanting activity. The nearest replanting will be conduct in 2025.</p>	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Ukui Group and Ukui Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting years 1988, 1989, 1990 and 1991.</p> <p>Replanting has been done mechanically, consisting of: falling tree, chipping by excavator, terracing by excavator, digging, road construction, ditch/waterways construction, planting LCC and planting oil palm. Company has established “Ketentuan Replanting areal Mineral”</p>	Complied

		<p>tahun 2016. In the mechanism explained that replanting must be conducted mechanically without burning.</p> <p>Based on field visit in Sei Lala Estate Block D24e Div 4, the land preparation is using mechanical method. No open burning was noted for land preparation. It can also demonstrate in the agreement contract between company and subcontractor that all activity of replanting is performed manual and mechanically.</p> <p><b>Scheme Smallholder:</b></p> <p>There was not any open burning was noted for land preparation. Replanting plan has been drawn up in the near future. The replanting plan was available under "Pelaksanaan Replanting Kebun Plasma Ukui Group". During field visit in sampled smallholder (64 smallholder), there was no replanting activity. The nearest replanting will be conduct in 2025.</p>	
7.11.3	The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.	<p>The policy has communicated to all smallholders remember and local community to engages stakeholders in adjacent locations for fire prevention and control measures. The last one was on 2 January 2024 in KUD Trani Maju, KUD Tani Subur and KUD Tani Bahagia.</p> <p>Replanting has been done mechanically, consist of: falling tree, chipping by excavator, terracing by excavator, digging, road construction, ditch/waterways construction, planting LCC and planting oil palm. Company has established "Ketentuan Replanting areal Mineral" tahun 2016. In the mechanism explained that replanting must be conducted mechanically without burning.</p> <p>During field visit in sampled smallholder (64 smallholder), there was no replanting activity. The nearest replanting will be conduct in 2025.</p>	Complied
<b>Criteria 7.12:</b> 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.			



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**PROCEDURAL NOTE for 7.12:**

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

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

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

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

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

7.12.1	<p><b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged 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>PT Inti Indosawit Subur – Ukui Group Certification unit and supply bases (including smallholder) did not carry out any new plantings after November 2005. The planting year started in 1987, 1988, 1989, and the company has started replanting in 2015 – present. Currently during audit sighted that Sei Lala Estate was doing replanting for ± 495 ha.</p> <p>Therefore, the requirement of this indicator is not applicable.</p>	Not Applicable
7.12.2	<p><b>(C)</b> HCV and HCS forests, and other conservation areas are identified as follows:</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>During audit ASA 2.3 there is no additional expansion or new planting of plantation PT Inti Indosawit Subur Ukui Group. Existing HCV area are managed and maintain accordingly.</p> <p>PT Inti Indosawit Subur – Ukui Group is in cooperation with Faculty of Forestry, Bogor Agriculture University in preparing HCV Identification "Dokumen Identifikasi dan Analisis Keberadaan Nilai Konservasi Tinggi (NKT) di Areal Perkebunan Kelapa Sawit di Kebun Ukui dan Soga pada tahun 2010". Guidance use is HCV Toolkit 2008. The document has put into consideration the landscape condition, including Teso Nilo National</p>	Complied

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		<p>Park near the plantation. HCV assessment was including plasma/scheme smallholder area.</p> <p>The assessment team comprise of Ir. Nyoto Santoso, MS as lead assessor HCV RN registered lead assessor, Ir.Heru B Pulunggono, MSc (hydrology and soil conservation), Handian Purwawangsa, S.Hut, MSI, (social), Iing Nasihin S.Hut, MSi (flora and GIS), Tutut Sunarminto, MSi, (social and cultural), Yanti Apriyanti, S.Pi (social and cultural), Rizki Ratna Ayu Paramita Sari, S.Hut (social and cultural). The HCV assessment identified the presence of HCV 1.1, HCV 1.2, HCV 1.3, HCV 2.3, HCV 4.1 and HCV 6. Total HCV area identified under PT Inti Indosawit Subur Ukui Group (including Ukui Estate, Soga Estate and Sei lala Estate was 234.458 Ha. While HCV area which include in scope of Sei Lala Estate and Soga Estate is 116.298 Ha, the rest of HCV area is include in scope of Ukui Estate (Ukui I POM certificate holder) which is 142.168 ha. Below are the detail of HCV area in Soga and Sei Lala Estate:</p> <table><tr><th>HCV</th><th>Status</th><th>Ha</th></tr><tr><td>River/Sungai Napuh</td><td>1.1, 1.2, 4.1</td><td>27.770</td></tr><tr><td>Tributary/Anak Sungai Napuh</td><td>1.1, 1.2, 4.1</td><td>5.985</td></tr><tr><td>Tributary/Anak-Anak Sungai Napuh</td><td>1.1, 1.2, 4.1</td><td>0.800</td></tr><tr><td>River/Hulu Sungai Air Hitam Kiri</td><td>1.1, 4.1</td><td>55.013</td></tr><tr><td>River/Hulu Sungai Air Hitam Kanan</td><td>1.1, 4.1</td><td>19.656</td></tr><tr><td>Wastewater pond/Kolam Limbah</td><td>1.1, 4.1</td><td>2.057</td></tr><tr><td>Water reservoir/Waduk</td><td>1.1, 4.1</td><td>2.400</td></tr><tr><td>Graveyard/Makam Afdeling 1</td><td>1.1, 4.1</td><td>0.443</td></tr><tr><td>Graveyard/Makam Afdeling 5</td><td>1.2, 1.3, 2.3, 5</td><td>0.060</td></tr></table>	HCV	Status	Ha	River/Sungai Napuh	1.1, 1.2, 4.1	27.770	Tributary/Anak Sungai Napuh	1.1, 1.2, 4.1	5.985	Tributary/Anak-Anak Sungai Napuh	1.1, 1.2, 4.1	0.800	River/Hulu Sungai Air Hitam Kiri	1.1, 4.1	55.013	River/Hulu Sungai Air Hitam Kanan	1.1, 4.1	19.656	Wastewater pond/Kolam Limbah	1.1, 4.1	2.057	Water reservoir/Waduk	1.1, 4.1	2.400	Graveyard/Makam Afdeling 1	1.1, 4.1	0.443	Graveyard/Makam Afdeling 5	1.2, 1.3, 2.3, 5	0.060	
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River/Sungai Napuh	1.1, 1.2, 4.1	27.770																															
Tributary/Anak Sungai Napuh	1.1, 1.2, 4.1	5.985																															
Tributary/Anak-Anak Sungai Napuh	1.1, 1.2, 4.1	0.800																															
River/Hulu Sungai Air Hitam Kiri	1.1, 4.1	55.013																															
River/Hulu Sungai Air Hitam Kanan	1.1, 4.1	19.656																															
Wastewater pond/Kolam Limbah	1.1, 4.1	2.057																															
Water reservoir/Waduk	1.1, 4.1	2.400																															
Graveyard/Makam Afdeling 1	1.1, 4.1	0.443																															
Graveyard/Makam Afdeling 5	1.2, 1.3, 2.3, 5	0.060																															

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		<table><tr><td>Graveyard/Makam Afdeling 2</td><td>6</td><td>2.109</td></tr><tr><td>Graveyard/Makam Arah SP VI</td><td>6</td><td>0.005</td></tr><tr><td><b>Total</b></td><td></td><td><b>116.298</b></td></tr></table> <p>Most of the HCV identified, located within the existing plantation. Company maintains the riparian area. A number of fauna identified in the plantation area: Mammals such as "Kucing kuwuk" (<i>Felis bengalensis</i>), "Kancil" (<i>Tragulus javanicus</i>), "Kijang" (<i>Muntiacus muntjak</i>), "Trenggiling" (<i>Manis javanica</i>), Monkey (<i>Macaca fascicularis</i>), "Beruk" (<i>Macaca nemestrina</i>), "Musang" (<i>Paradoxurus hermaphroditus</i>). Birds such as "Raja udang meninting" (<i>Alcedo meninting</i>), "Burung madu" (<i>Aethopyga siparaja</i> and <i>Nectarinia jugularis</i>), "Elang tikus" (<i>Elanus caeruleus</i>), "Elang ular bido" (<i>Spilomis cheela</i>), "Cekakak belukar" (<i>Halicyon smymensis</i>), "Kipasan belang" (<i>Rhipidura javanica</i>). Reptile such as "Ular Piton" (<i>Phyton molurus</i>), Biawak (<i>Varanus salvator</i>). Identified also protected plants such as "Meranti batu" (<i>Shorea leprosula</i>), "Meranti bunga" (<i>Shorea teysmanniana</i>).</p> <p>HCV assessment performed in consultation with relevant stakeholders/public consultation. The HCV identification report was peer reviewed by WWF on 10/25/2010 - 10/27/2010.</p>	Graveyard/Makam Afdeling 2	6	2.109	Graveyard/Makam Arah SP VI	6	0.005	<b>Total</b>		<b>116.298</b>	
Graveyard/Makam Afdeling 2	6	2.109										
Graveyard/Makam Arah SP VI	6	0.005										
<b>Total</b>		<b>116.298</b>										
	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.	PT Inti Indosawit Subur – Ukui Group Certification unit and supply bases (including smallholder) did not carry out any new plantings after November 2005. The planting year started in 1987, 1988, 1989, and the company has started replanting in 2015 – present.										
7.12.3	(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into	Based on HCV assessment report and field observation confirmed that there is no High Forest Cover Landscapes (HFCLs) within area of PT Inti Indosawit Subur Sei Lala Estate and Soga Estate.	Not Applicable									

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	consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.	PT Inti Indosawit Subur Sei Lala Estate and Soga Estate was located in another purpose area and not in forest area. This indicator not applicable.	
<b>PROCEDURAL NOTE for 7.12.3:</b> Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.			
7.12.4	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management 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>PT Inti Indosawit Subur – Ukui Group Certification unit and supply bases (including smallholder) did not carry out any new plantings after November 2005. The planting year started in 1987, 1988, 1989, and the company has started replanting in 2015 – present.</p> <p>According to HCV assessment 2010, there are no High Forest Cover Landscapes (HFCLs) identified. Most of the HCV identified, located within the existing plantation.</p> <p>Conservation management plan Soga &amp; Sei Lala Estate update on January 2023, consist of:</p> <ul style="list-style-type: none"> <li>• Area demarcation and maintenance the boundary markers</li> <li>• Socialization of HCV area and protection to employee and surrounding community</li> <li>• Riparian restoration</li> <li>• Prohibiting chemical application in riparian zone/river border</li> <li>• Water surface quality monitoring in the river</li> <li>• Biodiversity monitoring</li> <li>• Protection and monitoring of HCV area</li> </ul> <p>Evidence Continuous monitoring documentation and report regarding the status of RTE species and HCV presented in "Laporan Monitoring tumbuhan dan Satwaliar PT Inti Indosawit Subur – Kebun Ukui, Soga &amp; Sei Lala" Period January – June 2023 and July – December 2023". According to HCV management and monitoring report semester I and II-year 2023, it was reported that there is no HCV area</p>	Complied

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		<p>disturbance/destruction, wildlife monitoring found presence of animal such as:</p> <p>Aves: Centropus bengalensis, Halcyon smyrnensis (protected), Orthotomus sepium, Amaurornis phoenicurus (protected), Rhipidura javanica (protected), Pycnonotus galavies, Prinia polychroa, Alcedo meninting (protected).</p> <p>Reptilia: Varanus salvator, Fejevaryia sp</p> <p>Mamalia: Macaca fascicularis, Sus crofa, Calosciurus notatus,</p> <p>Monitoring documentation such as: "Daftar Temuan Satwa liar di Areal kebun" contain information regarding result of wildlife and RTE species monitoring, "Tabel Monitoring Kerusakan Kawasan Lindung" contain information regarding result of HCV area monitoring and HCV condition monitoring such as illegal hunting, HCV area disturbance, and HCV condition. Latest monitoring both RTE species and HCV area conducted in April 2024.</p> <p>Socialisation and awareness to employee regarding HCV has been conducted regularly through master morning.</p> <p>Scheme Smallholder:</p> <p>Conservation management plan Plasma Ukui II (Scheme Smallholder) update on January 2024, consist of:</p> <ul style="list-style-type: none"> <li>• Biodiversity monitoring</li> <li>• Signboard maintenance</li> <li>• Socialization of HCV area</li> <li>• Riparian protection</li> <li>• Prohibiting chemical application in riparian zone/river border</li> </ul>	
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		HCV training and socialization to smallholder member has been conducted on 2 January 2024 to all smallholder group and KUD. Minutes of socialization and attendance list are available.	
7.12.5	Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	PT Inti Indosawit Subur – Ukui Group Certification unit and supply bases (including smallholder) did not carry out any new plantings after November 2018. The planting year started in 1987, 1988, 1989, and the company has starts replanting in 2015 – present. Therefore, the requirement of this indicator is not applicable.	Not Applicable
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	<p><b>Soga &amp; Sei Lala Estate:</b></p> <p>A number of fauna identified in the plantation area: Mammals such as "Kucing kuwuk" (<i>Felis bengalensis</i>), "Kancil" (<i>Tragulus javanicus</i>), "Kijang" (<i>Muntiacus muntjak</i>), "Trenggiling" (<i>Manis javanica</i>), Monkey (<i>Macaca fascicularis</i>), "Beruk" (<i>Macaca nemestrina</i>), "Musang" (<i>Paradoxurus hermaphroditus</i>). Birds such as "Raja udang meninting" (<i>Alcedo meninting</i>), "Burung madu" (<i>Aethopyga siparaja</i> and <i>Nectarinia jugularis</i>), "Elang tikus" (<i>Elanus caeruleus</i>), "Elang ular bido" (<i>Spilomis cheela</i>), "Cekakak belukar" (<i>Halcyon smymensis</i>), "Kipasan belang" (<i>Rhipidura javanica</i>). Reptile such as "Ular Piton" (<i>Phyton molurus</i>), Biawak (<i>Varanus salvator</i>).</p> <p>Identified also protected plants such as "Meranti batu" (<i>Shorea leprosula</i>), "Meranti bunga" (<i>Shorea teysmanniana</i>).</p> <p>Company has prepared a procedure for protection of flora and fauna, explained in Environmental Management System: Biodiversity (AA-432-002e-LT), IUCN redlist (AA-432-006-LT), CITES list (AA-432-07-LT).</p> <p>Estate has established the management plan to maintain and/or enhance High conservation value area. HCV management and monitoring plan described measures taken for each HCV and its</p>	Complied

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		<p>monitoring. Relevant laws were taken into account for determining appropriate measure including UU #5/1990 about Natural resources conservation, PP#7/1999 about List of protected plan and wildlife, Kepres #32/1990, and PP #26/2008. Conservation management plan 2023 consist of:</p> <ul style="list-style-type: none"><li>• Area demarcation and maintenance the boundary markers</li><li>• Socialization of HCV area and protection to employee and surrounding community</li><li>• Riparian restoration</li><li>• Prohibiting chemical application in riparian zone/river border</li><li>• Water surface quality monitoring in the river</li><li>• Biodiversity monitoring</li><li>• Protection and monitoring of HCV area</li></ul> <p>Signboards are placed on the area identified with conservation values. Monitoring for the HCVs are carried out as per Conservation Management Plan. The conservation management plan covers area enhancement, socialization to workers and local communities, prohibition of chemical regime near the area and river buffer zone' restoration. Plan for monitoring and patrol has been incorporated into the management and monitoring plan. Another effort planned was to have HCV sign board and "no-hunting" sign boards placed near identified HCV areas – on progress.</p> <p>PT Inti Indosawit Subur – Ukui Group is also having procedure to monitor the protected/conservation area as per "SOP Pemantauan Areal Lindung" No.AA-PL-08-EFP – describing procedure for vegetation monitoring, wildlife monitoring (path and rapid method), conservation area inspection procedure, vegetation enhancement procedure and data analysis procedure.</p>	
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		<p>Interview and document verification of "Laporan Monitoring Pengelolaan Tumbuhan dan Satwa Nilai Konservasi Tinggi" of PT Inti Indosawit Subur – Kebun Ukui period semester I &amp; II Tahun 2023 can be demonstrate that the measures contained in the management plan been actively implemented. According to HCV management and monitoring report semester I and II year 2023, it was reported that there is no HCV area disturbance/destruction, wildlife monitoring found presence of animal such as:</p> <p>Aves: <i>Centropus bengalensis</i>, <i>Halcyon smyrnensis</i> (protected), <i>Orthotomus sepium</i>, <i>Amaurornis phoenicurus</i> (protected), <i>Rhipidura javanica</i> (protected), <i>Pycnonotus galavies</i>, <i>Prinia polychroa</i>, <i>Alcedo meninting</i> (protected).</p> <p>Reptilia: <i>Varanus salvator</i>, <i>Fejevaryia sp</i></p> <p>Mamalia: <i>Macaca fascicularis</i>, <i>Sus crofa</i>, <i>Calosciurus notatus</i>,</p> <p>Monthly monitoring of HCV area condition and animal species also performed by Foreman HCV and each Foreman Afdeling, animal presence recorded in "Daftar Temuan Satwa Liar.</p> <p>Company continuously disseminating HCV and wildlife protection to employee and surrounding community. Socialisation and awareness to employee regarding HCV has been conducted regularly through master morning. HCV training and socialization to smallholder member has been conducted on 2 January 2024 to all smallholder group and KUD. Minutes of socialization and attendance list are available.</p>	
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	<p>HCV and wildlife/animal monitoring continuously conducted in a regular basis. Secondary monitoring conducted each month and primary monitoring conducted twice a year. Monitoring of animal/wildlife performed by HCV/Sustainability officer and field workers, result of monitoring presented in "Laporan Pemantauan Jenis Satwa/Tumbuhan".</p> <p>Report of Management and Monitoring for HCV and RTEs is reported every 6 months and review is conducted regularly to ensure that</p>	Complied



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		<p>monitoring is effective. Reports period semester I &amp; II year 2023 can be demonstrated. Results of monitoring was evaluated using trend evaluation. According to HCV management and monitoring report semester I and II year 2023, it was reported that there is no HCV area disturbance/destruction, wildlife monitoring found presence of animal such as Monyet Ekor Panjang (<i>Macaca fascicularis</i>), Beruk (<i>Macaca nemestrina</i>), Macan Akar (<i>Felis bengalensis</i>), Musang (<i>Paradoxurus</i> sp), burung kipasan belang (<i>Rhipidura javanica</i>), burung cekakak belukar (<i>Halcyon smirnensis</i>), Burung-madu sriganti (<i>Nectarinia jugularis</i>), Elang Ular (<i>Circaetus Gallicus</i>), Cangak Merah (<i>Ardea Purpurea</i>) and Biawak (<i>Varanus salfator</i>).</p> <p>Management recommendations are an integral part of the Conservation Management Plan (CMP) document. Based on the results of observations and findings in the field, recommendations for improving the management of protected areas are recommended. Reinserting natural saplings that have died in accordance with the Conservation Management Plan (CMP) document and implementing the APM Harvest SOP regarding the arrangement of fronds in riparian areas. And socialize the prohibition on felling trees in protected areas indirectly by installing prohibitory sign boards.</p>	
7.12.8	<p><b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.</p>	<p>PT Inti Indosawit Subur – Ukui Group Certification unit and supply bases (including smallholder) did not carry out any new plantings after November 2018. The planting year started in 1987, 1988, 1989, and the company has starts replanting in 2015 – present.</p> <p>Therefore, the requirement of this indicator is not applicable.</p>	Not Applicable

## Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in 2023 for PT Inti Indosawit Subur - Ukui II Mill and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2023 for PT Inti Indosawit Subur - Ukui II Mill and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	0.77
PKO	0.00

Extraction	%
OER	20.20
KER	5.58

Production	t/yr
FFB Process	175,462.00
CPO Produced	35442
PKO Produced	9788

Land Use	Ha
OP Planted Area	10836.00
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	92.29
<b>Total</b>	<b>10,836.00</b>

### Summary of Field Emission and Sink

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	12385.29	0.10	0.00	0.00	0.00	0.00	12385.29	0.10
CO <sub>2</sub> Emission from fertilizer	2901.74	0.02	1923.95	0.39	0.00	0.00	4,825.69	0.41
NO <sub>2</sub> Emission	2731.57	0.02	1972.31	0.40	0.00	0.00	4,703.88	0.42
Fuel Consumption	1041.24	0.01	310.74	0.06	0.00	0.00	1,351.98	0.07
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Sink</b>								
Crop Sequestration	-11131.11	-0.09	0.00	0.00	0.00	0.00	-11131.110	-0.09
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>7928.73</b>	<b>0.06</b>	<b>4207.00</b>	<b>0.08</b>	0.00	0.00	<b>12135.73</b>	<b>0.14</b>

\*Note: Includes both estates and smallholders

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#### Summary of Mill Emission and Credit

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	31408.51	0.18
Fuel Consumption	133.35	0.00
Grid Electricity Utilization	226.87	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	-8976.00	-0.05
Sales of EFB	0.00	0.00
<b>Total</b>	<b>22,792.72</b>	<b>0.13</b>

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

Emissions	tCO <sub>2</sub> e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
<b>Total Crusher emissions</b>	<b>0.00</b>

\*This mill has no kernel crusher operation.

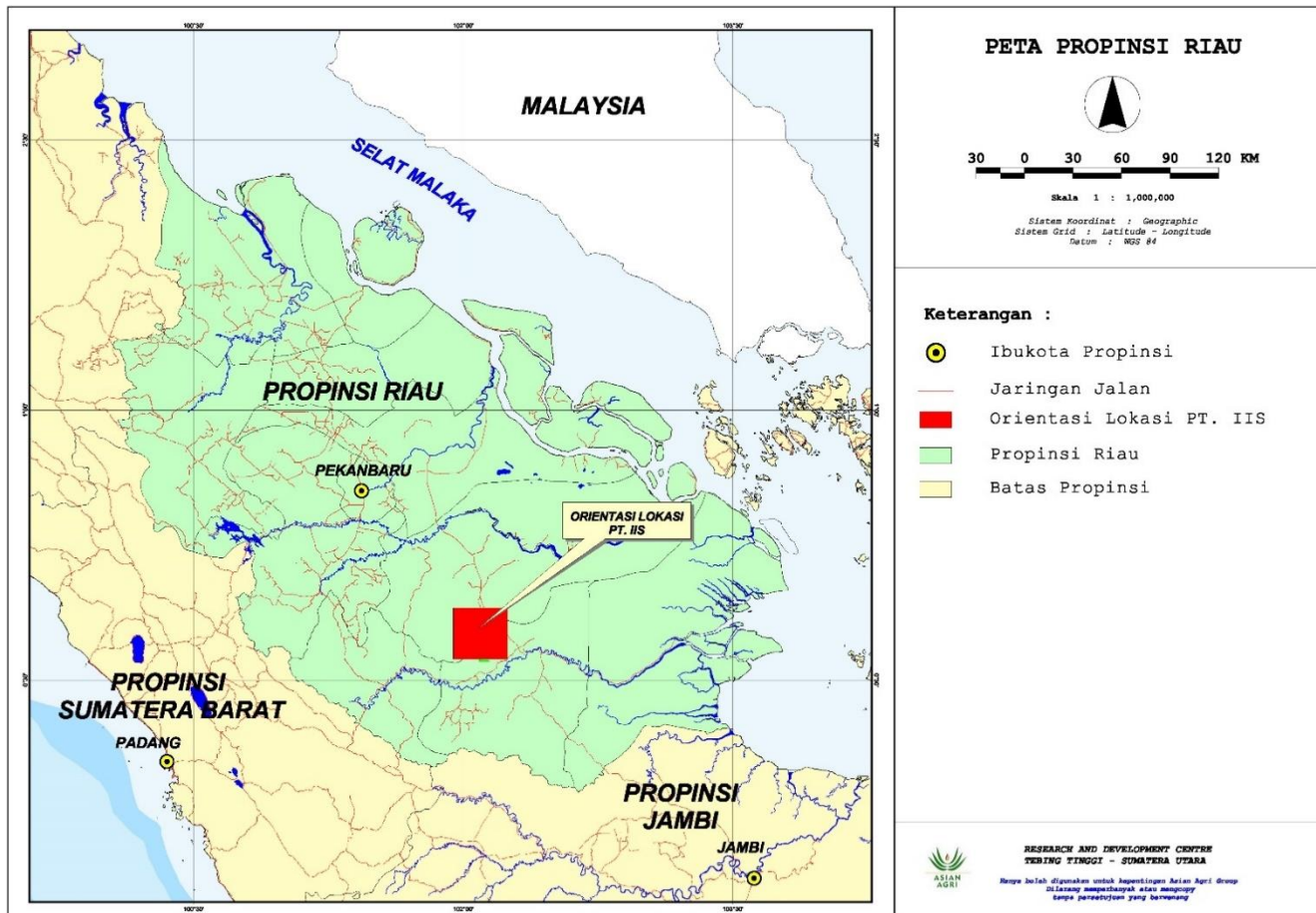
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

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

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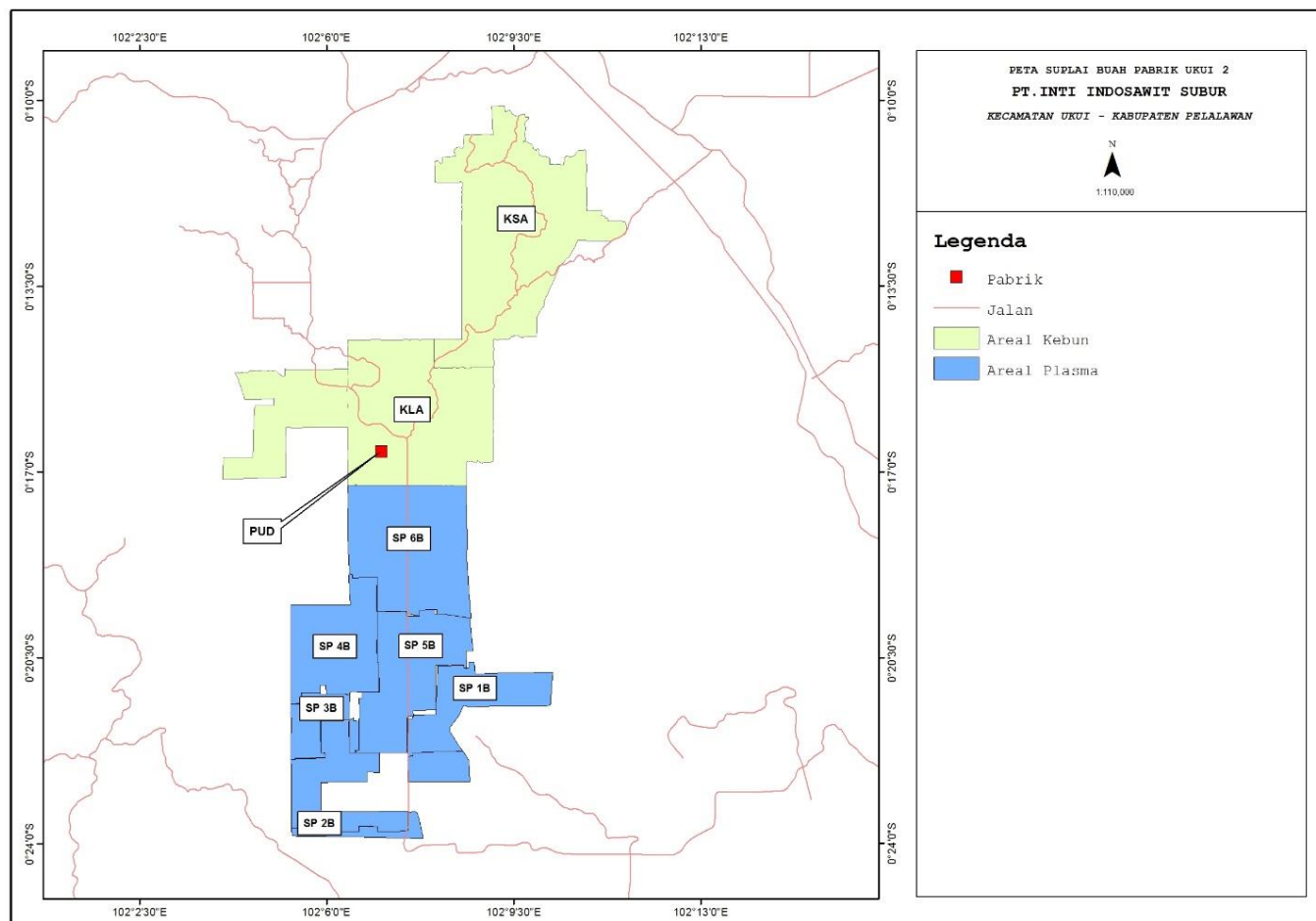
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#### Appendix C: Location Map of Certification Unit and Supply bases



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**Appendix D: Estate Field Map**



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

Sampling Group	Current Certification	Scope Extension	Other:
Risk Factor Applied	1.2 (medium risk)	N/A	N/A
Justification of Risk Factor Applied	Oil palm plantation under Plasma management and homogen, geographically in one location		
Number of samples	64		
Remarks	Total number of smallholder 2,831 $\sqrt{2,831} * 1.2 = 63.85$ rounded 64.		

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (S)	Longitude (E)	Total Certified Area	Planted Area			
KUD TANI SUBUR									
1	Edi Sumarno	Sei Beberas Hilir village	0° 22.098' S	102° 7.560' E	2	2	18	1993/1994	4570
2	Adi	Sei Beberas Hilir village	0° 22.157' S	102° 7.558' E	2	2	18	1993/1994	4586
3	Muhammad Ramdani	Sei Beberas Hilir village	0° 22.115' S	102° 7.637' E	2	2	18	1993/1994	4515
4	Ihsan Sucipto	Sei Beberas Hilir village	0° 22.007' S	102° 7.691' E	2	2	18	1993/1994	4488
5	Bahar Rudin	Sei Beberas Hilir village	0° 22.007' S	102° 7.745' E	2	2	18	1993/1994	4489
6	Saijan	Sei Beberas Hilir village	0° 22.005' S	102° 7.796' E	2	2	18	1993/1994	4490
7	Romio	Sei Beberas Hilir village	0° 22.005' S	102° 7.906' E	2	2	18	1993/1994	4492
8	Joni	Sei Beberas Hilir village	0° 22.006' S	102° 7.961' E	2	2	18	1993/1994	4493
9	Suhadi	Sei Beberas Hilir village	0° 22.008' S	102° 8.013' E	2	2	18	1993/1994	4494
10	Doni	Sei Beberas Hilir village	0° 21.901' S	102° 8.013' E	2	2	18	1993/1994	4437
11	Rikwan	Sei Beberas Hilir village	0° 21.899' S	102° 7.961' E	2	2	18	1993/1994	4438
12	Aris	Sei Beberas Hilir village	0° 21.897' S	102° 8.178' E	2	2	18	1993/1994	4495
13	Memet	Sei Beberas Hilir village	0° 21.902' S	102° 8.065' E	2	2	18	1993/1994	4496
14	Musanapah	Sei Beberas Hilir village	0° 21.899' S	102° 8.120' E	2	2	18	1993/1994	4497
15	Puji Santoso	Sei Beberas Hilir village	0° 22.247' S	102° 8.340' E	2	2	18	1993/1994	4433
16	Kusnun	Sei Beberas Hilir village	0° 21.963' S	102° 8.282' E	2	2	18	1993/1994	4430
17	Anto	Sei Beberas Hilir village	0° 21.970' S	102° 8.339' E	2	2	18	1993/1994	4431
18	Sudiman	Sei Beberas Hilir village	0° 22.171' S	102° 8.453' E	2	2	18	1993/1994	4584
KUD TANI BAHAGIA									
1	Kunto	Kulim Jaya village	0° 20.432' S	102° 7.661' E	2	2	20	1993/1994	3721
2	Iskandar	Kulim Jaya village	0° 20.380' S	102° 7.567' E	2	2	20	1993/1994	3722
3	Rolan	Kulim Jaya village	0° 20.440' S	102° 7.566' E	2	2	20	1993/1994	3723
4	Addy Suisni	Kulim Jaya village	0° 20.107' S	102° 6.967' E	2	2	20	1993/1994	3585
5	Krismanto	Kulim Jaya village	0° 20.216' S	102° 6.970' E	2	2	20	1993/1994	3649

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No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (S)	Longitude (E)	Total Certified Area	Planted Area			
6	Mundakir	Kulim Jaya village	0° 20.322' S	102° 6.969' E	2	2	20	1993/1994	3669
7	Lamiran	Kulim Jaya village	0° 20.429' S	102° 6.970' E	2	2	20	1993/1994	3734
8	Bari	Kulim Jaya village	0° 20.537' S	102° 6.971' E	2	2	20	1993/1994	3757
9	Supe	Kulim Jaya village	0° 20.428' S	102° 7.025' E	2	2	20	1993/1994	3733
10	Mahfut	Kulim Jaya village	0° 20.534' S	102° 7.025' E	2	2	20	1993/1994	3758
11	Basori	Kulim Jaya village	0° 20.427' S	102° 7.078' E	2	2	20	1993/1994	3732
12	Rohman	Kulim Jaya village	0° 20.542' S	102° 7.462' E	2	2	20	1993/1994	3725
13	Rohman	Kulim Jaya village	0° 20.532' S	102° 7.397' E	2	2	20	1993/1994	3765
14	Nofan	Kulim Jaya village	0° 20.531' S	102° 7.341' E	2	2	20	1993/1994	3764
15	Indra	Kulim Jaya village	0° 20.374' S	102° 7.462' E	2	2	20	1993/1994	3640
16	Riski	Kulim Jaya village	0° 20.425' S	102° 7.395' E	2	2	20	1993/1994	3726
17	Riski	Kulim Jaya village	0° 20.425' S	102° 7.340' E	2	2	20	1993/1994	3727
18	Indra	Kulim Jaya village	0° 20.424' S	102° 7.287' E	2	2	20	1993/1994	3728
19	Edi	Kulim Jaya village	0° 20.620' S	102° 7.450' E	2	2	20	1993/1994	3766
20	Siman	Kulim Jaya village	0° 20.687' S	102° 7.455' E	2	2	20	1993/1994	3814
21	Supriatin	Kulim Jaya village	0° 20.641' S	102° 7.374' E	2	2	20	1993/1994	3815
22	Jari	Kulim Jaya village	0° 20.641' S	102° 7.321' E	2	2	20	1993/1994	3816
23	Winardi	Kulim Jaya village	0° 20.644' S	102° 7.269' E	2	2	20	1993/1994	3817
24	Winarno	Kulim Jaya village	0° 20.754' S	102° 7.271' E	2	2	20	1993/1994	3849
KUD TRANI MAJU									
1	Ariyadi	Pontian Mekar village	0° 20.130' S	102° 6.480' E	2	2	25	1994/1995	3575
2	Muis	Pontian Mekar village	0° 20.117' S	102° 6.539' E	2	2	25	1994/1995	3577
3	Ribowo	Pontian Mekar village	0° 20.114' S	102° 6.593' E	2	2	25	1994/1995	3578
4	Suwarto	Pontian Mekar village	0° 20.115' S	102° 6.647' E	2	2	25	1994/1995	3579
5	H.Wawan S	Pontian Mekar village	0° 20.112' S	102° 6.699' E	2	2	25	1994/1995	3580
6	Intan	Pontian Mekar village	0° 20.333' S	102° 6.542' E	2	2	25	1994/1995	3661
7	Nurman	Pontian Mekar village	0° 20.221' S	102° 6.701' E	2	2	25	1994/1995	3654
8	Supat	Pontian Mekar village	0° 20.219' S	102° 6.649' E	2	2	25	1994/1995	3655
9	Nugroho	Pontian Mekar village	0° 20.222' S	102° 6.595' E	2	2	25	1994/1995	3656
10	Surono	Pontian Mekar village	0° 20.224' S	102° 6.541' E	2	2	25	1994/1995	3657
11	Gusnandar	Pontian Mekar village	0° 20.236' S	102° 6.482' E	2	2	25	1994/1995	3576
12	Suryadi	Pontian Mekar village	0° 20.627' S	102° 6.503' E	2	2	25	1994/1995	3747
13	Suprianto	Pontian Mekar village	0° 20.647' S	102° 6.574' E	2	2	25	1994/1995	3749
14	Taufik Akbar	Pontian Mekar village	0° 20.756' S	102° 6.575' E	2	2	25	1994/1995	3830
15	Rudin	Pontian Mekar village	0° 20.817' S	102° 6.502' E	2	2	25	1994/1995	3832
16	Suprpto	Pontian Mekar village	0° 20.876' S	102° 6.499' E	2	2	25	1994/1995	3833
17	Jumari	Pontian Mekar village	0° 20.647' S	102° 6.679' E	2	2	25	1994/1995	3834
18	Samuri	Pontian Mekar village	0° 20.756' S	102° 6.575' E	2	2	25	1994/1995	3835
19	Muji	Pontian Mekar village	0° 20.756' S	102° 6.498' E	2	2	25	1994/1995	3836
20	Ridwan	Pontian Mekar village	0° 20.979' S	102° 6.577' E	2	2	25	1994/1995	3961

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No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (S)	Longitude (E)	Total Certified Area	Planted Area			
21	Hasanuddin Butar-Butar	Pontian Mekar village	0° 20.648' S	102° 6.627' E	2	2	25	1994/1995	3829
22	Munir	Pontian Mekar village	0° 20.760' S	102° 6.402' E	2	2	25	1994/1995	5487



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#### Appendix F: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
ISS	Independent Smallholder Standard
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure