

## RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

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

<b>Client Company Name / Parent Company:</b> <b>PT Inti Indosawit Subur</b>
Client Company / Parent Company Address: Jl Palembang Kav 35-37 Jakarta 10230, Indonesia
Certification Unit: <b>PT. Inti Indosawit Subur – Buatan II Palm Oil Mill</b> Location of Certification Unit: Delik & Pangkalan Village, Bunut Langgam District, Pelalawan Regency, Riau Province, Indonesia
Date of Final Report: 21/02/2024

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## Section 1: Scope of the Assessment

1. Company Details			
Parent Company	PT. Inti Indosawit Subur		
RSPO Membership Number	1-0022-06-000-00	Membership Approval Date	06/02/2006
Address	Jl Palembang Kav 35-37 Jakarta 10230, Indonesia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT. Inti Indosawit Subur – Buatan II Palm Oil Mill		
Location / Address	Delik & Pangkalan Village, Pelalawan District, Pelalawan Regency, Riau Province, Indonesia		
Website	<a href="http://www.asianagri.com">www.asianagri.com</a>		
Management Representative	Mr Ivan Novrizaldie	E-mail	Mr Ivan Novrizaldie
Telephone	+6221 2301119	Facsimile	+6221 2301119

2. Certification Information			
Certificate Number	RSPO 638947	Certificate Start Date	12/08/2021
Date of First Certification	16/09/2010	Certificate Expiry Date	11/08/2026
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	<ul style="list-style-type: none"> <li>Determination of the conformity of the client's management system, or parts of it, with audit criteria.</li> <li>Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.</li> </ul>		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_2) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	60 MT/hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-DE100-02042123	ISCC EU	SGS	01/02/2024
SGS-ID-ISPO-0033	ISPO	SGS	21/03/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Buatan II Palm Oil Mill	Delik & Pangkalan Village, Pelalawan District, Pelalawan Regency, Riau	00° 27' 36.0" N	101° 52' 02.5"E
Simpang Perak Estate	Delik & Pangkalan Village, Pelalawan District, Pelalawan Regency, Riau	00° 27' 36.0" N	101° 52' 02.5"E
KUD Mulus Rahayu	Delima Jaya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 30' 37.6" N	101° 49' 27.4" E
KUD Bhirawa Bhakti	Buana Bhakti Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 20.1" N	101° 47' 24.7" E
KUD Tani Rukun	Simpang Perak Jaya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 27' 03.2" N	101° 54' 03.2 E
KUD Kebun Sawit Harapan	Gabung Makmur Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 29' 10.9" N	101° 54' 36.7" E
KUD Buatan Jaya	Jatimulya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 06.8" N	101° 53' 53.0" E
KUD Mitra Usaha	Buatan Baru Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 32' 02.1" N	101° 52' 56.1" E
KUD Makarti Sawit	Buana Makmur Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 37' 13.7" N	101° 51' 56.6" E
KUD Bina Mulia	Suka Mulia Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 35' 08.0" N	101° 55' 25.6" E
<b>Note:</b> <i>*Buatan Estate (Division IV, V and VI) and starting 1 Jan 2019 changes name to Simpang Perak Estate</i> <i>*KKPA Delima Sakti out of scope due to their participation in RSPO ISH Certification</i>			

5. Description of Supply Base					
<b>New Planting Development</b>	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Simpang Perak Estate	3,082	35	42	3,159	97.56
KUD Mulus Rahayu (237 members)	698	0	0	698	100
KUD Bhirawa Bhakti (291 members)	996	0	0	996	100
KUD Tani Rukun (293 members)	952	0	0	952	100
KUD Kebun Sawit Harapan (218 members)	800	0	0	800	100
KUD Buatan Jaya (225 members)	860	0	0	860	100
KUD Mitra Usaha (361 members)	1,200	0	0	1,200	100
KUD Makarti Sawit (230 members)	800	0	0	800	100
KUD Bina Mulia (217 members)	872	0	0	872	100
<b>Total</b>	<b>10,260</b>	<b>35</b>	<b>42</b>	<b>10,337</b>	<b>99.26</b>

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Simpang Perak Estate	480	1,874	0	728	2,602	480
KUD Mulus Rahayu	0	376	0	322	698	-
KUD Bhirawa Bhakti	240	0	0	756	756	240
KUD Tani Rukun	0	0	462	490	952	-
KUD Kebun Sawit Harapan	0	0	344	456	800	-
KUD Buatan Jaya	0	0	200	660	860	-
KUD Mitra Usaha	192	0	0	1,008	1,008	192
KUD Makarti Sawit	0	0	800	0	800	-
KUD Bina Mulia	0	0	872	0	872	-

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<b>Total (ha)</b>	<b>912</b>	<b>2,250</b>	<b>2,678</b>	<b>4,420</b>	<b>9,348</b>	<b>912</b>
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Note:

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

Estate / Smallholders	Tonnage / year			
	Estimated last year (Aug 2022 – July 2023)	Actual (July 2022 – June 2023)		Forecast (Aug 2023 – July 2024)
		Previous license period (July 2022)	Actual license period (Aug 2022 – June 2023)	
Simpang Perak Estate	101,171	5,902.51	61,094.85	75,028
KKPA Delima Sakti	23,912	1,722.29	17,697.12	-
KUD Mulus Rahayu	8,525	935.47	7,336.84	9,548
KUD Bhirawa Bhakti	13,449	1,163.23	9,479.11	11,625
KUD Tani Rukun	17,065	1,752.16	16,672.11	17,218
KUD Kebun Sawit Harapan	16,438	1,634.71	15,362.06	16,992
KUD Buatan Jaya	16,871	1,473.61	15,132.97	17,157
KUD Mitra Usaha	18,465	1,681.79	16,382.42	17,999
KUD Makarti Sawit	12,026	1,249.18	11,449.03	13,040
KUD Bina Mulia	9,952	1,211.66	12,819.85	11,998
<b>Total</b>	<b>237,874</b>	<b>202,152.96</b>		<b>190,605</b>

Note:

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

\*\* Immature area of Simpang Perak estate in the next year will be turned to mature. Therefore, the mature area will be 3,082 and FFB yield consequent in the next year because of this reason is about 24.34 tons/ha/year

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

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Aug 2022 – July 2023)	Actual (July 2022 – June 2023)		Forecast (Aug 2023 – July 2024)
		Previous license period (July 2022)	Current license period (Aug 2022 – June 2023)	
Kebun Buatan	-	-	44,339.89	50,913
<b>Total</b>	<b>-</b>	<b>44,339.89</b>		<b>50,913</b>

Note:

Kebun Buatan is supply bases of PT IIS – Buatan I POM (Certificate Number RSPO 638918)

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9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage / year			
	Estimated last year (Aug 2022 – July 2023)	Actual (July 2022 – June 2023)		Forecast (Aug 2023 – July 2024)
		Previous license period (July 2022)	Previous license period (Aug 2022 – June 2023)	
3 <sup>rd</sup> Party	-	5,662	-	-
Total		-		
Note:				

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	July 2022	18,339.99	-	
2	August	17,971.37	-	
3	September	18,047.56	-	
4	October	17,712.58	-	
5	November	17,890.04	-	
6	December	18,280.44	-	
7	January 2023	16,255.16	-	
8	February	14,764.12	-	
9	March	15,448.81	-	
10	April	13,319.28	-	
11	May	18,691.07	-	
12	June	15,045.91	-	
<b>TOTAL</b>		<b>202,152.96</b>	<b>-</b>	
<b>Note:</b>				

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10. Summary of Certified Tonnage (MT) (not applicable for ISS)				
Estimated last year (Aug 2022 – July 2023)	Actual (July 2022 – June 2023)			Forecast (Aug 2023 – July 2024)
	Previous license period (July 2022)		Current license period (Aug 2022 – June 2023)	
FFB	FFB			FFB
237,874 mt	18,726.62 mt		183,426.35 mt	190,605 mt
	TOTAL	202,152.96 mt		
CPO (OER: 19.90 %)	CPO (OER: 19.72 %)			CPO (OER: 17.31 %)
47,349 mt	3,616.65 mt		36,171.68 mt	32,993.73 mt
	TOTAL	39,788.33 mt		
PK (KER: 5.37 %)	PK (KER: 4.64 %)			PK (KER: 4.70 %)
12,763 mt	850.98 mt		8,510.98 mt	8,958.44 mt
	TOTAL	9,361.96 mt		
Note:				

<b>10A. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (MT)</b>	<b>Certified PK (MT)</b>
1	July 2022	3,616.65	850.98
2	August	3,543.95	833.87
3	September	3,558.98	837.41
4	October	3,492.92	821.86
5	November	3,527.92	830.10
6	December	3,604.90	848.21
7	January 2023	3,205.52	754.24
8	February	2,911.48	685.06
9	March	3,046.51	716.82
10	April	2,626.56	618.01
11	May	3,685.88	867.27
12	June	2,967.05	698.13
<b>TOTAL</b>		<b>39,788.33</b>	<b>9,361.96</b>
<b>Note:</b>			



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11. Summary of Actual Volume sold					
Current License period (Aug 2022 – June 2023)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	15,631.86	0	0	0	15,631.86
PK (MT)	9,136.64	0	0	0	9,136.64
Credits	0	0	0	0	0
Previous License period (July 2022)					
CPO (MT)	0	0	0	0	0
PK (MT)	0	0	0	0	0
Credits	0	0	0	0	0
<b>Note:</b> Conventional is RSPO certified material but sold as non-RSPO.					

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	PT Sari Dumai Sejati	RSPO_AC1000014068	13,816.31	28.85
2	AAA Oils & Fats Pte Ltd	RSPO_AC1000001313	1,499.76	
	PT Sari Dumai Oleo	RSPO_AC1000013966	315.79	
	PT IIS Buatan I KCP	RSPO_AC1000002742		9,107.79
<b>TOTAL</b>			<b>15,631.86</b>	<b>9,136.64</b>
<b>Note:</b>				

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)
	-	--	-	-
<b>TOTAL</b>			<b>-</b>	<b>-</b>
<b>Note:</b>				

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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:			

5. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (key in period)			Actual (key in period)			Forecast (key in period)		
	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			-			-			-
IS-CSPO	-	-		-	-		-	-	
IS-CSPKO	-	-		-	-		-	-	
IS-CSPKE	-	-		-	-		-	-	
CSPK	-	-		-	-		-	-	

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

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

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

## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)

Suite 29.01 Level 29, The Gardens North Tower,

Mid Valley City, Lingkaran Syed Putra,

59200 Kuala Lumpur, Malaysia.

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

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **10 – 15 July 2023**. The audit programme is included as Section 2.3.

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

The Critical NC close out on-site assessment was conducted on **26 September 2023**. The audit programs are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Indonesia National Interpretation 2020 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

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

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

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

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

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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**

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Re- certification)</b>	<b>Year 2 (ASA 2_1)</b>	<b>Year 3 (ASA 2_2)</b>	<b>Year 4 (ASA 2_3)</b>	<b>Year 5 (ASA 2_4)</b>
Buatan II Palm Oil Mill	X	X	X	X	X
Simpang Perak Estate	X	X	X	X	X
KKPA Delima Sakti*	X	X			
KUD Mulus Rahayu	X	X	X		X
KUD Bhirawa Bhakti	X		X		X
KUD Tani Rukun		X		X	X
KUD Kebun Sawit Harapan	X		X		X
KUD Buatan Jaya	X		X		
KUD Mitra Usaha		X		X	
KUD Makarti Sawit		X		X	
KUD Bina Mulia				X	

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

**Tentative Date of Next Visit: July 8, 2024 - July 13, 2024**

**Total Number of Mandays: 25.5**

## 2.2 BSI Assessment Team

<b>Name</b>	<b>Role</b>	<b>Competency</b>
Eko Prastio Ramadhan (EPR)	Team Leader	<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, ISO 45001 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</p>

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		<p>Batch 19 Training, ISO 9001 Lead Auditor Course 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> During this assessment, he assessed on the aspects of Environment responsibility, environment impact assessment and management plan, Waste management.</p>
Mujinius Jalaraya (MJ)	Team Member	<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</p> <p><b>Language proficiency:</b> Fluent in Bahasa Indonesia and English</p> <p><b>Aspect covered in this audit:</b> During this assessment, he assessed on the aspects of Occupation Health Safety requirement, HIRARC, Natural and biodiversity conservation, HCV, and RSPO supply chain requirements.</p>
Edy Widodo (EW)	Team Member	<p><b>Education:</b> Holds a Bachelor Degree majoring Agricultural Technology from University of Padjadjaran, Bandung.</p> <p><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.</p> <p><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&amp;C Lead Auditor Course, SMETA Requirements Training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation.</p> <p><b>Language proficiency:</b> Fluent in Bahasa Indonesia and English</p> <p><b>Aspect covered in this audit:</b> During this assessment, he assessed on the aspects of Social requirements, contract agreement, human rights, workers' welfare, smallholder welfare, Stakeholder Consultation.</p>
Nanang Rusmana (NR)	Team Member	<p><b>Education:</b> Holds a Bachelor Degree of Forestry, Bogor Agricultural University (IPB)</p> <p><b>Work Experience:</b> 5 years working experience in palm oil industry as SHE Assistant at PT. Astra Agro Lestari Tbk. 3 years working experience in mining industry as Environment Coordinator and SHE Coordinator with PT. Kapuas Prima Coal Group. 6 years working experience as RSPO/ISPO auditor</p> <p><b>Training attended:</b> Completed ISO 9001:2015 Lead Auditor Course, ISPO Auditor Course, ISO 14001:2015 Lead Auditor Course, ISO 45001:2018 Lead Auditor Course, Endorsed RSPO P&amp;C Lead Auditor Course, Endorsed RSPO</p>

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		Supply Chain Certification Lead Auditor Course, SMK3 Auditor Course, HCV Assessor Course, General OHS Expert Course, SMETA Requirements training. <b>Language proficiency:</b> Fluent in Bahasa Indonesia and English <b>Aspect covered in this audit:</b> During this assessment, he assessed on Economic management plan, Estate best management practices, Mill best management practices.
Briyogi Sadiwa	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 several audit activities 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 RSPO Lead Auditor Course by Checkmark, ISPO Auditor Training by LPP, Lead Auditor ISO 9001: 2015, RSPO Supply Chain Certification Training Course by Checkmark, CQI & IRCA Lead Auditor ISO 14001: 2015, SMK3 Awareness, OHSAS 18001 Awareness: 2007, SA 8000 Awareness, ISO 45001: 2018 Awareness and General OHS Expert Training. <b>Aspect covered in this audit:</b> During this audit, he assessed on Legal, Policy and commitment, Union labour, gender committee.

## Accompanying Persons:

Name	Role
-	-

## 1.3 Assessment Plan

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

Date	Time	Subjects	EPR	MJ	NR	BS	EWi
Monday, 3 July 2023	07.30 – 09.15	Flight Jakarta – Pekanbaru (GA 172)	✓	✓	✓	✓	✓
	10.00 – 12.00	Pekanbaru to site	✓	✓	✓	✓	✓
	14.00 – 17.00	Opening Meeting for PT IIS - Buatan I POM and supply bases Document review	✓	✓	✓	✓	✓

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Date	Time	Subjects	EPR	MJ	NR	BS	EWi
Monday, 10 July 2023	08.00 – 09.00	<b>Opening Meeting</b> <ul style="list-style-type: none"> <li>Presentation by PT. IIS – Buatan II POM, Estate and Smallholder</li> <li>Presentation by BSI Indonesia</li> </ul>	√	√	√	√	√
	09.00 – 12.00	<b>Field Visit to Simpang Perak 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>	√	√	√	√	√
	14.00 – 16.30	<b>Field Visit to Buatan 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.</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>	√	√	√	√	√



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Date	Time	Subjects	EPR	MJ	NR	BS	EWi
Tuesday, 11 July 2023	08.00 – 12.00	<b>Field Visit to Scheme Smallholder KUD Buatan Jaya</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.		√	√	√	
	08.00 – 12.00	<b>Field Visit to Scheme Smallholder KUD Mulus Rahayu</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.	√				√
	12.00 – 14.00	<b>Break</b>	√	√	√	√	√
	14.00 – 16.30	<b>Field Visit to Scheme Smallholder KUD Bhirawa Bhakti</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.		√	√	√	
	14.00 – 16.30	<b>Field Visit to Scheme Smallholder KUD Kebun Sawit Harapan</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.	√				√
	16.30 – 17.00	<b>Wash-up Meeting</b>	√	√	√	√	√
Wednesday, 12 July 2023	08.00 – 12.00	Document Review for PT. IIS – Buatan II POM, Estate and Smallholder	√	√	√	√	

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Date	Time	Subjects	EPR	MJ	NR	BS	EWi
	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 – Buatan II POM, Estate and Smallholder	√				√
	16.30 – 17.00	<b>Wash-up Meeting</b>	√	√	√	√	√
Thursday, 13 July 2023	08.00 – 12.00	Document Review for PT. IIS – Buatan II POM, Estate and Smallholder	√	√	√	√	√
	12.00 – 14.00	<b>BREAK</b>	√	√	√	√	√
	14.00 – 16.30	Document Review for PT. IIS – Buatan II POM, Estate and Smallholder	√	√	√	√	√
	16.30 – 17.00	<b>Wash-up Meeting</b>	√	√	√	√	√
Friday, 14 July 2023	08.00 – 12.00	Document Review for PT. IIS – Buatan II POM, Estate and Smallholder	√	√	√	√	√
	12.00 – 14.00	<b>BREAK</b>	√	√	√	√	√
	14.00 – 14.30	Auditors discussion /preparation for closing meeting	√	√	√	√	√
	14.30 – 16.00	<b>Closing meeting</b>	√	√	√	√	√
Saturday, 15 July 2023		<b>Flight Pekanbaru - Jakarta</b>	√	√	√	√	√

## NCR Close-out Visit assessment plan

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Date	Time	Subjects	MJ
Tuesday, 26/09/2023	07.30 – 09.15	Flight Jakarta – Pekanbaru (GA-172)	√
	09.45 – 12.00	Travel from Pekanbaru – Buatan I & II POM	√
	12.00 – 14.00	Break	√
	14.00 – 14.30	<b>Opening Meeting</b> - Presentation by PT Inti Indosawit Subur – Buatan I & II POM & Supply bases - Presentation by BSI Indonesia	√
	14.30 – 17.00	<b>Buatan I POM</b> <b>Verification NCR Close Out (Field visit, Document Review, Interview)</b> NC# 2366049-202307-M1, Indicator 3.6.1 NC# 2358185-202305-N1, Indicator 2.3.2	√
Wednesday, 27/09/2023	08.00 – 11.00	<b>Buatan II POM</b> <b>Verification NCR Close Out (Field visit, Document Review, Interview)</b> NC# 2367923-202307-M1, Indicator 3.6.1 NC# 2367923-202307-M2, Indicator 6.2.2	√
	11.00 – 12.00	<b>Closing Meeting</b>	√
	12.00 – 13.00	<b>Break</b>	√
	13.00 – 15.00	Traveling to Pekanbaru	√
	16.30 – 18.25	Flight Pekanbaru - Jakarta (GA-179)	√

## 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, Bahilang Estate (Supply bases for Tanah Datar Mill) planned in year 2024 due to still in process of RACP. Teluk Panjie Estate (801ha) as supply bases for Teluk Panjie Mill planned in 2026 due to HGU still in process. Sentral Estate (Supply bases for Gunung Melayu II POM planned in 2024 due to still in process of RACP.  Revision of TBP has been approved by RSPO on 19/04/2023	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	No, there is no new acquisition conducted by PT Inti Indosawit Subur and its subsidiary.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Yes, there is time bound plan revision dated 1 July 2021, signed by Management Representative. Justification available, it caused by status of disclosure PT MUP is in progress of review by RSPO. PT MUP will conduct re-audit in 2022.  Revision of TBP has been approved by RSPO on 19/04/2023	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 1 July 2021, signed by Management Representative. Justification available, it caused by status of disclosure PT MUP is in progress of review by RSPO. PT MUP has undergo re-audit in Dec 2021.  Revision of TBP has been approved by RSPO on 19/04/2023	Complied
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	There is no any isolated lapses in implementation of the plan. There are the changing on the plan due to RaCP process in Bahilang Estate and Sentral Estate and HGU issuance process for Teluk Panji Estate.	Complied

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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	There is no fundamental failure to proceed with implementation of the plan. Company has taken action to proceed all uncertified unit to complete the RaCP and to obtained the HGU for Teluk Panji Estate	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.	<p>According to Land Use change analysis, there are several area conversion cacao plantation in Bahilang Estate and Sentral Estate, no primary forest.</p> <p>Bahilang Estate (PT Nusa Pusaka Kencana/NPK). RaCP still under Process. Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024.</p> <p>Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planned on 2024. LUCA submission has been sent on 28 Dec 2020, latest update from RSPO email dated 18 March 2021 to company, LUCA still under review and report needs clarification and still follow up by company.</p> <p>Teluk Panji Estate. HGU for this unit has not been obtained and still under process. Certification audit will be planned on 2026. Latest updated April 2023, HGU still on Progress, since the estate under 2 different province, the final approval must come from National Authority (BPN Pusat).</p> <p>Revision of TBP has been approved by RSPO on 19/04/2023.</p>	Complied
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	<p>According to Land Use change analysis, there are several area conversion cacao plantation in Bahilang Estate and Sentral Estate, no primary forest.</p> <p>Bahilang Estate (PT Nusa Pusaka Kencana/NPK). RaCP still under Process. Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024.</p> <p>Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planned on 2024. LUCA submission has been sent on 28 Dec 2020, latest update from RSPO email dated 18 March 2021 to company, LUCA still under review and report needs clarification and still follow up by company.</p> <p>Teluk Panji Estate. HGU for this unit has not been obtained and still under process. Certification audit will be planned on 2026. Latest updated April 2023, HGU still on Progress, since the estate under 2 different province, the final approval must come from National Authority (BPN Pusat)</p>	Complied
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO	According to internal audit result on December 2020, there is no land conflict occur in PT Mitra Unggul	Complied

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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>Pusaka – Segati Mill. In addition, the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p> <p>According to the RSPO RaCP tracker (<a href="https://www.rspo.org/certification/remediation-and-compensation/racp-tracker">https://www.rspo.org/certification/remediation-and-compensation/racp-tracker</a>) update 01 September 2022, 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</li> <li>• Concept Note submitted (MUs): 2</li> <li>• Concept Note endorsed (MUs): 0</li> <li>• Remediation Plan required (MUs): 4 units</li> <li>• Remediation Plan submitted (MUs): 0</li> <li>• Remediation Plan approved (MUs): 0</li> </ul> <p>Updated on May 2023, 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</li> <li>• Concept Note submitted (MUs): 2</li> <li>• Concept Note endorsed (MUs): 0</li> <li>• Remediation Plan required (MUs): 4 units</li> <li>• Remediation Plan submitted (MUs): 0</li> <li>• Remediation Plan approved (MUs): 0</li> </ul>	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	<p>Internal audit has conducted for Bahilang Estate on 08-09 February 2022, Teluk Panji Estate on 18-23 February 2022 and Sentral Estate on 22-27 August 2022, there is no Labor disputes occur in this management unit. In addition, the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p> <p>Besides that, interview with management representative who assign as PIC for certification was conducted to know the process of internal audit that has been held.</p>	Complied

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	There are no ongoing case/s of grievances or complaint based on RSPO Complaint tracker ( <a href="https://askrspo.force.com/Complaint/s/casetracker">https://askrspo.force.com/Complaint/s/casetracker</a> )	
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 08-09 February 2022, Teluk Panji Estate on 18-23 February 2022 and Sentral Estate on 22-27 August 2022, there is no legal non-compliance occur in this management unit. In addition, the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.	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.	Internal audit has been conducted for Bahilang Estate on 08-09 February 2022, Teluk Panji Estate on 18-23 February 2022 and Sentral Estate on 22-27 August 2022. Report of internal audit are available. Result of internal audit: - Bahilang Estate, Teluk Panji Estate and Sentral Estate has complied to relevant regulation, no issue regarding the legal compliance. - No complaint or grievances and disputes from stakeholders and affected parties. - No labor disputes occur since the latest audit. - No land conflict: Documents related to the history of land tenure and the actual legal or customary use of the land are available. - No new plantings are established on local people's land and no HCV area replacement.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	According to internal audit result, there is no Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates. According to the RSPO RaCP tracker ( <a href="https://www.rspo.org/certification/remediation-and-compensation/racp-tracker">https://www.rspo.org/certification/remediation-and-compensation/racp-tracker</a> ) update 01 September 2022, PT Inti Indosawit Subur has: <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</li> <li>• Concept Note submitted (MUs): 2</li> <li>• Concept Note endorsed (MUs): 0</li> <li>• Remediation Plan required (MUs): 4 units</li> <li>• Remediation Plan submitted (MUs): 0</li> <li>• Remediation Plan approved (MUs): 0</li> </ul>	Complied

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	<p>Updated <u>on</u> May 2023, 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</li> <li>• Concept Note submitted (MUs): 2</li> <li>• Concept Note endorsed (MUs): 0</li> <li>• Remediation Plan required (MUs): 4 units</li> <li>• Remediation Plan submitted (MUs): 0</li> <li>• Remediation Plan approved (MUs): 0</li> </ul> <p>Due to the ongoing process of RaCP, the company has revised it TBP and approved by RSPO on 19/04/2023.</p>	
Have there been any stakeholder (including NGO) consultation conducted?	During internal audit (Bahilang Estate on 08-09 February 2022, Teluk Panji Estate on 18-23 February 2022 and Sentral Estate on 22-27 August 2022), stakeholders consultation already conducted. There is no issue.	Complied

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

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





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**Approved Time Bound Plan**

Approved by RSPO on 19/04/2023

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

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Name of Mill	Mill Address	Name of Supply Bases	Location / Address	Time Bound for Certification	Status
		Sei Lala Estate*	Ukui Village, Ukui District, Pelalawan Regency, Riau	2011	*Split From Ukui & Soga Estate Since 1 January 2019 Re-certified in 2021
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016 Re-certified in 2021
Ukui II Mill - PT Inti Indosawit Subur	Ukui Village, Ukui District, Pelalawan Regency, Riau	Soga Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016 Re-certified in 2021
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016 Re-certified in 2021
Tungkal Ulu Mill - PT Inti Indosawit Subur	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Tungkal Ulu Estate	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	2012	Certified on 15 August 2012 Re-Certification in August 2017

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Name of Mill	Mill Address	Name of Supply Bases	Location / Address	Time Bound for Certification	Status
					Re-certified in 2022
		Tungkal Ulu (Plasma)	Renah Mendalo, Merlung, Muara Papalik District, Tanjung Jabung Barat Regency,	2012	Certified on 15 August 2012 Re-Certification in August 2017 Re-certified in 2022
Muara Bulian Mill - PT Inti Indosawit Subur	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pematang District, Batang Hari Regency, Jambi	Muara Bulian Estate	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pematang District, Batang Hari Regency,	2013	Certified on 12 July 2013 Re-Certification in August 2017 Re-certified in 2022
		Muara Bulian (Plasma)	Maro Sebo Ilir District, Batanghari Regency, Jambi	2013	Certified on 12 July 2013 Re-Certification in August 2017 Re-certified in 2022
Topaz Mill – PT Tunggal Yunus Estate	Petapahan Village, Tapung District, Kampar Regency, Riau	Topaz Estate	Petapahan Village, Tapung District, Kampar Regency, Riau	2015	Certified on 30 March 2015 Re-certified in 2020
Taman Raja Mill – PT Dasa Anugrah Sejati	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Vilage, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Taman Raja, Badang & Bernai Estate*	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Vilage, Tungkal Ulu	2015	Certified on 20 February 2015 *Bernai Estate Split From Taman Raja &

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			District, Tanjung Jabung Regency, Jambi		Badang Estate Since 1 January 2019 Re-certified in 2020
Segati Mill – PT Mitra Unggul Pusaka	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	Segati Estate	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	2022	Certified on 1 November 2022
		Gondai Estate	Pangkalan Sarik / Baru Village, Langgam / Siak Hulu District, Pelalawan / Kampar Regency, Riau	2022	Certified on 1 November 2022
Penarikan Mill – PT Mitra Unggul Pusaka	Penarikan Village, Langgam District, Pelalawan Regency, Riau	Penarikan Estate*	Penarikan / Tambak Village, Langgam District, Pelalawan Regency, Riau	2022	Certified on 1 November 2022
Tanah Datar Mill – PT Supra Matra Abadi	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	Tanah Datar Estate	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	2015	Certified on 18 May 2015 Re-certified in 2020
		Bahilang Estate	Bahilang Village, Tebing Tinggi District, Serdang Bedagai Regency, North Sumatera	2024	*Bahilang Estate on Process RaCP

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Aek Nabara Mill – PT Supra Matra Abadi	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatra	Aek Nabara Estate	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatra	2015	Certified on 6 March 2015 Re-certified in 2020
Teluk Panjie Mill – PT Supra Matra Abadi	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatra	Teluk Panjie Estate (3,885 Ha)	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatra	2015	Certified on 21 April 2015 Re-certified in 2020
		Teluk Panjie Estate (801 Ha)		2026	HGU is still in Process
Peranap Mill – PT Rigunas Agri Utama	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau	Peranap Estate	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau	2015	Certified on 7 January 2015 Re-certified in 2020
		Peranap (Plasma)		2016	Certified on 18 August 2016 Re-certified in 2021
Bungo Tebo Mill – PT Rigunas Agri Utama	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	Bungo Tebo Estate	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	2015	Certified on 3 December 2015 Re-certified in 2020
		Bungo Tebo (Plasma)		2017	Certified on 7 February 2017 Re-certified in 2022



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Tanjung Selamat Mill – PT Indo Sepadan Jaya	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Tanjung Selamat	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	Certified on 26 May 2015 Re-certified in 2020
		Pangkalan	Sennah Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	Certified on 26 May 2015 Re-certified in 2020
Gunung Melayu I – PT Saudara Sejati Luhur	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	Pulau Maria Estate	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	2015	Certified on 7 September 2015 Re-certified in 2020
Gunung Melayu II – PT Gunung Melayu	Gonting Malaha Village, Bandar Pulau District, Asahan Regency, North Sumatra	Aek Tarum & Batu Anam Estate	Gonting Malaha Village, Bandar Pulau District, Asahan Regency, North Sumatra	2015	Certified on 8 July 2015 Re-certified in 2020
		Sentral Estate		2024	*Sentral Estate on Process RaCP
Negri Lama II Mill – PT Hari Sawit Jaya	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Negri Lama	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2016	<ul style="list-style-type: none"> <li>• Certified on 23 December 2016 as Independent Mill</li> <li>• Audit in 2016 as Mill and Supply Base</li> </ul>



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Name of Mill	Mill Address	Name of Supply Bases	Location / Address	Time Bound for Certification	Status
					• Re-certified in 2021
		Aek Kuo (2,088 Ha)	Aek Korsik Village, Aek Natas District, Labuhan Batu Regency, North Sumatra	2018	Certified in 2018
		Aek Kuo (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> <li>• Re-certified in 2020</li> </ul>

### 3.3 Details of Nonconformities

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

During this Assessment there were two (2) Critical nonconformities; none (0) Minor nonconformities raised. The PT Inti Indosawit Subur – Buatan II Pom Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	2367923-202307-M1	Issued Date	15 July 2023
Due Date	14 October 2023	Closure Date	26 September 2023
Indicator & Category (Critical / Minor)	Critical 3.6.1		
Statement of Nonconformity:	Risk analysis has been carried out by the company, however there is some activity has not cover by risk analysis.		
Requirement Reference:	(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	<ul style="list-style-type: none"> <li>During field visit to Buatan II POM, there were activity of Biogas Plant construction, however there is no risk analysis carried out by Buatan II POM.</li> <li>During field visit to Simpang Perak Estate, there were activity of pest and disease census, however there is no risk analysis carried out by Simpang perak Estate.</li> <li>Based on document verification and field visit it was noted that there were housing repair and maintenance activity, however there is no risk analysis carried out for the activity.</li> <li>PT IIS Buatan II POM and Simpang Perak Estate has shown risk analysis and risk control document updated January 2023, however risk analysis has not cover the activity as above.</li> </ul>		
Corrections:	Coordination with the HSE team in updating HIRADC by analyzing the risk of the activities of biogas plant construction by contractors, pest and disease census and housing repair and maintenance activity.		
Root Cause Analysis:	<ul style="list-style-type: none"> <li>Updates to the risk analysis documents only been carried out at the beginning of every year, so that new activity conducted by contractor the risk analysis documents for each job are not updated.</li> <li>Lack of monitoring by OHS personnel for HIRADC and its implementation.</li> </ul>		
Corrective Actions:	Update and evaluated HIRADC at least once a year, considering work accident occurs, new activity by contractors or new activity in the operation whether permanent or seasonal work.		
Assessment Conclusion:	<ul style="list-style-type: none"> <li>Buatan II POM coordinate with HSE team and Biogas contractor to evaluate and conduct the risk analysis for Biogas construction activity.</li> </ul>		



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	<ul style="list-style-type: none"> <li>Risk analysis result has been included and updated in HIRADC document, dated 2 August 2023. Risk analysis result also has been communicated to all contractors workers on 22 August 2023. Evidence of HIRADC document updated and socialization of HIRADC to contractor workers can be shown during audit. Interview with contractor workers also confirmed that they have aware regarding the risk and its mitigation related to their work activity.</li> <li>Buatan II POM and estate has coordinated with HSE team to evaluate and conduct the risk analysis for Pest and disease census. HIRADC document for pest and disease census has been establish and updated 29 July 2023. Risk and its mitigation plan also has been establish and communicated to related workers.</li> <li>Buatan II POM and Estate has coordinate with HSE team to evaluate and conduct the risk analysis for housing rep[air and maintenance. HIRADC document for phousing repair and maintenance has been establish and updated 29 July 2023. Risk and its mitigation plan also has been establish and communicated to related workers.</li> </ul> <p>This nonconformances can be closed</p>
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Non-conformity			
NCR Ref #	2367923-202307-M2	Issued Date	15 July 2023
Due Date	14 October 2023	Closure Date	26 September 2023
Indicator & Category (Critical / Minor)	Critical 6.2.2		
Statement of Nonconformity:	At the time of the audit, it was found that workers were doing work without a work contract with the company.		
Requirement Reference:	(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed		
Objective Evidence:	<p>Based on field observations and interviews with harvest workers in Afdeling 3 Block C91e, the following was found:</p> <ul style="list-style-type: none"> <li>Harvesters are accompanied by their wives when they are harvesting where the wife quotes loose fruit and is not registered as a worker and does not have a work contract with the company</li> <li>Confession from 3 harvesters stating that they sometimes help with harvesting activities (fruit-loose picker) but these people are not registered as workers and do not have a work contract with the company.</li> </ul>		
Corrections:	<ul style="list-style-type: none"> <li>Create a policy (Memo) from management regarding the prohibition on carrying harvester helper without work contract with company.</li> <li>Conduct socialization to harvesters regarding the prohibition on carrying own helper.</li> <li>Install billboards prohibiting carrying own helper at every Afdeling office</li> </ul>		

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<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>Harvesters on their own initiative bring in workers (picking loose fruit) who do not have work agreements with the aim of increasing the output they will get, while company management has determined that every job must carry out a work agreement.</li> <li>Lack of supervision in the field by foremen and field assistants</li> </ul>
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>Provide warnings and sanctions to harvesters if they still bring helper/workers who do not have work contracts with company into the field.</li> <li>Supervision carries out monitoring in the morning and while working in the field to ensure there is no harvester helper without contract working in the field.</li> </ul>
<b>Assessment Conclusion:</b>	<ul style="list-style-type: none"> <li>Company has issued the Memorandum No. EST/KBN/MEMO/07/2023 dated 27 July 2023 regarding prohibition on bringing children, wives and workers who do not have a work contract with the company. Memorandum or policy has been communicated to all harvester on 4 August 2023 and 15 September 2023 in all Afdeling of Simpang Perak Estate. During interview with sampled harvester confirmed that they have aware that it is prohibit to carrying the own helper in the field without work contract with company. They also have aware about the risk of carrying own helper without work contract and its sanction if violate the company policy on this.</li> <li>Company also has install the signboard/billboard prohibiting carrying own helper at every Afdeling office. Evidence of signboard can be shown during field visit to Afdeling Office of Simpang Perak Estate. Record of signboard installment are available in "Berita Acara Pemasangan Baliho Larangan Gerdang" dated 7 August 2023 in Afdeling 1, 2, 3, 4 and Perumahan/Hosuing Eko 2 and 3.</li> <li>Monitoring has been conducted by field supervisor and field assistant to ensure there is no helper for harvesting in the field who has no contract with company. Evidence of monitoring can be shown as record in Checklist Pemeriksaan Gerdang". Record of monitoring period August 2023 can be shown during audit.</li> </ul> <p>This nonconformances can be closed</p>

Opportunity for Improvements	
OFI #	Description
OFI 1	-

Positive Findings	
PF #	Description
PF 1	-

## 3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2213475-202206-N1	Issued Date	17/06/2022
Due Date	Next audit	Closure Date	15 July 2023
Indicator & Category (Critical / Minor)	3.7.3 - minor		
Statement of Nonconformity:	Personal carrying out the tasks critical for SCCS implementation was not trained properly		
Requirement Reference:	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.		
Objective Evidence:	During the interview with weighbridge clerk at Buatan II Mill confirmed that the weighbridge clerk (on behalf Putri Gea Indrasari) has not been trained for RSPO SCCS, in addition she has not understand about the RSPO SCCS.		
Corrections:	The organizations conduct SCCS training to the weighbridge clerk on behalf Putri Gea Indrasari.		
Root Cause Analysis:	When the SCCS training was held, the employee on behalf of Putri Gea Indrasari could not attend due to permission. For head of administrative (KTU) who were present during the training, they had not socialized to employees.		
Corrective Actions:	At the time of SCCS training all PICs related to the SCCS must follow it. If someone is unable to attend, KTU will conduct socialization again to employees who are not present.		
Assessment Conclusion:	<p>During ASA 2.2 audit in July 2023 has been reviewed records such as SCCS refreshment Training has been caried out on 14 February 2023 by Sustainability Department. Evidence of training can be demonstrated during audit sucah as attendance list, training material and photo documentation.</p> <p>During interview with weighbridge Clerk, KTU (head of administration), mill manager and dispatch operator Buatan II POM confirmed that they has understanding on RSPO supply chain.</p> <p>This nonconformances can be closed</p>		
Effectiveness Closure (for previous audit closed Critical NC):	The CAP has been implemented effectively and the NC can be closed.		

Non-conformity			
NCR Ref #	2213475-202206-N2	Issued Date	17/06/2022
Due Date	Next ASA	Closure Date	15 July 2023
Indicator & Category (Critical / Minor)	6.7.2 - minor		

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<b>Statement of Nonconformity:</b>	The organization have an emergency procedures but its implementation is inconsistent
<b>Requirement Reference:</b>	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.
<b>Objective Evidence:</b>	During field visit there were found inconsistencies on implementation: The fire extinguisher at Gudang TUS and clinic are empty, and the seals are broken. Emergency Response Procedure was not clearly understood by assigned operators at PBD (Hydrant near Boiler Station).
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>Replacing the empty fire extinguisher with a new one</li> <li>Conducting emergency response simulation</li> </ul>
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>Inconsistency from the PIC in replacing the empty fire extinguisher</li> <li>There are new employees who have not participated in the emergency response simulation because it is planned in the next agenda.</li> </ul>
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>Appoint an assistant at each station as the PIC to conduct monitoring of fire extinguisher at each station.</li> <li>Establish an emergency response simulation training schedule so that it is monitored.</li> </ul>
<b>Assessment Conclusion:</b>	<p>During ASA 2.2 audit in July 2023 has been reviewed records such as record of accident are kept by P2K3 (OHS Expert) and review during P2K3 meeting (monthly). Evidence of P2K3 meeting can be shown during audit discussed about emergency simulation, emergency facilities and work accident.</p> <p>Based on observation in estate and mill observed all fire extinguisher are monitored and in good condition.</p> <p>The monitoring carried out on monthly basis and results were discussed during safety committee meeting.</p> <p>This nonconformances can be closed</p>
<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	The CAP has been implemented effectively and the NC can be closed.

Opportunity for Improvement	
OFI#	Description
OFI 1	<p><b>OFI Statement:</b> Nil</p> <p><b>Verification / Follow-up actions:</b> Nil</p>

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### 3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
<b>Previous Assessment (ASA-1.4)</b>				
1800365-201906-M1	Critical	4.7.3	10 July 2019	Closed on 30 August 2019
1800365-201906-M2	Critical	4.5.1	10 July 2019	Closed on 30 August 2019
1800365-201906-M3	Critical	4.6.5	10 July 2019	Closed on 30 August 2019
1800365-201906-M4	Critical	5.5.2	10 July 2019	Closed on 30 August 2019
1800365-201906-N1	Minor	6.2.3	10 July 2019	Closed on 23 July 2020
<b>Recertification Assessment (Remote Audit)</b>				
1937028-202007-M1	Critical	3.8.6	23 July 2020	Closed on 17 October 2020
1937028-202007-M2	Critical	3.8.16	23 July 2020	Closed on 17 October 2020
1937028-202007-M3	Critical	6.6.2	23 July 2020	Closed on 17 October 2020
1937028-202007-M4	Critical	7.10.1	23 July 2020	Closed on 17 October 2020
<b>Recertification Assessment (Onsite Audit)</b>				
2032041-202103-N1	Minor	6.2.7	5 March 2021	Closed on 15 June 2022
2032041-202103-N2	Minor	7.3.2	5 March 2021	Closed on 15 June 2022
<b>Surveillance Audit (ASA2_1)</b>				
2213475-202206-N1	Minor	3.7.3	17 June 2022	Closed on 15 July 2023
2213475-202206-N2	Minor	6.7.2	17 June 2022	Closed on 15 July 2023
<b>Surveillance Audit (ASA2_2)</b>				
2367923-202307-M1	Major	3.6.1	15 July 2023	Closed on 26 Sept 2023
2367923-202307-M2	Major	6.2.2	15 July 2023	Closed on 26 Sept 2023

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

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

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

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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 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 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)
<b>Internal Stakeholders</b>	<b>Gender Committee:</b> Ibu Selvia JH (Chief of Gender Committee in PT IIS - Buatan Group)  <b>Union Labor –PUK SPSI:</b> Siswanto as Chief of PUK SPSI PBD  <b>Estate Clinic doctor:</b> dr.Lisa Yulia Sari	Consultation was conducted by face to face
<b>Government Departments</b>	<ul style="list-style-type: none"> <li>▪ <b>Environmental Office of Pelalawan Regency:</b> Bpk. Dely Abee (Kasi. Pengawas Lingkungan)</li> <li>▪ <b>Department of Plantation in Pelalawan Regency:</b> Bpk. Heri</li> <li>▪ <b>Department of Manpower of Pelalawan Regency/Riau Province:</b> Bpk. Sondang Leni</li> </ul>	Consultation was conducted by phone.
<b>Communities representative</b>	<b>Penghulu/Head Bukit Agung Village:</b> Bpk. Parlaungan Panjaitan	Consultation was conducted by face to face
<b>NGO</b>	<b>LPA - Lembaga Perlindungan Anak Kab. Pelalawan:</b> Bpk. Tohap P. Sianipar	Consultation was conducted by face to face

Stakeholders comment	
<b>1</b>	<b>Feedbacks:</b> <b>Dinas Perkebunan Kabupaten Pelalawan – Plantation Agency Pelalawan Regency</b> Bpk. Heri

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	<ul style="list-style-type: none"> <li>• The company has sent reports related to environmental management (RKL-RPL, Hazardous Waste Report, Liquid Waste Report) periodically.</li> <li>• In the 2022-2023 period, there were no complaints of environmental pollution from local communities, NGOs or other parties.</li> <li>• Environmental management at the PT IIS - Buatan Plantation has been carried out quite well.</li> <li>• Liquid waste application permits are in place, liquid waste management/application reports are reported regularly.</li> <li>• Environmental measurements have been carried out and reported regularly by PT IIS - Buatan through the RKL-RPL Environmental Management Report in 6 month bases.</li> <li>• The administration issue of Plasma where the the Koperasi located in Pelalawan regency meanwhile the farmers land located in Siak Regency, especially for replanting program supported by the government (PSR program)</li> </ul>
	<p><b>Audit Team verification and response:</b></p> <p>Company acknowledge the comment from Plantation Agency.</p> <p><u>Buatan Group:</u> Surat Pendaftaran Usaha Perkebunan (SPUP) from Forestry and Plantation Ministry, No.185/Mentanhut/ VII/2000, dated 3 November 2000.</p> <p>The most important issue is the replanting process, especially for farmers in 2 Regencys, i.e. Palalawan Regency and Siak Regency, where the cooperative is in Pelalawan Regency while the farmers' land is in Siak Regency. However, the Plasma Management of PT IIS Buatan Group has sent a letter requesting Replanting with the PSR Program (Program Peremajaan Sawit - BPD PKS) to each Regency including the documents required. Until this audit was carried out there was still no response.</p> <p>This is an issue where the problem is related to the regional government (Siak Regency and Pelalawan Regency) which has not decided in accordance with applicable laws and regulations.</p> <p>The auditor will always monitor the progress of the smallholder replanting scheme program at each audit visit.</p>
2	<p><b>Feedbacks:</b></p> <p><b>Environmental Office of Pelalawan Regency:</b> Bpk. Dely Abee (Kasi. Pengawas Lingkungan)</p> <ul style="list-style-type: none"> <li>• Company has revised the AMDAL document.</li> <li>• Company has an environmental document related to development of biogas plant and kernel crushing plant.</li> <li>• Replanting activity has been covered in environmental management and monitoring plan.</li> <li>• Company has consistently reporting the environmental management: Laporan RKL-RPL, Laporan Pengelolaan Limbah B3, Laporan Pemanfaatan Limbah Cair.</li> <li>• PT Inti Indosawit Subur – Buatan I &amp; II POM has performed environmental management in good manner.</li> <li>• Hazardous waste/LB3 monitoring report on Shelter Temporary (TPS) Hazardous waste/LB3 has been done.</li> <li>• Company has managed the hazardous waste, obtained permit for temporary storage – in accordance with relevant regulation.</li> <li>• There was no report from stakeholder on environmental pollution caused by plantation operation of palm oil mill operation.</li> </ul>

	<p><u>Buatan II POM:</u></p> <p>There is an issue from the community that there is a bad smell bursting, alleged comes from PT IIS waste - Buatan I POM. On 13 April 2023, the community through its representatives went to the location, it founded there was a rotten and suspected to come from factory waste that was not neatly arranged by the factory manager.</p> <p><b>Audit Team verification and response:</b></p> <ul style="list-style-type: none"> <li>For the positive things that have been done will be maintained and improved towards a better by management companies.</li> <li>In the face of replanting activities, of course there are many social issues arising from environmental impacts. In this case, the company has conducted a social impact aspect (SIA) assessment which subsequently made a social impact management plan. Plans for management and monitoring of social impacts to avoid or reduce negative impacts and promote positive ones presented in "Rencana Kelola Dampak Sosial dan Rencana Pemantauan Dampak Sosial".</li> <li>Related to the issue of pollution from Buatan I POM: The company has identified the source of the odor originating from the sewer pipe to the Land Application area which is underground in the area of the Buatan I Estate plantation experiencing a leak (caused by a pipe crossing the road traversed by a tractor that was about to carry FFB and broke and leaked). After reports from the community, the countermeasures team from Buatan I POM has made repairs and immediately replaced the pipe and diverted the pipeline so that it is not crossed by vehicles or heavy equipment.</li> </ul>
3	<p><b>Feedbacks:</b></p> <p><b>Department of Manpower of Pelalawan Regency/Riau Province:</b> Bpk. Sondang Leni</p> <ul style="list-style-type: none"> <li>Generally, PT Inti Indosawit – Buatan Group POM has built good communication with Manpower and Transmigration Office – Pelalawan Regency.</li> <li>PT Inti Indosawit Subur – Buatan Group POM has complied well with legislation related to employment, i.e; <ul style="list-style-type: none"> <li>Company has provided 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, working tools, etc.).</li> <li>There was no report/complaint logged in related to discriminative action by company. There was no report/complaint logged in related to the use of child worker/under age worker.</li> <li>Company has submitted health and safety performance report regularly to the manpower agency.</li> <li>Complaint received from worker union related to medical service provided by "BPJS Kesehatan", in particular medical treatment service from hospital/clinic where no cooperation with BPJS.</li> <li>There is no industrial relationship dispute occurred from the last year.</li> <li>No identified issues related to the use of child labor, violence and forced labor.</li> <li>Company has prepared infrastructure and facility for worker's welfare such as: housing, clean water, electricity, medical facility, education, etc.</li> </ul> </li> <li>There are suggestions:</li> </ul>



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	<p>In relation to the daily worker (PHL), so that the appointment program can be made as a permanent worker if it meets the requirements.</p> <p><b>Audit Team verification and response:</b></p> <p>In relation to the daily worker (PHL), so that the appointment program can be made as a permanent worker if it meets the requirements.</p> <p>A. <u>Buatan I:</u></p> <p>The company has established a program for appointing PHL harvesters to become permanent workers (SKUH) which is set to be achieved by the end of 2023. This program for appointing/promoting harvester employees has been submitted to the Pelalawan Regency Manpower and Transmigration Service.</p> <p>Realization of PHL (temporary workers) promotion to SKU (permanent worker) particularly harvester up to until end of 2023:</p> <p><u>Buatan I Estate:</u></p> <ul style="list-style-type: none"> <li>- Harvester PHL to SKU promotion in 2022 as many as 15 harvesters.</li> <li>- In the first semester of 2023, as much as 12 harvesters have been promoted.</li> </ul> <p>So, in 2024 period, there will be no workers with PHL status. Meanwhile, if there is a recruitment, it will refer to the recruitment of permanent workers with a probationary period of 3 months which will then be evaluated so that they can be proposed to become permanent workers in SKUH.</p> <p>B. <u>Buatan I POM:</u></p> <p>Promotions in the Semester I/2023 period were 8 PHL workers.</p> <p>So that by the end of 2023, 16 harvesters who still have PHL status until the end of 2023 (who entered work in semester II/2023) will be promoted in February 2024, so that there will be no more harvesters with PHL status at the beginning of 2024. Meanwhile, if there is a recruitment, it will refer to the recruitment of permanent workers with a probationary period of 3 months which will then be evaluated so that they can be proposed to become permanent workers in SKUH.</p> <p><u>Realization</u> of PHL (temporary workers) promotion to SKU (permanent worker) particularly harvester up to until end of 2023:</p> <p>C. <u>Buatan II Mill:</u></p> <ul style="list-style-type: none"> <li>- Promosi PHL to SKU of Buatan II Mill in 2022 based on Memorandum No. 075/MI-PBS/MEMO/IV/2022, dated 12 April 2022 have promoted as many 15 employees.</li> <li>- Promosi PHL to SKU of Buatan II Mill in 2023 based on Memorandum No. 103/MI-PBS/MEMO/IV/2023, dated 29 April 2023 have promoted as many 8 employees.</li> </ul> <p>So, in 2024 period, there will be no workers with PHL status. Meanwhile, if there is a recruitment, it will refer to the recruitment of permanent workers with a probationary period of 3 months which will then be evaluated so that they can be proposed to become permanent workers in SKUH.</p> <p>D. <u>Simpang Perak Estate:</u></p> <ul style="list-style-type: none"> <li>- Promosi PHL to SKU of Buatan II Estate (Simpang Perak Esatate) in 2022 based on Memorandum No. 05/MI-KSP/MEMO/IV/2022, dated 12 April 2022 have promoted as many 13 employees.</li> <li>- Promosi PHL to SKU of Buatan II Estate (Simpang Perak Esatate) in I and II quarters of 2023 based on Memorandum No. 09/MI-KSP/MEMO/IV/2022, dated 17 July 2023 have promoted as many 25 employees.</li> <li>- Promosi PHL to SKU of Buatan II Estate (Simpang Perak Esatate) in III and IV quarters of 2023 will be promoted as many 49 employees.</li> </ul>
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	<p>So that by the end of 2023, 16 harvesters who still have PHL status until the end of 2023 (who entered work in semester II/2023) will be promoted in February 2024, so that there will be no more harvesters with PHL status at the beginning of 2024. Meanwhile, if there is a recruitment, it will refer to the recruitment of permanent workers with a probationary period of 3 months which will then be evaluated so that they can be proposed to become permanent workers in SKUH.</p>
4	<p><b>Feedbacks:</b>  <b>LPA - Lembaga Perlindungan Anak Kab. Pelalawan:</b>  Bpk. Tohap P. Sianipar</p> <ul style="list-style-type: none"> <li>There are at least two reasons why child labor is still prevalent in oil palm plantations <ol style="list-style-type: none"> <li>1) First, poverty in rural areas is the reason parents make their children work on oil palm plantations.</li> <li>2) The practice of child labor in oil palm plantations is, in essence, triggered by low wages for adult laborers and the obligation to achieve work targets and earn additional money.</li> </ol> </li> <li>With this obligation, these adult workers (parents) finally allow their children to work because they are lulled into the way of life that is regulated by the capitalist.</li> <li>Their hope of entering the palm oil industry is to get economic benefits, improve living standards such as nutritional consumption and food quality</li> <li>Based on field observations and consultations with the gender committee, PT IIS - Made by the Group does not prove that there is a practice of child labor or child employment.</li> <li>The company has a very strict policy on child labor and is always socialized to all workers and stakeholders.</li> </ul> <p><b>Audit Team verification and response:</b></p> <ul style="list-style-type: none"> <li>For the positive things that have been done will be maintained and improved towards a better by management companies.</li> <li>PT Inti Indosawit Subur has established Company Policy dated 1 December 2019, which stated there is not allowed all children to work in every activities/processes in company, it stated on Company policy on point 14; "Prohibit children from working in any company activities".</li> <li>PT IIS – Buatan Group, also put in place a policy related to the prohibition of child labor (under 18 years), on the document of the FFB Supplier Statement and Guarantee in point 12; "Do not employ children (under 18 years) which as prohibited by Law no. 13/2003.</li> <li>The company is very concerned about children (especially those who are still toddlers) by issuing Policy for employees who are breastfeeding, based on the Memorandum from the Farm Manager No. 171/ES-IIS/MEMO/ 01/20 dated January 4, 2020, stated: the company guarantees female employees to breastfeed their children during working hours, by giving time and place to all female employees who have babies to breastfeed their children once for 45 minutes: morning at 10.00-10.45 WIB at the clinic or afdeling office or 11.30 - 12.15 WIB.</li> <li>Periodic check-ups at the clinic to monitor the health of the baby by providing POSYANDU services once a month at the Central TPA (Child Care Center) including immunization and vitamins.</li> </ul>
5	<p><b>Feedbacks:</b>  <b>Penghulu/Head Bukit Agung Village:</b>  Bpk. Parlaungan Panjaitan</p>

	<ul style="list-style-type: none"> <li>• There was no land conflict with surrounding community.</li> <li>• In general communication and coordination between the village government and the Company has been running well.</li> <li>• The Company always responds to any problems submitted by the village government officials or from the surrounding community, villagers have confirmed that organisation has done some positive CSR activities on their surroundings. Routinely companies provide assistance through CSR programs in the form of borrowing heavy equipment (excavators, graders and compactors), scholarships, assistance to the poor, religious facilities, etc.</li> <li>• Access roads surrounding villages are always maintained by the company.</li> <li>• Enclave owner has proper access to their own farm inside company's farm without any difficulties.</li> <li>• No identified issues related to the use of child labor, violence and forced labor</li> <li>• There was an issue in Buatan I POM: Residents of Bukit Agung village feel the disturbance of smoke released from Boiler 3 (which does not have a WET SCRUBBER) which serves to reduce dust levels and smoke concentration.</li> </ul>
	<p><b>Audit Team verification and response:</b></p> <ul style="list-style-type: none"> <li>• It is suggested that PT Inti Indosawit Subur can maintain communication with the community and village apparatus.</li> <li>• CSR programs to be developed in accordance with community empowerment programs and guidance and coaching.</li> <li>• Related to issues from the Bukit Agung Village community to the Buatan I POM: Based on verification with the Buatan I POM Manager, at this time, boiler 1 at Buatan I POM was damaged, where a wet scrubber was installed. So the boiler currently used is boiler 3, but the boiler does not yet have a wet scrubber to reduce the impact of pollution from smoke emitted from the chimney. In the future, the company is working on installing a wet scrubber on boiler chimney 3. For this reason, the auditor team will carry out monitoring and checking again in the future to ensure a wet scrubber has been installed on boiler 3.</li> </ul>
6	<p><b>Feedbacks:</b> <b>Union Labor –PUK SPSI:</b> Siswanto as Chief of PUK SPSI PBD</p> <ul style="list-style-type: none"> <li>• Company and employee has agreed to establish bipartite organization to resolve issued related to industrial relationship; the organization has been registered to "Dinas Tenaga Kerja Kabupaten Pelalawan". Meeting between company and employee conducted whenever issues occurred and requires discussion.</li> <li>• Company has provided health and safety training and provided first aid kit to field supervisor/mandor.</li> <li>• Company has a policy to prohibit the recruitment of employee under 18 years old, including family worker in all operation.</li> <li>• Company does not use migrant worker and prohibit force labour.</li> <li>• Worker salary has followed minimum wage as lined out by Riau Province government for year 2023</li> <li>• There is a collective working agreement between company and employee.</li> <li>• Company has provided 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, working tools, etc.).</li> </ul>

**Gender Committee:**

Ibu Selvia JH (Chief of Gender Committee in PT IIS - Buatan Group)

**Estate Clinic doctor:**

dr.Lisa Yulia Sari

- Company 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.
- All female worker in sprayer team and fertilizer team should join pregnancy test in company clinic, once a month, but they are not forced to take the test.
- There has been no report logged in to committee related to sexual harassment and/or violence.
- There is no indication that company practicing sexual harassment, no indication of gender discrimination, no indication of human right violation, and forced labour.

**Audit Team verification and response:**

- Acknowledge by the auditor as a positive response, and will be monitored at each subsequent audit.
- Audit team will continue to monitor PT Inti Indosawit Subur – Buatan Group POM related to Plantation management and monitoring performance.
- Management will strive to continue and improve the positive practices in implementing company commitment towards health and safety, and upholding the human rights.
- The company has also identified its workers as young mothers and conducted consultations by distributing questionnaires on June 15, 2023 to 21 young mothers at PKS Buatan II and Simpang Perak Plantation.
- From the results of surveys and consultations, management issued several policies, including:
  - Policy for employees who are breastfeeding; management issued a Memorandum from Farm Manager No. 171/ES-IIS/MEMO/01/20 dated January 4 2020, stated: the company guarantees female employees to breastfeed their children during working hours, by providing time and space for all female employees who have babies to breastfeed their children once for 45 minutes : in the morning at 10.00-10.45 WIB at the clinic or afdeling office or 11.30 - 12.15 WIB.  
Health needs for children/babies, the opportunity to be able to give breast milk to babies who are still breastfeeding, periodic immunizations and the need for care for children and babies in the plantation environment.
  - Regular check-ups at the clinic to monitor the baby's health; The POSYANDU service program once a month at the Central TPA (Child Care Center) includes immunizations and vitamins.
  - The company consistently carries out pregnancy tests on female workers who work as fertilizers and sprayers once every month.

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List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Nil					
PT Inti Indosawit Subur – Buatan II POM has established since 1985 and has planting palm oil since 1988, 1989, 1990 and 1991. Currently the palm oil has been replanting since 2014 – 2021.					

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

### 3.5 Impartiality and conflict of interest

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

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

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that PT Inti Indosawit Subur – Buatan II POM has complied with the Indonesia National Interpretation 2020 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that PT Inti Indosawit Subur – Buatan II POM is remain certified.	
Report prepared by	Acceptance of Assessment Conclusion
<b>Name: Eko Prastio Ramadhan</b>	<b>Name: Putu Ghryate Yonata Aksa</b>
<b>Company Name On behalf of BSI Services Malaysia Sdn. Bhd.:</b>	<b>Company Name:</b> <b>PT Inti Indosawit Subur – Buatan II POM</b>
<b>Title: Client Manager</b>	<b>Title:</b> <b>Sustainability Operation</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: 11 December 2023</b>	<b>Date: 13 December 2023</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. - Critical (Major) compliance -	The certificate holder has used list of procedure that can be accessed by relevant stakeholder on " <i>Daftar Dokumen dan Informasi untuk Diakses Publik PT Inti Indosawit Subur - Buatan Group</i> ". In the document, the list of accessible information covers relevant legal, social, and environmental aspects related to sustainability. These documents include land certificates (HGU, IMB), OHS plans, environmental and social impact plans, and assessments (RKL-RPL), HCV documentation, pollution prevention and reduction plans, complaints, negotiation procedures, complaint progress, public summary reports on certification assessment, and human rights policy. Based on interviews with government agency and Village Head of Bukit Agung, they area already know the types of documents accessible to the public.	Complied
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	Based on the results of document review and interviews with agencies, such as the Pelalawan Regency Plantation Service, the Environment Service, Land Office, and Manpower Office, it is known that the information presented by the certification unit has been presented in an appropriate language and can be accessed by the agency.  The unit of certification has provided evidence that the information has been received in an appropriate form and language for the relevant stakeholders, such as reports on the implementation of environmental management for the 1st and 2nd semesters of 2022, for example, the	Complied

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		document has also been reported to the relevant agency via SIMPEL (ID TTE 1673249330-1744, dated 9 January 2023).	
1.1.3	<b>(C)</b> Records of requests for information and responses are maintained. - Critical (Major) compliance -	<p>The certificate holder maintains records of requests for and responses to information on record "<i>Laporan Permintaan Informasi Lainnya PT Inti Indo Sawit</i>". From the results of the record review for the 2022/2023 period, there were no requests for information or other documents from the certificate holders by stakeholders. This is in line with the results of public consultations with related parties such as the Agency of Pelalawan Regency and Umbara Utama Village, where the parties have never submitted a request for information to the certificate holder</p> <p>For Buatan Plasma, the management also has a record of receiving information contained in the Document "Logbook of Requests for Information Responses to Buatan Plasma Plantations". In the recording, there is no record of requests for information from affected parties. Some of the letters that came were related to invitations from the service, for example an invitation to the Isra Mi'raj celebration from the Al-Jihad Mosque on February 17, 2023.</p>	Complied
1.1.4	<b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official. - Critical (Major) compliance -	Based on the results of interviews with community representatives and village leaders (Umbara Utama & Bukit Agung Village) and local contractors, and other stakeholders, it is known that they understand the communication mechanism owned by the company. The village did not object to the existing complaint submission mechanism.	Complied
1.1.5	An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives. - Minor compliance -	Based on the results of the verification of stakeholder list document which was updated as of May 2022, there are several stakeholders that have been included in the list, for example: Village representative (Buana Bhakti, Bukit Agung, Jatimula, Lalang Kabung, Kerinci Kanan, Simpang Perak Jaya Village), Media Reporter (TRIBUN), NGO (LPAI, LCKI, FSP NIBA KSPSI), Contractor (Sri Rahayu, John Riady, Yusrizal, Ivan), Government Agency (Plantation, BKPM, BPN, Police Sector, DLH,	Complied

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		DISHUB), and Cooperation (KUD Mulus Rahayu, Bhirawati Bhakti, Jaya Makmur, Sejahtera, etc). Furthermore, based on random checked with stakeholder list, for example reporter of TRIBUN still relevant with contact person stated.	
<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. - Minor compliance -	<p>The Company is committed to ethical behavior in all transactions and business operations that are guided by the company's policy set on 1 December 2019 in Medan which was ratified by the Managing Director (Kevin Tio). The company's policy confirms the code of Conduct behavior in business at point 2 of the stated the conduct of fair and ethical business on all transactions and business operating, including the prohibition of all forms of corruption, bribery, and fraud in the use of funds and resources.</p> <p>For smallholder schemes there is also a policy of acting ethically contained in policy of code of ethical conduct and integrity in all operation and transaction, dated 14 February 2020, which stated: <i>"Berkomitmen dalam perilaku etis dalam berbisnis dalam seluruh transaksi dan operasi bisnis, pelaksanaan seluruh bentuk korupsi, penyuapan dan penipuan dalam penggunaan dana dan sumber daya"</i>. Based on the results of interviews with PK shipping contractor representatives (Parlau**** Panjaitan), it is known that the contractor has understood and is ready to implement the ethical behavior policy in the company such as no corruption and legal commitment.</p> <p>Based on that explanation, the unit of certification has a policy for ethical behavior.</p>	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	To ensure compliance with the ethical behavior policy within the scope of its operations, the certificate holder carries out monitoring activities in the following records:	Complied



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		<ul style="list-style-type: none"> <li>- Internal Audit Sustainable Integration activities carried out from 27 March to 1 April 2023. In these activities, the auditors assess compliance with ethical behavior policies, for example related to compliance with government regulations, legality assurance, and implementation of operational procedures.</li> <li>- Visit Agronomy Report (VA-KSP-MAY-FULL-02052023, dated 2 – 5 May 2023). In the recording of the activity, the certificate holder assesses the fulfillment of company policies in the aspect of agronomy to corporate units for various points, for example: area statement, manpower, production &amp; quality, cost of production, administration, and sustainability.</li> </ul>	
<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. - Critical (Major) compliance -	The company has implemented compliance with government regulations, here is some evidence: <ul style="list-style-type: none"> <li>- The Company has shown compliance related OHS aspect such as Minister of Manpower Regulation No. 4 of 1987 concerning the Committee for Occupational Safety and Health and Procedures for Appointing Occupational Safety Experts and Regulation of the Minister of Manpower and Transmigration of the Republic of Indonesia No. 8 of 2010 concerning Personal Protective Equipment.</li> <li>- Has been manage the hazardous waste and domestic waste in accordance with applicable regulation (refer to criteria 7.3).</li> <li>- Land preparation without burning and has the infrastructure in fire anticipation, according to <i>Permentan</i> Number. 26 of 2007 section 15. (Refer to criteria 7.11).</li> <li>- The company has complied with regulations in labor aspects</li> </ul>	Complied

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		<p>such as minimum implementation, registration of labor unions, national health and labor insurance (BPJS), no child and forced labor, etc. Based on interviews with stakeholders such as government agencies, it is known that the company has complied with related regulations, for example: no workers under 18 years old, its application to drinking jobs, and there are no negative issues related to.</p> <ul style="list-style-type: none"> <li>- Surat Pendaftaran Usaha perkebunan (SPUP) from Forestry and Plantation Ministry, No.185/Mentanhut/VII/2000, dated 3 November 2000.</li> <li>- SK. HGU (Land Title), approved by "Menteri Negara Agraria/Kepala BPN No.10/HGU/1993, dated 13 May 1993 <i>tentang Pemberian HGU atas nama PT. Inti Indosawit Subur, atas tanah di Kabupaten Kampar seluas 5,781.47 Ha</i>".</li> <li>- HGU (Land titles) No.01, 1993, dated 19 June 1993. for Buatan Estate (5,781 Ha);</li> <li>- Legal Document of Smallholder samples:</li> </ul> <table> <tr> <th>Name</th><th>KUD</th><th>SHM No.</th><th>Area (ha)</th></tr> <tr> <td>Anda Juanda</td><td>Bhirawa Bakti</td><td>190</td><td>2</td></tr> <tr> <td>Anip Supriatna</td><td>Bhirawa Bakti</td><td>216</td><td>2</td></tr> <tr> <td>Ija Hidayat</td><td>Bhirawa Bakti</td><td>756</td><td>2</td></tr> <tr> <td>Dahlan</td><td>Bhirawa Bakti</td><td>689</td><td>2</td></tr> <tr> <td>Suyitno</td><td>Buatan Jaya</td><td>952</td><td>2</td></tr> <tr> <td>Supri Rojikin</td><td>Buatan Jaya</td><td>944</td><td>2</td></tr> <tr> <td>Radisan</td><td>Buatan Jaya</td><td>584</td><td>2</td></tr> </table>	Name	KUD	SHM No.	Area (ha)	Anda Juanda	Bhirawa Bakti	190	2	Anip Supriatna	Bhirawa Bakti	216	2	Ija Hidayat	Bhirawa Bakti	756	2	Dahlan	Bhirawa Bakti	689	2	Suyitno	Buatan Jaya	952	2	Supri Rojikin	Buatan Jaya	944	2	Radisan	Buatan Jaya	584	2	
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Radisan	Buatan Jaya	584	2																																

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			Sungep	Buatan Jaya	573	2			
			Pranesto	Kebun Sawit Harapan	444	2			
			Saino	Kebun Sawit Harapan	466	2			
			Hendar	Kebun Sawit Harapan	459	2			
			Bambang Suloso	Kebun Sawit Harapan	469	2			
			Nurcahya	Mulus Rahayu	63	2			
			Sani	Mulus Rahayu	35	2			
			Pawito	Mulus Rahayu	239	2			
			- Tax ID Document of Smallholder samples:						
			KUD		NPWP No.				
			Bhirawa Bakti		96.414.741.7-222.000				
			Buatan Jaya		02.251.257.8-222.000				
			Kebun Sawit Harapan		01.747.031.1-222.000				
			Mulus Rahayu		01.555.119.5-222.000				
			- Cooperation Permit						
			KUD		Type	Document No.			
			Bhirawa Bhakti		Surat Izin Tempat Usaha	523.33/SITU /II/2020/04			

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			Buatan Jaya	Surat izin Tempat Usaha	523.33/2020/22	
			Kebun Sawit Harapan	Surat Izin Tempat Usaha	523.33/SITU/IV/2020/06	
			Mulus Rahayu	Surat Izin Tempat Usaha	523.33/SITU/XI/2020/021	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.</p> <p>- Minor compliance -</p>	<p>An evaluation of the latest legal compliance was carried out on May 2023 by Humas Group Buatan on Document "<i>Daftar Regulasi Kepatuhan Hukum Per Mei 2023 PT Inti Indosawit Subur Group Buatan</i>" 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>Certificate holder has a list of contractors in Mill and estate, such as: FFB transporter on behalf of Supatmi and Parlaungan Panjaitan, CPO, PK and CPKO Transporter on behalf PT Wijaya Multi Prima Lestari, CV Trans Cargo Logistic, CV Teman Setia, PT Buana Jaya Bersama. All contract, including those for FFB supply, have contained specific clauses to meet the relevant legal requirements, that has been mentioned in the contract agreement in Chapter 7 "<i>Tanggung Jawab dan Kewajiban</i>" which has explained the contractor's responsibilities to meet legal requirement such as being willing to pay according to the wages set by the government, not employing child labor and not performing forced labor and trafficking labor as well, which states:</p> <ul style="list-style-type: none"><li>• The company policy related to children/underage worker, anti-drugs etc.</li><li>• Workers payment referred to local minimum payment's regulation.</li></ul>	Complied			

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		<ul style="list-style-type: none"> <li>All worker will be register in health insurance and workers insurance according to national regulation.</li> </ul> <p>Based on interviews with contractor observed that all contractor, scheme smallholder and independent FFB suppliers have met the legality requirements, there are no issues related to child labor, forced labor and human rights.</p> <p>The latest regulations that have been ratified and implemented by the company, for example:</p> <ul style="list-style-type: none"> <li><i>Peraturan Pemerintah Nomor : 22 Tahun 2021 Tentang Penyelenggaraan Perlindungan Dan Pengelolaan Lingkungan Hidup</i></li> <li><i>Peraturan Pemerintah No. 36 Tahun 2021 Tentang Pengupahan</i></li> </ul>	
2.1.3	<p>Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.</p> <p>- Minor compliance -</p>	<p>Legal (HGU) boundaries are clearly demarcated and maintained based HGU Map issued by National Land Agency. Based on field observation on HGU stones and land demarcation in Estate, has known that HGU stones has been installed in accordance with the coordinates, and other boundaries such as boundary drain and boundary road were maintained. There was no planting exceed the HGU boundary.</p> <p>For examples :</p> <ul style="list-style-type: none"> <li>Boundary poles BPN 11 Block C91E Afdeling III</li> <li>Boundary poles BPN 9 Block B21G Afdeling II</li> <li>Boundary poles BPN 19 Block B21I Afdeling II</li> </ul> <p>The boundary poles recorded in document "<i>Laporan Pemeriksaan dan Perawatan Patok Batas</i>". The poles monitored twice a year. The last</p>	Complied

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		<p>monitoring held in 18-19 April 2023. All poles (reported in good condition.</p> <p><b>Scheme Smallholder:</b></p> <p>During this audit, auditor team has visited the smallholder sample from KUD Mulus Rahayu, KUD Bhirawa Bhakti, KUD Kebun Sawit Harapan and KUD Buatan Jaya. Based on field visit, the boundaries are well demarcated in the form of land title (SHM) stake, path, drain, trees, etc. There is no indication of dispute among the plots as well with external parties.</p>																					
<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	<p>A list of contracted parties is available.</p> <p>- Minor compliance -</p>	<p>PT IIS – Buatan II already has a list of contractors both of Mill and Estate updated in May 2023. List contractor contains the name of the business entity/organization, address, PIC, contact number. There are 10 contractors in cooperation with the PT IIS – Buatan II group.</p> <p>The list of contractors can see as follow:</p> <p><b>Daftar Kontraktor</b></p> <p><b>PMKS Buatan II &amp; Simpang Perak Estate</b></p> <p><b>12 July 2023</b></p> <table border="1"> <thead> <tr> <th>No.</th><th>Contractors Name</th><th>PIC</th><th>Type of Colloborartion</th></tr> </thead> <tbody> <tr> <td colspan="4"><b>PMKS Buatan II</b></td></tr> <tr> <td>1</td><td>PT Eka Mandiri Sejahtera</td><td>Muhammad Adnan</td><td></td></tr> <tr> <td>2</td><td>Parlaungan Panjaitan</td><td>Parlaungan</td><td>Transporter of EFB</td></tr> <tr> <td>3</td><td>CV Trans Cargo Logistic</td><td>Toni H.</td><td>CPO, PK and CPKO Transporter</td></tr> </tbody> </table>	No.	Contractors Name	PIC	Type of Colloborartion	<b>PMKS Buatan II</b>				1	PT Eka Mandiri Sejahtera	Muhammad Adnan		2	Parlaungan Panjaitan	Parlaungan	Transporter of EFB	3	CV Trans Cargo Logistic	Toni H.	CPO, PK and CPKO Transporter	Complied
No.	Contractors Name	PIC	Type of Colloborartion																				
<b>PMKS Buatan II</b>																							
1	PT Eka Mandiri Sejahtera	Muhammad Adnan																					
2	Parlaungan Panjaitan	Parlaungan	Transporter of EFB																				
3	CV Trans Cargo Logistic	Toni H.	CPO, PK and CPKO Transporter																				

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		4	CV Teman Setia	Jhon S.	CPO, PK and CPKO Transporter
		<b>Simpang Perak Estate</b>			
		3	Masjidi	Masjidi	Angkut EFB
		4	Supatmi	Supatmi	Angkut TBS & EFB
		5	Eko P.	Eko P.	School Bus Rental
		6.	Redo M.	Redo M.	Housing renovation in Simpang Perak Estate
		<p>Certificate holder has a list of contractors in Mill and estate, such as: School Transportation on behalf of Eko Purwanto, FFB transporter on behalf of Supatmi and Parlaungan Panjaitan, CPO, PK and CPKO Transporter on behalf PT Wijaya Multi Prima Lestari, CV Trans Cargo Logistic, CV Teman Setia, PT Buana Jaya Bersama.</p> <p>Based on interviews with local village representatives, that all contractor, scheme smallholder and independent FFB suppliers have met the legality requirements, there are no issues related to child labor, forced labor and human rights.</p> <p><b>Scheme Smallholder:</b></p> <p>In smallholder activity, FFB transport from their land to mill by using the association of FFB-Transporter (usually smallholder members that owned truck). For example, sighted the annual FFB-Transporter contract between:</p> <ul style="list-style-type: none"> <li>- KUD Bhirawa Bhakti with Sena (FFB Transporter) Buana Bhakti Village, Kerinci Kanan Sub District, Siak District, Agreement No. 05/KUD-BB/VI/2021 dated 11 August 2021, with a validity period until both parties agree to terminate the collaboration</li> </ul>			

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		<ul style="list-style-type: none"> <li>- Koperasi Kebun Sawit Harapan with Misdi, Kaslam, Andik Priyadi Luga, Irwan, Suriadi and Ujang (FFB Transporter) Kampung Gabung Makmur Village, Kerinci Dayun Sub District, Siak District, Agreement No. 09/KUD-KSH/VIII/2020 dated 8 August 2020, with a validity period until both parties agree to terminate the collaboration</li> <li>- Koperasi Buatan Jaya with Kosin (FFB Transporter) Jati Mulya Village, Kerinci Kanan Sub District, Siak District, Agreement No. 04/KUD-BJ/VIII/2021 dated 11 July 2021, with a validity period until both parties agree to terminate the collaboration.</li> <li>- SPK Work Agreement Document No. 013/P2/KUD-MR-1/01/2023 dated January 2, 2023 the FFB Transport work agreement between KUD Mulus Rahayu and Agus Julianto is valid until December 31, 2023.</li> </ul> <p>All contract was verified by the auditor. Based on the interview with the contractor, all working agreement has covered the issues such as occupational safety and health, no underage worker and payments. There were no dispute issues so far.</p>	
2.2.2	<p>All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.</p> <p>- Minor compliance -</p>	<p>FFB supplier for Buatan II POM are from Simpang Perak Estate, KKPA Delima Sakti, and Scheme Smallholders (KUD Mulus Rahayu, KUD Bhirawa Bhakti, KUD Tani Rukun, KUD Kebun Sawit Harapan, KUD Buatan Jaya, KUD Mitra Usaha, KUD Makarti Sawit and KUD Bina Mulia), Plasma Plantation Conversion and pre conversion and KKH4 Estate (Kiap Hulu Afdeling 4).</p> <p>All contract, including those for FFB supply, have contained specific clauses to meet the relevant legal requirements, that has been mentioned in the contract agreement in Chapter 7 "<i>Tanggung Jawab dan Kewajiban</i>" which has explained the contractor's responsibilities to meet legal requirement such as being willing to pay according to the</p>	Complied



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		<p>wages set by the government, not employing child labor and not performing forced labor.</p> <p>According to Asian Agri's policy regarding to traceability, they have conducted traceability project to verify their supply chain. The company's policy on traceability can be seen on the page <a href="https://www.asianagri.com/en/sustainability/traceability">https://www.asianagri.com/en/sustainability/traceability</a>.</p>	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.</p> <p>- Minor compliance -</p>	<p>All contract, including those for FFB supply, have contained specific clauses to meet the relevant legal requirements, that has been mentioned in the contract agreement in Chapter 7 "<i>Tanggung Jawab dan Kewajiban</i>" which has explained the contractor's responsibilities to meet legal requirement such as being willing to pay according to the wages set by the government, not employing child labor and not performing forced labor and trafficking labor as well, which states:</p> <ul style="list-style-type: none"> <li>• The company policy related to children/underage worker, anti-drugs etc.</li> <li>• Workers payment referred to local minimum payment's regulation.</li> <li>• All worker will be register in health insurance and workers insurance according to national regulation.</li> </ul> <p>The same regulation also implemented in smallholder scheme. All of contract data kept by Head Clerk in estate and mill.</p> <p>Documents Verified:</p> <ol style="list-style-type: none"> <li>1. Work Order No. 010/E2KSP/II/2023 dated 17 February 2023 for work orders for renovation of type E employee housing in Simpang Perak Estate as much as 15 Kopel to CV Sipaet with a completion time until 31 July 2023.</li> </ol>	Complied

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		<p>2. School Bus on behalf of Sri Rahayu (Contract No. 008/E2KBN/01/2020 dated 1 January 2020).</p> <p>3. FFB transporter on behalf of Wongso Santoso (Contract No. 009/E2KBN/01/2020 dated 1 January 2020).</p> <p>4. FFB/EFB transporter on behalf of Parlaungan Panjaitan (Contract No. 010/E2/KBN/01/2020 dated 1 January 2020).</p> <p>5. CPO, PK and CPKO Transporter on behalf PT Wijaya Multi Prima Lestari (Contract No. SPK No. 05/VI/W/WMPL-IIS/2020 dated 4 June 2020).</p> <p>6. CPO, PK and CPKO Transporter on behalf CV Trans Cargo Logistic (Contract No. 01/VI/tCL-IIS/2022, dated 6 June 2022).</p> <p>7. CPO, PK and CPKO Transporter on behalf CV Teman Setia (Contract No. June 2022).</p> <p>8. CPO, PK and CPKO Transporter on behalf PT Buana Jaya Bersama (Contract No. 03/VI/BJB-IIS/2020, dated 4 June 2020)</p> <p><b>Scheme Smallholder:</b></p> <p>All contract, including those for FFB supply, have contained specific clauses to meet the relevant legal requirements, that has been mentioned in the contract agreement in Chapter 7 "<i>Tanggung Jawab dan Kewajiban</i>" which has explained the contractor's responsibilities to meet legal requirement such as being willing to pay according to the wages set by the government, not employing child labor and not performing forced labor.</p> <p>According to Asian Agri's policy regarding to traceability, they have conducted traceability project to verify their supply chain. The company's policy on traceability can be seen on the page <a href="https://www.asianagri.com/en/sustainability/traceability">https://www.asianagri.com/en/sustainability/traceability</a>.</p>	
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		<p>Document verified:</p> <ul style="list-style-type: none"> <li>- Dokumen SPK Perjanjian Kerja No. 013/P2/KUD-MR-1/01/2023 tanggal 2 January 2023 perjanjian kerja Angkut TBS antara KUD Mulus Rahayu dengan Agus Julianto berlaku sampai dengan 31 Desember 2023.</li> <li>- Surat Perjanjian Kerja Angkutan TBS No. 11/KUD-BM/VIII/2021 tanggal 25 November 2021 perjanjian antara Koperasi Bhakti Mandiri dengan Bpk. Siman (Desa Kampung Bukit Harapan.</li> </ul>	
<b>Criteria 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p><b>(C)</b> For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <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> <p>- Critical (Major) compliance -</p>	<p>Buatan II POM has chosen the Mass Balance Module, the supply bases as directly sourced of FFB are estate (Simpang Perak Estate), scheme smallholder (certified under Buatan II POM), KKPA Delima Sakti and KKH4 (Kebun Kiap Hulu 4 – PT PBN).</p> <p>The scheme smallholders are KUD Mulus Rahayu, KUD Bhirawa Bakti, KUD Tani Rukun, KUD Kebun Sawit Harapan, KUD Buatan Jaya, KUD Mitra Usaha, KUD Makarti Sawit and KUD Bina Mulia. For KKPA Delima Sakti has excluded from the scope of certification of Buatan II POM during ASA2.2. The information related geolocation, proof of ownership status, and trading license a cooperative has shown during audit.</p> <p>Verified document for directly FFB supplier is for Kebun Kiap Hulu 4 PT PBN as follows:</p> <ul style="list-style-type: none"> <li>• Geolocation: N: 00° 24' 39.48" and E 101° 45' 51.11"</li> <li>• Proof of ownership status, right/claim of the land by grower/smallholder; SK HGU No. xx/HGU/2000 from Bupati Pelalawan dated 20 September 2000.</li> <li>• Business permit: NIB No. 9120304292529</li> </ul>	Complied

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2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1. - Minor compliance -	Based on document review and interview to the management during ASA2.2 for period January – December 2022 and January – June 2023 it was known that there is indirect supplier of FFB for Buatan II POM, which is a third-party supplier, consist of 1 Supplier: Kebun Kiap Hulu (KKH) Afdeling IV.	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. - Critical (Major) compliance -	<div>The Certificate Holder has five years’ management plan covering Own Estate, Mill and Smallholder’s scheme updated January 2023, as follow: 1. Projection – FFB (MT)</div> <table><tr><th>Unit</th><th>2023</th><th>2024</th><th>2025</th><th>2026</th><th>2027</th></tr><tr><td></td><th>Ton</th><th>Ton</th><th>Ton</th><th>Ton</th><th>Ton</th></tr><tr><td>FFB Production – Simpang Perak Estate</td><td>75.028</td><td>70.821</td><td>70.535</td><td>70.200</td><td>70.115</td></tr><tr><td>FFB Production - Plasma Buatan II (KUD Mulus Rahayu, KUD Bhirawa Bakti, KUD Tani Rukun, KUD Kebun Sawit Harapan, KUD Buatan Jaya, KUD Mitra Usaha, KUD Makarti Sawit.</td><td>128.492</td><td>112.264</td><td>112.154</td><td>112.115</td><td>111.875</td></tr></table>	Unit	2023	2024	2025	2026	2027		Ton	Ton	Ton	Ton	Ton	FFB Production – Simpang Perak Estate	75.028	70.821	70.535	70.200	70.115	FFB Production - Plasma Buatan II (KUD Mulus Rahayu, KUD Bhirawa Bakti, KUD Tani Rukun, KUD Kebun Sawit Harapan, KUD Buatan Jaya, KUD Mitra Usaha, KUD Makarti Sawit.	128.492	112.264	112.154	112.115	111.875	Complied
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3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	PT Inti Indosawit Subur – Simpang Perak Estate was able to demonstrate annual replanting program period 2024 – 2026 as follows: <table><tr><td>Year</td><td>Program (Ha)</td><td>Actual (ha)</td></tr></table>	Year	Program (Ha)	Actual (ha)	Complied																																																																					
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3.1.3	The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.	Organization has conducted management review annually. The management review stipulated in the procedure "AA-SOP-ES-6001-R5	Complied																																										

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	<p>- Minor compliance -</p>	<p>dated 1 August 2020". The latest management review at PT IIS Buatan II POM was conducted in March 2023 and attended by 11 persons.</p> <p>During the onsite audit, auditor team also verifying the record of internal audit/visit. Sighted the record of visit in each unit as follows:</p> <p>The company has annual internal audit activity namely Visit Agronomy (VA) and Visit Engineering (VE).</p> <p><b>Simpang Perak Estate:</b></p> <p>Report No. VA-KSP-MAY-FULL-23 dated 02 May 2023. There were some issues in this estate, for example: less focus on palm circles, size of circles less than 1.5 meters and control of <i>Centotheca</i> was poor, while in the lowlands, there was no maintenance on circle under leaning palms and for manuring activity found sporadic Boron deficiency sighted in Block A20c Afd I. The Estate has made a corrective action plan and the issues has been closed in June 2023.</p> <p><b>Buatan II POM:</b></p> <p>Report No. VE-PBD-FEB-FULL-01-2022-Full Report, date of visit in February 2023. There were no main issues in this estate. However, there is issue in the Loading Ramp Station related to the use of Manila capstan rope is wasteful because the roller holding the rope uses round and stiff iron, so the friction on the rope is quite large. And in the Sterilizer St related to the condensate water does not come out of the Steriliser smoothly due to the shape and size of the condensate steriliser filter no. 1 to 4 vary in shape and size, which causes them to clog easily. The unit has made a corrective action plan and the issues has been closed in April 2023.</p> <p><b>Scheme smallholders:</b></p> <p>Report visits scheme smallholder "<i>Kunjungan Head Smallholder ke Kebun Plasma Buatan</i>" conducted by Coordinator of Smallholder in Plasma Buatan Group, sample seen visit on 29 May 2023 based on the report there is an issue related to the pest and disease. The unit has</p>	
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		made a corrective action plan and the issues has been closed in June 2023.	
<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	<p><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> <p>- Critical (Major) compliance -</p>	<p>Certificate holder has conducted several trainings to empowering independent smallholder through one day coaching clinic namely <i>Pelatihan Dinamika Kelompok Kebun Plasama Buatan (KLB)</i>. The last has been held on 11 January 2023 and attended by 45 participants (villagers surrounding concessions area).</p> <p>During ASA2.2 obtained information related to improvement in smallholder management. Problem: acceleration of the replanting program, the farmers are still questioning the production of topaz seedlings for old plants, in KUD which will be replanted. Action: Management has conducted socialization and also conducted a comparative study to other plantations (1 group) whose production is still high namely to Gondai Estate – PT MUP, the yield is 32,8 MT/Ha/year.</p> <p>In addition, the management of Kebun Plasma Buatan has conducted the annual schedule of awareness/socialization and refreshment training to updating smallholder's knowledge and awareness related palm oil sustainability. For example, safety, Emergency Response, Basic Fire, HCV and best practises awareness/training on 22 June 2022 located in meeting room of Plasma Buatan. This training attended by 150 representative's participants from smallholder. And also fire training on 31 May 2023 attended by 30 participants.</p> <p>Simpang Perak Estate has an action plan for Continuous improvement: Modify fertilization techniques to reduce fertilization costs to below 60%, apart from that, all trees can receive the same type of fertilizer and the same dose.</p>	Complied



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		<p>Buatan II Palm Oil Mill has an action plan for Continuous improvement:</p> <p>Reduce oil losses from 1.32% to be 1.25% with improve performance of machine and proses handling at Bunch Press Station, Press/Digester and Clarifier Station.</p> <p>The improvement plan has been implemented and well monitored.</p>	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.</p> <p>- Minor compliance -</p>	<p>RSPO Annual Communication of Progress 2022 of PT Inti Indosawit Subur has been available in RSPO website under membership number 1-0022-06-000-00. At the time of the audit, the RSPO Metrics template has shown during audit.</p>	Complied
<b>Criteria 3.3:</b> Operating procedures are appropriately documented, consistently implemented and monitored.			
3.3.1	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p><b>Estate:</b></p> <p>Based on document review during ASA2.2, it was known that Estate has had Standard Operational Procedures (SOP) that covering entire operational activity as follows:</p> <ul style="list-style-type: none"> <li>• SOP AA-APM-OP-1100.01-R4 dated 5 September 2016: <i>Pembibitan</i> (Nursery).</li> <li>• SOP AA-APM-OP-1100.02-R3 dated 10 June 2015: <i>Penanaman Areal Baru</i> (New Planting).</li> <li>• SOP AA-APM-OP-1100.03-R2 dated 24 July 2015: <i>Pembuatan dan Perawatan Jalan dan Jembatan</i> (Road and Bridge construction and maintenance);</li> <li>• SOP AA-APM-OP-1100.04-R3 dated 7 Decmeber 2015: <i>Pembuatan dan Pemeliharaan Parit</i> (Drainage Construction and Maintenance).</li> <li>• SOP AA-APM-OP-1100.05-R3 dated 23 November 2016: <i>Konservasi Tanah dan Air</i> (Soil &amp; Water Conservation).</li> <li>• SOP AA-APM-OP-1100.06-R6 dated 16 February 2017: <i>Menanam</i></li> </ul>	Complied

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		<p><i>kacangan</i> (Planting cover crops).</p> <ul style="list-style-type: none"> <li>• SOP AA-APM-OP-1100.07-R6 dated 16 February 2017: <i>Menanam Kelapa Sawit</i> (Planting Oil Palms).</li> <li>• SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed control).</li> <li>• SOP AA-APM-OP-1100.09. R5 dated 26 December 2018: <i>Pemupukan</i> (Fertilizer application).</li> <li>• SOP AA-APM-OP-1100.10. R6 dated 23 November 2016: <i>Pengendalian Hama dan Penyakit</i> (Pests &amp; Disease Control).</li> <li>• SOP AA-APM-OP-1100.11. R1 dated 1 February 2009: <i>Pestisida dan Pengendaliannya</i> (Pesticide Handling).</li> <li>• SOP AA-APM-OP-1100.12. R3 dated 23 November 2016: <i>Kastrasi</i> (Palm castration) explain cutting all generative product (mal flower, female flower, all fruit, to support vegetative growth) – done 5-6 months before being harvested.</li> <li>• SOP AA-APM-OP-1100.13. R3 dated 4 March 2016: <i>Tunas Pokok</i> (Pruning).</li> <li>• SOP AA-APM-OP-1100.14. R3 dated 16 February 2017: <i>Sensus dan Identifikasi Pokok</i> (Census and Palm Identification).</li> <li>• SOP AA-APM-OP-1100.15. R2 dated 1 October 2010: <i>Sensus Produksi</i> (Production Census).</li> <li>• SOP AA-APM-OP-1100.16. R1 dated 1 February 2009: <i>Konsolidasi Pohon Tumbang</i> (Provision of Support to Fallen Palm).</li> <li>• SOP AA-APM-OP-1100.17. R1 dated 23 October 2014: <i>Pengelolaan Air</i> (Water Management).</li> <li>• SOP AA-APM-OP-1100.18.R3 dated 20 April 2015: <i>Potong Buah</i> (Harvesting).</li> <li>• SOP AA-APM-OP-1100.19.R1 dated 1 February 2009: <i>Pengelolaan</i></li> </ul>	
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		<p><i>Transport</i> (FFB Transport).</p> <ul style="list-style-type: none"> <li>SOP AA-APM-OP-1100.20-R6 dated 1 May 2019: <i>Peremajaan</i> (Replanting).</li> </ul> <p>There is no change about the SOP until this audit.</p> <p>Buatan II POM has documented and implemented procedure related to process of FFB to become CPO and PK, starts from FFB receiving to dispatch of CPO and PK:</p> <ol style="list-style-type: none"> <li>SOP AA-MPM-OP-1400.02.R2 dated 1 September 2011: <i>Stasiun Penerimaan</i> for FFB Receiving Station;</li> <li>SOP AA-MPM-OP-1400.03.R1 dated 1 February 2009: <i>Stasiun Rebusan</i> for Sterilizer;</li> <li>SOP AA-MPM-OP-1400.04.R1 dated 1 February 2009: <i>Stasiun Pemisahan Berondolan</i> for Loose Fruit Separation;</li> <li>SOP AA-MPM-OP-1400.05-R1 dated 1 February 2009: <i>Stasiun Pengadukan</i> dan Pengempaan for Pressing Station;</li> <li>SOP AA-MPM-OP-1400.06-R1 dated 1 February 2009: <i>Stasiun Pemurnian</i> for Clarification;</li> <li>SOP AA-MPM-OP-1400.07-R1 dated 1 February 2009: <i>Stasiun Pemisahan Nut dan Fiber</i> for Nut and Fiber Separation;</li> <li>SOP AA-MPM-OP-1400.08-R1 dated 1 February 2009: <i>Stasiun Kernel</i> for Kernel Station;</li> <li>SOP AA-MPM-OP-1400.09-R1 dated 1 February 2009: <i>Stasiun Boiler</i>;</li> <li>SOP AA-MPM-OP-1400.10-R1 dated 1 February 2009: <i>Stasiun Engine Room</i>;</li> <li>SOP AA-MPM-OP-1400.11-R1 dated 1 February 2009: <i>Stasiun Water Treatment</i>;</li> </ol>	
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		<p>11. SOP AA-MPM-OP-1400.12-R1 dated 1 February 2009: Laboratorium;</p> <p>12. SOP AA-MPM-OP-1400.13-R1 dated 1 February 2009: <i>Stasiun Pengelolaan Limbah</i> for Palm Oil Mill Effluent Treatment;</p> <p>13. SOP AA-MPM-OP-1400.14-R2 dated 1 September 2011: <i>Stasiun Penimbunan dan Pengiriman CPO dan Kernel</i> for CPO and PK Bulking and Despatch Operation;</p> <p>14. SOP AA-MPM-OP-1400.15-R1 dated 1 February 2009: <i>Perawatan</i> for Preventive Maintenance;</p> <p>15. SOP AA-MPM-OP-1400.19.R2 dated 1 September 2011: <i>Manajemen dan Metode Menghitung Emisi Gas Rumah Kaca</i> (GHG)</p> <p>16. SOP AA-MPM-OP-1400.18-R4 Book Keeping</p> <p>17. AA-MPM-OP-1400.17-R6 Traceability</p> <p>There is no change about the SOP until this audit. Those documents above are available in each unit.</p> <p><b>Scheme Smallholder:</b>  Scheme smallholder has had best management practices procedure as follows:</p> <ul style="list-style-type: none"> <li>• AA-PLASMA-PP-KS-01 <i>Pembibitan</i> (Nursery)</li> <li>• AA-APM-OP-1100.09-R3 <i>Pemupukan</i> (Manuring) dated 20 April 2015</li> <li>• AA-PLASMA-PP-KS-04 <i>Potong Buah</i> (Harvesting)</li> <li>• AA-PLASMA-PP-KS-05 <i>Pengangkutan TBS</i> (FFB Transport)</li> <li>• AA-APM-OP-1100.10-R5 <i>Pengendalian Hama dan Penyakit</i> (Pest and Disease Control) dated 11 January 2016</li> </ul>	
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		<ul style="list-style-type: none"> <li>• AA-APM-OP-1100.20-R5 <i>Peremajaan</i> (Replanting) dated 4 March 2016</li> <li>• AA-MM-508-1-RO <i>Penerimaan TBS Plasma</i> (FFB Plasma Receiving) 1 September 2015</li> <li>• AA-MM-508-2-RO <i>Penentuan Taksasi TBS Plasma</i> (FFB Plasma Estimation)</li> <li>• AA-APM-OP-1100.8-R5 <i>Pengendalian Gulma</i> (Weed Control)</li> <li>• AA-FA-220-2-RO <i>Stempel</i> (Stamp)</li> <li>• AA-MPM-OP-1400-17-R6 <i>Ketertelusuran</i> (Traceability) dated 1 September 2017</li> <li>• AA-APM-OP-1100.02-R3 <i>Penanaman Area Baru</i> (New Planting)</li> <li>• AA-SOP-ES-6001-R4 <i>Audit Internal Sustainability</i> (Internal Audit Sustainability)</li> <li>• AA-KL-12-EFP <i>Restorasi Riparian dan Areal di Sekitar Danau/Waduk dan Mata Air Lainnya</i> (Restoration of Riparian Area or Near Area of Lake/Damp or Water Sources) dated 1 August 2010</li> <li>• AA-HR-305.2-RO <i>Rekrutmen dan Seleksi Karyawan</i> (Recruitment and Selection of Employee).</li> </ul> <p>There is no change about the SOP until this audit.</p> <p>During ASA2.2, auditor has conducted field visit to the Simpang Perak Estate as follows:</p> <ul style="list-style-type: none"> <li>• Harvesting in Simpang Perak Estate at Block C91e Afdeling III. The implementation was good, the harvester can demonstrate the best management practices for harvesting and also safety working procedure.</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Barn owl box Block C91a Afdeling III. The management unit using natural predator to control rat infestation. According to the interview, there are 4 barn owl boxes to covering 630 Ha of Afdeling III.</li> <li>• Upkeep activity at Simpang Perak Estate A17n Afdeling I, based on interview with the workers, they have carried out the upkeep procedure well.</li> <li>• Chemical weeding. During the ASA2.2, there is no spraying activity due to rainy weather. However, the pesticides applicator was carried out interview, based on the interview to the pesticides applicator it was known that they have understood the spraying procedure well.</li> <li>• Fertilizer application Block G16f Afdeling IV. According to fertilizer recommendation, Simpang Perak Estate conducted fertilizer application using ZA with dosage 2.59 kg/palm. The fertilizer applicator can demonstrate the application and safety working procedure.</li> </ul> <p>EFB application Block C91e Afdeling III. Unit management using EFB in immature palm to enrich the soil fertility, maintain soil moisture and reducing weeding especially in circle. EFB placing in each palm circle with dosage 27 ton/Ha or equal to 200 – 250 kg/palm.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor compliance -</p>	<p>During ASA2.2 it was known that the organization has had a mechanism to check consistent implementation of procedures through annual internal audit activity namely Visit Agronomy (VA) and Visit Engineering (VE).</p> <p><b>Simpang Perak Estate:</b></p> <p>Report No. VA-KSP-MAY-FULL-23 dated 02 May 2023. There were some issues in this estate, for example: less focus on palm circles, size of circles less than 1.5 meters and control of <i>Centotheca</i> was poor, while in the lowlands, there was no maintenance on circle under leaning palms and for manuring activity found sporadic Boron deficiency sighted in</p>	Complied

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		<p>Block A20c Afd I. The Estate has made a corrective action plan and the issues has been closed in June 2023.</p> <p><b>Buatan II POM:</b></p> <p>Report No. VE-PBD-FEB-FULL-01-2022-Full Report, date of visit in February 2023. There were no main issues in this estate. However, there is issue in the Loading Ramp Station related to the use of Manila capstan rope is wasteful because the roller holding the rope uses round and stiff iron, so the friction on the rope is quite large. And in the Sterilizer St related to the condensate water does not come out of the Steriliser smoothly due to the shape and size of the condensate steriliser filter no. 1 to 4 vary in shape and size, which causes them to clog easily. The unit has made a corrective action plan and the issues has been closed in April 2023.</p> <p><b>Scheme smallholders:</b></p> <p>Report visits scheme smallholder "Kunjungan Head Smallholder ke Kebun Plasma Buatan" conducted by Coordinator of Smallholder in Plasma Buatan Group, sample seen visit on 29 May 2023 based on the report there is an issue related to the pest and disease. The unit has made a corrective action plan and the issues has been closed in June 2023.</p>	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor compliance -</p>	<p>Certificate holder conducted monitoring of operational activity in all levels of workers. Each field supervisor has equipped with monitoring sheets/worksheets. For example, harvesting supervisor collected harvesting record and quality of each harvester. The report submitted to estate manager daily. Therefore, daily operational activity also recorded in daily worksheet by mill supervisor before reported to the mill manager.</p> <p>To ensuring the result of operational activity in line with the procedures, mill/estate manager conducted regularly monitoring of and</p>	Complied

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		management review to solve the findings issues. All results of management review are implemented by respective staff.	
<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	<p><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> <p>- Critical (Major) compliance -</p>	<p>There is no change in term of the statement of conformity when comparing from the previous audit result. Up to now since previous assessment last year till the date of this audit, no new planting in PT Inti Indosawit Subur – Buatan Group plantation area.</p> <p>The company have a SEIA documents such as :</p> <ul style="list-style-type: none"> <li>• PT. Inti Indosawit Subur – Buatan Group has demonstrated a document of <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>, mill capacity 30 tonnes FFB/hours.</li> <li>• PT. Inti Indosawit Subur – Buatan Group has demonstrated a document Environmental Management and Monitoring Document “<i>Dokumen Pengelolaan dan Pemantauan Lingkungan</i>” year 2009. The document was approved by Governor of Riau through “<i>Surat Keputusan Gubernur Riau No.Kpts.975/X/2009 tentang Penetapan Dokumen Pengelolaan dan Pemantauan Lingkungan Penambahan Kapasitas Produksi Pabrik Minyak Kelapa Sawit PT. Inti Indosawit Subur dan Kegiatan Pendukungnya, Sentral Workshop Buatan dan Pembuatan Laboratorium Kultur Jaringan Berlokasi di Kecamatan Pangkalan Kerinci dan Kecamatan Pelalawan, Kabupaten Pelalawan; Kecamatan Kerinci Kanan dan Kecamatan Dayun, Kabupaten Siak, Provinsi Riau</i>” – dated 28<sup>th</sup> September 2009. Mill capacity 60 tonnes FFB/hour.</li> <li>• Kernel Crushing Plant and Biogas Plant; the EIA is available under document “UKL-UPL (Environmental Management Effort / Environmental Monitoring Effort)” year 2012. Capacity of KCP 260</li> </ul>	Complied



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		<p>MT/day. UKL UPL has been approved by Local authorities through letter No.660/BLH-AM/2012/202 dated February 2012. Identified impacts: domestic solid waste, POME, hazardous waste, emission, dust, and noise from KC activities.</p> <ul style="list-style-type: none"> <li>• KUD (cooperative) holds a set of copy of latest AMDAL documents in the Cooperative office. EIA of scheme small holder has been covered by the "Dokumen Pengelolaan dan Pemantauan Lingkungan", for mill with capacity 60 tonnes FFB/hour, Own Estate 5,781 hectares, and Plasma 12,000 hectares. The EIA (DPPL) has met the applicable requirement and has been approved on 2009 through Governor Decree number Kpts.975/X/2009 dated 28th October 2009.</li> </ul> <p>The environmental impact assessment carried out by PT. Holistika Primagrahita with team consist of:</p> <ul style="list-style-type: none"> <li>• Team leader: Ir.Nur Iskandar (Fisheries/AMDAL B)</li> <li>• Physic/Chemical team: Azni Hamzah, S.Si (Chemical/AMDAL B)</li> <li>• Biology team: Khairunnazmi, S.Pi (Aquatic biology/AMDAL B), Marualat Harahap (Agriculture/AMDAL B)</li> <li>• Activity: Marualat Harahap (Agriculture/AMDAL B)</li> <li>• Social team: Yandra Mufialdo, S.Sos (Social economy)</li> <li>• Mapping: M. Irsyadul Anwar, S.Pi</li> </ul> <p>All significant impacts have been identified e.g: reduction of soil and water quality, reduction of air quality, impact to socioeconomic of local community, etc. Plan to monitor and manage of each identified environment impact have been provided and documented. The EIA document contained evidence of involvement of surrounding community during study and public consultation with relevant stakeholder.</p>	
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		<p>The impact assessment for replanting has identified impacts such as: changes in micro-climate, a decrease in air quality, increase in noise level, quantity and quality of surface water, soil erosion and sedimentation, loss of flora and fauna, disturbance to aquatic biota, community health and surrounding environment health.</p> <p>The document has also completed with environmental management and monitoring plan. The plans were explaining type of impact, source of impact, impact parameter, management purpose, management and monitoring plan, management/monitoring location, management/monitoring timeframe.</p> <p><b><u>Social Impact Assessemnt (SIA)</u></b></p> <p>PT Inti Indosawit Subur – Buatan POM has also shown the document of Social Impact Assessment PT Inti Indosawit Subur Kebun Buatan in Kabupaten Siak and Kabupaten Pelalawan Propinsi Riau, in 2009 by Fakultas Kehutanan Institut Pertanian Bogor.</p> <p>Assessment of aspects of social impacts was done by several methods, including:</p> <ul style="list-style-type: none"> <li>• Focus Group Discussion (FGD)</li> <li>• Deep interview</li> <li>• Structured Interviews</li> </ul> <p>During preparation for Social Impact assessment team and company management have involved communities through interviews and meetings with village peoples, farmers, village officials and regency officials. Record of meeting with affected parties and stakeholder are available and can demonstrated. Evidence of participation with affected parties is to use a questionnaire conducted on 13- 19 April 2009, questionnaires can be demonstrated at the time of the audit.</p>	
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		<p>Based on document verification, it is known that the social and environmental impact assessment has been carried out independently and participatively by involving affected stakeholders, including impact assessments from smallholder schemes.</p> <p>The results of field observations during the audit activity show that all the company's operational activities have been included in the environmental documents owned by the company.</p> <p>Based on interviews with representative of village officials, it is known that the social impacts of the company's existence include partnerships with business actors to provide business opportunities to the community, CSR, job opportunities, etc. These social impacts have also been identified in the SIA Document, Environmental Document, as well as the company's social impact management plan.</p> <p>Based on document verification, it is known that the scope of the social impact assessment has covered all villages, farmers, and has involved internal workers.</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.</p> <p>- Minor compliance -</p>	<p>Environmental management and monitoring of PT Inti Indosawit Subur – Buatan Group has been stated in ANDAL Document "<i>Matriks Rencana Pengelolaan Lingkungan dan Matriks Rencana Pemantauan Lingkungan</i>". This management and monitoring plan valid until there are changes or revision to ANDAL document.</p> <p>There is no change in term of the statement of conformity when comparing from the previous audit result. Up to now since previous assessment last year till the date of this audit, the social environmental management plan have been developed with participation of affected stakeholder. Details of management plan can be seen in document "<i>Rencana Pengelolaan Lingkungan</i>" and dokumen "<i>Rencana Kerja Lingkungan</i>" consisted of:</p>	Complied

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		<ul style="list-style-type: none"> <li>• Impact from main activities in oil palm plantation (spraying activity, natural vegetation conservation)</li> <li>• Impact from main activities in palm oil mill (utilization of palm oil mill manpower, FFB processing, palm oil mill effluent management, land application of palm oil mill effluent, application of empty fruit bunch, transport of crude palm oil, palm kernel and logistics, provision, and use of clean water).</li> <li>• Impact from supporting activities (energy source operation, central workshop operation, temporary hazardous waste storage, landfill operation)</li> </ul> <p>Review and evaluation upon future activities, such as:</p> <ul style="list-style-type: none"> <li>• Replanting activity, within the replanting activity review, team has identified type of impact such as: change in micro-climate, air quality decrease, increase of noise, dynamics in quantity and quality of surface water, erosion, and sedimentation, decrease in terrestrial flora and fauna, disturbance in aquatic life, effect on community health.</li> <li>• Social jealousy due to workers recruitment for replanting activities</li> </ul> <p>The document has also completed with environmental management and monitoring plan, gives description type of impact, source of impact, impact parameter, management objective, management/monitoring plan, period of management/monitoring, PIC for management/monitoring.</p> <p>For Smallholder scheme, the type of environmental impact from their oil palm plantation such as:  water pollution → control the spraying and fertilizer application, avoid spraying near water body;</p>	
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		<p>soil erosion -&gt; no blanket spraying, frond stacking, degradation on wildlife -&gt; no hunting.</p> <p>The Social Environmental monitoring and management report reported in regular basis each semester in "Laporan Pelaksanaan Izin Lingkungan". The company has also reviewed the SIA management and monitoring plan which was carried out together with the surrounding community and workers as evidenced by showing questionnaire on 2 February 2022 which was given to stakeholders as input in determining social programs.</p>	
3.4.3	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p> <p>- Critical (Major) compliance -</p>	<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>Based on Government Regulation No. 27/2012 concerning Environmental Permits Article 53 (1) and (2) states that the person in charge of business must prepare a report and submit a report on the implementation of environmental management activities every 6 months. This reporting period is still in accordance with the latest regulations (Government Regulation No. 22 of 2021 concerning Implementation of Environmental Protection and Management, Article 49 (6.f.6)).</p> <p>Social Environment management and monitoring plan as per RKL – RPL document has been implemented by PT Inti Indosawit Subur – Buatan Group. The evidence Lingkungan". Based on verification on Environmental management and monitoring report, confirmed that the management and monitoring plan has been well implemented accordingly.</p> <p>The document has also been reported to the relevant agency via SIMPEL KLHK RI (ID TTE 1673249330-1744, dated 9 January 2023). The environmental management and monitoring plan is in accordance with the environmental documents it has. The results of the verification of</p>	Complied

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		<p>the implementation of the environmental management and monitoring plan for semesters 1 and 2 of 2022 are in accordance with the directions of the environmental documents owned. In general, the results of environmental management and monitoring are in accordance with the provisions. The company has also conducted evaluations such as trend evaluation, critical level evaluation, and compliance evaluation. Based on the results of interviews with the surrounding community, information was also obtained that there was no environmental pollution by the company. In addition, the results of the interview with the Environmental Service of Pelalawan Regency also explained that the company had carried out environmental management and monitoring and reported the results of the implementation of environmental management and monitoring to the Environmental Service.</p> <p>In general, the results of environmental monitoring carried out by the company are in accordance with its environmental management and monitoring plan. In general, the results of the management of liquid waste have been effective, this can be seen from the test results which are still below the quality standard, besides that the temporary storage of hazardous waste has been carried out in accordance with relevant regulations.</p> <p>Sample of certificate analysis :</p> <ul style="list-style-type: none"> <li>• Surface water certificate analysis Number : D.01.236/LHU/2023 dated 14 February 2023; conducted by KAN accredited laboratory (PT ITEC Solution Indonesia) located in Bogor, West java; reference to PP RI No. 2/2021 (Lampiran VI)</li> <li>• Certificate of Analysis for Clean Water (boiled water), location in Buatan II POM – Report of Analysis No: D.03.785/LHU/2023, dated 20 March 2023 the reference of analysis report is based on</li> </ul>	
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		<p>PERMENKES No 2/2023. The result shown comply with the regulation.</p> <p><b><u>Social Aspect</u></b></p> <p>The company has implemented the SIA management and monitoring plan for the 2022 period. The plans that have been implemented have been in accordance with the SIA management and monitoring plan. Some examples of the implementation of the SIA management and monitoring plan are as follows:</p> <ul style="list-style-type: none"> <li>- Community Involvement Working at PT. IIS – Buatan Estate. The company opens as wide as possible for Farmers' Children if they want to work or have a career as an Employee or Staff. The company also makes a graph of the number of workers based on ethnicity, religion, and origin of workers.</li> <li>- Guidance and social assistance related to religious and educational activities have also been carried out to the surrounding community.</li> <li>- The company, through the Tanoto Foundation, provides scholarships for outstanding students, and establishes foster schools in the operational areas of the plantations. Like the SD 004 Bukit Agung target school.</li> <li>- The Company (Plasma) assists and provides Facilitators or resource persons to conduct training for KUD, KT Management and Farmers.</li> <li>- The company aids (guidance and counselling) to independent farmers who have become the company's mentor in the CSV (created share value) program</li> <li>- Enrolling employees in training according to their respective fields, for example: Basic education for security personnel and general administration.</li> </ul>	
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		The company has also reviewed the SIA management and monitoring plan which was carried out together with the surrounding community and workers as evidenced by showing questionnaire on 2 February 2022 which was given to stakeholders as input in determining social programs, for example.	
<b>Criteria 3.5:</b> A system for managing human resources is in place.			
3.5.1	<p>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> <p>- Minor compliance -</p>	<p>Regarding recruitment, employee completion and employee promotion, PT IIS Buatan Group has established the procedure and there is no change from the previous audit.</p> <p>Procedure for worker recruitment (SDM-A-001-00) and procedure for employee assessment (HRD C-002-00) was available and 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.</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> <p>SOP recruitment and employee selection No. SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding "<i>penerimaan karyawan baru</i>" (recruitment and selection of employee), explained that: When candidates have passed in the process of selection, next recruitment sends the candidate in full data system into HR-it) to be made an agreement work (made 2 duplicate and should be sign by candidates in question.</p> <p>PT Inti Indosawit Subur – Buatan II POM and Estate has issued the specific labor policy and procedures for temporary workers (PHL/PKWT); The policy and procedure are issued for each unit at PT Inti Indosawit Subur – Buatan II POM and Estate has issued the specific labor policy</p>	Complied



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		and procedures for temporary workers (PHL/PKWT); The policy and procedure are issued for each unit as Simpang Perak Estate and POM: The policy and procedure have been communicated to workers, especially to temporary workers at Buatan II POM and Simpang Perak Estate on 12 April 2022. The procedure was explained the detail of mechanism for temporary workers recruitment, promotion of temporary workers to be permanent workers, term and condition and requirement of temporary workers in accordance with National regulation (UU No. 11/2021 and PERPU no.6/2023 Cipta Kerja).	
3.5.2	Employment procedures are implemented and records are maintained. - Minor compliance -	<p>There are no changes, with labor procedures that have been determined by PT IIS-Buatan Group and still remind maintained and applied consistently, including:</p> <ul style="list-style-type: none"> <li>- SOP related to the payments No. AA-FA-219.1-R1: "Pengupahan" (Wages) dated 1 January 2008.</li> <li>- Mechanism to handle complaint from external party, as written in "Mekanisme Penanganan Keluhan" – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under "Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan" – Employee' complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05).</li> <li>- Specific labor policy and procedures for temporary workers (PHL/PKWT); The policy and procedure are issued for each unit at PT Inti Indosawit Subur – Buatan II POM and Estate has issued the specific labor policy and procedures for temporary workers (PHL/PKWT); The policy and procedure are issued for each unit as Simpang Perak Estate and POM:</li> <li>- The policy and procedure have been communicated to workers, especially to temporary workers at Buatan II POM and Simpang Perak Estate on 12nd April 2022. The procedure was explained the detail of mechanism for temporary workers recruitment, promotion</li> </ul>	Complied

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		<p>of temporary workers to be permanent workers, term and condition and requirement of temporary workers in accordance with National regulation (UU No. 13 tahun 2003 and Perpu No. 6/2023 Cipta Kerja).</p> <ul style="list-style-type: none"> <li>- SOP recruitment and employee selection No. SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding "penerimaan karyawan baru" (recruitment and selection of employee), explained that: When candidates have passed in the process of selection, next recruitment sends the candidate in full data system averis into HR-it) to be made an agreement work (made 2 duplicate and should be sign by candidates in question.</li> </ul> <p>Implementation of mechanism and procedures:  Realization of PHL (temporary workers) promotion to SKU (permanent worker) particularly harvester:</p> <ul style="list-style-type: none"> <li>- Promosi PHL to SKU of Buatan II Mill in 2022 based on Memorandum No. 075/MI-PBS/MEMO/IV/2022, dated 12 April 2022 have promoted as many 15 employees.</li> <li>- Promosi PHL to SKU of Buatan II Mill in 2023 based on Memorandum No. 103/MI-PBS/MEMO/IV/2023, dated 29 April 2023 have promoted as many 8 employees.</li> <li>- Promosi PHL to SKU of Buatan II Estate (Simpang Perak Esatate) in 2022 based on Memorandum No. 05/MI-KSP/MEMO/IV/2022, dated 12 April 2022 have promoted as many 13 employees.</li> <li>- Promosi PHL to SKU of Buatan II Estate (Simpang Perak Esatate) in I and II quarters of 2023 based on Memorandum No. 09/MI-KSP/MEMO/IV/2022, dated 17 July 2023 have promoted as many 25 employees.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Promosi PHL to SKU of Buatan II Estate (Simpang Perak Estate) in III and IV quarters of 2023 will be promoted as many 49 employees.</li> </ul> <p>So that the harvesters who are still PHL status until the end of 2023 are as many as 16 harvesters (who are included in universe II / 2023) will be promoted in February 2024. so that there will be no more harvesters with PHL status at the beginning of 2024.</p>	
<b>Criteria 3.6:</b> An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p><b>(C)</b> All operational activities risks assessed to identify the H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur – Buatan II POM and Estate has a procedure to identify and prepare a risk assessment register (HIRAC). The procedure of HIRADC (Hazard identification and risk analysis and determining control) as a guidance and standard to conduct the hazard and risk assessment as well as the determining control for risk and hazard. Procedure presented in SOP "Identifikasi bahaya, Penilaian Resiko dan Penentuan Pengendalian" AA-SOP-HSE-03 R0 dated 20 May 2018.</p> <p>Risk assessment method used is quantitative and qualitative method which is the multiplication of severity with the level of possibility. The company has set matrix multiplication result, which is subsequently determined from the matrix level/quality risk is divided into five (5) categories: extreme, high, moderate, low and tolerance/permitted.</p> <p>Risk Assessment presented in document of HIRADC - last review in 2 January 2023 covering for all activities both in Buatan II POM and Estate, such as: boiler operation, sterilizer operation, generator set operation, loading ramp activity, cleaning of CPO storage tank, chemical mixing, fertilizer warehouse, herbicide, and pesticide sprayer, harvesting, road</p>	Non-compliance

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		<p>maintenance, HCV Monitoring, Boundary Monitoring, land application maintenance.</p> <p>Mitigation plan to eliminate the risk and control the risk has been determined in the HIRADC document.</p> <p>Mitigation plan to reduce and minimize the risk impact has been develop by company covering:</p> <ul style="list-style-type: none"> <li>• Elimination of risk. One of elimination risk is arrangement of FFB truck vehicles on loading ramp by installing a barriers sign to maintain a safe distance between cars and workers.</li> <li>• Substitution of material and process.</li> <li>• Engineering control.</li> <li>• Administrative control. Administrative control was performed by employee mutation/rotation, sanction for safety rules violation. Safety inspection was performed regularly to ensure the compliance of safety regulation.</li> <li>• Personal protective equipment. Company has provide PPE for all workers according to the type of work and risk.</li> </ul> <p>PT Inti Indosawti Subur – Buatan II POM has prepared and documented the OHS Plan as in "Program Manajemen K3 Tahun 2023", such as:</p> <ul style="list-style-type: none"> <li>• Reducing the risk of work accidents: First aid training, basic safety training, basic fire training</li> <li>• Arrangement of the Assignment of First Aid Officers to the Manpower Office</li> <li>• Checking Apar, Hydrant, Evacuation Route, Assembly Point, Evacuation Controller Flag</li> <li>• Carry out a "Drill" for handling land fires and assess the readiness and measure the effectiveness of the Emergency Response Team's work</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Safety induction and dissemination of SOP to new employees</li> <li>• Safety briefing</li> <li>• PPE monitoring checklist</li> </ul> <p><b><u>Scheme Smallholder:</u></b></p> <p>During audit document HIRADC document for KUD Mulus Rahayu, KUD Bhirawa Bakti, KUD Kebun Sawit Harapan and KUD Buatan Jaya were available and could be demonstrated.</p> <p>The document of "Hazard Identification and Risk Assessment and Control (HIRAC) – Analisis Risiko tahun 2020/2021", last review in April 2022. The document has covered for all activities in field, e.g: transport FFB, harvesting, manuring and spraying.</p> <p>Mitigation plan to eliminate or reduce the hazard and risk has been develop according to HIRAC as per "Alternatif Kontrol Resiko untuk Tindakan Perbaikan".</p> <p>An OHS plan year 2023 has prepared as per "Rencana K3 (Keselamatan dan Kesehatan Kerja) majority to provide and control use of PPE, including socialization and monitoring, program such as:</p> <ul style="list-style-type: none"> <li>– Inspection and monitoring on using of PPE for harvester – daily</li> <li>– Training on emergency and preparedness – once a year</li> <li>– Training of first aider and monitoring of first aid kit</li> <li>– Refresh training of OHS including risk assessment.</li> </ul> <p>The implementation of risk analysis and risk control can be demonstrated during field audit such as: PPE provision for harvester (helmet, safety boot, glasses and hand gloves, sickle cover), OHS awareness for harvester and smallholder member.</p> <p>Non conformance :</p>	
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		<p>Risk analysis has been carried out by the company, however there is some activity has not cover by risk analysis.</p> <p>Objective evidence :</p> <ul style="list-style-type: none"> <li>During field visit to Buatan II POM, there were activity of Biogas Plant construction, however there is no risk analysis caried out by Buatan II POM.</li> <li>During field visit to Simpang Perak Estate, there were activity of pest and disease census, however there is no risk analysis caried out by Simpang perak Estate.</li> <li>Based on document verification and field visit it was noted that there were housing repair and maintenance activity, however there is no risk analysis caried out for the activity.</li> <li>PT IIS Buatan II POM and Simpang Perak Estate has shown risk analysis and risk control document updated January 2023, however risk analysis has not cover the activity as above.</li> </ul>	
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>- Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur – Buatan II POM, Estate and scheme smallholders has demonstrated the document of effectiveness of OHS program year 2023, such as:</p> <ul style="list-style-type: none"> <li>Refreshment training related to OHS, dated 10<sup>th</sup> March 2022, consisted of: understanding MSDS; handling empty pesticide containers; emergency response plan (for accident and spillage/contamination); prohibit use of agrochemical for pregnant and breastfeeding female worker; prohibit spraying in HCV and water body.</li> <li>OHS safety meeting period January – June 2022 -&gt; record of OHS meeting provided</li> <li>Report of OHS inspection (monthly) -&gt; last inspection was carried out on June 2022</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>PPE Provision for all workers at mill are demonstrated as per "Bukti Serah Terima Alat Pelindung Diri". Sample seen for PPE provision in Buatan II POM and Simpang perak Estate period 2023.</li> </ul> <p>Based on field visit during onsite audit for spraying workers it was found that sprayer has using appropriate PPE (eye wear/safety glasses, mask, and hand gloves) to mitigate the risk and regular training for sprayer workers are conducted by Simpang Perak Estate management.</p> <p>Discipline of PPE usage monitoring regularly conducted by Estate management to ensure all workers use the appropriate PPE during working. Monitoring record present in "Daftar Pemeriksaan Alat Pelindung Diri (APD)". Sample seen for PPE monitoring of fertilizer workers, spraying workers and harvester period January – June 2023.</p> <p>Based on interview with worker in pesticides application, method to minimizing risk and negative impact i.e: - Mixing of chemical conducted by trained person (Supervisor). There were aims to ensuring proper dosage, type of pesticide use. - Using of PPE while chemical mixing. Mixing of chemical located in mixing area, side by side with the chemical storage.</p>	
<b>Criteria 3.7:</b> All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.			
3.7.1	<p><b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender- specific needs, and which covers applicable aspects of P&amp;C Principles, in a form they understand and includes assessment of the training.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a training program set for main estate and scheme smallholder, while the training program includes socialization for several policies owned by the company such as human rights policies, business ethics policies, policies on equal opportunities and treatment in employment opportunities, policies on freedom of association and understanding of human trafficking, etc.</p> <p>Based on this explanation, the certification unit already has a training program prepared for period 2023 referring to the needs of workers as</p>	Complied

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		<p>well as third parties. The following are some of the intended training plans/programs:</p> <p><u>Simpang Perak Estate</u></p> <ul style="list-style-type: none"> <li>- Refresh Training Pest and Disease Control SOP in March 2023</li> <li>- Refresh Training Fertilizer SOP in June 2023.</li> <li>- QC Integrity Staff Training in July 2023.</li> <li>- Refresh Training Loading Ramp in March 2023.</li> <li>- Refresh Training Sterilizer in June 2023</li> <li>- Refresh Training Boilers in May 2023</li> <li>- OHS License for <i>Operator Pesawat Tenaga Produksi</i> in November 2023.</li> <li>- Electricity Technician Training in March 2023.</li> </ul> <p><u>Buatan Plasma</u></p> <ul style="list-style-type: none"> <li>- Limited Pesticide and weed control training in August 2023</li> <li>- Fertilizer Training in August 2023.</li> <li>- Integrated Pest Management Training in September 2023.</li> <li>- Counseling on SOP Water Management in August 2023.</li> <li>- Soil and Water Conservation Training in September 2023.</li> </ul>	
3.7.2	<p>Records of training are maintained, where appropriate on an individual basis.</p> <p>- Minor compliance -</p>	<p>The company has a managed training record, for example, every policy that is socialized by the company documenting it with a list of attendance of everyone who attends, for example:</p> <ul style="list-style-type: none"> <li>- Socialization of Pesticide Hazards for breastfeeding mothers on April 8, 2023 which was attended by 16 workers.</li> </ul>	Complied



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		<ul style="list-style-type: none"> <li>- Minutes of Training on Basic Fire, HCV, OHS and PPGD <i>Pembina Plasma</i> With KUD, Farmer Groups and Farmers which was held on June 22 2023 and was attended by 150 farmers.</li> <li>- Refresh Training "SOP Fertilizer" to 5 agronomy staff conducted on 16 June 2023.</li> <li>- Driver Training for 15 workers conducted on June 4, 2023.</li> <li>- Fire Fighting Training on January 9, 2023 which was attended by 14 workers.</li> <li>- Fire Equipment and service training on June 12, 2023 which was attended by 13 workers.</li> <li>- Heavy equipment training on April 4 – 5 2023 which was attended by 31 workers.</li> </ul> <p>From the results of interviews with workers, for example 3 workers spraying pesticides, it is known that the workers admit that they have attended training related to spraying technicians and OHS aspects given by the certificate holder.</p> <p>The certificate holder also maintains a list of workers who have attended licensed training, the following are examples:</p> <table border="1"> <thead> <tr> <th>Name</th><th>Operator Permit Document</th><th>No. Document</th><th>Valid Thru</th></tr> </thead> <tbody> <tr> <td>Suyono</td><td><i>Pesawat Angkat Angkut</i></td><td>100030-OPK3-PAA/VII/2011</td><td>30 September 2023</td></tr> <tr> <td>M. Yusni</td><td><i>Pesawat Angkat Angkut</i></td><td>Ser.1763/OPK3/PAA/III/2014</td><td>25 September 2024</td></tr> </tbody> </table>	Name	Operator Permit Document	No. Document	Valid Thru	Suyono	<i>Pesawat Angkat Angkut</i>	100030-OPK3-PAA/VII/2011	30 September 2023	M. Yusni	<i>Pesawat Angkat Angkut</i>	Ser.1763/OPK3/PAA/III/2014	25 September 2024	
Name	Operator Permit Document	No. Document	Valid Thru												
Suyono	<i>Pesawat Angkat Angkut</i>	100030-OPK3-PAA/VII/2011	30 September 2023												
M. Yusni	<i>Pesawat Angkat Angkut</i>	Ser.1763/OPK3/PAA/III/2014	25 September 2024												

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		Erwan	Teknisi K3 Listrik	Ser.00809/TK3-List/IV/2015	15 April 2024	
		Heri Suhaimi	Pesawat Uap	513/PGT/KK/OB-I/IX/05	30 September 2023	
		Kuat	Pesawat uap	692/PNK3-PUBT/OB-I/VII/08	30 September 2023	
		Wendy Tanjung	Juru Las Kelas II	No. S.216/JL/KK/VI/2014	-	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed. - Minor compliance -	SCCS Refreshment Training has been caried out on 14 February 2023 by Sustainability Department. Evidence of training can be demonstrated during audit such as attendance list, training material and photo documentation. During interview with weighbridge Clerk, KTU (head of administration), mill manager and dispatch operator Buatan II POM confirmed that they has understanding on RSPO supply chain.				Complied
<b>Criteria 3.8:</b> Supply chain requirements for mills. Procedure note: all requirements are classified as Critical Indicators. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)						
3.8.1	Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB	PT Inti Indosawit Subur – Buatan II POM implements RSPO Supply Chain model Mass Balance.  • Not applicable.				Not Applicable

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	without physically separating them, then only Mass Balance Module is applicable.		
3.8.2	<p>Mass Balance Module</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>PT. Inti Indosawit Subur – Buatan II POM holds current RSPO P&amp;C Certificate No. RSPO 633774, first certification start on 1<sup>st</sup> March 2011 and current certificate issued on 12/08/2021 and expired on 11/08/2026. In the current certificate, PT. Inti Indosawit Subur – Buatan II POM uses Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate (Simpang Perak Estate) and 9 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD). The proportion of non-certified FFB comes from third-party supplier, consist of 1 Supplier: Kebun Kiap Hulu (KKH) Afdeling IV.</p>	Complied
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 produce by PT. Inti Indosawit Subur – Buatan II POM its recorded in RSPO Public Summary report, certificate and RSPO IT Platform.</p> <p>The mill has met registration and reporting requirement as it registered in RSPO IT Platform (PalmTrace) with ID number RSPO_PO1000000148. Below are the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year 2022/2023:</p> <p><u>Forecast volume (Aug 2022 – July 2023)</u></p> <p>FFB : 237,874 MT</p> <p>CPO : 47,349 MT (OER: 19.90%)</p> <p>PK : 12,763 (KER: 5.40%)</p> <p><u>Actual production volume (Aug 2022 – ytd June 2023)</u></p> <p>FFB: 233,584 MT</p> <p>CPO: 46,581.90 MT</p>	Complied

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		PK: 11,299 MT <u>Actual sold volume as RSPO certified (Aug 2022 – ytd June 2023)</u> CPO: 15,631.86 MT PK: 9,136.64 MT	
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	PT. Inti Indosawit Subur – Buatan II POM is subsidiary of PT. Inti Indosawit Subur, a member of RSPO, with RSPO membership No.1-0022-06-000-00 since 6 February 2006. PT Inti Indosawit Subur – Buatan II POM has meet all registration and reporting requirements. RSPO IT Platform/PalmTrace account RSPO_ PO1000000382.	Complied
3.8.5	Documented procedures The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.	During this audit, there is no changing on the procedure of company related to supply chain implementation. PT. Inti Indosawit Subur – Buatan II POM can demonstrate procedures as follow: <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 Simpang Perak Estate and Smallholder, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years.</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-December each year. Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction.</li> <li>SOP for mill operation Mill Policy Manual:</li> </ul>	Complied

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		<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> <li>- SOP AA-MPM-OP-1400.18-R4 Book Keeping</li> <li>- SOP AA-MPM-OP-1400.17-R7 Traceability</li> </ul>	
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		<p>PT. Inti Indosawit Subur – Buatan 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-R6), the responsible person in charge to the supply chain system is Mill Manager. During audit, the mill manager is able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill.</p> <p>PT IIS Buatan II POM has a procedures for receiving and processing certified and non-certified FFBs as described in SOP AA-MPM-OP-1400.17-R7 Traceability, dated 1 October 2019. However Buatan II POM was apply Mass Balance system.</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p> <p>a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b) Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>PT. Inti Indosawit Subur – Buatan II POM has a procedure to conduct internal audit RSPO, including RSPO SCCS as per Procedure of Traceability (AA-MPM-OP-1400.17-R7) chapter 6.7, Sustainability Internal Audit Manager conducted internal audit annually, to ensure all operational and documentation activities are comply with the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>Internal audit for all scheme including RSPO SCCS also refer to SOP Internal Audit Nomor: AA-SOP-ES-6001-R5 dated 1 August 2020; Chapter 4.0 stated that Internal audit conducted minimum once a year considering the critical area.</p> <p>Latest internal audit conducted on 27 March – 1 April 2023. The report available under document "Internal Audit Sustainability Integrasi".</p> <p>Management review dated 10 April 2023, was attended by Technical Controller, POM Manager, Sustainability Staff. Document of Management Review available and recorded in minutes of meeting:</p>	Complied

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		<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> </ul> <p>Output of management review has include:</p> <ul style="list-style-type: none"> <li>- Recommendation for improvement</li> <li>- Resources needed.</li> </ul>	
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 – Buatan II POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R7), chapter 5.1 indicates the Weighbridge Clerk has responsibility to input data and print weighbridge card based on “Surat Pengantar TBS”, covering information e.g. estate name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number.</p> <p>PT. Inti Indosawit Subur – Buatan II POM holds current RSPO P&amp;C Certificate No. RSPO 633774, first certification start on 1<sup>st</sup> March 2011 and current certificate issued on 12/08/2021 and expired on 11/08/2026. In the current certificate, PT. Inti Indosawit Subur – Buatan II POM uses Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate (Simpang Perak Estate) and 9 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD). The proportion of non-certified FFB comes from third-party supplier, consist of 1 Supplier: Kebun Kiap Hulu (KKH) Afdeling IV.</p>	Complied

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		<p>The company have a system to inform CB for projected overproduction in place and how it is implemented and mechanism for handling non-conforming FFB and/or documents as stated in indicator 3.8.5 above.</p> <p>Document "Surat Pengantar TBS" (FFB Delivery Note) and Kartu Timbangan (Weighbridge Card) described identity and location of FFB source and other item required e.g.</p> <p>Certified FFB:</p> <ul style="list-style-type: none"> <li>• Weighbridge ticket "Kartu Timbangan No.PBDA123113265 dated 11/07/2023, for 466 FFB bunches; nett weight 7,548 kg; from Kebun KKPA Buatan – KKPA Delima Sakti, Afdeling 8, block H03t; vehicle number BM9195YU; Driver: M. Ari Saputra; RSPO certificate No.RSPO638947.</li> <li>• Weighbridge ticket "Kartu Timbangan No.PBDA123113322 dated 11/07/2023, for 696 FFB bunches; nett weight 3,130 kg; from Kebun Buatan – Afdeling 3, block C18f, C18l, C18n; vehicle number BM8291TZ; Driver: Ade Chandra; RSPO certificate No.RSPO638947.</li> <li>• Weighbridge ticket "Kartu Timbangan No.PBDA123113320 dated 11/07/2023, for 730 FFB bunches; nett weight 5,910 kg; from Kebun Buatan – Afdeling 3, block C18f, C18h; vehicle number BM9249QB; Driver: Ahmad Supriadi; RSPO certificate No.RSPO638947.</li> <li>• Weighbridge ticket "Kartu Timbangan No.PBDA123113214 dated 10/07/2023, for 1,297 FFB bunches; nett weight 5,650 kg; from Kebun Simpang Perak – Afdeling 2, block B19j, l, k; vehicle number BM8212TZ; Driver: Ogut; RSPO certificate No.RSPO 638947.</li> <li>• Weighbridge ticket "Kartu Timbangan No.PBDA123113236 dated 10/07/2023, for 500 FFB bunches; nett weight 5,110 kg; from Kebun Simpang Perak – Afdeling 4, block D16g; vehicle number BM8330TZ; Driver: Angga P Nasution; RSPO certificate No.RSPO 638947.</li> <li>• Weighbridge ticket "Kartu Timbangan No.PBDA223106660 dated 07/07/2023, for 317 FFB bunches; nett weight 7,635 kg; from Kebun</li> </ul>	
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		<p>Plasma – KUD Bhakti Mandiri KT-45 Rawa Mukti, ID KPB; Block B0201; RSPO certificate No.RSPO 638947; Vehicle number BM8089SD; Driver: Junaedi;</p> <ul style="list-style-type: none"> <li>• Weighbridge ticket "Kartu Timbangan No.PBDA223106178 dated 07/07/2023, for 397 FFB bunches; nett weight 8,691 kg; from Kebun Plasma – KUD Buatan Jaya KT-181 Janur Sawit, ID KPB; Block B0401; RSPO certificate No.RSPO 638947; Vehicle number BM8737SU; Driver: Yatin;</li> <li>• Weighbridge ticket "Kartu Timbangan No.PBDA223106333 dated 28/06/2023, for 300 FFB bunches; nett weight 7,789 kg; from Kebun Plasma – KUD Kebun Sawit Harapan KT-137 Rendement, ID KPB; Block B0600; RSPO certificate No.RSPO 638947; Vehicle number BM9620SC; Driver: Safii;</li> <li>• Weighbridge ticket "Kartu Timbangan No.PBDA223112392 dated 28/06/2023, for 432 FFB bunches; nett weight 5,331kg; from Kebun Plasma – KUD Mulus Rahayu Plasma Pre Konversi Afd. 1, ID KVB-1; Block A16a; RSPO certificate No.RSPO 638947; Vehicle number BM8287SC; Driver: Agus Julianto;</li> </ul> <p>Non-certified FFB:</p> <ul style="list-style-type: none"> <li>• Weighbridge ticket "Kartu Timbangan No.PBDA423100225" dated 10/07/2023, for 432 FFB bunches; nett weight 6,200 kg; from Supplier Kebun Kiyab Hulu Afdeling 4 – Block F08a, F08b; ID KKH-4; vehicle BM8215SU; Driver: Galang W Pratama; Non Certified.</li> <li>• Weighbridge ticket "Kartu Timbangan No.PBDA423100221" dated 07/07/2023, for 555 FFB bunches; nett weight 8,020 kg; from Supplier Kebun Kiyab Hulu Afdeling 4 – Block F08c, F08d; ID KKH-4; vehicle BM8215SU; Driver: Galang W Pratama; Non Certified.</li> </ul>	
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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> <ol style="list-style-type: none"> <li>The name and address of the buyer;</li> <li>The name and address of the seller;</li> <li>The loading or shipment / delivery date;</li> <li>The date on which the documents were issued;</li> <li>RSPO certificate number;</li> <li>A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>The quantity of the products delivered;</li> <li>Any related transport documentation;</li> <li>A unique identification number.</li> </ol>	<p>PT Inti Indosawit Subur – Buatan II Palm Oil Mill has ensure that the following minimum information for RSPO certified products is made available in document form such as: Sales contract, Delivery Order/Delivery notes and Weighbridge Ticket. The information are completed and can be presented across a range of documents issued for RSPO certified oil palm products. Sample seen:</p> <p>CSPO Contract, Delivery Order and Weighbridge ticket:</p> <ul style="list-style-type: none"> <li>- Sales Contract No. 03017/CC10/02/23 dated 10 Maret 2023. Buyer name: PT Sari Dumai Sejati; Buyer address; Jl. Palembang Kav 35 – 37, Kebon Melati, Tanah Abang, Kota Adm. Jakarta Pusat, DKI Jakarta 10230; Delivery date: Soonest; Quantity: 500 MT; Comodity: RSPO Certified CPO; SC Model: Mass Balance; Certificate Number: RSPO 638947; Specification: FFA max 5%, Moisture and impurities max 0.5%; Price: IDR ***; Seller: PT Inti Indosawit Subur; Seller address: Jl. Palembang Kav 35 – 37, Kebon Melati, Tanah Abang, Kota Adm. Jakarta Pusat, DKI Jakarta 10230; Destination port: Jl. Raya Lubuk Gaung RT 006 RW 000 Lubuk Gaung Sungai Sembilan Kota Dumai Riau.</li> <li>- The sales contract was defined into delivery orders: Delivery Order PT. Inti Indosawit Subur No.03017/DC10/02/23 dated 10 March 2023, instruction to PT. Inti Indosawit Subur – Buatan II POM to deliver 500,000 kg commodity Minyak Kelapa Sawit RSPO; Supply Chain Model Mass Balance; No.Ref. RSPO 638947.</li> <li>- Delivery Order No. 03017/DC10/02/23 dated 10 March 2023, completed with 17 deliveries. Sample dispatch slip CSPO from Buatan II POM to customer: <ul style="list-style-type: none"> <li>✓ Weighbridge ticket Buatan II POM No.PBDC123200336 dated 14 March 2023. Destination PT. Sari Dumai Sejati. Commodity CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO 638947. DO No. 03017/DC10/02/23.</li> </ul> </li> </ul>	Complied
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		<p>Transporter Buana Jaya Bersama, Vehicle No.BM9514CU, Driver: Rizki Adha. Volume dispatched netto 27,730 kg; Seal No. 6489998-6490004.</p> <ul style="list-style-type: none"> <li>✓ Weighbridge ticket Buatan II POM No.PBDC123100338 dated 14 March 2023. Destination PT. Sari Dumai Sejati. Commodity CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO 638947. DO No. 03017/DC10/02/23. Transporter CV. Jasa Sahabat Abadi, Vehicle No.BK9359VW, Driver: Zamoga TM Sitorus. Volume dispatched netto 30,770 kg; Seal No. 6490012-6490018.</li> <li>- Delivery Order No. 03023/DC10/02/23 dated 14 March 2023, completed with 27 deliveries. Sample dispatch slip CSPO from Buatan II POM to customer:</li> <li>✓ Weighbridge ticket Buatan II POM No.PBDC123200356 dated 17 March 2023. Destination PT. Sari Dumai Sejati. Commodity CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO 638947. DO No. 03023/DC10/02/23. Transporter CV Jasa Sahabat Abadi, Vehicle No.BK8875VY, Driver: Jumadi. Volume dispatched netto 28,240 kg; Seal No. 6490210-6490216.</li> <li>✓ Weighbridge ticket Buatan II POM No.PBDC123200355 dated 17 March 2023. Destination PT. Sari Dumai Sejati. Commodity CPO Certified RSPO. Supply Chain Model: Mass Balance. RSPO Certificate No.RSPO 638947. DO No. 03023/DC10/02/23. Transporter CV Jasa Sahabat Abadi, Vehicle No.BK8875VY, Driver: Jumadi. Volume dispatched netto 28,240 kg; Seal No. 6490210-6490216.</li> </ul> <p>This transaction was recorded in PalmTrace as TR-893a003d-8446, dated 17 June 2023 for CSPO Mass Balance, volume 1,210.78 MT. Seller</p>	
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		<p>PT. Inti Indosawit Subur – Buatan II POM. Buyer PT Sari Dumai Sejati, confirmation date 17/06/2023.</p> <p>PK Sales Contract/Delivery Order:</p> <p>All PK from PT Inti Indosawit Subur – Buatan II POM was deliver and process in Buatan I Kernel Crushing Plant (same company).</p> <p>Delivery Order PT. Inti Indosawit Subur No.12301/DC10/13/21 dated 1 December 2021; From: PT Inti Indosawit Subur – Buatan II POM, To: PT Inti Indosawit Subur – KCP Buatan I; Comodity: Palm Kernel; Quantity: 200,000 Kg; Supply Chain model: Mass Balance; Certificate number RSPO 638947. This DO fulfilled with 10 deliveries. Sample dispatch slip CSPK from Buatan II POM to customer:</p> <ul style="list-style-type: none"> <li>✓ Weighbridge Ticket No. PBDC221200717 dated 4 December 2021. Destination PT. Inti Indosawit Subur – Buatan I KCP. Commodity PK Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO638947. DO No. 12301/DC10/13/21. Transporter Buana Jaya Bersama, Vehicle No.BM9547PC. Volume dispatched 18,350 kg. Seal No.5635044-5635055.</li> </ul> <p>This transaction was recorded in PalmTrace as TR-055db206-f4b6, dated 31 January 2022 for CSPK Mass Balance, confirmation date 31 January 2022.</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>PT. Inti Indosawit Subur – Buatan II POM not outsource its milling activities however operate subcontractor for CPO and PK transporter. The appointed outsourced company is CV Jasa Bersama, PT Buana Jaya Bersama and PT Jasa Sahabat Abadi.</p> <p>PT. Inti Indosawit Subur – Buatan II POM having legal ownership of material being transported by appointed outsourced companies: CV Jasa Bersama, PT Buana Jaya Bersama and PT Jasa Sahabat Abadi.</p> <p>PT. Inti Indosawit Subur – Buatan II POM have a contract agreement with transporter as below:</p>	Complied

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	<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>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>	<ul style="list-style-type: none"> <li>- "Perjanjian Pengangkutan Nomor: 05/VIII/JB-IIS/2019" dated 2 August 2019 between PT Inti Indosawit Subur – Buatan II POM and CV Jasa Bersama. Contract transport for CPO &amp; PK.</li> <li>- "Perjanjian Pengangkutan Nomor: 07/VIII/BJB-IIS/2019" dated 2 August 2019 between PT Inti Indosawit Subur – Buatan II POM and PT Buana Jaya Bersama. Contract transport for CPO &amp; PK.</li> <li>- "Perjanjian Pengangkutan Nomor: 07/VIII/BJB-IIS/2019" dated 2 August 2019 between PT Inti Indosawit Subur – Buatan II POM and PT Jasa Sahabat Abadi. Contract transport for CPO &amp; PK.</li> </ul> <p>Contract agreement are signed and enforceable by both parties. According to contract agreement article 7 point 1.k 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 – Buatan II POM) and external auditor from Certification Body if necessary.</p> <p>Interview with transporter CV Jasa Bersama and PT Jasa Sahabata Abadi conducted during audit onsite, it was noted that they have understand with RSPO Supply Chain requirement during CPO/PK transport.</p> <p>PT IIS Buatan II POM has a procedure to control the outsourced transporter through "SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019"</p> <p>Internal control for CPO and PK delivery by contractor has made as well with:</p> <ul style="list-style-type: none"> <li>✓ Izin Pengisian PMKS Buatan II, contain information of Driver name, Identity number, Car/Truck Number, CPO/PK Dispatch time, netto, incoming and outgoing time.</li> </ul>	
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		<p>✓ Delivery Order Slip from Transporter, contain information of sales contract number, Truck number, destination, driver name, port destination.</p> <p>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.</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 – Buatan II POM not outsource its milling activities however operate subcontractor for CPO and PK transporter. The appointed outsourced company is CV Jasa Bersama, PT Buana Jaya Bersama and PT Jasa Sahabat Abadi.</p> <p>PT. Inti Indosawit Subur – Buatan II POM having legal ownership of material being transported by appointed outsourced companies: CV Jasa Bersama, PT Buana Jaya Bersama and PT Jasa Sahabat Abadi.</p> <p>PT. Inti Indosawit Subur – Buatan II POM have a contract agreement with transporter as below:</p> <ul style="list-style-type: none"> <li>- "Perjanjian Pengangkutan Nomor: 05/VIII/JB-IIS/2019" dated 2 August 2019 between PT Inti Indosawit Subur – Buatan II POM and CV Jasa Bersama. Contract transport for CPO &amp; PK.</li> <li>- "Perjanjian Pengangkutan Nomor: 07/VIII/BJB-IIS/2019" dated 2 August 2019 between PT Inti Indosawit Subur – Buatan II POM and PT Buana Jaya Bersama. Contract transport for CPO &amp; PK.</li> <li>- "Perjanjian Pengangkutan Nomor: 07/VIII/BJB-IIS/2019" dated 2 August 2019 between PT Inti Indosawit Subur – Buatan II POM and PT Jasa Sahabat Abadi. Contract transport for CPO &amp; PK.</li> </ul> <p>Contract agreement are signed and enforceable by both parties. According to contract agreement article 7 point 1.k stated that "Transporter bersedia memenuhi persyaratan sistem sertifikasi rantai pasok saat pengangkutan bahan baku dan bersedia untuk diaudit oleh</p>	Complied

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		<p>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 – Buatan II POM) and external auditor from Certification Body if necessary.</p> <p>Interview with transporter CV Jasa Bersama and PT Jasa Sahabata Abadi conducted during audit onsite, it was noted that they have understand with RSPO Supply Chain requirement during CPO/PK transport and they were pleasure if the CB/Auditor verify their operation while needed.</p> <p>PT IIS Buatan II POM has a procedure to control the outsourced transporter through “SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019”</p> <p>Internal control for CPO and PK delivery by contractor has made as well with:</p> <ul style="list-style-type: none"> <li>✓ Izin Pengisian PMKS Buatan II, 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> </ul> <p>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.</p>	
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>PT. Inti Indosawit Subur – Buatan II POM not outsource its milling activities however operate subcontractor for CPO and PK transporter. The appointed outsourced company is CV Jasa Bersama, PT Buana Jaya Bersama and PT Jasa Sahabat Abadi.</p>	Complied

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		<p>PT. Inti Indosawit Subur – Buatan II POM having legal ownership of material being transported by appointed outsourced companies: CV Jasa Bersama, PT Buana Jaya Bersama and PT Jasa Sahabat Abadi.</p> <p>PT. Inti Indosawit Subur – Buatan II POM have a contract agreement with transporter as below:</p> <ul style="list-style-type: none"> <li>- “Perjanjian Pengangkutan Nomor: 05/VIII/JB-IIS/2019” dated 2 August 2019 between PT Inti Indosawit Subur – Buatan II POM and CV Jasa Bersama. Contract transport for CPO &amp; PK.</li> <li>- “Perjanjian Pengangkutan Nomor: 07/VIII/BJB-IIS/2019” dated 2 August 2019 between PT Inti Indosawit Subur – Buatan II POM and PT Buana Jaya Bersama. Contract transport for CPO &amp; PK.</li> <li>- “Perjanjian Pengangkutan Nomor: 07/VIII/BJB-IIS/2019” dated 2 August 2019 between PT Inti Indosawit Subur – Buatan II POM and PT Jasa Sahabat Abadi. Contract transport for CPO &amp; PK.</li> </ul> <p>Contract agreement are signed and enforceable by both parties. According to contract agreement article 7 point 1.k 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 – Buatan II POM) and external auditor from Certification Body if necessary.</p> <p>Interview with transporter CV Jasa Bersama and PT Jasa Sahabata Abadi conducted during audit onsite, it was noted that they have understand with RSPO Supply Chain requirement during CPO/PK transport and they were pleasure if the CB/Auditor verify their operation while needed.</p>	
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		<p>PT IIS Buatan II POM has a procedure to control the outsourced transporter through "SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019"</p> <p>Internal control for CPO and PK delivery by contractor has made as well with:</p> <ul style="list-style-type: none"> <li>✓ Izin Pengisian PMKS Buatan II, 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> </ul> <p>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.</p>	
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>The organization has maintained accurate, complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain requirements, as evident in:</p> <ul style="list-style-type: none"> <li>- FFB delivery note</li> <li>- Weighbridge ticket for FFB receiving, CPO and PK delivery</li> <li>- Delivery Order</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>The procedure of Traceability (AA-MPM-OP-1400.7.R7), requires that all records and reports related to traceability and book keeping are retained for a period of 10 years.</p>	Complied

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	<p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>All receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK are record and balance in a three-monthly basis, as evidence in "Mass Balance Report Buatan II POM" period 2022/2023: January March, April – June, July – September, October – December, January – March, April –June.</p> <p>All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios/actual production of CPO and PK. According to Mass balance Report, Buatan II POM only deliver Mass Balance sales from a positive stock.</p>										
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of 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>The organization is able to provided estimate volume of CPO and PK in a year period as in Budget FY 2022/2023 Production FFB, CPO and PK. The organization also keep an up to date record of the FFB volume received, CPO and PK produced over a period of twelve (12) month, as in Rekapitulasi Produksi TBS, CPO dan PK PT Inti Indosawit Subur – Buatan II POM.</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 2023 as 19.90% and KER as 5.40%.</p> <p>Budget FFB process August 2022 – July 2023: certified 237,874 MT</p> <p>Budget CPO production August 2022 – July 2023: certified 47,349 MT</p> <p>Budget PK production August 2022 – July 2023: certified 12,763 MT</p> <p>Previous Budget vs realization on August 2022 – June 2023 as below:</p> <table><tr><th>Description</th><th>Budget</th><th>Realization (per June 2023)</th></tr><tr><td>FFB Certified</td><td>237,874</td><td>202,152.96</td></tr><tr><td>FFB Non Certified</td><td>-</td><td>-</td></tr></table>	Description	Budget	Realization (per June 2023)	FFB Certified	237,874	202,152.96	FFB Non Certified	-	-	Complied
Description	Budget	Realization (per June 2023)										
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		<table><tr><td>CPO Certified</td><td>47,349</td><td>39,788.33</td></tr><tr><td>CPO Non Certified</td><td>-</td><td>-</td></tr><tr><td>PK Certified</td><td>12,763</td><td>9,361.96</td></tr><tr><td>PK Non Certified</td><td>-</td><td>-</td></tr><tr><td>OER</td><td>19.91%</td><td>19.72</td></tr><tr><td>KER</td><td>5.37%</td><td>4.64</td></tr></table>	CPO Certified	47,349	39,788.33	CPO Non Certified	-	-	PK Certified	12,763	9,361.96	PK Non Certified	-	-	OER	19.91%	19.72	KER	5.37%	4.64	
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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 daily basis through sounding result and documented in daily report. PT. Inti Indosawit Subur – Buatan II POM is able to demonstrate the work instruction for analysis of oil content.</p> <p>Sample seen on document of “Laporan Harian Produksi”. Based on Laporan Harian Produksi dated 31 May 2023, the sounding result and production report shows that actual conversion ratios from FFB into CPO are:</p> <p>a. OER For FFB from Own Estate: 21.17%</p> <p>b. OER For FFB from Scheme smallholder: 20.75%</p> <p>c. OER For FFB from third-party: -</p> <p>d. OER Average 20.67%</p> <p>And actual conversion ratios from FFB into PK are:</p> <p>a. KER For FFB from Own Estate: 4.60%</p> <p>b. KER For FFB from Scheme smallholder: 4.59%</p> <p>c. KER For FFB from third-party: -</p> <p>d. OER average 4.60%</p>	Complied																		

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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>	Not applicable. PT IIS – Buatan II POM implementing Mass Balance Model for Supply Chain.	Not Applicable																																																												
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 – Buatan II POM has made shipping announcement inside PalmTrace transaction, sample seen for period Sept 2022 – May 2023:</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-893a003d-8446</td><td>PT. SDS</td><td>CSPO</td><td>MB</td><td>1210.78</td><td>Confirmed</td></tr><tr><td>TR-2b2c0d66-ed97</td><td>Buatan I KCP</td><td>CSPK</td><td>MB</td><td>1263.53</td><td>Confirmed</td></tr><tr><td>TR-526ea5b4-6c10</td><td>Buatan I KCP</td><td>CSPK</td><td>MB</td><td>2700.08</td><td>Confirmed</td></tr><tr><td>TR-1d11183a-47c5</td><td>PT Sari Dumai Oleo</td><td>CSPO</td><td>MB</td><td>210.53</td><td>Confirmed</td></tr><tr><td>TR-5a1902b9-7978</td><td>PT. SDS</td><td>CSPO</td><td>MB</td><td>2339.52</td><td>Confirmed</td></tr><tr><td>TR-d2e7ab25-617b</td><td>PT. SDS</td><td>CSPO</td><td>MB</td><td>6658.79</td><td>Reversed</td></tr><tr><td>TR-b98170d8-d65e</td><td>PT. SDS</td><td>CSPO</td><td>MB</td><td>1594.94</td><td>Reversed</td></tr><tr><td>TR-9aa87184-c07e</td><td>Buatan I KCP</td><td>CSPK</td><td>MB</td><td>1279.53</td><td>Confirmed</td></tr><tr><td>TR-6139c328-0ec4</td><td>PT. SDS</td><td>CSPK</td><td>MB</td><td>28.85</td><td>Confirmed</td></tr></table>	Transaction ID	Buyer	Product	Supply Chain Model	Volume*	Status	TR-893a003d-8446	PT. SDS	CSPO	MB	1210.78	Confirmed	TR-2b2c0d66-ed97	Buatan I KCP	CSPK	MB	1263.53	Confirmed	TR-526ea5b4-6c10	Buatan I KCP	CSPK	MB	2700.08	Confirmed	TR-1d11183a-47c5	PT Sari Dumai Oleo	CSPO	MB	210.53	Confirmed	TR-5a1902b9-7978	PT. SDS	CSPO	MB	2339.52	Confirmed	TR-d2e7ab25-617b	PT. SDS	CSPO	MB	6658.79	Reversed	TR-b98170d8-d65e	PT. SDS	CSPO	MB	1594.94	Reversed	TR-9aa87184-c07e	Buatan I KCP	CSPK	MB	1279.53	Confirmed	TR-6139c328-0ec4	PT. SDS	CSPK	MB	28.85	Confirmed	Complied
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3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>PT. Inti Indosawit Subur – Buatan II 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																																																																		

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4.1	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.	The corporate communication can be found at <a href="http://www.asianagri.com">http://www.asianagri.com</a> . PT. Inti Indosawit Subur (with the brand Asian Agri), the parent company of Buatan II POM is highlighting its commitment to the principles of RSPO, and directly referring to RSPO website.	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> <li>• Display its RSPO membership status</li> <li>• Display the RSPO web address (<a href="http://www.rspo.org">www.rspo.org</a>)</li> <li>• State that the member supports the work of the RSPO</li> <li>• State the member's history with regard to the RSPO.</li> <li>• Use the RSPO trademark to promote its membership of the RSPO.</li> </ul> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at <a href="http://www.rspo.org">www.rspo.org</a>' where the link must lead to the member's profile page.</p>	<p>PT. Inti Indosawit Subur (with the brand Asian Agri), in its website:</p> <ol style="list-style-type: none"> <li>a. Display its RSPO membership status: No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status. The CH only stated "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received our first RSPO certification for our estate in 2010."</li> <li>b. Display the RSPO web address: Not in direct manner. PT. Inti Indosawit Subur (with the brand Asian Agri), made a link to RSPO website.</li> <li>c. State the member supports the work of the RSPO: Not in direct manner. In the website, PT. Inti Indosawit Subur (with the brand Asian Agri), "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received our first RSPO certification for our estate in 2010."</li> <li>d. State the member's history with regards to the RSPO: Not in direct manner. In the website, PT. Inti Indosawit Subur (with the brand Asian Agri), "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received our first RSPO certification for our estate in 2010, and in 2012, the certification for our smallholder scheme."</li> </ol> <p>Use of RSPO Trademark to promote its membership of the RSPO: No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not use RSPO trademark in its corporate communication such in website.</p>	Complied



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4.3	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 oil palm products.	PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status. 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
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status. It is clear that the statement are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in the PT. Inti Indosawit Subur – Buatan II POM own products.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	PT. Inti Indosawit Subur (with the brand Asian Agri) did not display its RSPO Corporate Logo in any document.	Complied
<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	There was no use of RSPO trademark and/or RSPO corporate logo in business to business communication related to RSPO certified product; between PT. Inti Indosawit Subur – Buatan II POM and their buyers.	Complied
5.2	When confirming the sale of certified oil palm 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.	When confirming the sale of certified oil palm products, PT. Inti Indosawit Subur – Buatan II POM followed the requirements of the RSPO SCCS. PT. Inti Indosawit Subur – Buatan II POM stating the supply chain model and certificate number under which the claim is being made.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a) If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate	PT. Inti Indosawit Subur – Buatan II POM is not a distributor and/or wholesaler. Not applicable.	Not Applicable

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	<p>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 product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>PT. Inti Indosawit Subur – Buatan II POM is not producing or selling end-product to consumer. No labelling on product whatsoever.</p> <p>Not applicable.</p>	Not Applicable
<b>MODULE A – IDENTITY PRESERVED &amp; SEGREGATED SPECIFIC RULES</b>			
<b>Certified oil palm content (IP)</b>			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	PT Inti Indosawit Subur – Buatan II POM is producing and selling CSPO and CSPK; All CSPO/CSPK sold are 100 % content oil palm RSPO MB-certified.	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	PT Inti Indosawit Subur – Buatan II POM is producing and selling CSPO and CSPK; All CSPO/CSPK sold are 100 % content oil palm RSPO MB-certified.	Not Applicable
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified	PT Inti Indosawit Subur – Buatan II POM was sold the RSPO MB for CSPO and CSPK. The product is 100% RSPO certified MB. There is no any percentage of non-certified oil palm within the product.	Complied



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	oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.		
<b>Labelling and trademark (IP)</b>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• RSPO trademark which includes the tag 'CERTIFIED' or</li> <li>• RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.</li> </ul>	<p>PT Inti Indosawit Subur (with the brand Asian Agri), did not use RSPO trademark in its corporate communication such in website.</p> <p>When confirming the sales of certified oil palm products, PT Inti Indosawit Subur – Buatan II POM followed the requirements of the RSPO SCCS. PT Inti Indosawit Subur – Buatan II POM stating the supply chain model and certificate number under which the claim is being made.</p>	Complied
<b>Messaging (IP)</b>			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> <li>• The oil palm products contained in this product have been certified to come from RSPO sources. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• The entire supply chain is monitored by independent, RSPO-accredited auditors. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. <a href="http://www.rspo.org">www.rspo.org</a></li> </ul>	<p>PT Inti Indosawit Subur – Buatan II POM was not apply storytelling in product.</p>	Complied

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	<ul style="list-style-type: none"> <li>References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records.</li> </ul>		
<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.			
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>- Critical (Major) compliance -</p>	<p>The certification unit has a commitment to respecting human rights and describe in corporate policy set on 14 July 2020 by Group Manager (GM) PT Inti Indosawit Subur – Group Buatan according to the Memorandum from GM No. 01/GM-Buatan/MEMO/VII/2020 dated 14 July 2020, related "<i>The policy prohibits any acts of revenge, intimidation and harassment for whistle-blowers / human rights defenders</i>" (Human Right Defender).</p> <p>The policy relating to human rights, is explained in point 13, stating that: "<i>The company respects human rights by treating all employees fairly, both in terms of acceptance, valuation, conditions and working environment, as well as representation regardless of tribe, caste, national origin, religion/belief, disability, gender, sexual orientation, membership of trade union political affiliation and/or age</i>".</p> <p>As for the Buatan Plasma, the human rights policy is contained in every KUD, for example the Bhirawa Bakti KUD which was established on 6 September 2022 which contains commitments:</p> <ol style="list-style-type: none"> <li>1) Compliance with regulation and law</li> <li>2) Ethical behavior in business (prohibition of all forms of corruption, bribery, fraud in the use of funds and resources)</li> <li>3) Environmental pollution</li> <li>4) Occupational Health and Safety</li> </ol>	Complied

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		<p>5) Prohibition of the practice of burning land, peat areas and forest areas</p> <p>6) Respect defenders without giving threats or intimidation</p> <p>7) Respect human rights defenders without making threats or intimidation prevents sexual harassment</p> <p>8) Respect human rights by treating employees and peasants fairly and does not differentiate between ethnicity, caste, religion, and gender.</p> <p>9) Prohibition of employing children under the age of 18 in every plantation operational activity.</p> <p>This is evidenced by statements from plantation workers (harvesters, fertilizers, sprayers, and maintenance), factories (mill operators and warehouse workers) as well as contractors who state that so far there have been no incidents or issues of human rights violations occurring in the operational area of the certification unit.</p>	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.</p> <p>- Minor compliance -</p>	<p>During the past year (period 2022/2023), the certification unit did not have records related to the use of violence / mercenaries or paramilitaries in resolving conflicts / problems that existed between the certification unit and related stakeholders (surrounding communities, workers, or others). Based on extracting information related to issues on social media and the internet, the auditors did not find any information of violence or abuse perpetrated by the company.</p> <p>The results of interviews with the surrounding community (Bukit Agung Village), related agency and company workers revealed that up to now if there was a conflict / problem with the company, the resolution action taken was deliberation without resorting to violence. Resolution of conflicts / problems using these deliberations has been quite effective</p>	Complied

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		and during the past year there have never been any conflicts / problems with the company.	
<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	<p><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.</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes related to the procedure for handling complaints like external parties, namely: "<i>Mekanisme Penanganan Keluhan</i>" – complaint handling mechanism (Doc. No. SOP AA-GL-5005-RO-01) while complaint from internal regulated under "<i>Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i>" – Employee' complaint and resolution mechanism (Doc. No. SOP-AA-HR-3008-RO 05) and responded not more than 14 days. This procedure has also ensured the anonymity of complainants, defenders of human rights or whistleblowers and without any risk of retaliation or intimidation against whistleblowers.</p> <p>These mechanisms have communicated to external parties and disseminated to PT IIS employees. Based on interview with local communities and worker union leader; they understood the procedure and mechanism to communicating complaint and/or grievance to company.</p> <p><b>Scheme smallholders:</b></p> <p>The scheme smallholders have a mechanism of consultation and communication and there is no changes in the form of "<i>Mekanisme Komunikasi, Konsultasi dan Keluhan</i>", dated 13 January 2011.</p> <p>The procedure has been communicated to all members on 10 January 2023 and also recorded into the "Buku Pintar" for each of farmer.</p> <p>This procedure has also communicated again to all members of each cooperative (KUD Mulus Rahayu, KUD Bhirawa Bhakti, KUD Kebun Sawit Harapan and KUD Buatan Jaya) in February 2023 which was presented during the meeting for RAT discussions.</p>	Complied

4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>There are no changes related to the procedure for handling complaints like external parties, namely: "<i>Mekanisme Penanganan Keluhan</i>" – complaint handling mechanism (Doc. No. SOP AA-GL-5005-RO-01) while complaint from internal regulated under "<i>Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i>" – Employee' complaint and resolution mechanism (Doc. No. SOP-AA-HR-3008-RO 05) and responded not more than 14 days. This procedure has also ensured the anonymity of complainants, defenders of human rights or whistleblowers and without any risk of retaliation or intimidation against whistleblowers.</p> <p>These mechanisms have communicated to external parties and disseminated to PT IIS employees. Based on interview with local communities and worker union leader; they understood the procedure and mechanism to communicating complaint and/or grievance to company.</p> <p>These mechanisms has been communicated to external parties at the time conducting of communication and consultation with stakeholder, contractor and local communities on January 2022. While for the internal parties (all level employees at PT Inti Indosawit Subur – Buatan Group has been communicated on 19-21 January 2023 (list of participants can be shown during audit). Through this communication, the company explained about the mechanism of submission of complaints in detail and lasts in two directions (ask-answer/discussion), so if there are illiterate parties can understood.</p> <p><b>Scheme smallholders:</b></p> <p>The scheme smallholders have a mechanism of consultation and communication and there is no changes in the form of "<i>Mekanisme Komunikasi, Konsultasi dan Keluhan</i>", dated 13 January 2011.</p>	Complied
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		<p>The procedure has been communicated to all members on 10 January 2023 and also recorded into the "Buku Pintar" for each of farmer.</p> <p>This procedure has also communicated again to all members of each cooperative (KUD Mulus Rahayu, KUD Bhirawa Bhakti, KUD Kebun Sawit Harapan and KUD Buatan Jaya) in February 2023 which was presented during the meeting for RAT discussions.</p>	
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Regarding the complaint mechanism, there is no change from the previous audit period, namely the new procedure, namely the SOP for Submitting and Resolving Employee Complaints (SOP No: AA-HR-308.5-R1 effective December 1 2019). This procedure also protects the anonymity of the reporter. Refer to the Asian Agri website <a href="https://www.asianagri.com/id/panel-keberbesaran/keluhan-pengaduan">https://www.asianagri.com/id/panel-keberbesaran/keluhan-pengaduan</a></p> <p>Asian Agri is committed to responding quickly and constructively to any complaints made against our operations or our suppliers, and reporting them publicly. We developed a robust complaints procedure to resolve all verifiable complaints and conflicts with all relevant stakeholders such as land conflicts, social conflicts, human rights issues, labor issues, etc.</p> <p>Internal:</p> <ul style="list-style-type: none"> <li>• There are log books located in all estates and mills managed by Asian Agri's business units. Employees are free to file concerns and reports in these log books, on matters related to Asian Agri's sustainability policy. Concerns on operation disruptions faced by employees may be documented in the Disruption Log Book. Issues pertaining to employee rights may be documented in the Complaint Log Book.</li> <li>• Confidential reports may be submitted through email or telephone to protect the identity of the reporter; channel used: Poster on Whistleblowing is placed in every office of Asian Agri, Telephone: +62 811 910 7916, Email: <a href="mailto:attention@asianagri.com">attention@asianagri.com</a>.</li> </ul>	Complied

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		<p>External:</p> <p>Stakeholders of Asian Agri including but not limited to Government, smallholders, suppliers, vendors, academicians, NGOs, media, etc), are provided different channels to report their concerns/findings.</p> <p>Reporters may share their concerns and information on business misconduct, corruption, harassment, criminal acts, environment, etc.; channel used: Email: <a href="mailto:grievance@asianagri.com">grievance@asianagri.com</a>. Address: Jl. MH Thamrin No. 31, Jakarta 10230, Indonesia.</p> <p>This procedure is also applied to scheme smallholder operational. The procedure provides guidelines on handling grievances related to sustainability practices across our supply chain as well governance matters in our operations. The following grievance channels are available to support business transparency:</p> <p>The last socialization of SOP namely SOP <i>Penyampaian dan Penyelesaian Keluhan Karyawan</i> (SOP No: AA-HR-308.5-R1 effective dated 1 December 2019) was performed on 15-16 April 2023 and attended by 130 participants.</p> <p>Based on a review of documents listing complaints in plantations and factories for 2022 - 2023, in general workers' complaints are related to damage to housing facilities that need to be repaired. The organization has responded to worker complaints according to procedures and the complaints no longer exist. For external complaints, based on a review of the external complaint logbook, for 2022 and 2023 there will be no complaints to the organization.</p> <p><b>Scheme smallholders:</b></p>	
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4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>The most important issue is the replanting process, especially for farmers in 2 Regencys, i.e. Palalawan Regency and Siak Regency, where the cooperative is in Pelalawan Regency while the farmers' land is in Siak Regency. However, the Plasma Management of PT IIS Buatan Group has sent a letter requesting Replanting with the PSR Program (Program Peremajaan Sawit - BPD PKS) to each Regency including the documents required. Until this audit was carried out there was still no response.</p> <p>This is an issue where the problem is related to the regional government (Siak Regency and Pelalawan Regency) which has not decided in accordance with applicable laws and regulations.</p>	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.	<b>Buatan II POM, Eatate and Scheme Smallholder:</b>	Complied



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	<p>- Minor compliance -</p>	<p>PT IIS – Buatan Group already has policies related to social responsibility to the surrounding villages through CSR programs. The part responsible for this CSR program is the CSR Department led by Mr. Eko Budi Kristianto.</p> <p>This CSR program is made based on consideration of the situation and condition of the surrounding village community through Musrenbang (<i>Musyawarah Perencanaan Pembangunan</i>) meetings which are held every year, the last Musrenbang meeting was held on February 2, 2023 at the Kerinci District Office. The invitation to this meeting was conveyed through a letter from Kerinci District on January 30, 2023 letter no. 005/UM/2023/43.</p> <p>Here are the CSR programs for the 2022-2023 Period:</p> <p>Period 2022:</p> <ul style="list-style-type: none"> <li>- Assistances 600 liter cooking oil package for the Dhuafa for 20 villages in Pangkajene Kerinci, Pelalawan and Kerinci Kanan sub-districts totaling 600 liters, has been realized in April 2022</li> <li>- Musical instrument assistance to Delik Village (1 set of Hadrah musical instruments), has been realized in April 2022.</li> <li>- Funding assistance for the "Mandi Balimau Sultan's" traditional event, has been realized in April 2022.</li> <li>- Awarding of the 7th Package scholarship (ST2P) in Langgam Village, has been realized in March 2022.</li> <li>- Providing scholarships to elementary, middle and high school students in Delik Village. Scholarships in the form of 5 sets of school uniforms (compulsory 2 sets of uniforms, scouts, special uniforms, sports), shoes, books and stationery for a year. Has been realized in November 2022.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Alternative economic empowerment in the form of goat farming in Delima Village and Bukit Agung Village, assistance of 27 goats and has been realized in November - December 2022.</li> <li>- Procurement of a public cemetery in Pangkalan Kerinci District with a land area of 1.7 Ha has been realized in September 2022.</li> </ul> <p>Period 2023:</p> <ul style="list-style-type: none"> <li>- The provision of traditional musical instruments to the Bukit Agung Village Community has been realized in March 2023.</li> <li>- The implementation of the 2023 Cheap Cooking Oil Bazaar in 5 villages around the plantation, has been realized in April 2023 for IDR 8,053,350.</li> <li>- Training of Posyandu cadres for stunting prevention in 3 villages (Lalang Kabung Village, Delik Village and Pelalawan Village), has been realized in March – April 2023.</li> <li>- Giving Plastic Chair Assistance to the Indonesian Penta Costa Church in Makmur Village worth IDR 5,000,000 has been realized in March 2023.</li> <li>- Providing material assistance for the Al Ikhlas Mosque in Pelalawan Village and Pangkalan Kerinci worth IDR 5,000,000 has been realized on April 17, 2023.</li> </ul> <p>Based on interviews with the village heads of Bukit Agung and Kumbara Utama Head Villages, that the annual CSR planning at The Buatan Group is always involves representatives of villages around the plantation through village development initiatives.</p>	
<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.			

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4.4.1	<p><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> <p>- Critical (Major) compliance -</p>	<p>There are no changes of compliance statement compare to last year audit.</p> <p><b>Simpang Perak Estate:</b></p> <p>PT. Inti Indosawit Subur – Simpang Perak Estate 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>Simpang Perak Estate and POM has obtained the legal ownership in the form of HGU, as follow:</p> <ul style="list-style-type: none"> <li>- SK. HGU (Land Title), approved by "Menteri Negara Agraria/Kepala BPN No.10/HGU/1993, dated 13th May 1993 tentang Pemberian HGU atas nama PT. Inti Indosawit Subur, atas tanah di Kabupaten Kampar seluas 5,781.47 Ha".</li> <li>- HGU (Land titles) No.01, 1993, dated June 19th, 1993. for Buatan Estate (5,781 Ha);</li> <li>- Renewal land title No.145/HGU/BPN/2004, dated November 3rd, 2004. Expired until 2058 from Head of BPN (5,781 Ha);</li> </ul> <p><b>Scheme Smallholders:</b></p> <p>Based on interview with sampled smallholder member (farmer) and relevant authority, Plantation Agency of Siak District; there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary.</p>	Complied
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		Cooperatives have a conflicts resolution mechanism in “Mekanisme Penanganan Konflik” dated 1 August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.	
4.4.2	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>- Minor compliance -</p> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p> <p>4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;</p> <p>4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities. Including the implications for the legal status of their land at the expiry of the unit of certification’s title, concession or lease on the land.</p>	<p>There are no changes of compliance statement compare to last year audit.</p> <p><b>Simpang Perak Estate and Scheme Smallholders:</b></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 other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.</p> <p>Until the surveillance assessment is carried out, there is no additional or expansion operational area.</p> <p>There are no changes of compliance statement compare to last year audit.</p> <p><b>Simpang Perak Estate and Scheme Smallholders:</b></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 other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.</p>	Complied
4.4.3	<b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping	<b>Estate:</b>	Complied

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	<p>involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>Maps of an appropriate scale 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> <p><b>Scheme Smallholders:</b></p> <p>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.</p>	
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p><b>Simpang Perak Estate</b></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 other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.</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 plots already have legal use rights.</p>	Complied
4.4.5	<p><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.</p> <p>- Critical (Major) compliance -</p>	<p><b>Simpang Perak Estate</b></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 other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.</p>	Complied

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		<b>Scheme Smallholder:</b> 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 plots already have legal use rights.	
4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	<b>Simpang Perak Estate</b> Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.  <b>Scheme Smallholder:</b> 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 plots already have legal use rights.	Complied
<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. - Critical (Major) compliance -	Based on the AMDAL document (013/ANDAL/BA/V/1995) and DPPL Document (KPTS.975/X/2009) and historical documents of plantation land use such as maps and other company documents, planting activities at scope certification began in 1988 and were completed in 1991. Until the surveillance assessment activities were implemented, there were no new planting activities or new land clearing above 15 November 2018.	Complied

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4.5.2	<p><b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions. All the relevant information and documents are made available, and community have option of resourced access to independent third-party advice through a documented, long-term and two- way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	Based on the AMDAL document (013/ANDAL/BA/V/1995) and DPPL Document (KPTS.975/X/2009) and historical documents of plantation land use such as maps and other company documents, planting activities at scope certification began in 1988 and were completed in 1991. Until the surveillance assessment activities were implemented, there were no new planting activities or new land clearing above 15 November 2018.	Complied
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'agree' or 'not agree' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	Based on the AMDAL document (013/ANDAL/BA/V/1995) and DPPL Document (KPTS.975/X/2009) and historical documents of plantation land use such as maps and other company documents, planting activities at scope certification began in 1988 and were completed in 1991. Until the surveillance assessment activities were implemented, there were no new planting activities or new land clearing above 15 November 2018.	Complied
4.5.4	<p>To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of land allocations process.</p> <p>- Minor compliance -</p>	Based on the AMDAL document (013/ANDAL/BA/V/1995) and DPPL Document (KPTS.975/X/2009) and historical documents of plantation land use such as maps and other company documents, planting activities at scope certification began in 1988 and were completed in 1991. Until the surveillance assessment activities were implemented, there were no new planting activities or new land clearing above 15 November 2018.	Complied
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	Based on the AMDAL document (013/ANDAL/BA/V/1995) and DPPL Document (KPTS.975/X/2009) and historical documents of plantation land use such as maps and other company documents, planting activities at scope certification began in 1988 and were completed in 1991. Until the surveillance assessment activities were implemented, there were no new planting activities or new land clearing above 15 November 2018.	Complied

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4.5.6	Evidence is available that the communities or their representatives gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	Based on the AMDAL document (013/ANDAL/BA/V/1995) and DPPL Document (KPTS.975/X/2009) and historical documents of plantation land use such as maps and other company documents, planting activities at scope certification began in 1988 and were completed in 1991. Until the surveillance assessment activities were implemented, there were no new planting activities or new land clearing above 15 November 2018.	Complied
4.5.7	After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes. - Minor compliance -	Based on the AMDAL document (013/ANDAL/BA/V/1995) and DPPL Document (KPTS.975/X/2009) and historical documents of plantation land use such as maps and other company documents, planting activities at scope certification began in 1988 and were completed in 1991. Until the surveillance assessment activities were implemented, there were no new planting activities or new land clearing above 15 November 2018.	Complied
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	Based on the AMDAL document (013/ANDAL/BA/V/1995) and DPPL Document (KPTS.975/X/2009) and historical documents of plantation land use such as maps and other company documents, planting activities at scope certification began in 1988 and were completed in 1991. Until the surveillance assessment activities were implemented, there were no new planting activities or new land clearing above 15 November 2018.	Complied
<b>Criteria 4.6:</b> 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	<b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	Unit of certification has procedure of land compensation on " <i>Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2</i> ", dated 8th May 2015, which explaining that the settlement of land disputes is carried out through negotiation process involving deliberation of regional leaders, respective government agencies. Value of compensation should be agreed by both parties and recorded on the agreement. Calculations carried out with reasonable prices in accordance with the taxable value and state of the areas. Procedure do not distinguish the compensation calculation based on gender, local community or ethnic groups.	Complied



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4.6.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	Unit of certification has procedure of land compensation on " <i>Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2</i> ", dated 8th May 2015, which explaining that the settlement of land disputes is carried out through negotiation process involving deliberation of regional leaders, respective government agencies. Value of compensation should be agreed by both parties and recorded on the agreement. Calculations carried out with reasonable prices in accordance with the taxable value and state of the areas. Procedure do not distinguish the compensation calculation based on gender, local community or ethnic groups.	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement).</p> <p>- Minor compliance -</p>	<p>Until the surveillance audit-2.2 was carried out, there is currently no new land compensation. The compensation documentation process was completed before 1991.</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 other legal rights within the company areas and in smallholder plantation.</p>	Complied
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them.</p> <p>- Minor compliance -</p>	<p>Until the surveillance audit-2.2 was carried out, there is currently no new land compensation. The compensation documentation process was completed before 1991.</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 other legal rights within the company areas and in smallholder plantation.</p>	Complied
<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>			
4.7.1	<p><b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	There are no changes of compliance statement compare to last year audit.	Complied

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		<p><b>Simpang Perak Estate:</b>  PT. Inti Indosawit Subur – Buatan II 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, KUD Delima Sakti, KUD Mulus Rahayu, KUD Mitra Usaha, KUD Bina Mulia and KUD Makarti Sawit sampled smallholder member (farmer) and relevant authority, Plantation Agency of Siak District; there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary.  Cooperatives have a conflicts resolution mechanism in "Mekanisme Penanganan Konflik" dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.</p>	
4.7.2	<p><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.  - Critical (Major) compliance -</p>	<p>There are no changes of compliance statement compare to last year audit.</p> <p><b>Simpang Perak Estate:</b>  PT. Inti Indosawit Subur – Buatan has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May</p>	Complied

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		<p>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>The procedure covers land dispute handling mechanism, negotiation process, and verification upon legal ownership evidence up to land compensation. Should negotiation process fails, any land dispute will be processed through legal/litigation mechanism. During the process, a complete record is maintained.</p> <p>Based on mechanism, public relation officer will receive information of any complaint, grievance and land dispute/claims and records under the logbook.</p> <p>PT IIS-Buatan II POM &amp; Estate have not acquiring any additional land and not involved in any land compensation payments. Therefore the mechanism only applicable to resolve land dispute within company's HGU. Land ownership from previous landowner becomes important document in order to continue negotiation process against land claim. Land claim without supporting evidence of land ownership, will be treated with approach and legal manner.</p> <p>There is no negotiation/compensation payment currently for both estate and scheme smallholders. The land has settled now, no any complaint was received in the last few years. In Scheme smallholder's area, it was settled since the "PIR Project" started due to this project from Central Government, where the land status is "Clean and Clear".</p> <p>Based on the results of interviews with the Environment Agency (Dinas Lingkungan Hidup) and Plantation Agency (Dinas Perkebunan) of Pelalawan Regency, there is no land dispute between PT IIS – Buatan and the ownership of the surrounding community.</p>	
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		<p><b>Scheme Smallholders:</b></p> <p>Based on interview with sampled smallholder member (farmer) and relevant authority, Plantation Agency of Siak District; there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary</p> <p>Cooperatives have a conflicts resolution mechanism in “Mekanisme Penanganan Konflik” dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.</p> <p>There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan II Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.</p>	
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>There are no changes of compliance statement compare to last year audit.</p> <p><b>Simpang Perak Estate:</b></p> <p>PT. Inti Indosawit Subur – Buatan has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) “Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2”, dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>The procedure covers land dispute handling mechanism, negotiation process, and verification upon legal ownership evidence up to land</p>	Complied

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		<p>compensation. Should negotiation process fails, any land dispute will be processed through legal/litigation mechanism. During the process, a complete record is maintained.</p> <p>Based on mechanism, public relation officer will receive information of any complaint, grievance and land dispute/claims and records under the logbook.</p> <p>PT IIS-Buatan II POM &amp; Estate have not acquiring any additional land and not involved in any land compensation payments. Therefore the mechanism only applicable to resolve land dispute within company's HGU. Land ownership from previous landowner becomes important document in order to continue negotiation process against land claim. Land claim without supporting evidence of land ownership, will be treated with approach and legal manner.</p> <p>There is no negotiation/compensation payment currently for both estate and scheme smallholders. The land has settled now, no any complaint was received in the last few years. In Scheme smallholder's area, it was settled since the "PIR Project" started due to this project from Central Government, where the land status is "Clean and Clear".</p> <p>Based on the results of interviews with the Environment Agency (Dinas Lingkungan Hidup) and Plantation Agency (Dinas Perkebunan) of Pelalawan Regency, there is no land dispute between PT IIS – Buatan and the ownership of the surrounding community.</p> <p><b>Scheme Smallholders:</b></p> <p>Based on interview with sampled smallholder member (farmer) and relevant authority, Plantation Agency of Siak District; there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary</p> <p>Cooperatives have a conflicts resolution mechanism in "Mekanisme Penanganan Konflik" dated 1st August 2014. The mechanism explaining</p>	
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		<p>flow process to resolution on land conflict, with involvement of company, village government and all related agencies.</p> <p>There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan II Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.</p>	
<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	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p>	<p><b>Estate and Scheme Smallholders:</b></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 area have been issued with valid land title in the form of "Hak Guna Usaha/HGU" for company and "Sertifikat Hak Milik" for smallholder.</p> <p>Based on interview with the sampled smallholder, 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.</p> <p>Regarding land conflicts, the certificate holder has written procedures related to this fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "<i>Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2</i>", dated 8th May 2015. The procedure is written in Indonesian. The procedure regulated information convey, negotiation, participative boundary measurement,</p>	Complied

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		<p>involvement of other party and neighbouring parties – in the boundary of the conflicted area (if any).</p> <p>For plasma plantations, there are also policies/procedures related to land conflict resolution which are contained in “<i>Mekanisme Penanganan Konflik</i>” dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.</p>	
4.8.2	<p><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.</p> <p>- Critical (Major) compliance -</p>	<p><b>Estate and Scheme Smallholders:</b></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 area have been issued with valid land title in the form of “Hak Guna Usaha/HGU” for company and “Sertifikat Hak Milik” for smallholder.</p> <p>Based on interview with the sampled smallholder, that the boundary markers between smallholder block, as well as boundary markers with neighbouring farmer group has been established. There was no land dispute noted.</p> <p>Regarding land conflicts, the certificate holder has written procedures related to this fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) “<i>Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2</i>”, dated 8th May 2015. The procedure is written in Indonesian. 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).</p>	Complied

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		For plasma plantations, there are also policies/procedures related to land conflict resolution which are contained in " <i>Mekanisme Penanganan Konflik</i> " dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.	
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4). - Minor compliance -	<p><b>Estate and Scheme Smallholders:</b></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 area have been issued with valid land title in the form of "Hak Guna Usaha/HGU" for company and "Sertifikat Hak Milik" for smallholder.</p> <p>Based on interview with the sampled smallholder, 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.</p> <p>Regarding land conflicts, the certificate holder has written procedures related to this fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "<i>Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2</i>", dated 8th May 2015. The procedure is written in Indonesian. 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).</p>	Complied



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		For plasma plantations, there are also policies/procedures related to land conflict resolution which are contained in " <i>Mekanisme Penanganan Konflik</i> " dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.	
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	<p><b>Estate and Scheme Smallholders:</b></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 area have been issued with valid land title in the form of "Hak Guna Usaha/HGU" for company and "Sertifikat Hak Milik" for smallholder.</p> <p>Based on interview with the sampled smallholder, that the boundary markers between smallholder block, as well as boundary markers with neighbouring farmer group has been established. There was no land dispute noted.</p> <p>Regarding land conflicts, the certificate holder has written procedures related to this fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "<i>Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2</i>", dated 8th May 2015. The procedure is written in Indonesian. 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).</p> <p>For plasma plantations, there are also policies/procedures related to land conflict resolution which are contained in "<i>Mekanisme Penanganan</i></p>	Complied

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		<i>Konflik</i> " dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.	
<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. - Minor compliance -	Based on interview with management representative i.e.. public affair staff, sustainability and plasma manager obtained information that the actual prices informed directly to the board of plasma or other FFB supplier. The actual prices also informed by social media messenger such as WhatsApp or by phone call.  During the audit, Kebun Plasma Buatan II has showed the FFB payment receipt period May 2023 in accordance with official FFB price that issued by FFB Pricing Team of Riau Province. All smallholder classified as up to 25 year which is the lower price due to the extraction that diminished. Sighted the payments record of KUD Mulus Rahayu, KUD Kebun Sawit Harapan, KUD Buatan Jaya and KUD Bhirawa Bhakti period May 2023. All payments have been complied with the pricing that stipulated by FFB Pricing Team of Riau Province.	Complied
5.1.2	<b>(C)</b> Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders. - Critical (Major) compliance -	Based on document verification of Memorandum of Understanding (MoU) between the smallholders/KUD and PT Inti Indosawit Subur obtain information that the FFB pricing has followed the official FFB price stipulated by FFB Pricing Team of Riau Province. According to the local regulation in Riau Province, the FFB Price updated weekly (every 7 days). The FFB payments conducted monthly, for example, there was a receipt of FFB payments period of May 2023 on behalf of KUD Mulus Rahayu, KUD Kebun Sawit Harapan, KUD Buatan Jaya and KUD Bhirawa Bhakti.	Complied

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5.1.3	<p><b>(C)</b> Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>Management of PT Inti Indosawit Subur – Buatan Group has a commitment to share the RSPO premium price in accordance with the agreement with their smallholder. Premium sharing is not distributed in the form of money but in the form of smallholder empowerment activities aimed at increasing the competence and competitiveness of smallholders based on participatory suggest from the smallholders.</p> <p>During this audit obtained information that the premium sharing for Buatan Plasma period 2022 has been handover in December 2022. Buatan Plasma using that fund for:</p> <ul style="list-style-type: none"> <li>• Installation of boundary poles</li> <li>• Providing PPE for harvester</li> <li>• Alternative income (cattle)</li> <li>• Purchasing the stationery and office equipment.</li> </ul> <p>Based on interview with the smallholder's representatives known that the training has given the positive insight to the smallholders to facing the replanting period. Some smallholders have prepared the alternative income during the replanting with other business such as quail farm, goat and cows and domestic waste composting.</p>	Complied
5.1.4	<p><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> <p>- Critical (Major) compliance -</p>	<p>The smallholder's member of Buatan Plasma originated from government transmigration program on 1990 – 1991. Mostly from East Java, West Java and local area (Riau Province). Based on information obtained during ASA2.2 known that some of smallholders' member were women. The annual meeting of KUD always invited all members which is some women. All the decision made was involved the smallholder members, including women members.</p>	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Based on interview with management representative i.e. Public affair staff, sustainability and plasma manager obtained information that all the contract is signed by both parties.</p>	Complied

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		<p>Based on document all contract is written in Bahasa. For example: Contract with Plasma (KUD Mulus Rahayu, KUD Kebun Sawit Harapan, KUD Buatan Jaya and KUD Bhirawa Bhakti) for supply FFB according to Perjanjian Kerjasama between Koperasi Unit Desa "Perjanjian Kerjasama antara Petani Peserta PIR-Trans dengan PT. Inti Indosawit Subur".</p> <p>Based on document review and interview with KUD confirmed that agreement between company and KUDs is made fairly, legal and transparent and have an agreed timeframe.</p>	
5.1.6	<p><b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>Based on document verification sighted that monthly invoice for FFB payment contains data of price, weigh, deductions and amount paid are given.</p> <p>Based on document all contract is written in Bahasa. For example: Contract with Plasma (KUD Mulus Rahayu, KUD Kebun Sawit Harapan, KUD Buatan Jaya and KUD Bhirawa Bhakti) for supply FFB according to Perjanjian Kerjasama between Koperasi Unit Desa "Perjanjian Kerjasama antara Petani Peserta PIR-Trans dengan PT. Inti Indosawit Subur".</p> <p>Based on document review and interview with KUD confirmed that agreement between company and KUDs is made fairly, legal and transparent and have an agreed timeframe.</p>	Complied
5.1.7	<p>Weighing equipment is verified by an independent third party on a regular basis.</p> <p>- Minor compliance -</p>	<p>Weighbridge in Buatan II POM is verified by government agency in annual basis. Latest verification was performed on 09 September 2021 by UPTD METROLOGI LEGAL Dinas Perindustrian dan Perdagangan Kabupaten Pelalawan. Weighbridges calibration certificate were sighted during audit:</p> <ul style="list-style-type: none"> <li>• Surat Keterangan Hasil Pengujian Nomor: 510.3/DKUKMPP-UM/SKHP/2021/162, dated 26 August 2022, valid until 25 August</li> </ul>	Complied

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		<p>2023. Weighbridge Avery weigh Tronix; Serial Number 161356025; Type: E1205; Capacity 50,000 kg.</p> <ul style="list-style-type: none"> <li>Surat Keterangan Hasil Pengujian Nomor: 510.3/DKUKMPP-UM/SKHP/2021/161, dated 26 August 2022, valid until 25 August 2023. Weighbridge Avery weigh Tronix; Serial Number 162056109; Type: E1205; Capacity 50,000 kg.</li> </ul> <p>According to certificate it was noted that verification results were comply to requirement, endorsed based on UU RI No. 2 Year 1981 concerning Metrology Legal.</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>- Minor compliance -</p>	<p>Based on review of agreement, the company carried out the development and provide supervision in KUD (Scheme Smallholder). The company support KUD in form of supervision in upkeep, fertilizer application, harvesting, FFB transport and implementation of RSPO P&amp;C requirements.</p> <p>For independent Smallholder, supports is provided in the form of CSV Program (Create Share Value). Form of support is the company give coaching to the independent smallholder related good agriculture practices, organisation and administration. Those independent smallholders expected to be certified in next few years.</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>- Critical (Major) compliance -</p>	<p><b>Simpang Perak Estate and Mill</b></p> <p>There is no changes related to the mechanism to handle complaint from external party, as written in "Mekanisme Penanganan Keluhan Pihak Luar" – complaint handling mechanism (Doc. No. SOP AA-GL-5005-RO-01 dated 22 August 2011) while complaint from internal regulated under "Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan" – Employee' complaint and resolution mechanism (Doc. No. SOP-AA-HR-3008-RO 05) and responded not more than 14 days. These</p>	Complied

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		<p>mechanisms have communicated to external parties and disseminated to PT IIS employees.</p> <p>Certificate holder has had new procedure namely SOP Penyampaian dan Penyelesaian Keluhan Karyawan (SOP No: AA-HR-308.5-R1 effective dated 1 December 2019). This procedure also protected whistle blower anonymity. Referring to Asian Agri's website <a href="https://www.asianagri.com/id/panel-keberlanjutan/keluhan-engaduan">https://www.asianagri.com/id/panel-keberlanjutan/keluhan-engaduan</a>.</p> <p>Asian Agri is committed to responding quickly and constructively to any grievance raised against any of our own operations or our suppliers, and to report them publicly. We develop a robust grievance procedure to resolve all verifiable complaints and conflicts with all related stakeholders such as land conflicts, social conflicts, human right issues, labor issues, etc.</p> <table><tr><th>Internal Reporting:</th><th>Channel/Remarks</th></tr><tr><td>There are log books located in all estates and mills managed by Asian Agri's business units. Employees are free to file concerns and reports in these log books, on matters related to Asian Agri's sustainability policy. Concerns on operation disruptions faced by employees may be documented in the Disruption Log Book. Issues pertaining to employee rights may be documented in the Complaint Log Book.</td><td>Log Books:<ul style="list-style-type: none"><li>• Disruption</li><li>• Complaint</li></ul></td></tr><tr><td>Confidential reports may be submitted through email or telephone to protect the identity of the reporter.</td><td>Poster on Whistleblowing is placed in every office of Asian Agri.</td></tr></table>	Internal Reporting:	Channel/Remarks	There are log books located in all estates and mills managed by Asian Agri's business units. Employees are free to file concerns and reports in these log books, on matters related to Asian Agri's sustainability policy. Concerns on operation disruptions faced by employees may be documented in the Disruption Log Book. Issues pertaining to employee rights may be documented in the Complaint Log Book.	Log Books: <ul style="list-style-type: none"><li>• Disruption</li><li>• Complaint</li></ul>	Confidential reports may be submitted through email or telephone to protect the identity of the reporter.	Poster on Whistleblowing is placed in every office of Asian Agri.	
Internal Reporting:	Channel/Remarks								
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		<div>Telephone: +62 811 910 7916 Email: attention@asianagri.com</div>					
		<table><tr><th>External Reporting:</th><th>Channel/Remarks</th></tr><tr><td><p>Stakeholders of Asian Agri including but not limited to Government, smallholders, suppliers, vendors, academicians, NGOs, media, etc), are provided different channels to report their concerns/findings.</p><p>Reporters may share their concerns and information on business misconduct, corruption, harassment, criminal acts, environment, etc.</p><p>All reports will be treated confidentially and if deemed appropriate, updates will be made publicly available as per our Grievance mechanism.</p></td><td><ul style="list-style-type: none"><li>Email: grievance@asianagri.com</li><li>Address: Jl. MH Thamrin No. 31 Jakarta 10230 Indonesia</li><li>Fax: +62 21 230 1120 Attn.: Grievance Secretariat Grievance submissions should be made using the Grievance Submission Form.</li></ul></td></tr></table>	External Reporting:	Channel/Remarks	<p>Stakeholders of Asian Agri including but not limited to Government, smallholders, suppliers, vendors, academicians, NGOs, media, etc), are provided different channels to report their concerns/findings.</p> <p>Reporters may share their concerns and information on business misconduct, corruption, harassment, criminal acts, environment, etc.</p> <p>All reports will be treated confidentially and if deemed appropriate, updates will be made publicly available as per our Grievance mechanism.</p>	<ul style="list-style-type: none"><li>Email: grievance@asianagri.com</li><li>Address: Jl. MH Thamrin No. 31 Jakarta 10230 Indonesia</li><li>Fax: +62 21 230 1120 Attn.: Grievance Secretariat Grievance submissions should be made using the Grievance Submission Form.</li></ul>	
External Reporting:	Channel/Remarks						
<p>Stakeholders of Asian Agri including but not limited to Government, smallholders, suppliers, vendors, academicians, NGOs, media, etc), are provided different channels to report their concerns/findings.</p> <p>Reporters may share their concerns and information on business misconduct, corruption, harassment, criminal acts, environment, etc.</p> <p>All reports will be treated confidentially and if deemed appropriate, updates will be made publicly available as per our Grievance mechanism.</p>	<ul style="list-style-type: none"><li>Email: grievance@asianagri.com</li><li>Address: Jl. MH Thamrin No. 31 Jakarta 10230 Indonesia</li><li>Fax: +62 21 230 1120 Attn.: Grievance Secretariat Grievance submissions should be made using the Grievance Submission Form.</li></ul>						
		<p>This procedure is also applied to scheme smallholder operational. The procedure provides guidelines on handling grievances related to sustainability practices across our supply chain as well governance matters in our operations. The following grievance channels are available to support business transparency:</p> <p>The last socialization of SOP namely SOP Penyampaian dan Penyelesaian Keluhan Karyawan (SOP No: AA-HR-308.5-R1 effective dated 1</p>					

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		<p>December 2019) was performed on 15-16 April 2023 and attended by 130 participants.</p> <p>Based on interviews with stakeholders (heads of Kumbara Utama village and Bukit Agung village) that until now there was no complaint from the community.</p> <p><b>Scheme smallholders:</b></p> <p>There is no changes related to mechanism of consultation and communication in "Mekanisme Komunikasi, Konsultasi dan Keluhan", dated 3rd January 2011. The procedure has been communicated to all members on November 2019 and also recorded into the "Buku Pintar" for each of farmer.</p> <p>Based on this record, the organization has followed the complaint handling mechanism according to the procedure "Mekanisme Komunikasi, Konsultasi dan Keluhan". Until this audit was carried out, there was no record of complaints from the surrounding community and also from members of eachKUD.</p>	
<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	<p>The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p>	<p>PT IIS-Buatan Group always communicates with interested small farmers, including women farmers, to support their livelihoods, especially those related to RSPO certification.</p> <p>For independent Smallholder, supports is provided in the form of CSV Program (Create Share Value). Form of support is the company give coaching to the independent smallholder related good agriculture practices, organisation and administration. Those independent smallholders expected to be certified in next few years.</p>	Complied



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		<p>Several company activities that can be considered as supporting activities for interested small farmers include:</p> <ul style="list-style-type: none"> <li>• Basic Fire which was held on March 31 2022 was attended by 112 farmers.</li> <li>• HCV awareness, carried out on May 4 2022, attended by 122 farmers.</li> <li>• Limited Pesticide Application (refresh), carried out on May 4 2022, attended by 122 farmers.</li> <li>• Harvesting, Weed Control &amp; IPM (refresh), carried out on 4 May 2022, attended by 122 farmers.</li> </ul>	
5.2.2	<p>The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).</p> <p>- Minor compliance -</p>	<p>PT Inti Indosawit Subur – Buatan Group sets a scheme manager, with field assistant assigned for each cooperative to improve smallholder management, including productivity. Each year, company provisioned training program, aside from day-to-day operation monitoring by field assistant, e.g.:</p> <ul style="list-style-type: none"> <li>• Safety, Emergency Response, Basic Fire, HCV and best practises awareness/training on 22 June 2022 located in meeting room of Plasma Buatan. This training attended by 150 representative's participants from smallholder.</li> </ul> <p>Fire, BMP (Including manuring, spraying) training on 31 May 2023 attended by 30 participants.</p>	Complied
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	<p>Buatan II POM supplied by own estates (Simpang Perak Estate), smallholder from 9 KUD's with total 2,822 smallholders and third party's supplier. Based on interview with smallholder representatives from KUD Mulus Rahayu, KUD Kebun Sawit Harapan, KUD Buatan Jaya and KUD Bhirawa Bhakti obtain information that entire land has been granted by government (private land title/SHM).</p> <p>According to the signboard in mill's gate, Buatan II POM does not accept FFB from illegal sources (forest area or crop stolen). All FFB from third</p>	Complied

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		<p>parties shall comply with regulation. Mill's staff told that FFB Purchasing Department has set the procedures for their supplier as follows:</p> <ul style="list-style-type: none"> <li>• New supplier shall propose their FFB purchased offer including submitted the name and land legality of each potential farmer.</li> <li>• FFB Purchasing Department verify the geolocation of potential farmer that submitted by the third parties.</li> <li>• New supplier shall sign the agreement which stated to not send illegal FFB sources. This agreement will automatically be cancelled if any violation on this clause.</li> <li>• The FFB transporter shall signed the zero illegal FFB statement letter in security gate in each delivery note.</li> </ul> <p>Based on interview with smallholder representatives from KUD Mulus Rahayu, KUD Kebun Sawit Harapan, KUD Buatan Jaya and KUD Bhirawa Bhakti obtain information that entire land has been granted by government (private land title). Asian Agri's through his subsidiary PT. Inti Indosawit Subur fully supported their smallholder to be certified by ensuring all FFB come from legal sources and comply with national regulation. They also conducted good engagement to demonstrated best management practices in agronomy, environmental handling and safety procedures. For example, each plot received 4 unit barn owl box to help them control rat population.</p> <p>During the audit, auditor also obtain information that PT. Inti Indosawit Subur are now assisting the smallholders on replanting project in collaborated with local government. This aims to ensure that farmers produce palm oil sustainably.</p>	
5.2.4	<p><b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) compliance -</p>	<p>Certificate Holder has assigned chemical weeding team (Tim Unit Semprot/TUS) in each estate/unit to handling chemical weeding activity. The team member originated from own workers (for own estate) and local communities (for smallholder). They regularly attended training on</p>	Complied

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		<p>pesticide handling that conducted by the pesticide supplier in collaboration with local pesticide committee.</p> <p>Based on document review and interview with random pesticide applicator known that they were attending the last training on pesticide handling on 24 May 2019. The refresh training in January 2023, some topic that discuss such as safety 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>	
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.</p> <p>- Minor compliance -</p>	<p>Annual review of progress of the smallholder support by Asian Agri's is publicly available and can be downloaded from Asian Agri's website <a href="https://www.asianagri.com/id/panel-keberlanjutan/laporan-keberlanjutan">https://www.asianagri.com/id/panel-keberlanjutan/laporan-keberlanjutan</a>. Plasma manager (KLB) also described that PT Inti Indosawit Subur helped the smallholder based on monthly management review of smallholder performance as follows:</p> <ul style="list-style-type: none"> <li>Assisted the KUD's to achieve the production and upkeep target. Until this audit, plasma area has been achieved 5% above the target.</li> <li>Assisting the KUD's in replanting program. Until this audit, there is a record of approval by smallholder member in some KUD's. PT Inti Indosawit Subur as agreed to be bank guarantor for the financial scheme of replanting.</li> </ul> <p>Based on field visit and interview with smallholder representatives, each KUD's has been supported in IPM program. They equipped with</p>	Complied

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		<p>beneficial plant and barn owl box (4 unit 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>• Safety, Emergency Response, Basic Fire, HCV and best practises awareness/training on 22 June 2022 located in meeting room of Plasma Buatan. This training attended by 150 representative's participants from smallholder.</li> <li>• Fire, BMP (Including manuring, spraying) training on 31 May 2023 attended by 30 participants.</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	<p><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.</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes related to the Company's Policy on Equal Opportunities as outlined in "Company Policy", dated 1 December 2014: "Treating all employees fairly, both in terms of recruitment, assessment of working conditions and environment, as well as representation regardless of ethnicity, caste, origin Country, religion/belief, disability, gender, sexual organization, trade union membership, political affiliation and/or age" - treating all cooperative members fairly, and respecting human rights, and representation without discrimination regardless of ethnicity, race, caste, country origin, religion/belief, disability, gender, sexual orientation, trade union affiliation, political affiliation or age.</p> <p>This policy has been communicated to all workers recorded on the "Company Policy Socialization Attendance List", on March 16 2022 the location at PKS Buatan II was attended by 43 workers and on February 13 2022 the location at Simpang Perak Estate was attended by 64 workers</p> <p>The Group Manager has established the ICS Policy in the "Group Manager Policy" dated 14 February 2020 which was signed by the ICS</p>	Complied

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		<p>Buatan Group Manager, in point 9 it states "Respect for human rights, as well as representation regardless of ethnicity, caste, national origin, religion/belief, disability, gender, sexual organizations, trade union membership, political affiliation and/or age" – treating all cooperative members fairly, respecting human rights, and representation without discriminating against ethnicity, race, caste, country of origin, religion/belief, disability, gender, sexual orientation, union affiliation, political affiliation, or age.</p> <p>The ICS policy has been communicated again to all workers as recorded in the "Group Manager Policy Socialization Attendance List", on February 24 2023 the location at KUD Mulus Rahayu was attended by 41 members, on January 16 2023 the location at KUD Bhirawa Bakti was attended by 36 people members of small farmers and on 7 February 2023 the location at KUD Kebun Sawit Harapan was attended by 37 members of small farmers.</p> <p>Promotions and promotions are based on annual employee assessments as outlined in the Employee Evaluation Form which is signed by the employee concerned, approved by the line manager and checked by the General Manager. The form indicates that there is no indication of employment discrimination in terms of ethnicity, caste, religion, disability, gender, sexual orientation, trade union membership, political affiliation and/or age. Regarding examples of promotions, please see 3.5.2 above.</p> <p>Based on interviews with management, samples of farmer members and document verification, there is no discrimination against workers in the recruitment and promotion process or appointing workers to permanent employment.</p>	
6.1.2	<b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated	Based on interview during onsite audit year 2023 workers were aware if there any cases of discrimination, e.g., Document review of salary	Complied

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	<p>against. Evidence includes migrant workers non-payment of recruitment fees.</p> <p>- Critical (Major) compliance -</p>	<p>payment month April 2023 and May 2023, there was no evidence of discrimination.</p> <p>The workers and groups including local communities, women, and migrant workers have not been discriminated against</p>	
6.1.3	<p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>PT Inti Indosawit Subur – Buatan II POM can demonstrated the commitment that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities, and medical fitness. Such as:</p> <ul style="list-style-type: none"> <li>• The company has prepared a procedure for hiring workers, regulated that hiring and promotion of workers based on skill, work experiences, and job evaluation.</li> <li>• 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.</li> <li>• Job opportunities were communicated and given to surrounding villagers at priority where no discrimination found observed during interview and related records of workers being employed. All workers have treated equally in accordance with company regulation including rights of worker as well.</li> </ul> <p>All discrimination has prohibited for all area in estate and mill. PKB also mentioned ban of discrimination for all workers in the organization. Procedure for worker recruitment (SDM-A-001-00) and procedure for employee assessment (HRD C- 002-00) was available and 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.</p>	Complied

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		<p>Regular employee appraisals are carried out annually, which outlines the results of assessments on 10 categories such as Ability, Responsibility, Cooperation with others, hard worker, open, trustworthy/honest, discipline, timeliness in carrying out tasks, administration, and loyalty.</p> <p>Employment records are well maintained by the KTU, for example:</p> <ul style="list-style-type: none"> <li>- Promosi PHL to SKU of Buatan II Mill in 2022 based on Memorandum No. 075/MI-PBS/MEMO/IV/2022, dated 12 April 2022 have promoted as many 15 employees.</li> <li>- Promosi PHL to SKU of Buatan II Mill in 2023 based on Memorandum No. 103/MI-PBS/MEMO/IV/2023, dated 29 April 2023 have promoted as many 8 employees.</li> <li>- Promosi PHL to SKU of Buatan II Estate (Simpang Perak Esatate) in 2022 based on Memorandum No. 05/MI-KSP/MEMO/IV/2022, dated 12 April 2022 have promoted as many 13 employees.</li> </ul>	
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>The company does not carry out pregnancy tests which are a discriminatory measure, the company carries out pregnancy tests on spraying officers to ensure that the officers are not pregnant in carrying out their work.</p> <p>Regarding the pregnancy test, the company's paramedics will confirm the menstrual cycle of each female worker involved in the use of chemicals. This is in line with the results of interviews with 3 pesticide spray workers.</p>	Complied
6.1.5	<p><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> <p>- Critical (Major) compliance -</p>	<p>The company already has a gender committee on document "Gender committee structure for Period 2023/2024", consisting of:</p> <ul style="list-style-type: none"> <li>- Advisor : Andreas R. F. Sitompul</li> <li>- Chairman : Selvia Junita Harefa</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>- Secretaries : Agensia V. Sianipar</li> <li>- Treasure : Dina Hutagaol</li> <li>- Organizer I : Armainah</li> <li>- Organizer II : Demak Sianturi</li> <li>- Organizer III : Arnita Irwati</li> </ul> <p>The management composition is determined on January 2, 2023. Based on the results of interviews with workers, that workers are aware of the existence of a gender committee and the worker also understands the procedure for conveying gender-related issues to the gender committee.</p> <p>And the results of interviews with the gender committee representative that during the past year, there were no incidents or problems related to sexual harassment, domestic violence, child labor or human rights violations.</p> <p>And the gender committee at the company also has a work program for 2023, including:</p> <ul style="list-style-type: none"> <li>- Cleanliness of the daycare environment</li> <li>- Socialization of Pesticides Hazards for Breastfeeding Mothers</li> <li>- Socialization of sexual harassment</li> <li>- Socialization of new mothers.</li> </ul> <p>The auditor conducted interviews with female workers (spraying, fertilizing), and it was found that the workers were aware of the existence of a gender committee as a forum for workers to convey gender aspirations and complaints, especially women.</p>	
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		Based on this explanation, the certification unit already has a gender committee and has a work program for 2023.	
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	<p><b>Buatan II POM, Simpang Perak Estate and Scheme Smallholder:</b></p> <p>Company has stated the wages for workers base on Decree of Keputusan Gubernur Riau No. Kpts. 1783/XII/2022”, dated 07/12/2022 for Upah Minimum Kabupaten/Kota in Province of Riau on 2023 is IDR 3,287,623.60/month (Pelalawan Regency) or IDR 131,505 per day.</p> <p>The company composes the structure and scale of the 2023 wage period based on Permenaker No. 1 of 2017. This wage scale structure is a determination of the amount of wages for permanent workers (SKU-B) based on class, rank/position.</p> <p>PT Inti Indosawit Subur – Buatan Group has also provided pay slip 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 June 2023. 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.</p> <p>In detail about the components of wages given to workers, poured in employee salary slips/scripts provided every month before payday.</p> <p>Data verified, Payslip month June 2023, such as:</p> <ol style="list-style-type: none"> <li>1) Mr. Ha*** Pra**** (BHL-Daily worker) – in Simpang Perak Estate Afd. 2, working day: 20 days <ul style="list-style-type: none"> <li>• Basic salary IDR 3,030,598</li> <li>• Process premium IDR 854,989</li> <li>• Deductions: IDR 131,506 (including Payment of BPJS Kesehatan and Ketenagakerjaan)</li> </ul> </li> </ol>	Complied

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		<ul style="list-style-type: none"> <li>• Total take home pay: IDR 3,353,582</li> </ul> <p>2) Mr. Wi** Prs***** (BHL- Daily worker) – in Simpang Perak Estate Afd. 4, working day: 23 days</p> <ul style="list-style-type: none"> <li>• Basic salary IDR 3,024,615</li> <li>• Process Premium IDR 1,163,357</li> <li>• Deductions: IDR 131,506; (including Payment of BPJS Kesehatan and Ketenagakerjaan</li> <li>• Total take home pay: IDR 4,609,044</li> </ul> <p>3) Mr. Legi*** (SKUH- permanent worker) – in Simpang Perak Estate Afd. 4 manuring team, working day: 24 days</p> <ul style="list-style-type: none"> <li>• Basic salary IDR 3,024,615</li> <li>• Process Premium IDR 1,163,357</li> <li>• Deductions: IDR 131,506; (including Payment of BPJS Kesehatan and Ketenagakerjaan</li> <li>• Total take home pay: IDR 3,261,106</li> </ul> <p>4) Mr. Ari Ap**** (PHL – Buatan II Mill) position as Opr. Produsction, working day: 18 days</p> <ul style="list-style-type: none"> <li>• Basic salary IDR 2,630,088</li> <li>• Fringe Benefits IDR 547,935</li> <li>• Premium IDR 214,587</li> <li>• Deductions: IDR 131,504; (including Payment of BPJS Kesehatan and Ketenagakerjaan</li> <li>• Total take home pay: IDR 3,349,825</li> </ul>	
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		Based on sample salary slip aboved, confirmed that the company has paid wages employees salary according to the working days and it is applied in a fair to all employees.	
<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	<p><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> <p>- Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur – Buatan Group has also provided pay slip 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 June 2023. 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.</p> <p>In detail about the components of wages given to workers, poured in employee salary slips/scripts provided every month before payday.</p> <p>Data verified, Payslip month June 2023, such as:</p> <ol style="list-style-type: none"> <li>1) Mr. Ha*** Pra***** (BHL-Daily worker) – in Simpang Perak Estate Afd. 2, working day: 20 days <ul style="list-style-type: none"> <li>• Basic salary IDR 3,030,598</li> <li>• Process premium IDR 854,989</li> <li>• Deductions: IDR 131,506 (including Payment of BPJS Kesehatan and Ketenagakerjaan)</li> <li>• Total take home pay: IDR 3,353,582</li> </ul> </li> <li>2) Mr. Wi** Prs***** (BHL- Daily worker) – in Simpang Perak Estate Afd. 4, working day: 23 days <ul style="list-style-type: none"> <li>• Basic salary IDR 3,024,615</li> <li>• Process Premium IDR 1,163,357</li> </ul> </li> </ol>	Complied

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		<ul style="list-style-type: none"> <li>• Deductions: IDR 131,506; (including Payment of BPJS Kesehatan and Ketenagakerjaan</li> <li>• Total take home pay: IDR 4,609,044</li> </ul> <p>3) Mr. Legi*** (SKUH- permanent worker) – in Simpang Perak Estate Afd. 4 manuring team, working day: 24 days</p> <ul style="list-style-type: none"> <li>• Basic salary IDR 3,024,615</li> <li>• Process Premium IDR 1,163,357</li> <li>• Deductions: IDR 131,506; (including Payment of BPJS Kesehatan and Ketenagakerjaan</li> <li>• Total take home pay: IDR 3,261,106</li> </ul> <p>4) Mr. Ari Ap**** (PHL – Buatan II Mill) position as Opr. Produsction, working day: 18 days</p> <ul style="list-style-type: none"> <li>• Basic salary IDR 2,630,088</li> <li>• Fringe Benefits IDR 547,935</li> <li>• Premium IDR 214,587</li> <li>• Deductions: IDR 131,504; (including Payment of BPJS Kesehatan and Ketenagakerjaan</li> <li>• Total take home pay: IDR 3,349,825</li> </ul> <p>Based on sample salary slip aboved, confirmed that the company has paid wages employees salary according to the working days and it is applied in a fair to all employees.</p>	
6.2.2	<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	<p><b>Buatan II POM and Simpang Perak Estate:</b></p> <p>The company has entered into a work agreement for permanent employees through a collective work agreement (PKB-Joint Work</p>	Non-compliance

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	<p>dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.</p> <p>- Critical (Major) compliance -</p>	<p>Agreement) with a period of 2 years. This PKB was made in collaboration with BKS PPS (Sumatran Plantation Company Cooperation Agency) including PT Inti Indosawit Subur - Buatan Group.</p> <p>At the time of this audit, the PKB was for the 2018 - 2020 period and had been registered by the <i>Dirjen PHI Kementerian Ketenagakerjaan</i> on July 4 2018. The extension of the PKB or work agreement for 2021 - 2023 was still in the process of approval and registration with the Ministry of Manpower (Dirjen PHI ).</p> <p>According to the provisions of the PKB, it is stated that if the new PKB is not yet available, the old PKB is still valid as a reference. The company has set employment provisions in accordance with the rules and legal requirement. It is stated on employment contract off daily labour on article 1 about the types of work, working hours (maximum 40 hours per week and working from Monday to Saturday) and the wages has provides is based on waging regulation (Decree of Governor of Riau) in effect at January 2020. Statements about wages, stated in PKB in Article V concerning Wages-Upah; stated: <i>"Pekerja harian Tetap dan Pekerja Bulanan diberi upah berupa uang yang ditetapkan berdasarkan kesepakatan bersama dengan BKS-PPS dengan PD.FSP.PP-SPSi Propinsi yang bersangkutan sesuai dengan peraturan perundangan Otonomi Daerah yang berlaku, yaitu upah uang ditambah beras pekerja senilai/sejumlah 15 Kg (Upah BKS-PPS), dengan mengingat situasi ekonomi dan kemampuan perusahaan"</i>.</p> <p>Determination of wages (including benefits and other benefit/premium), working hours (including hours and overtime pay) and working days have been regulated in the PKB Period 2018-2020 in Article V; <i>Upah</i> - Wages, which explains:</p> <p>a) Permanent workers are given wages, the value of which is determined by the employer on the condition that it is not lower than government regulations.</p>	
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		<p>b) Certain permanent workers are given wages (Basic Salary and Rice) in accordance with the status of the group/level whose value is determined by the employer with provisions not lower than government regulations</p> <p>c) Permanent workers receive additional wages (UMP/UMSK) and / or attendance incentives as stipulated further in separate provisions.</p> <p>Rice allowance is: 9 kg and each anal (maximum 3 children) is given 7.5 kg per month, which consists of the basic salary and rice allowance. Rice supply is given once a month. Rice supply is intended to be of good quality and is considered appropriate for the health of the Worker and the gift is linked to attendance.</p> <p>Provisions on holidays and leave (both maternity leave and menstruation leave) have been regulated in Article VIII regarding Non-working Days; including: absenteeism, rest days of the week, official holidays, annual leave, maternity leave and others.</p> <p>The certification holder has made a salary slip for his employees, which is explained in detail, including: basic wages, fixed and premium (harvest and non-harvest) allowances, overtime pay, health and retirement benefits, and deductions that include contributions of labor security and health insurance.</p> <p>Based on the sample pay slip above, that Simpang Perak Estate and Buatan II POM have applied the wages of their employees in line with Company has stated the wages for workers base on Decree of Gubernur Riau No. Kpts. 1272/XI/2021", dated 20/11/2021 for Upah Minimum Kabupaten/Kota in Province of Riau on 2022 and Law No. 13 of 2003 on Employment.</p> <p><b>Scheme Smallholder</b></p> <p>The application of employee harvest and fertilizer wages in Plasma</p>	
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		<p>Buatan I is based on Decree of Gubernur Riau No. Kpts.1783/XII/2022", dated 07/12/2022 for Upah Minimum Kabupaten/Kota in Province of Riau on 2023 is IDR 3,287,623.60/month (Pelalawan Regency) or IDR 131,505 per day.</p> <p>The Cooperative also have working agreement letter - "<i>Surat Perjanjian Kerjasama</i>" with the workers, i.e: Working Agreement Letter on behalf of Mr. Manto (as Harvester) at KUD Kebun Sawit Harapan dated 2 January 2023, on behalf of Mr. Maskur at KUD Bhirawa Bakti date 9 January 2023.</p> <p>Determining of wages, state on Article 2; <i>Upah Atau Imbalan</i>: The Wages/benefits is given monthly are calculated based on Rp/kg of FFB harvested per rotation, amounting to IDR 150-180 per kg of FFB, working for 5-6 hours per day (starting at 07.00 - 14.00). Based on interviews with several permanent residents in the Smallholder area, the average daily gain is 2.5 to 3 tons And this is still above the establishment of the district minimum wage.</p> <p>Meanwhile, for fertilizer sowing workers, the work agreement is stipulated at IDR 250 per Kg of fertilizer, except for Borate fertilizer at IDR 12,500 per sack. Whereas for fertilizer application, determine in a work agreement is IDR 250 per kg fertilizer except for Borate fertilizer IDR 12,500 per sack/bag.</p> <p>Payment of harvest wages is done hand over payment in the form of payment receipts from farmers (Farmer Groups) directly to the harvesters, sample taken:</p> <ul style="list-style-type: none"> <li>Harvesters on behalf of Manto for the harvest on KUD Kebun Sawit Harapan field on period June 2023, for harvesting FFB: 3 rotation : 4,300 kg FFB with wages of IDR 180 per kg, total wages of IDR 774,000</li> <li>Harvesters on behalf of Maskur for the harvest on KUD Bhirawa Bakti field period June 2023, for harvesting FFB: 3 rotation : 3,250</li> </ul>	
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		<p>kg FFB with wages of IDR 180 per kg, total wages of IDR 585,000.</p> <p>Non conformance :</p> <p>At the time of the audit, it was found that workers were doing work without a work contract with the company.</p> <p>Objective evidence :</p> <p>Based on field observations and interviews with harvest workers in Afdeling 3 Block C91e, the following was found:</p> <ul style="list-style-type: none"> <li>• Harvesters are accompanied by their wives when they are harvesting where the wife quotes loose fruit and is not registered as a worker and does not have a work contract with the company</li> <li>• Confession from 3 harvesters stating that they sometimes help with harvesting activities (fruit-loose picker) but these people are not registered as workers and do not have a work contract with the company.</li> </ul>	
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>- Critical (Major) compliance -</p>	<p><b>Buatan II POM and Simpang Perak Estate:</b></p> <p>The company has established employment conditions in accordance with legal rules and requirements. It is stated in the work contract (PKB) for non-daily workers in Article 1 regarding the type of work, working hours (maximum 40 hours per week and work Monday to Saturday) and wages given based on wage regulations (Riau Governor's Decree) which will take effect from January of the current year. Statement regarding wages, stated in the PKB in Article V concerning Wages; stated: "Permanent daily workers and monthly workers are given wages in the form of money determined based on a joint agreement with the BKS-PPS and PD.FSP.PP-SPSI of the province concerned in accordance with the applicable Regional Autonomy laws and regulations, namely cash</p>	Complied



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		<p>wages plus rice workers worth/amounting to 15 Kg (BKS-PPS wages), taking into account the economic situation and the company's capabilities."</p> <p>Determination of wages (including allowances and other allowances/premiums), working hours (including working hours and overtime pay) and working days have been regulated in the 2018-2020 PKB in Article V; Wages - Wages, which explains:</p> <ol style="list-style-type: none"> <li>Permanent workers are given wages whose amount is determined by the employer with conditions that are not lower than government regulations.</li> <li>Certain permanent workers are given wages (Basic Salary and Rice) according to their class/level status, the value of which is determined by the employer with conditions that are not lower than government regulations.</li> <li>Workers continue to receive additional wages (UMP/UMSK) and/or attendance incentives as further specified in separate provisions.</li> </ol> <p>The rice allowance is: 9 kg and each child (maximum 3 children) is given 7.5 kg per month, which consists of basic salary and rice allowance. Rice supplies are given once a month. The rice supply is intended to be of good quality and deemed appropriate for Workers' health and its provision is linked to attendance.</p> <p>Provisions regarding holidays and leave (both maternity leave and menstrual leave) are regulated in Article VIII concerning Non-Working Days; including: absenteeism, rest days in a week, official holidays, annual leave, maternity leave and others.</p> <p>Certification holders have made pay slips for their employees which explain in detail, among other things: basic wages, fixed and premium allowances (harvest and non-harvest), overtime wages, health and</p>	
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		<p>pension benefits, as well as deductions covering labor contributions, security and health insurance.</p> <p>Verified documents:</p> <ol style="list-style-type: none"> <li>1. Employee salary slip for the period June 2023 (see 6.2.1)</li> <li>2. Overtime Orders (SPL: <i>Surat Perintah Lembur</i>) – Overtime orders for example: <ul style="list-style-type: none"> <li>• SPL dated 20 May 2023 in the name of Wilman Simanulang (Buatan II POM) for the work process at PBD for 4 hours.</li> <li>• SPL dated 28 May 2023 in the name of Rizky Rama Diansyah (Buatan II POM) for the work process at PBD for 5 hours.</li> </ul> </li> <li>3. Leave Application Letter in the name of Fristya Nanda (Simpang Perak Estate), for annual leave taken on 26–29 July 2023 (within 4 days) entitlement to 12 days of leave. (in accordance with applicable laws and regulations)</li> </ol> <p>Based on the salary slip example above, Simpang Perak Plantation and Badan POM buatan II have implemented employee wages in accordance with Law Number 6 of 2023 (UU Cipta kerja) concerning Employment and PP no. 36/2021 regarding Remuneration.</p> <p><b>Small Farmers Scheme</b></p> <p>The application of employee harvest and fertilizer wages in Plasma Buatan I is based on Decree of Gubernur Riau No. Kpts.1783/XII/2022", dated 07/12/2022 for Upah Minimum Kabupaten/Kota in Province of Riau on 2023 is IDR 3,287,623.60/month (Pelalawan Regency) or IDR 131,505 per day.</p> <p>The Cooperative aslo have working agreement letter - "<i>Surat Perjanjian Kerjasama</i>" with the workers, i.e: Working Agreement Letter on behalf of Mr. Manto (as Harvester) at KUD Kebun Sawit Harapan dated 2 January 2023, on behalf of Mr. Maskur at KUD Bhirawa Bakti date 9</p>	
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		<p>January 2023.</p> <p>Determining of wages, state on Article 2; <i>Upah Atau Imbalan</i>: The Wages/benefits is given monthly are calculated based on Rp/kg of FFB harvested per rotation, amounting to IDR 150-180 per kg of FFB, working for 5-6 hours per day (starting at 07.00 - 14.00). Based on interviews with several permanent residents in the Smallholder area, the average daily gain is 2.5 to 3 tons And this is still above the establishment of the district minimum wage.</p> <p>Meanwhile, for fertilizer sowing workers, the work agreement is stipulated at IDR 250 per Kg of fertilizer, except for Borate fertilizer at IDR 12,500 per sack. Whereas for fertilizer application, determine in a work agreement is IDR 250 per kg fertilizer except for Borate fertilizer IDR 12,500 per sack/bag.</p> <p>Payment of harvest wages is done hand over payment in the form of payment receipts from farmers (Farmer Groups) directly to the harvesters, sample taken:</p> <ul style="list-style-type: none"> <li>• Harvesters on behalf of Manto for the harvest on KUD Kebun Sawit Harapan field on period June 2023, for harvesting FFB: 3 rotation : 4,300 kg FFB with wages of IDR 180 per kg, total wages of IDR 774,000</li> <li>• Harvesters on behalf of Maskur for the harvest on KUDBhirawa Bakti field period June 2023, for harvesting FFB: 3 rotation : 3,250 kg FFB with wages of IDR 180 per kg, total wages of IDR 585,000.</li> </ul> <p>Based on the sample pay slip above, that Simang Perak Estate and Buatan II Mill have applied the wages of their employees in line with Law No. 6 of 2023 on Employment (UU Cipta Kerja) and PP no. 36/2021 regarding Remuneration.</p>	
6.2.4	(C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available	<b>Buatan II POM and Simpang Perak Estate:</b>	Complied

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	<p>or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Based on document verification and observations in the field (employee housing facilities), there are no newly built public facilities.</p> <p>Buatan II POM has prepared facilities for their workers, such as:</p> <ul style="list-style-type: none"> <li>• Housing Mess (1 unit), type B (4 units), Type D (17 units), Type D1 (20 units), Type D2 (24 units), Type E (486 units),</li> <li>• Polyclinic (2 units),</li> <li>• Mosque (2 units),</li> <li>• Church (1 unit),</li> <li>• Community hall (1 unit),</li> <li>• Sport facilities, school bus (5 units),</li> <li>• Kindergartens (1 units),</li> <li>• Electricity, water supply, etc.</li> </ul> <p>Simpang Perak Estate has prepared facilities for their workers, such as:</p> <ul style="list-style-type: none"> <li>• Housing complex (399 units)</li> <li>• Elementary (1 unit) and kindergarden (1 units)</li> <li>• Polyclinic (1 unit)</li> <li>• Mosque (2 units)</li> <li>• Church (1 unit)</li> <li>• School bus (2 units)</li> <li>• Ambulance (1 unit)</li> <li>• Sport facilities</li> <li>• Etc.</li> </ul> <p>Company performed regular water quality test, whereby the source from worker housing's well.</p>	
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		<p>The Company also has a Budget for employee housing improvements every year, based on the 2023 employee home improvement budget. The budget has been distributed based on cash flow / detailing every month for a year, The housing budget includes renovation and repair of facilities and infrastructure of 50,000,000 per year.</p> <p>At the beginning of the year, a survey was carried out by KTU regarding damage to public facilities and employee housing which will be budgeted for over the next year.</p> <p><b>Scheme smallholders:</b></p> <p>All workers in Plasma has own house with water and electricity supplies from government (PLN). Based on interview with smallholder in KUD Kebun Sawit Harapan, KUD Bhirawa Bhakti, KUD Buatan Jaya and KUD Mulus Rahayu explained that the worker has their own house in the village.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p><b>Buatan II POM and Simpang Perak Estate:</b></p> <p>Within the company area there are minimarkets managed by employee cooperatives and traditional markets located around the company area, most of the goods employees need are provided by minimarkets. Prices at minimarkets are affordable and cheaper than traditional markets around the company location. Price control is carried out by the cooperative and all members, including workers and company administrators. So, access to the food needs of PT IIS-Buatan Group employees is not a problem.</p> <p><b>Small farmer scheme:</b></p> <p>There is a market in the village where small workers live. Road access and availability of food and other basic necessities are easy to find at</p>	Complied

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		competitive/affordable prices. Prices are determined by the market and controlled by the government.	
6.2.6	<p>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> <p>- Minor compliance -</p>	<p>Company has stated the wages for workers base on Decree of Keputusan Gubernur Riau No. Kpts. 1783/XII/2022", dated 07/12/2022 for Upah Minimum Kabupaten/Kota in Province of Riau on 2023 is IDR 3,287,623.60/month (Pelalawan Regency) or IDR 131,505 per day.</p> <p>Based on verification of wage documents and sample salary slips at the time this audit was carried out, PT IIS - Buatan Group has set wage standards based on wages set by the Riau Provincial government for the period 2023. The company also provides scripts/salary slips to employees before salaries are given, salary slips also includes basic salary, allowances, premiums, worker health insurance (BPJS Employment and Health) and deductions.</p> <p>The company also made calculations related to DLW on period 2023, based on the wages given to employees as costs given by the company. Based on the verification the results of the DLW calculation in year 2023 shows that total cost and kind benefit for average is IDR 582,014; average monthly take home salary per worker is IDR 2,807,046 and total value of prevailing wage is IDR 3,389,060.</p> <p><b>Scheme Smallholder:</b></p> <p>The DLW calculation for the 2023 period has no change from the previous period calculation (because workers' wages have not changed). Calculation of DLW Cooperative employees period 2023, DLW Calculation of Family Workers (K-3) KUD</p> <p>Based on the verification of documents the results of the 2022 DLW calculation shows that the Gross of DLW is IDR 6,196,061.04.</p>	Complied

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		<p>Piece rate/quotas calculation has been calculated based on the achievement of 7 working hours in accordance with applicable regulations (UU No. 6/2023- UU Cipta Kerja), for example:</p> <p>Calculation of labor harvest in Plasma:</p> <ul style="list-style-type: none"> <li>• Ability to harvest power for 7 hours per day: 3,000 kg</li> <li>• Harvest area: 4 hectares</li> <li>• Job performance in 1 hour 429 kg / hour</li> <li>• Basic wages Based on the provisions of Prov. Riau: IDR 120,800 per day</li> <li>• Price of harvest: IDR. 40 / kg</li> <li>• Price per hectare: IDR 30,200 per Ha</li> <li>• Actual Harvest Costs (currently in effect): IDR 200 / Kg</li> <li>• There is a gap of: 273% positive.</li> </ul> <p>Calculation of fertilizer labor piece rate:</p> <ul style="list-style-type: none"> <li>• The ability to sow fertilizer for 7: 600 kg</li> <li>• Tonnage per hour: 86 Kg / hour</li> <li>• Basic wages Based on the provisions of Prov. Riau: IDR 120,800 per day</li> <li>• Fertilizer wages: IDR 201 / Kg</li> <li>• Actual fertilization wages (valid now): IDR 200 / kg</li> </ul> <p>There is a gap of: 0.66% positive.</p>	
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**PROCEDURAL NOTE:**

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

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

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

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

6.2.7	<p>Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>Based on the verification of employee data for June 2023 period, PT IIS – Buatan II POM has permanent and non-permanent employees (SKU and PHL). There are no significant gap of benefit between SKU and PHL workers, all of them get wage in accordance of minimum wage, their medical and manpower insurance (BPJS Kesehatan and BPJS Ketenagakerjaan) are covered by the company and they get the same type of house and facilities in emplacement area.</p> <p>The unit certification has identified those related to the main work in oil palm plantations based on the Circular Letter from GAPKI dated 8 February 2013 No. 073/GAPKI/II/2013 concerning the Circular on the Activity Flow of the Work Implementation Process in the Oil Palm Plantation Business Sector, stating that; only 2 (two) jobs that are the main activities in the Oil Palm Plantation industry, namely harvesting and processing products, the rest are supporting activities in accordance with <i>Permenakertrans No. 19/2012</i> which implementation can be left to other parties.</p> <p>The company has established a program for appointing PHL harvesters to become permanent workers (SKUH) which is set to be achieved by the end of 2023. This program for appointing/promoting harvester employees has been submitted to the Pelalawan Regency Manpower and Transmigration Service.</p> <p>Realization of PHL (temporary workers) promotion to SKU (permanent worker) particularly harvester up to until end of 2023:</p> <p><u>Buatan II Mill:</u></p>	Complied
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		<ul style="list-style-type: none"> <li>- Promosi PHL to SKU of Buatan II Mill in 2022 based on Memorandum No. 075/MI-PBS/MEMO/IV/2022, dated 12 April 2022 have promoted as many 15 employees.</li> <li>- Promosi PHL to SKU of Buatan II Mill in 2023 based on Memorandum No. 103/MI-PBS/MEMO/IV/2023, dated 29 April 2023 have promoted as many 8 employees.</li> </ul> <p>So, in 2024 period, there will be no workers with PHL status. Meanwhile, if there is a recruitment, it will refer to the recruitment of permanent workers with a probationary period of 3 months which will then be evaluated so that they can be proposed to become permanent workers in SKUH.</p> <p><u>Simpang Perak Estate:</u></p> <ul style="list-style-type: none"> <li>- Promosi PHL to SKU of Buatan II Estate (Simpang Perak Esatate) in 2022 based on Memorandum No. 05/MI-KSP/MEMO/IV/2022, dated 12 April 2022 have promoted as many 13 employees.</li> <li>- Promosi PHL to SKU of Buatan II Estate (Simpang Perak Esatate) in I and II quarters of 2023 based on Memorandum No. 09/MI-KSP/MEMO/IV/2022, dated 17 July 2023 have promoted as many 25 employees.</li> <li>- Promosi PHL to SKU of Buatan II Estate (Simpang Perak Esatate) in III and IV quarters of 2023 will be promoted as many 49 employees.</li> </ul> <p>So that by the end of 2023, 16 harvesters who still have PHL status until the end of 2023 (who entered work in semester II/2023) will be promoted in February 2024, so that there will be no more harvesters with PHL status at the beginning of 2024. Meanwhile, if there is a</p>	
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		recruitment, it will refer to the recruitment of permanent workers with a probationary period of 3 months which will then be evaluated so that they can be proposed to become permanent workers in SKUH.	
<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	<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. - Critical (Major) compliance -	<p>Certificate holder had a policy concerning on the freedom of association stated in the freedom of association policy, dated 01 December 2019, this policy has been informed to all employees and being placed into public area easily accessed. The freedom to gather and form associations is listed in the Company Policy at point 16: "...Perusahaan menghormati hak setiap karyawan untuk membentuk atau menjadi anggota serikat pekerja sesuai dengan keinginannya dan untuk melakukan tawar menawar secara kolektif.". It stated that the group respects workers' rights to freedom of association and association with other individuals and collectively expresses. The policy was published in Bahasa which can be understood by all employees.</p> <p>As for Buatan Plasma, KUD also has a policy related to freedom of association which is contained in the CS Policy under "Kebijakan Group Manager"</p> <p>Based on the interviews with labor union representatives in each unit, it explained that the company had given freedom of association and labor unions have been formed. The establishment of the union was in accordance with the applicable laws and regulations and has been recorded in "Dokumen Tanda Bukti Pencatatan PUK-SPPP SPSI PT.IIS PMKS – II Buatan" dated 29 December 2011 by Labor and Transmigration Agency of Pelalawan Regency.</p>	Complied

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		Based on the interviews with labor union members representatives, it's known that there was no force or pressure to be a member of labor union. The membership of labor union was voluntary.	
6.3.2	Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request. - Minor compliance -	<p>Certificate holder has documented the records of meetings between labor unions and management representatives. The following are examples of records of meetings conducted by labor unions in 2023, here as follows: The meeting between the labor union in all units and management representative on 28 June 2023 to discuss about drafting a work plan for trade unions and reforming the administrative system for trade union membership. The recording of the activity was attended by the chairman and members of the trade union.</p> <p>Based on the interviews with labor union representatives and their members who work in each unit, it's known that the labor union held meetings whenever it's needed. The meetings accommodated in bipartite and internal meeting and there has been no labor issue that brought to Manpower Agency.</p>	Complied
6.3.3	Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers. - Minor compliance -	<p>Based on the interviews with the labor union representatives, there was no interference in the selection or labor union operational activities. All processes of selecting, decisions making and planning activities, members' aspirations to their representatives run democratically. The worker who is currently placed as the Chairman of the Labor Union in each unit is a worker in estate/mill, then there will be no conflict of interest that occurs with the company because there were no workers who have the authority as decision-makers (staff class and above). company also involved the labor union representative in drafted the collective labor union.</p> <p>The establishment of the union was in accordance with the applicable laws and regulations and has been recorded at the Manpower Agency. Unit of certification was giving freedom for workers to express their aspirations and did not give any intervention related to labor union</p>	Complied

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		activity. Based on the interview with workers, it's known that there were no mandatory to be the member of labor union. The membership of labor union is voluntary.	
<b>Criteria 6.4:</b> Children are not employed or exploited.			
6.4.1	<p>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> <p>- Minor compliance -</p>	<p>The Company already has the Company in possession of a Circular regarding the prohibition of child labor as stated in Company Policy dated 1 December 2019 that stated it is not allowed for any children to work in every activities/process in company. This policy has been socialization to all worker and contractor on 17-21 February 2020. It also stated on Company policy on point 14; "Prohibit children from working in any company activities". Based on that document, in the process of hiring employees, the minimum age limit is 18 years.</p> <p>For Buatan Plasma plantations there is also a policy prohibiting the employment of children under the age of 18 which is contained in "<i>Kebijakan Koperasi Bhirawa Bhakti</i>" dated 6 September 2022 and in "<i>Kebijakan Koperasi Mulus Rahayu</i>" dated 10 August 2022.</p> <p>Based on the results of interviews with the PK transporter contractor, the contractor understands that there is a prohibition on the employment of children within the scope of the company, including third parties who work together.</p>	Complied
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>- Critical (Major) compliance -</p>	<p><b>Buatan II POM and Simpang Perak Estate:</b></p> <p>There are no changes related to the Company Policy which prohibits child labor and underage workers, i.e. The company policy was established on December 1 2019 which states that all children are not allowed to work in any activity/process in the company.</p>	Complied

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		<p>This policy has been socialized again to all workers and contractors on March 6-7 2023. This is stated in the Company's policy at point 14; "Prohibit children from working in any company activities".</p> <p>The certificate holder - PT IIS – Buatan Group, has also placed a policy regarding the prohibition of child labor (under 18 years), in the TBS Supplier Statement and Guarantee document at point 12; "Not employing children (under 18 years) which is prohibited by Law no. 13/2003.</p> <p>Document verified:</p> <ul style="list-style-type: none"> <li>Employee register of Buatan II – Simpang Perak Estate, June 2023 period. There were 585 workers, the youngest worker namely Sutrisno date of birth 30 December 1985 and joint on 26 June 2005 (19 years and 6 months).</li> <li>Employee register of Buatan II POM, June 2023 period. There were 108 workers in operation, the youngest worker namely Amirudin date of birth 2 April 1986 and joint on 1 September 2006 (20 years and 5 months).</li> </ul>	
6.4.3	<p><b>(C)</b> Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes related to the Company Policy which prohibits child labor and underage workers, i.e. The company policy was established on December 1 2019 which states that all children are not allowed to work in any activity/process in the company.</p> <p>This policy has been socialized again to all workers and contractors on March 6-7 2023. This is stated in the Company's policy at point 14; "Prohibit children from working in any company activities".</p> <p>The certificate holder - PT IIS – Buatan Group, has also placed a policy regarding the prohibition of child labor (under 18 years), in the TBS Supplier Statement and Guarantee document at point 12; "Not</p>	Complied

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		<p>employing children (under 18 years) which is prohibited by Law no. 13/2003.</p> <p>Document verified:</p> <ul style="list-style-type: none"> <li>Employee register of Buatan II – Simpang Perak Estate, June 2023 period. There were 585 workers, the youngest worker namely Sutrisno date of birth 30 December 1985 and joint on 26 June 2005 (19 years and 6 months).</li> <li>Employee register of Buatan II POM, June 2023 period. There were 108 workers in operation, the youngest worker namely Amirudin date of birth 2 April 1986 and joint on 1 September 2006 (20 years and 5 months).</li> </ul> <p><b>Scheme Smallholder:</b></p> <p>Since 2020, policies related to the prohibition of child labor have not changed, i.e. policy regarding the prohibition of employing children (under 18 years). The samples taken from the KUD Mulus Rahayu, KUD Bhirawa Bakti, KUD Kebun Sawit Harapan and KUD Buatan Jaya policies on February 14 2020 are explained in point 10; It is prohibited to employ children under the age of 18 in any plantation operational activities." This policy was socialized to all members on February 14 2022.</p> <p>Based on document review (list of employees) of KUD Bhirawwa Bakti, KUD Buatan Jaya and KUD Kebun Sawit Jaya, there were found that a minimum age are met (the youngest of harvester born year 1996 – based on ID verification).</p>	
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>In accordance with the explanation in indicator 6.4.1, the certificate holder has a policy regarding the prohibition of child labor contained in the Company Policy dated 1 December 2019 that stated it is not allowed for any children to work in every activities/processes in company. This</p>	Complied

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		<p>policy has been socialization to all worker and contractor on 17-21 February 2020.</p> <p>For Buatan Plasma plantations there is also a policy prohibiting the employment of children under the age of 18 which is contained in "<i>Kebijakan Koperasi Bhirawa Bhakti</i>" dated 6 September 2022 and in "<i>Kebijakan Koperasi Mulus Rahayu</i>" dated 10 August 2022.</p> <p>From the results of the field observation, it can be concluded that there are no child laborers in the company's operational areas.</p> <p>In addition, from the results of interviews with stakeholders for example PK contractors, that the company has socialized the policy of no child labor in the company's operational area.</p>	
<b>Criteria 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p><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> <p>- Critical (Major) compliance -</p>	<p>The company has a policy regarding the prevention of sexual violence and harassment as stated in the one stipulated on:</p> <ul style="list-style-type: none"> <li>- "<i>Kebijakan Perusahaan</i>" that was signed by Managing Director dated 1st December 2019, in point 15; "To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights".</li> <li>- "<i>Kebijakan Group Manager</i>" dated 14<sup>th</sup> February 2020, that was signed by Manajer Group ICS Buatan, point 6 stated "<i>Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan</i>" - Preventing sexual harassment and various forms of violence against women and protecting their reproduction rights"</li> <li>- "<i>Kebijakan Koperasi Bhirawa Bhakti</i>" dated 6 September 2022 at point 11 stated "<i>Mencegah Pelecehan Seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-</i></li> </ul>	Complied

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		<p><i>hak reproduksinya."</i></p> <ul style="list-style-type: none"> <li>- "Surat Perjanjian Kerja Angkutan" (No.: 05/KUD-BB/VI/2021, dated 11 August 2021) between KUD Bhirawa Bhakti and Sena (TBS Transporter) especially in Clause 7 explains the obligation of the transporter not to commit immoral acts, abuse, threaten or intimidate co-workers.</li> </ul> <p>Based on the results of interviews with harvest workers, spray workers and factory operational workers, it is known that the workers know that there is a prohibition against violence in any form.</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>- Critical (Major) compliance -</p>	<p>The company also has policies to protect the reproductive rights of workers, especially women stated on several document, such as:</p> <ul style="list-style-type: none"> <li>- "Kebijakan Koperasi Bhirawa Bhakti" dated 6 September 2022 at point 11 stated "Mencegah Pelecehan Seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya."</li> <li>- "Perjanjian Kerja Bersama 2022-2024" dated 13 March 2022 at clause VIII stated that Women workers get menstruation leave as well as maternity leave according to the labor law.</li> </ul> <p>The certificate holder also shows the implementation of granting the right to maternity leave to workers, for example in the recording of the "Employee Leave Application" in the name of Her**** (Fertilizer worker of Division I) submitted on 1 May to 29 July 2022. The request for leave has been approved by Estate Manager 1 week before the leave is executed.</p>	Complied



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		Based on the results of interviews with fertilizer workers (permanent workers), it is known that workers also know that female workers have the right to maternity leave.	
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.</p> <p>- Minor compliance -</p>	<p>For breastfeeding mothers and those who have children under 5 years old, the company has provided Child Care Places (TPA) located in each division/afdeling. In the TPA room, the company also provides special space and time for 1 hour for breastfeeding mothers who need time to breastfeed their babies.</p> <p>The company has also identified its workers as young mothers and conducted consultations by distributing questionnaires on June 15, 2023 to 21 young mothers at PKS Buatani II and Simpang Perak Plantation.</p> <p>From the results of surveys and consultations, management issued several policies, including:</p> <ul style="list-style-type: none"> <li>- Policy for employees who are breastfeeding; management issued a Memorandum from Farm Manager No. 171/ES-IIS/MEMO/01/20 dated January 4 2020, stated: the company guarantees female employees to breastfeed their children during working hours, by providing time and space for all female employees who have babies to breastfeed their children once for 45 minutes : in the morning at 10.00-10.45 WIB at the clinic or afdeling office or 11.30 - 12.15 WIB.</li> <li>- Health needs for children/babies, the opportunity to be able to give breast milk to babies who are still breastfeeding, periodic immunizations and the need for care for children and babies in the plantation environment.</li> <li>- Regular check-ups at the clinic to monitor the baby's health; The POSYANDU service program once a month at the Central TPA (Child Care Center) includes immunizations and vitamins.</li> </ul>	Complied

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		- The company consistently carries out pregnancy tests on female workers who work as fertilizers and sprayers once every month.	
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>Until this audit was carried out, procedures related to complaints had not changed, i.e. Procedure No. SOP: XX-HR-308.5-RO; Revision: 0, December 11, 2009: Employee Complaints: Filing and Resolving. The complaint management mechanism that needs to maintain the confidentiality of complainants is contained in the draft company policy as one of the points of this policy states that:</p> <p>"To provide appropriate information to those who ask and maintain confidentiality for whistle blower cases in accordance with laws and regulations regarding environmental and social issues, food safety, occupational health and safety, so that they can participate more in the decision-making process. to improve company performance".</p> <p>Based on interviews with stakeholders and related government agencies in Pelalawan Regency, in the 2022-2023 period, there were no recorded complaints from external parties (community around the plantation).</p>	Complied
<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> </ul>	<p><b>Buatan II POM and Simpang Perak Estate:</b></p> <p>Based on verification of the worker's document list, there were no indications of forced labor, contract substitution and/or human trafficking. All employees have a work agreement that regulates the rights and obligations of the company and employees. The employment agreement includes working hours and salary payments.</p> <p>Based on the overtime work order, it has been verified that there is no indication that there is an overtime work order, overtime work is carried out based on the approved order. There is no indication that there are workers working because of debt bondage, and there are no costs whatsoever in recruiting workers. All workers have been determined</p>	Complied

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	<ul style="list-style-type: none"> <li>• Debt bondage</li> <li>• Withholding of wages</li> <li>- Critical (Major) compliance -</li> </ul>	<p>based on the agreed work contract. If the worker decides to stop working before the contract period ends, the company will conduct counseling/interviews with the worker concerned and the decision will be taken based on the agreement of both parties.</p> <p>Based on document verification and salary payments, it shows that employees have paid according to the minimum wage provisions, as well as verification of the employee master list for the period June 2023, there is no use of migrant/foreign/honorary workers.</p> <p>All workers, including temporary workers, have a work agreement; regulates the scope of work, term of work agreement, working hours, salary payments, overtime and BPJS. Based on verification of the master list of employees for the period June 2023 and interviews with several workers during field visits, there are no indications of changes in contracts, storage of identity documents/passports, payment of recruitment fees, unintentional overtime, limiting workers' freedom to resign, sanctions for termination of employment, debt bondage and wage cuts (which were not agreed upon).</p> <p><b>Scheme Smallholders:</b></p> <p>Similar to estate and mill, there is no forced and trafficked labour has noted during assessment.</p> <p>KUD has a policy related to use of migrant worker inside "Kebijakan Koperasi". Based on document verification, there were no migrant worker used in cooperative.</p> <p>All worker in cooperative have work agreement. All of them already appointed as permanent worker.</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.	<b>Buatan II POM , Simpang Perak and Scheme Samllholder:</b>	Complied

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	- Critical (Major) compliance -	<p>PT Inti Indosawit Subur – Buatan Group uses temporary workers as casual workers in the operations of Simpang Perak Estate, Plasma and Buatan II POM.</p> <p>The company has procedures regarding SOP for Accepting New Employees No. AA-HR-305.2-R0 dated February 1 2009, this procedure constitutes general employee acceptance (for all employees).</p> <p>PT Inti Indosawit Subur – POM Buatan II and Kebun Simpang Perak have issued special employment policies and procedures for non-permanent workers (PHL/PKWT); These policies and procedures are issued for each Simpang Perak Estate unit and the POM Agency: Memorandum No. 94/ES-KSP/MEMO/08/2020, dated 10 August 2020.</p> <p>These policies and procedures have been communicated to workers, especially non-permanent workers at Buatan II POM and Simpang Perak Estate on 11 August 2020. These procedures explain in detail the mechanism for recruiting non-permanent workers, promotion of non-permanent workers to permanent workers, time period and conditions as well as the needs of temporary workers in accordance with National Regulations (Law No. 13 of 2003).</p> <p>Regarding harvest workers who have Daily Worker status, this has been stated in 6.2.7 above.</p>	
<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.			
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>- Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur – Buatan II POM has appointed a person who responsible on OHS implementation and monitoring. The safety committee has defined in all estate and POM under P2K3 (<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i>).</p> <p>Sample seen:</p> <ul style="list-style-type: none"> <li>Safety committee has defined under "Surat Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Propinsi Riau nomor Kep.457/Disnakertrans-PK/SK-P2K3/XII/2021 tentang Pengesahan</li> </ul>	Complied

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		<p>Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) PT Inti Indosawit Subur – Pabrik Buatan, updated on 6 December 2021.</p> <ul style="list-style-type: none"> <li>The company has also assigned the person who responsible on OHS expert (AK3- Umum), namely Mr S*n*e*** with license number: No.Reg 5/1595/AS.02.04/II/2021 dated 31 March 2022 valid until 3 years.</li> <li>Record of monthly meeting (P2K3), sample seen: MoM on 18 May 2023, agenda meeting: review on previous OHS meeting, review of inspection of PPE usage, review on accidents report.</li> <li>Three months report on OHS performance for period January to March 2023 was sent to Manpower Agency in Pelalawan Regency.</li> </ul> <p><u>Scheme smallholders:</u></p> <p>Each KUD has established a team who has been responsible on implementation and implementation the OHS program. Based on interview during onsite audit, there was confirmed that smallholder's cooperative has established a team who has been responsible on implementation of OHS.</p>	
6.7.2	<p>Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>PT Inti Indosawit Subur – Buatan II POM has defined the procedure for emergency response under Standard Operational Procedure – Environmental Field Procedure, such as:</p> <ul style="list-style-type: none"> <li>Nomor AA-KL-11-EFP <i>tentang Penanganan Tumpahan di Laboratorium</i></li> <li>Nomor AA-KL-14-EFP <i>tentang Pengendalian Kebakaran Lahan</i></li> <li>Nomor AA-KL-16-EFP <i>tentang Pengendalian Tumpahan B3 dan Limbah B3</i></li> <li>Nomor AA-KL-17-EFP <i>tentang Pengendalian Ledakan Boiler, Tabung Gas dan Lainnya</i></li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>Nomor AA-KL-18-EFP <i>tentang Pengendalian Gempa Bumi, Banjir dan Tanah Longsor</i></li> <li>Nomor AA-KL-19-EFP <i>tentang Tanggap Darurat Kabut Asap</i></li> </ul> <p>PT Inti Indosawit Subur – Buatan II POM 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 April 2018.</p> <p>Record of accident are kept by P2K3 (OHS Expert) and review during P2K3 meeting (monthly). Evidence of P2K3 meeting can be shown during audit.</p> <p>The monitoring carried out on monthly basis and results were discussed during safety committee meeting. The incident statistics include man-hours, lost time accident and Frequency rate (FR) and Severity rate (SR) were reported quarterly as P2K3 report by safety officer to Manpower office, sample seen: P2K3 report period January – March 2023 Buatan II POM and Simpang Perak Estate reported on April 2023.</p> <p>Buatan II POM and Simpang Perak Estate there is a record of accident report and incident statistics include man-hours, lost time accident and Frequency rate (FR) and Severity rate (SR) were made by safety officer (Ahli K3):</p> <ul style="list-style-type: none"> <li>Simpang Perak Estate: During 2022 there were 98 accident occur with category first aid with no lost time injury, frequency rate 0 and severity rate 0; total manhours 1,163,768 hours.</li> <li>Buatan II POM During 2022 there were 3 accident occur with category mild injury and no lost time injury, frequency rate 15 and severity rate 0; total manhours 202,703 hours.</li> </ul>	
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	PT Inti Indosawit Subur – Buatan II POM and Supply bases has demonstrated the record of realization the OHS program 2022/2023 including use appropriate personal protective equipment (PPE) which is	Complied

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	<p>operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Evidence of PPE provision and handover to workers can be shown during audit in "<i>Tanda Terima APD</i>". During field visit and interview to Buatan II POM, Simpang Perak Estate and Scheme Smallholder it was sighted that all workers has use appropriate PPE during working and they explained that PPE is provided free of charge, when the PPE is broken because of the working usage workers can request to change for the new PPE.</p> <p>Simpang Perak Estate has provide sanitation facilities for spraying operator, so that workers can change out of PPE, wash and put on their personal clothing. Sanitation facilities provide in area of Agrochemical warehouse with separate place.</p> <p>Based on field visit to Simpang Perak Estate can be demonstrated that sanitation facilities are well function and sufficient for spraying workers.</p>	
6.7.4	<p>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.</p> <p>- Minor compliance -</p>	<p>All workers have been provided with medical care and accident insurance (BPJS Ketenagakerjaan &amp; BPJS Kesehatan).</p> <p>The insurances were still valid as seen by the recent slip payment in January – May 2023 for estate and mill.</p> <p>Several insurance payments are reviewed and are in accordance with the number of workers. For example, auditor has verified the BPJS Ketenagakerjaan (Accident and pension insurance) and Kesehatan receipt of payments period of January - May 2023 for Simpang Perak Estate and Buatan II POM.</p> <p>Based on interview with sampled worker during the field visit in estate and mill, the affected workers received appropriate medical treatment from the insurance policy.</p>	Complied
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p>	<p>PT Inti Indosawit Subur – Buatan II POM EHS team prepares safety index. The safety index is monitoring tool, indicating number of worker</p>	Complied

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	- Minor compliance -	<p>(at each operating units), number of major and minor accident as well as the lost time injury.</p> <p>The monitoring carried out on monthly basis and results were discussed during safety committee meeting. The incident statistics include man-hours, lost time accident and Frequency rate (FR) and Severity rate (SR) were reported quarterly as P2K3 report by safety officer to Manpower office, sample seen: P2K3 report period January – March 2023 Buatan II POM and Simpang Perak Estate reported on April 2023.</p> <p>Buatan II POM and Simpang Perak Estate there is a record of accident report and incident statistics include man-hours, lost time accident and Frequency rate (FR) and Severity rate (SR) were made by safety officer (Ahli K3):</p> <ul style="list-style-type: none"> <li>- Simpang Perak Estate: During 2022 there were 98 accident occur with category first aid with no lost time injury, frequency rate 0 and severity rate 0; total manhours 1,163,768 hours.</li> <li>- Buatan II POM During 2022 there were 3 accident occur with category mild injury and no lost time injury, frequency rate 15 and severity rate 0; total manhours 202,703 hours.</li> </ul> <p>The recorded incidents leads to the update of HIRAC or any applicable risk assessment, this was verified during interview with management representative and document review.</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	<p><b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p><b>Own Estates</b></p> <p>According to the Agricultural Policy Manual SOP AA-APM-OP-1100.10. R6 <i>Pengendalian Hama dan Penyakit</i> (Pests &amp; Disease Control),</p>	Complied



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		<p>certificate holder has plan to implement integrated pest management. There is no change about the SOP during ASA2.2.</p> <p>According to the interview with pest control officer in Simpang Perak Estate and IPM census workers, obtain information that management has had a schedule to regularly monitored pest attack (census) as follows:</p> <ul style="list-style-type: none"> <li>• Census of caterpillar/bag worm by monthly basis.</li> <li>• Census of <i>Ganoderma</i> annually.</li> <li>• Census rat infestation by recap the record of sortation in loading ramp.</li> <li>• Census of Barn Owl Box occupation in three monthly bases.</li> </ul> <p>Verified document as follows:</p> <p>The last census in Simpang Perak Estate has been conducted in second week of June 2023. Result of census shows that pest attack is still under control (below the economic threshold) which is limit 5%, namely bagworm 0.21%, rat 1%, Ganoderma 0% and</p> <p><b>Scheme Smallholder:</b></p> <p>According to document verification during ASA2.2, pest monitoring and control sighted pest management plan to conduct caterpillar/bag worm census in by monthly and barn owl box monitored in three monthly bases. Census was conducted by field supervisor that help by person that assign by board of KUD.</p> <p>During the field visit in own estate (Simpang Perak Estate Block B21g Afd II) visually there was no issues related to the outbreak or infestation. However, there were a usage of natural predator (<i>Tyto alba</i>) to reduce a rat infestation. Due to weather condition (heavy rain), there is no field</p>	
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		visit to smallholder plot. However, there is no report of outbreak in their plot so far.	
7.1.2	Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -	The company only uses natural predators namely <i>Tyto alba</i> and <i>Sycanus dichotomus</i> in pest control efforts. Both predators are not recorded in invasive species according to the information listed on the website <a href="http://www.cabi.org">www.cabi.org</a> on in global invasive species database <a href="http://www.iucngisd.org/gisd/search.php">http://www.iucngisd.org/gisd/search.php</a> .	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	Based on document verification, interview with management and stakeholders and field observation during ASA2.2 obtained information that there is no record use of fire for pest control.	Complied
<b>Criteria 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	Based on the document verification and interview with management, obtain information that there is only pesticide usage for chemical weeding and pest control (if needed). Recommendation of pesticide used are refer to SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (weed control) where explain the weeds type, weeding control methods and eradication, pesticide characteristic, and procedures of application (spraying volume, calibration, chemical weeding interval, target and sprayer maintenance).  During the audit, found some pesticide list that usually used with active ingredients such as <i>isopropyl amine glyphosate</i> , <i>fluoroksifir</i> , <i>methyl metsulfuron</i> , <i>triklofir</i> , <i>diuron</i> , <i>lamda sihalotrin</i> and <i>2,4-D dimetil amina</i> , <i>bacillus thuringiensis berliner</i> , <i>ammonium glufosinat</i> , <i>acephate</i> , <i>copper oxide</i> and <i>mancozeb</i> . Certificate holder no longer using paraquat since 15 November 2019, according to the circular letter of Deputy Managing Director No. 008/DMD/MEMO/OCT/19 dated 22 October 2019.	Complied

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		<p>According to the national regulation, all pesticide used by the management unit has registered in agricultural ministry of Indonesia. It can be check in <a href="http://pestisida.id/simpes_app/index.php">http://pestisida.id/simpes_app/index.php</a>.</p> <table border="1"> <thead> <tr> <th>Agrochemical</th><th>Active ingredients</th><th>Register No.</th><th>Target</th></tr> </thead> <tbody> <tr> <td>Kenlon 480 EC</td><td>Trikolpir Bitoksi Etil Ester 480 g/l</td><td>RI.01030120062433 Valid until 31 Dec 2023</td><td>Wood</td></tr> <tr> <td>Supremo 480SL</td><td>Isopropil Amina Glifosat 480 g/l</td><td>RI.01030119941170 Valid until 21 Dec 2023</td><td>Narrow leaf weed, <i>Asystasia</i>, <i>Imperata cylindrical</i></td></tr> <tr> <td>Metaprima</td><td>Metil metsulfuron</td><td>RI.01030120031897 Valid until 03 September 2023</td><td>Broadleaf weeds, <i>Ageratum conyzoides</i>, <i>Calopogonium mucunoides</i>, <i>Clidemia hirta</i>, <i>Synedrella nodiflora</i>.</td></tr> <tr> <td>Polidor 25EC</td><td>Lamda sihalotrin</td><td>RI.01010120031921 Valid until 03 September 2023</td><td><i>Spodoptera litura</i></td></tr> </tbody> </table> <p><b>Smallholder</b></p> <p>During the audit, sighted the list of pesticide recommendation (by active ingredients) that can used by smallholder such as isopropyl amine glyphosate, fluoroksifir, methyl metsulfuron and triklofir. During January 2022 – April 2023, the smallholders used pesticide with active ingredients isopropyl amine glyphosate, fluoroksifir and methyl metsulfuron.</p>	Agrochemical	Active ingredients	Register No.	Target	Kenlon 480 EC	Trikolpir Bitoksi Etil Ester 480 g/l	RI.01030120062433 Valid until 31 Dec 2023	Wood	Supremo 480SL	Isopropil Amina Glifosat 480 g/l	RI.01030119941170 Valid until 21 Dec 2023	Narrow leaf weed, <i>Asystasia</i> , <i>Imperata cylindrical</i>	Metaprima	Metil metsulfuron	RI.01030120031897 Valid until 03 September 2023	Broadleaf weeds, <i>Ageratum conyzoides</i> , <i>Calopogonium mucunoides</i> , <i>Clidemia hirta</i> , <i>Synedrella nodiflora</i> .	Polidor 25EC	Lamda sihalotrin	RI.01010120031921 Valid until 03 September 2023	<i>Spodoptera litura</i>	
Agrochemical	Active ingredients	Register No.	Target																				
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Polidor 25EC	Lamda sihalotrin	RI.01010120031921 Valid until 03 September 2023	<i>Spodoptera litura</i>																				
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>Certificate holder has showed the record of LD50 calculation in each unit based on amount of pesticide used.</p> <p>Simpang Perak Estate</p>	Complied																				

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- Critical (Major) compliance -

## 2022

Brand	Active Ingredient	LD50	Total Used	Total Active Ingredient	Ratio Active Ingredient/ Ha	Ratio per Kg production
Kenlon 480EC	Trychlopyr butoxy ethyl ester	500	500	82	16.40	0.016
Meta Prima	Methyl metsulfuron	5000	5000	535	256.8	0.245
Supremo 480SL	Isopropil amina glifosat	5000	5000	3665	1759.2	1.679
Polydor 25 EC	Lamda sihalotrin	2625	2625	625	256.8	0.286

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Brand	Active Ingredient	LD50	Total Used	Total Active Ingredient	Ratio Active Ingredient/ Ha	Ratio per Kg production
Meta Prima	Methyl metsulfuron	5000	361	173.28	0.165	0.00000748
Supremo 480SL	Isopropil amina glifosat	5000	1881	902.88	0.862	0.00003895
Polydor 25 EC	Lamda sihalotrin	2625	168	80.64	0.077	0.00000348

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			Scheme smallholders:					
			2022					
			KUD	Agrochemical	LD50	Applica tion (Ha)	Qty (Litre)	Ratio/ Ha
			Bhirawa Bhakti	Kenrane 288 EC	480	56	4	0.000
			Tani Rukun	Kenrane 288 EC	480	100	7	0.000
			Sawit Harapan	Kenrane 288 EC	480	88	6	0.000
			Buatan Jaya	Kenrane 288 EC	480	126	9	0.000
			Mitra Usaha	Kenrane 288 EC	480	86	6	0.000
			Makarti Sawit	Kenrane 288 EC	480	80	6	0.000
			Bina Mulia	Kenrane 288 EC	480	100	7	0.000
			2023					
			KUD	Agrochemical	LD50	Applica tion (Ha)	Qty (Litre)	Ratio/ Ha
			Bhirawa Bhakti	Supremo	480	128	41	0.000
			Tani Rukun	Supremo	480	164	52	0.000
			Sawit Harapan	Supremo	480	126	40	0.000
Buatan Jaya	Supremo	480	168	54	0.000			
Mitra Usaha	Supremo	480	134	43	0.000			
Makarti Sawit	Supremo	480	176	56	0.000			
Bina Mulia	Supremo	480	200	64	0.000			

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7.2.3	<p><b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>Until this recertification audit obtain information that there is no pesticide use for control pest attack. All of pesticide only using for weeding (herbicide).</p> <p>Based on interview with IPM supervisor and smallholder representatives known that no outbreak that causes pesticide usage.</p>	Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.</p> <p>- Minor compliance -</p>	<p>There was some pesticide usage especially in nursery and immature area to prevent pest infestation. For example, there was a record of pesticide (active ingredients Lamda sihalotrin) to prevent <i>Spodoptera litura</i> infestation. This prophylactic usage has followed the national guidelines such as dosage, interval and infestation rate. Also, in accordance to Asian Agri's Research and Development guidelines.</p>	Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:</p> <p>- Minor compliance -</p> <p>7.2.5a Judgment of the threat and verify why this is a major threat.</p>	<p>Based on the document verification and interview with management, obtain information that there is only pesticide usage for chemical weeding and pest control (if needed). Recommendation of pesticide used are refer to SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed control) where explain the weeds type, weeding control methods and eradication, pesticide characteristic, and procedures of application (spraying volume, calibration, chemical weeding interval, target and sprayer maintenance).</p> <p>According to bin card in chemical store obtained information of pesticide list that usually used with active ingredients such as <i>isopropyl amine glyphosate, fluoroksifir, methyl metsulfuron, triklofir, diuron, paraquat diklorida, diuron, and lamda sihalotrin</i>. Certificate holder no longer using paraquat since 15 November 2019, according to the circular letter of Deputy Managing Director No. 008/DMD/MEMO/OCT/19 dated 22 October 2019.</p> <p>To reduce the human and environmental risk, there is some continuous action that has been implemented as follows:</p>	Complied

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		<ul style="list-style-type: none"> <li>• Set up the pesticide rotation. For example, chemical weeding rotation is 4 times a year where the rotation in immature and early mature more often than mature and old palm.</li> <li>• Using the ultralow volume nozzle to minimize water consumption and reduce the risk for environment. During the field visit to the pesticide store sighted the micron herby system knapsack as example.</li> <li>• Conducted regularly training for pesticide applicator and equipped them with appropriate PPE's.</li> <li>• Delaying the pesticide if weed or pest is under control. According to the interview with estate manager obtain information that the pesticide rotation can be delayed or reduced especially in mature or old palm where weeds/pest population are under control.</li> <li>• Minimalize contamination for pesticide applicator and their families by ensuring them to clean themselves before back home.</li> </ul>	
	7.2.5b Why there is no other alternative which can be used.	<p>According to IPM procedures, certificate holder always using biological approach in order to monitoring pest attack. For example, estate using <i>Tyto alba</i> to monitor rat infestation than using rodenticide.</p> <p>To maintain ground condition especially weeding control, certificate holder has had a procedures SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control). This procedure has set the specific pesticide in with minimum risk in accordance with the target.</p>	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	<p>Certificate holder through Asian Agri's Research and Development Department has examined some pesticide in specific target. The result of examination and pesticide recommendation written in the SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control).</p>	

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	7.2.5d Process to limit the negative impacts of the application.	<p>SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control) has set some procedures to reduce negative impact of the application as follows:</p> <ul style="list-style-type: none"> <li>• Pesticide/herbicide selection to ensuring the application is effective.</li> <li>• Set up the appropriate nozzle in chemical weeding activity based on weed type, topography and availability of water.</li> <li>• Regularly spraying calibration to ensuring the application is effective and efficient.</li> <li>• Calculate pesticide/herbicide usage based on target (hectarage and weed type).</li> </ul> <p>Spraying technic.</p>	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	<p>Certificate holder did not use pesticide to eradicated pest without the outbreak. If any census result shows the pest attack almost reach the economical threshold, they usually conducted campaign test using pesticide if needed.</p> <p>Chemical weeding activity has regularly set by management. For example, normally circle, path and collecting point weeding conducted 4 times a year in immature and mature area. Those application can be reduced in line with the palm ages.</p>	
7.2.6	<p><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.</p> <p>- Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur – Buatan Group has assigned chemical weeding team (<i>Tim Unit Semprot/TUS</i>) in each estate/unit to handling chemical weeding activity. The team member originated from own workers (for own estate) and local communities (for smallholder). They regularly attended training on pesticide handling that conducted by the pesticide supplier in collaboration with local pesticide committee.</p> <p>Based on document review and interview with random pesticide applicator during ASA2.2, it was known that they attended the last training on pesticide handling in January 2023. Some topics that discuss such as safety pesticide handling, national regulation related to</p>	Complied



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		<p>pesticide, symbol and label awareness and emergency procedure if any contamination or poisonous. The worker can describe purpose of PPE usage, attending regularly medical check and safety working procedures.</p> <p>Workers that perform herbicide spraying in Simpang Perak Estate also perform spraying activity in smallholder plantation. Spraying team has been trained with pesticide handling training, agrochemical application training and limited pesticide training. Spraying team only handles herbicide to control the weed. Sprayers understood the type of chemical for each weed type, the hazard, the application, and appropriate PPE use.</p> <p>During audit year 2023, auditor team has also interviewed sample of smallholder representatives in KUD Mulus Rahayu, KUD Kebun Sawit Harapan, KUD Buatan Jaya and KUD Bhirawa Bhakti, 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>	
7.2.7	<p><b>(C)</b> Storage of all pesticides in accordance with recognized best practices.</p> <p>- Critical (Major) compliance -</p>	<p><b>Estate</b></p> <p>The location of the pesticides storage for the Simpang Perak Estate is in Buatan I Estate (centralized).</p> <p>Pesticides are always applied in accordance with the product label and storage instruction. During field visit at Pesticides Storage in Buatan Estate, it was known that:</p> <ul style="list-style-type: none"> <li>- The storage is permanent buildings.</li> <li>- Agrochemicals storage was locked in areas with limited access</li> <li>- The storage was ventilated and in good condition.</li> <li>- MSDS and hazard symbol label were provided nearby of</li> </ul>	Complied

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		<p>agrochemicals</p> <ul style="list-style-type: none"> <li>- Emergency shower and eyewash were also provided to anticipate in case of an emergency of agrochemical handling.</li> <li>- Permanent floor is cemented, the floor of the mixing of pesticides using ceramics, and equipped with a "spillage trap", the possible spillage was managed</li> <li>- Secondary containment was provided around the chemical storage area</li> <li>- Spill kit was also provided in the area.</li> <li>- MSDS are available for all types of existing pesticides and the pesticide management and safety instructions are available.</li> <li>- The flow of waste water is channeled and stored so that it is not discharged into the environment. The water used is used for its dilution.</li> </ul> <p>Interview with spraying workers demonstrated that all of them have a good knowledge regarding pesticide usage and its material usage and toxicity. PPE for handling of chemicals were provided including boots, apron, safety glass, respiratory mask and hand gloves. PPE used was appropriate according to recommendations in any risk assessments. PPE provided and used can be easily replaced if damaged. All precautions attached to the products properly observed, applied, and understood by workers.</p> <p>All waste products have been identified and documented under the "Evaluasi Aspek-Dampak Lingkungan" (Environmental Aspect impacts) year 2021". Domestic waste is the main concern to be managed.</p> <p>Both Mill and Estate, has periodically schedule to manage the domestic waste.</p>	
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		<p><b><u>Scheme smallholders:</u></b></p> <p>Group manager Smallholder Buatan has a policy and mechanism to manage the waste from ex fertilizer sack according to procedure of "Pengelolaan Kemasan Ex (Bekas) Pupuk di Kebun No. 035/DOK/SOP/PT.IIS KLB-AA/2016" dated 2 December 2016. The ex fertilizer sack must be handled by triple rinse and use as loose fruit sack, the inner bag of fertilizer was delivered to collector.</p> <p>During field visit and interview with sample smallholder in ASA2.2 in KUD Mulus Rahayu, KUD Buatan Jaya, KUD Kebun Sawit Harapan and KUD Bhirawa Bakti, they were well aware of the to manage the waste from ex fertilizer sack and empty chemical.</p>	
7.2.8	<p>All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.</p> <p>- Minor compliance -</p>	<p>All chemicals and empty containers collected and stored at permitted hazardous waste storage (Tempat Penyimpanan Sementara Limbah B3) location in Simpang Perak Estate.</p> <p><b><u>Scheme smallholders:</u></b></p> <p>Group manager has a policy and mechanism to manage the waste from ex fertilizer sack according to procedure of "Prosedur Pemusnahan Wadah Bekas Bahan Kimia dan Diagram Alur Pembuangan Wadah Bekas Agrokimia". The ex fertilizer sack must be handled by triple rinse and use as loose fruit sack, the inner bag of fertilizer was delivered to collector.</p> <p>During field visit and interview with sample smallholder, they were well aware of the to manage the waste from ex fertilizer sack and empty chemical.</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.</p>	Complied

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7.2.9	<p><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 provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	Based on document review, interview to the management and stakeholders, it was known that until this audit (ASA2.2), there is no aerial application of pesticide throughout the company plantation and scheme smallholders.	Complied
7.2.10	<p><b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>PT 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 Tani Maju, KUD Tani Bahagia and KUD Usaha Tani</p> <p>Last MCU was conducted on 5 – 8 March 2023 Focus Clinical Laboratory – Pekanbaru.</p> <p>Data seen: MCU for 43 workers handling with chemical, such as pesticide, herbicide, and fertilizer applicator and for PIC in pesticides storage.</p> <p>Special Medical Check-Up was covered to cholinesterase test, spirometry, and visual test. The result of MCU has communicated to all related workers on 16 April 2023.</p>	Complied
7.2.11	<p><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> <p>- Critical (Major) compliance -</p>	<p>The company has prohibits 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>	Complied

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		<p>The last of pregnancy test conducted in April 2023. All the female sprayer in well condition and not being pregnant nor breast feeding.</p> <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><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>- Minor compliance -</p>	<p>PT Inti Indosawit Subur – Buatan II POM and Estate collects all hazardous waste from estates and mill into temporary hazardous waste storage in central workshop compound.</p> <p>PT Inti Indosawit Subur – Buatan II POM has prepared a procedure to handle hazardous waste titled "Prosedur Penanganan Limbah B3" No.AA-KL-06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third party transporter</p> <p>PT Inti Indosawit Subur – Buatan II POM 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/DPMPSTSP-LB3/2020/34, dated 29 December 2020 and valid for 5 years..</p> <p>The hazardous waste is sent to the registered collector/transporter which approved by Environmental Ministry, namely PT Hazmat Techno Indonesia,</p>	Complied

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		A documented waste management plan to avoid or reduce pollution and its implementation shall available under document of Environmental Aspect-Impacts (Evaluasi Aspek-Dampak Lingkungan) year 2023. The document covered all operation in mill, estate, and its smallholders.	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	<p>The hazardous waste is sent to the registered collector/transporter which approved by 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>• PT Hazmat Techno Indonesia – B3 Waste Transportation and/or B3 waste collection based on the Decree of the Director General of Land Transportation No. SK.00107/AJ.309/I/DJPD/2018 dated May 9, 2018 is valid for 5 years and the Approval Letter from the Investment Service and One Stop Integrated Licensing Service Number 660/1798.</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> <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 Hazmat Techno Indonesia – B3 Waste Transportation and/or B3 waste collection based on the Decree of the Director General of Land Transportation No. SK.00107/AJ.309/I/DJPD/2018 dated May 9, 2018 is valid for 5 years and the Approval Letter from the</li> </ul>	Complied

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		<p>Investment Service and One Stop Integrated Licensing Service Number 660/1798.</p> <ul style="list-style-type: none"> <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:  Transported on March 30, 2023</p> <ul style="list-style-type: none"> <li>Manifest Festronik No. KLHK-1685993290, used chemical containers; hazardous waste code : B104d; Transporter PT Hazmat Techno Indonesia, Vehicle No BK 9742 BF.</li> </ul> <p>Records of Quarterly report of hazardous waste were seen and reviewed for Triwulan III- IV Y2022 and Triwulan I Y2023.  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. - Minor compliance -	All waste products have been identified and documented under the "Evaluasi Aspek- Dampak Lingkungan" (Environmental Aspect impacts).	Complied

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		<p>Domestic waste is the main concern to be manage. Both Mill and Estate, has periodically schedule to manage the domestic waste.</p> <p>The document of "Jadwal Pengangkutan Sampah 2022-2023 untuk Karyawan Buatan Estate" was reviewed. Regulation of domestic waste management refer to "UU No. 18 Tahun 2008 tentang Pengelolaan Sampah".</p> <p>ICS Group Plasma Buatan 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 ex-fertilizer sack was prohibit to dispose in plantation and housing area. All the ex-fertilizer sack usage must be identified and reported to Group Manager ICS.</p>	
<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	<p>Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.</p> <p>- Minor compliance -</p>	<p><b>Own Estates</b></p> <p>Both own estate and smallholder has had the procedure related to manage soil fertility (see detail in indicator 3.3.1). The implementation of manuring is based on fertilizer recommendation that set by Asian Agri's Research and Development Department. Fertilizer dosage has set according to the soil needed refer to SSU/LSU.</p> <p><b>Scheme Smallholder:</b></p> <p>Based on interview with plasma manager obtain information that the fertilizer recommendation set by Asian Agri's Research and Development Department. No fertilizer applied in riparian area to minimize environmental impact.</p>	Complied
7.4.2	<p>Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.</p> <p>- Minor compliance -</p>	<p>According to the Asian Agri's agricultural policy, soil sampling conducted every 6 years while leaf sampling conducted annually. Soil sampling refers to R&amp;D AA IK Profil Tanah Rev.00 "Instruksi Kerja Pengambilan Sampel Tanah Asian Agri Group" dated 09/01/2016, the Work</p>	Complied



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		<p>Instruction has explained that the soil sampling is conducted every 6 years and the document valid for 7 years.</p> <p>Based on document verification sighted the report of soil and leaf sampling in own estate and smallholders as follows:</p> <ul style="list-style-type: none"> <li>• The last soil sampling conducted on 5 October 2017. Parameter that tested is N, C, K, Ca, Mg and pH. Verified samples: <ul style="list-style-type: none"> <li>• P1, location Block B91d, Division II, No Lab. 15S2666-15S2669.</li> <li>• P2, location Block B91b, Division II, No Lab. 15S2670-15S2674.</li> <li>• P3, location Block A91c, Division II, No Lab. 15S2675-15S2679.</li> <li>• P3, location Block A91c, Division II, No Lab. 15S2675-15S2679.</li> </ul> </li> <li>• The last leaf sampling conducted on 24 May 2022. Parameter that tested is major element (Ash, N, P, K Mg, Ca) dan Minor element (B, Cu, Zn, Mn, Fe). Verified samples as follows: <ul style="list-style-type: none"> <li>• Ref Order No. 124/LSU-AGR/05/2022, dated 24/05/2022, location Afd III, 10 samples.</li> <li>• Ref Order No. 99/LSU-AGR/05/2022, dated 18/06/2022, location Afd II, 24 samples.</li> <li>• Ref Order No. 53/LSU-AGR/05/2022, dated 18/06/2022, location Afd I, 26 samples.</li> <li>• Ref Order No. 59/LSU-AGR/04/2022, dated 14/05/2022, location Afd IV, 23 samples.</li> </ul> </li> </ul> <p>Those reports are converted to be fertilizer recommendation by Asian Agri's Research and Development Department. The last Leaf Sampling will be the basis for determining fertilizer recommendations for the year 2023.</p>	
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7.4.3	<p>A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>According to the Agricultural Policy Manual, certificate holder has had a guidance in organic fertilizers such as Empty Fruit Bunch (EFB) and Palm Oil Mill Effluent (POME). Certificate holder has implemented EFB application in estate with dosage 30 – 50 ton/Ha in normal soil and POME with dosage 750 m3/Ha only Sei Lala Estate which is near the Buatan II POM.</p> <p>During this visit, auditor has observed the application of organic and inorganic fertilizers. For example: there is application of ZA fertilizer with dosage 2.59 Kg/palm in Block G16f Simpang Perak Estate. The applications have followed the recommendation stipulated by Asian Agri Research and Development Department.</p> <p>EFB and POME application in 2022 and 2023 (until June):</p> <p><b>2022</b></p> <table> <tr> <th>Month</th> <th>POME (m³)</th> <th>EFB (MT)</th> </tr> <tr><td>January</td><td>11,803</td><td>2,067</td></tr> <tr><td>February</td><td>11,195</td><td>1,240</td></tr> <tr><td>March</td><td>14,529</td><td>1,314</td></tr> <tr><td>April</td><td>13,968</td><td>1,912</td></tr> <tr><td>May</td><td>12,375</td><td>2,261</td></tr> <tr><td>June</td><td>13,141</td><td>1,593</td></tr> <tr><td>July</td><td>11,010</td><td>1,924</td></tr> <tr><td>August</td><td>11,208</td><td>2,349</td></tr> <tr><td>September</td><td>11,462</td><td>2,635</td></tr> <tr><td>October</td><td>13,057</td><td>2,739</td></tr> <tr><td>November</td><td>13,324</td><td>2,279</td></tr> </table>	Month	POME (m³)	EFB (MT)	January	11,803	2,067	February	11,195	1,240	March	14,529	1,314	April	13,968	1,912	May	12,375	2,261	June	13,141	1,593	July	11,010	1,924	August	11,208	2,349	September	11,462	2,635	October	13,057	2,739	November	13,324	2,279	Complied
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		<table><tr><td>December</td><td>15,122</td><td>2,125</td></tr><tr><td>Total</td><td>152,194</td><td>24,438</td></tr></table> <p><b>2023 (until June)</b></p> <table><tr><td>Month</td><td>POME (m³)</td><td>EFB (MT)</td></tr><tr><td>January</td><td>13,068</td><td>4,265</td></tr><tr><td>February</td><td>10,385</td><td>3,876</td></tr><tr><td>March</td><td>11,216</td><td>4,271</td></tr><tr><td>April</td><td>9,457</td><td>3,649</td></tr><tr><td>Total</td><td>44,126</td><td>16,061</td></tr></table> <p><b>Scheme Smallholder:</b> Based on document review, it was known that there is a EFB application in scheme smallholder (for Immature Area). According to the interview with smallholder representatives, only KUD Mulus Rahayu, KUD Kebun Sawit Harapan that still applied the fertilizer according to fertilizer recommendations for their whole areas. Whilst the KUD Buatan Jaya and KUD Bhirawa Bakti was not applied the fertilizer for their whole areas due to replanting plan in the next two year.</p>	December	15,122	2,125	Total	152,194	24,438	Month	POME (m³)	EFB (MT)	January	13,068	4,265	February	10,385	3,876	March	11,216	4,271	April	9,457	3,649	Total	44,126	16,061	
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7.4.4	Records of fertilizer inputs are maintained. - Minor compliance -	The result of leaf sampling analysis, soil sampling analysis along with visual analysis, planting material, planting age and rain fall are considered in proposing the Fertilizer Recommendation.  Fertilizer realization in Simpang Perak Estate for year 2022 and 2023 (until June) as follows:	Complied																								

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		<table><tr><th>Fertilizer</th><th>2022 (Kg)</th><th>2023 (Kg)</th></tr><tr><td>AC</td><td>202,933</td><td></td></tr><tr><td>Dolomite</td><td>573,989</td><td>714,122</td></tr><tr><td>NPK</td><td>125,955</td><td>143,733</td></tr><tr><td>HGFB</td><td>38,077</td><td>11,262</td></tr><tr><td>Kieserite</td><td>41,985</td><td>11,131</td></tr><tr><td>MOP/KCL</td><td>1,029,845</td><td>665,155</td></tr><tr><td>RP</td><td>529,725</td><td>46,499</td></tr><tr><td>Urea</td><td>530,403</td><td>467,997</td></tr></table>	Fertilizer	2022 (Kg)	2023 (Kg)	AC	202,933		Dolomite	573,989	714,122	NPK	125,955	143,733	HGFB	38,077	11,262	Kieserite	41,985	11,131	MOP/KCL	1,029,845	665,155	RP	529,725	46,499	Urea	530,403	467,997		
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		<p>Scheme smallholder</p> <p>Based on interview with the Plasma Manager and document review during ASA2.2, it was known that for the KUD which will conduct the replanting, the Plasma Manager has established Memorandum No. 02/ES-KLB/MEMO/12/2022 dated 21 December 2022 for Pengurus KUD and KT Kebun Plasma Buatan related to "Kebijakan Aplikasi Pupuk Petani Plasma Buatan", the Memo was explained for fertilizer application can be eliminated 1-2 years before replanting. However, if there are farmers who will continue to apply fertilizer, then for the dosage/tree you can refer to this recommendation, namely ZA/AC, MOP, RP and Dolomite with dosage 1Kg/tree with rotation 1 time per year.</p> <p>According to the interview with smallholder representatives, KUD Buatan Jaya and KUD Bhirawa Bakti was not applied the fertilizer for their whole areas due to replanting plan in the next two year.</p>																													

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<b>Criteria 7.5:</b> Practices minimise and control erosion and degradation of soils.		
7.5.1	<p><b>(C)</b> Maps that identify marginal and fragile soils, including steep sloped land are available.</p> <p>- Critical (Major) compliance -</p>	<p>There is no change in term of soil maps and soil analysis of Simpang Perak Estate and Scheme Smallholder during this audit.</p> <p><b>Simpang Perak Estate:</b></p> <ul style="list-style-type: none"> <li>Simpang Perak Estate is used to be Buatn Estate Division 4 – 7. Soil Analysis in PT Inti Indosawit Subur – Buatn Estate carried out in October – December 2008. Reported under "Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatn". Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium.</li> <li>Soil map scale 1:20,000 available, from semi- detailed soil survey 2008 by R&amp;D Asian Agri. The predominant soil type identified in Division IV, V and VI Buatn Estate composed of Typic dystrochpts (dominant), Typic kandiodults, Typic Endoaquults, Typic endoaqupts.</li> <li>Topographic map scale 1:20,000 available, from semi-detailed soil survey the slope between 0-8%, 8-15%, 15-30% and &gt;30%. The data and field information from semi-detailed soil survey 2008 by R&amp;D Asian Agri.</li> <li>Soil suitability: S2 2,656 Ha (47.2%) with limiting factor of low natural fertility; S3 2,050 Ha (36.4%) with limiting factor of topographic condition; N1 (not suitable) 925 Ha (16.4%) with limiting factor of slope more than 30% and sandy soil with rapid drainage.</li> </ul> <p><b>Scheme Smallholder:</b></p> <p>The soil map for all individual member was available at Plasma Buatn office and KUD office with scale 1:50,000. There are 4 series of soil type</p>

Complied

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		defined by Research and Development Asian Agri based on soil survey on April 2014 and soil survey semi detail on June 1998: 1. Typic Dystrudepts 2. Typic Endoaquepts 3. Typic Endoaquults 4. Typic Kandiuults <ul style="list-style-type: none"> <li>Soil map and soil survey result recorded in "Laporan Survei Tanah Tinjau Kebun Plasma Buatan".</li> </ul>	
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations. - Minor compliance -	Based on field visit in slope area especially in replanting areas known that the management unit has provide terrace contour. For example, in replanting area (Estate and Smallholder). There is no fire usage during that process. The management unit also provide legume cover crop to minimize the soil erosion.	Complied
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations. - Minor compliance -	There is no new palm oil planting in Simpang Perak Estate.	Complied
<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. - Critical (Major) compliance -	Based on the document review during ASA2.2, the results of the semi-detailed soil survey conducted by Asian Agri Research and Development dated 5 October 2017 found that there were areas that were categorized as non-conditional (N1) covering an area of 925 Ha (16.4% of the total area). To optimize those area, contour terraces and empty bunch applications should be implemented.	Complied
7.6.2	Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan. - Minor compliance -	Based on soil Analysis carried out by R & D in December 2008 in Buatan Estate. Reported under "Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatan". Based on the report, the physiographic location in plain with hilly tuffaceous	Complied

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		<p>sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium. There is no peat soil identified in Simpang Perak Estate according to the latest soil analysis by R &amp; D Asian Agri.</p> <p>There is no extensive planting within the certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma in accordance with Soil Analysis Report carried out by R &amp; D in December 2008.</p>	
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>Based on soil Analysis carried out by R &amp; D in December 2008 in Buatan Estate. Reported under "<i>Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatan</i>". Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium. There is no peat soil identified in Simpang Perak Estate according to the latest soil analysis by R &amp; D Asian Agri.</p> <p>There is no extensive planting within the certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma in accordance with Soil Analysis Report carried out by R &amp; D in December 2008.</p>	Complied
<b>Criteria 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<p><b>(C)</b> No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. First cycle starts from year 1988, 1989, 1990 and 1991.</p>	Complied
7.7.2	<p>Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).</p> <p>- Minor compliance -</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. First cycle starts from year 1988, 1989, 1990 and 1991.</p>	Complied

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**PROCEDURAL NOTE:** Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).

7.7.3	<p><b>(C)</b> Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	<p>There is no change in information related to the type of land in the scope of certification, where Based on Soil Analysis carried out by R &amp; D on December 2008 in Buatan Estate. Reported under "<i>Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatar</i>".</p> <p>Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium. There is no peat soil identified in Simpang Perak Estate according to the latest soil analysis by R &amp; D Asian Agri.</p> <p>Soil map scale 1:20,000 are available, from semi-detailed soil survey 2008 by R&amp;D Asian Agri. The predominant soil type identified in Buatan Estate composed of:</p> <ul style="list-style-type: none"> <li>• Typic Distrudepts 4,040 ha</li> <li>• Typic Endoaquents 140 ha</li> <li>• Typic Endoaquepts 515 ha</li> <li>• Typic Endoaquults 290 ha</li> <li>• Typic Kandiodults 621 ha</li> <li>• Typic Udipsaments 25 ha</li> <li>• Total 5,361 ha</li> </ul> <p>Topographic map scale 1:20,000 available, from semi-detailed soil survey the slope between 0-8%, 8-15%, 15-30% and &gt;30%. The data and field information from semi-detailed soil survey 2017 by R&amp;D Asian Agri. Soil suitability: S2 2,656 Ha (47.2%) with limiting factor of low natural fertility; S3 2,050 Ha (36.4%) with limiting factor of topographic condition; N1 (not suitable) 925 Ha (16.4%) with limiting factor of slope</p>	Not Applicable
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		<p>more than 30% and sandy soil with rapid drainage. Therefore, drainability assessment of peat soils were not applicable for Simpang Perak Estate.</p> <p><b>Scheme Smallholder:</b></p> <p>Based on soil map of Kebun Plasma Buatan, issued by Asian Agri Research and Development Centre Tebing Tinggi – Sumatera Utara, that include in "Laporan Survei Tanah Tinjau Kebun Plasma Buatan" there was no peat soil in Kebun Plasma Buatan. There are 4 series of soil type defined by Research and Development Asian Agri based on soil survey on April 2014 and soil survey semi detail on June 1998:</p> <ol style="list-style-type: none"> <li>1. Typic Dystrudepts</li> <li>2. Typic Endoaquepts</li> <li>3. Typic Endoaquults</li> <li>4. Typic Kandiudults.</li> </ol> <p>KKPA Delima Sakti is out of scope of certification in this surveillance audit.</p>	
7.7.4	<p><b>(C)</b> Availability of implementation evidence of the water and land cover management program.</p> <p>- Critical (Major) compliance -</p>	<p>There is no change in information related to the type of land in the scope of certification, where Based on Soil Analysis carried out by R &amp; D on December 2008 in Buatan Estate. Reported under "Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatan".</p> <p>Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium. There is no peat soil identified in Simpang Perak Estate according to the latest soil analysis by R &amp; D Asian Agri.</p>	Complied

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		Based on the results of field observations by the auditor in the Buatan Estate and Buatan Plasma areas, there is no indication of peat land.	
7.7.5	<p><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.</p> <p>- Critical (Major) compliance -</p>	<p>There is no change in information related to the type of land in the scope of certification, where Based on Soil Analysis carried out by R &amp; D on December 2008 in Buatan Estate. Reported under "<i>Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatan</i>". Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium. The entire area of the scope certification is a mineral land. There was no peat soil in the operational area.</p> <p>Based on the results of field observations by the auditor in the Simpang Perak Estate and Buatan Plasma areas, there is no indication of peat land.</p>	Not Applicable
<p><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.</p>			
7.7.6	<p><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).</p> <p>- Critical (Major) compliance -</p>	<p>Soil Analysis carried out by R &amp; D in December 2008 in Buatan Estate/Simpang Perak Estate. Reported under "<i>Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatan</i>". Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling too hilly. Natural fertility is low</p>	Not Applicable



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		<p>to medium. There is no peat soil identified in Simpang Perak Estate according to the latest soil analysis by R &amp; D Asian Agri.</p> <p>Soil map scale 1:20,000 are available, from semi-detailed soil survey 2008 by R&amp;D Asian Agri. The predominant soil type identified in Buatan Estate composed of:</p> <ul style="list-style-type: none"> <li>• Typic Distrudepts 4,040 ha</li> <li>• Typic Endoaquents 140 ha</li> <li>• Typic Endoaquepts 515 ha</li> <li>• Typic Endoaquults 290 ha</li> <li>• Typic Kandiudults 621 ha</li> <li>• Typic Udipsaments 25 ha</li> <li>• Total 5,361 ha</li> </ul> <p>Topographic map scale 1:20,000 available, from semi-detailed soil survey the slope between 0-8%, 8-15%, 15-30% and &gt;30%. The data and field information from semi-detailed soil survey 2017 by R&amp;D Asian Agri. Soil suitability: S2 2,656 Ha (47.2%) with limiting factor of low natural fertility; S3 2,050 Ha (36.4%) with limiting factor of topographic condition; N1 (not suitable) 925 Ha (16.4%) with limiting factor of slope more than 30% and sandy soil with rapid drainage. Therefore, drainability assessment of peat soils was not applicable for Simpang Perak Estate.</p> <p><b>Scheme Smallholder:</b></p> <p>Based on soil map of Kebun Plasma Buatan, issued by Asian Agri Research and Development Centre Tebing Tinggi – Sumatera Utara, that include in "Laporan Survei Tanah Tinjau Kebun Plasma Buatan" there was no peat soil in Kebun Plasma Buatan. There are 4 series of soil type</p>	
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		<p>defined by Research and Development Asian Agri based on soil survey on April 2014 and soil survey semi detail on June 1998:</p> <ol style="list-style-type: none"> <li>1. Typic Dystrudepts</li> <li>2. Typic Endoaquepts</li> <li>3. Typic Endoaquults</li> <li>4. Typic Kandiudults.</li> </ol> <p>A field observation conducted to water level pole #45 at Block H03n, the scale is pointing at 48 cm; peat subsidence pole at Block H03m, the scale is pointing at 10 cm from the first installation in 2012; piezometer at Block G01d, the scale is pointing at 62 cm. Monitoring record were available for water level and piezometer performed twice in a month, whilst peat subsidence monitored in twice in a year.</p>	
7.7.7	<p><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.</p> <p>- Critical (Major) compliance -</p>	<p>According to explanation in indicator 7.7.6 above conclude that there is no peat soil at simpang perak estate, therefore this indicator is not applicable for Simpang Perak Estate.</p> <p>Previously there was a peat soil at KKPA (scheme smallholder) manage by PT Inti Indosawit Subur – Buatan II, however in this audit ASA 2.2 KKPA is excluded from the certification scope because the smallholder is intend to be independent and not attached to the company.</p>	Not Applicable
<b>Criteria 7.8:</b> Practices maintain the quality and availability of surface and groundwater.			

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No	Category of River	Cross Section	Outside the Settlement		Inside at the Settlement		Articles
			Criteria	Minimum Riparian Zone	Criteria	Minimum Riparian Zone	
1	Levee		–	5 m	–	3 m	Article 6
2	Rivers with no dike (from river bank)		Big River River Basin > 500 km <sup>2</sup>	100 m	Depth : > 20 m	30 m	Articles 7 & 8
					Depth : 3 m to 20 m	15 m	Articles 7 & 8
			Small River River Basin < 500 km <sup>2</sup>	50 m	Depth : 0 m to 3 m	10 m	Articles 7 & 8
3	Lake / Reservoir		–	50 m	–	50 m	Article 10
4	Water Springs		–	200 m	–	200 m	Article 10
5	Rivers affected by tides (from river bank)		–	100 m	–	100 m	Article 10

7.8.1	<p>A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters:</p> <ul style="list-style-type: none"> <li>- Minor compliance -</li> </ul> <p>7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.</p>	<p>There is no change in terms of the statement of conformity when comparing from the previous audit result. Up to now since previous assessment last year till the date of this audit, water management plan and procedure for water and soil conservation are in place.</p> <p>PT Inti Indosawit Subur – Buatan II POM 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.</p> <p>Buatan II POM has permit for surface water usage from “Kementrian Pekerjaan Umum dan Perumahan Rakyat” as per “Keputusan Menteri Pekerjaan Umum dan Perumahan Rakyat nomor 14/KPTS/M/2018 tentang Pemberian izin Pengusahaan Sumber Daya Air kepada PT Inti Indosawit Subur untuk Usaha Industri di Sungai Laniago, Kabupaten Pelalawan dan Kabupaten Siak”, dated 5<sup>th</sup> January 2018. At the time of audit, this permit in progress for extension in Direktorat Jenderal Sumber Daya Air Balai Wilayah Sungai Sumatera III.</p> <p>Buatan II POM also paid the water retribution each month to “UPT Pengelolaan Pendapatan, Badan Pendapatan daerah Pemerintah</p>	Complied
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		<p>Provinsi Riau”, sample verified: SPPD (Surat Setoran Pajak Daerah) untuk Pajak Pengambilan dan Pemanfaatan Air Permukaan untuk period April 2023 dated 29 May 2023, IDR XXX.925.000</p> <p>The company has conducted measurement of water quality regularly (each semester) and consistent, the result of analysis first semester 2023, shown that water quality is complies with national regulation. Details of analysis :</p> <p>Certificate analysis Number : D.01.236/LHU/2023 dated 14 February 2023; conducted by KAN accredited laboratory (PT ITEC Solution Indonesia) located in Bogor, West java; reference to PP RI No. 2/2021 (Lampiran VI)</p>	
	7.8.1b Workers have adequate access to clean water.	<p>The company provide clean water to all workers and to ensure its quality, the company have conducted clean water analysis. The result of monitoring or testing the clean water / water consumption conducted by KAN accredited laboratory (PT ITEC Solution Indonesia) located in Bogor, West java.</p> <p>Certificate of Analysis for Clean Water (boiled water), location in Buatan II POM – Report of Analysis No: D.03.785/LHU/2023, dated 20 March 2023 the reference of analysis report is based on PERMENKES No 2/2023. The result shown comply with the regulation.</p>	
7.8.2	<p><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 Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).</p> <p>- Critical (Major) compliance -</p>	<p>Management plan for riparian area such as :</p> <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>Based on field observation, this management plan has been conducted.</p>	Complied

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7.8.3	<p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>There are no changes of mill effluent management compare to last year audit. For mill effluent treatment, Buatan II Palm Oil Mill (PBD) has 11 ponds in effluent treatment system (WWTP), which consists of Colling Pond, Primary Anaerobic Pond, Secondary Anaerobic Pond, Acidification Pond, and Buffering Pond. Procedure of WWTP operation available in Mill Policy Manual (MPM) dated 1 February 2013, chapter AA-MPM-OP-1400.13-R1.</p> <p>According to effluent monitoring data, all produced mill effluent used for land application. Mill holds permit to discharge wastewater into land application from local authority through Decree number KTPS.660/BLH/781/2014, issued on 10 September 2014 valid for 5 years. Total area of land application covers 1,137 ha at Block B, C, D, E, F. This license has been extended based on Decree Number : 503/DPMPTSP-LA/2019/05 dated 29 August 2019 and valid for 5 years.</p> <p>Location :</p> <table border="1"> <thead> <tr> <th>No</th><th>Blok</th><th>Luas</th><th>Tahun Tanam</th></tr> </thead> <tbody> <tr> <td>1</td><td>C 90 g</td><td>4,9</td><td>1990</td></tr> <tr> <td>2</td><td>C 90 f</td><td>26,7</td><td>1990</td></tr> <tr> <td>3</td><td>C 91 d</td><td>85,0</td><td>1991</td></tr> <tr> <td>4</td><td>C 91 e</td><td>94,0</td><td>1991</td></tr> <tr> <td>5</td><td>C 91 f</td><td>91,0</td><td>1991</td></tr> <tr> <td>6</td><td>C 91 g</td><td>76,0</td><td>1991</td></tr> <tr> <td colspan="2">Total</td><td>377,6</td><td></td></tr> </tbody> </table> <p>Control area :</p> <table border="1"> <thead> <tr> <th>No</th><th>Blok</th><th>Luas</th><th>Tahun Tanam</th></tr> </thead> <tbody> <tr> <td>1</td><td>D 16 i</td><td>55,5</td><td>2016</td></tr> <tr> <td colspan="2">Total</td><td>55,5</td><td></td></tr> </tbody> </table> <p>The company can show a document of the results of measuring the quality of liquid waste that is applied to the land for the period July 2022</p>	No	Blok	Luas	Tahun Tanam	1	C 90 g	4,9	1990	2	C 90 f	26,7	1990	3	C 91 d	85,0	1991	4	C 91 e	94,0	1991	5	C 91 f	91,0	1991	6	C 91 g	76,0	1991	Total		377,6		No	Blok	Luas	Tahun Tanam	1	D 16 i	55,5	2016	Total		55,5		Complied
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		<p>– June 2023. The test is carried out by a KAN accredited laboratory (PT ITEC Solution Indonesia) using quality standards that refer to the Minister of Environment Decree No. 28 of 2003. Based on the results of the analysis of the test document, it shows that all the parameters tested are in accordance with the applicable quality standards.</p> <p>Sample seen period July 2022 – June 2023:</p> <table><tr><th>Month - Year</th><th>BOD (mg/l) – standard of quality 5,000</th><th>pH – standard of quality 6-9</th></tr><tr><td>July 2022</td><td>4,200</td><td>7.92</td></tr><tr><td>August</td><td>3,200</td><td>8.20</td></tr><tr><td>September</td><td>812.54</td><td>6.90</td></tr><tr><td>October</td><td>1,587.66</td><td>7.10</td></tr><tr><td>November</td><td>2,293.15</td><td>7.40</td></tr><tr><td>December</td><td>1,829.31</td><td>7.30</td></tr><tr><td>January - 2023</td><td>1,218.73</td><td>7.10</td></tr><tr><td>February</td><td>2,549.12</td><td>7.36</td></tr><tr><td>March</td><td>1,075.38</td><td>7.90</td></tr><tr><td>April</td><td>1,043.27</td><td>6.50</td></tr></table> <p>For May and June 2023, the certificate analysis has not issued by the laboratory. Based on result of monitoring in table above shown comply with legal requirement</p>	Month - Year	BOD (mg/l) – standard of quality 5,000	pH – standard of quality 6-9	July 2022	4,200	7.92	August	3,200	8.20	September	812.54	6.90	October	1,587.66	7.10	November	2,293.15	7.40	December	1,829.31	7.30	January - 2023	1,218.73	7.10	February	2,549.12	7.36	March	1,075.38	7.90	April	1,043.27	6.50	
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7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	<p>Buatan 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.</p> <p>Record in July 2022 – June 2023 has shown:</p> <table><tr><th>Month - Year</th><th>M<sup>3</sup></th><th>Water use per ton FFB</th></tr><tr><td>July 2022</td><td>27,240</td><td>1.21</td></tr><tr><td>August</td><td>28,160</td><td>1.26</td></tr><tr><td>September</td><td>28,790</td><td>1.25</td></tr><tr><td>October</td><td>30,210</td><td>1.32</td></tr><tr><td>November</td><td>28,210</td><td>1.23</td></tr><tr><td>December</td><td>30,210</td><td>1.28</td></tr><tr><td>January - 2023</td><td>14,174</td><td>1.32</td></tr><tr><td>February</td><td>13,032</td><td>1.28</td></tr><tr><td>March</td><td>14,068</td><td>1.26</td></tr><tr><td>April</td><td>12,291</td><td>1.35</td></tr><tr><td>May</td><td>16,067</td><td>1.17</td></tr><tr><td>June</td><td>12,179</td><td>1.30</td></tr></table>	Month - Year	M <sup>3</sup>	Water use per ton FFB	July 2022	27,240	1.21	August	28,160	1.26	September	28,790	1.25	October	30,210	1.32	November	28,210	1.23	December	30,210	1.28	January - 2023	14,174	1.32	February	13,032	1.28	March	14,068	1.26	April	12,291	1.35	May	16,067	1.17	June	12,179	1.30	Complied
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**Criteria 7.9:** Efficiency of fossil fuel use and the use of renewable energy is optimised

7.9.1	<p>Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented.</p> <p>- Minor compliance -</p>	<p>The company has prepared the program for improving efficiency of the use of fossil fuels and to optimize renewable energy under “<i>Program Manajemen Lingkungan</i>” year 2022/2023. 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.</p> <p>EFB</p> <table><tr><th rowspan="2">Year</th><th colspan="2">EFB (Ton)</th></tr><tr><th>Actual</th><th>Budget</th></tr><tr><td>2021</td><td>3,187</td><td>3,670</td></tr><tr><td>2022</td><td>17,124</td><td>7,422</td></tr><tr><td>Per June 2023</td><td>88,934</td><td>8,132</td></tr></table> <p>Fiber</p> <table><tr><th rowspan="2">Year</th><th colspan="2">Fiber (Ton)</th></tr><tr><th>Actual</th><th>Budget</th></tr><tr><td>2021</td><td>24,568</td><td>36,701</td></tr><tr><td>2022</td><td>32,779</td><td>33,419</td></tr><tr><td>Per June 2023</td><td>15,460</td><td>32,635</td></tr></table> <p>Shell</p> <table><tr><th rowspan="2">Year</th><th colspan="2">Shell (Ton)</th></tr><tr><th>Actual</th><th>Budget</th></tr></table>	Year	EFB (Ton)		Actual	Budget	2021	3,187	3,670	2022	17,124	7,422	Per June 2023	88,934	8,132	Year	Fiber (Ton)		Actual	Budget	2021	24,568	36,701	2022	32,779	33,419	Per June 2023	15,460	32,635	Year	Shell (Ton)		Actual	Budget	Complied
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		2021	14,542	17,786		
		2022	14,944	19,983		
		Per June 2023	6,689	17,677		
<b>Criteria 7.10:</b> Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.						
7.10.1	<p><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> <p>- Critical (Major) compliance -</p>	<p>There are no changes regarding GHG identification and reduction plan. PT Inti Indosawit Subur – Buatan II POM has identified the emission sources and pollution under document of “Environmental Aspect-Impacts (Evaluasi Aspek-Dampak Lingkungan) year 2023”.</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 Has Rumah Kaca”. All the activities of mill and estate as well as the waste generated has been well documented, for examples the operational activity from generator is generates air emissions, the company conducts periodic generator maintenance and perform quality measurement of exhaust emissions each semester to ensure air quality is comply with standard regulation.</p> <p><u>Scheme Smallholder:</u></p> <p>Manager of Kebun Plasma Buatan has prepared the list significant pollutants and identify sources of emissions, presented in “Identifikasi Sumber Polusi di Perkebunan Petani Kebun Plasma Buatan PT Inti Indosawit Subur 2023”. List of significant pollutant such as emission from FFB transportation, water pollutant from fertilizing and spraying activity, emission from generator usage.</p>				Complied

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		The auditor team has verified the GHG palm that has been carried out by the company. Based on the verification results, it is known that the GHG palm input data is in accordance with the actual conditions. This is evidenced by the results of verification of the amount of FFB production from Estate and scheme smallholder, as well as the area of HCV	
7.10.2	<p><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).</p> <p>- Critical (Major) compliance -</p>	Based on the AMDAL document (013/ANDAL/BA/V/1995) and DPPL Document (KPTS.975/X/2009) and historical documents of plantation land use such as maps and other company documents, planting activities at scope certification began in 1988 and were completed in 1991. Until the surveillance assessment activities were implemented, there were no new planting activities or new land clearing above 15 November 2018.	Complied
7.10.3	<p><b>(C)</b> Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Based on document review and interviews with company representatives, it was found that there were no new developments. The company has identified sources of pollution in the mills and estates, the documents inform the sources (stations/activities), sources of pollution and emissions, impacts (humans, work equipment, environment) and impact control. For example, from the boiler it produces boiler ash, steam and chemical pollution, from the engine room it produces pollution in the form of noise.</p> <p>Efforts to reduce pollutants carried out by the company include:</p> <ul style="list-style-type: none"> <li>• Monitoring air quality and emissions from boilers and generators</li> <li>• Manage POME in WWTPs before use in plantations</li> <li>• Utilizing POME for Methane Capture (Biogas) which generates electrical energy.</li> <li>• Perform regular machine maintenance.</li> <li>• Use of fibre and shells in Mills to reduce diesel fuel.</li> </ul>	Complied

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		<p>The company has tested emissions from boilers and generators, as well as ambient air quality which was carried out in semesters 1 of 2023 by the PT ITEC Solution Indonesia (LP-894-IDN) on 25 January to 14 February 2023. Based on the results of the document review, it is known that the results of the tests carried out are in accordance with the provisions set by the Government (<i>Peraturan Menteri Lingkungan Hidup No. 07 Tahun 2007 and Peraturan Menteri Lingkungan Hidup dan Kehutanan Republik Indonesia No. 11 Tahun 2021</i>).</p> <p>The company also has mitigation as an effort to reduce GHG emissions, such as:</p> <ul style="list-style-type: none"> <li>• Utilization of palm oil from drain tanks at oil clarification and picking stations in empty containers and condensate to reduce the loss of palm oil as waste.</li> <li>• Use of fibre and shells for boiler fuel as a substitute for fossil fuels</li> <li>• Conduct environmental emission testing to determine repair schedule</li> <li>• Prohibition of burning waste for residential areas.</li> <li>• Planting trees that are useful for capturing carbon gas produced from factories</li> <li>• Perform regular vehicle repairs and monitoring.</li> </ul>	
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**Criteria 7.11:** Fire is not used for preparing land and is prevented in the managed area.

**Guidance:**

Related regulations include:

1. Minister of Agriculture Regulation No. 5 of 2018 concerning Opening and / or Processing of Plantation Land Without Fire.
2. Directorate General of Forest Protection and Conservation Regulation No.P.2 of 2014 concerning the Formation and Development of Fire Concerned Communities.
3. Minister of Agriculture Regulation No. 47 of 2014 concerning the Brigade and Guidelines for the Implementation of the Prevention and Control of Land and Plantation Fire.
4. Act No. 32 of 2009 concerning Environmental Protection and Management.

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7.11.1	<p><b>(C)</b> Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur – Buatan 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 Simpang Perak Estate the land preparation is using mechanical method. No open burning was noted for land preparation. It can also demonstrate in the agreement contract between compay and subcontractor that all activity of replanting is performed manual and mechanically.</p> <p><u>Scheme Smallholder:</u></p> <p>There was not any open burning was noted for land preparation and any activity in KUD Bhirawa Bhakti and KUD Sawit Harapan. Replanting plan has been drawn up soon. The replanting plan was available under “S Pelaksanaan Replanting Kebun Plasma Buatan”.</p> <p>During field visit to farmers plot, there was a replanting and no burning activity. The land preparation is using mechanical method.</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Scheme smallholders 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.</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>	Complied

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		<p>Based on field visit in Simpang Perak Estate 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>During field visit to farmers plot, there was a replanting and no burning activity. The land preparation is using mechanical method.</p>	
7.11.3	<p>The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>The policy has communicated to all smallholder remember and local community to engages stakeholders in adjacent locations for fire prevention and control measures.</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>	Complied

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

**PROCEDURAL NOTE for 7.12:**

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

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

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

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

The development of this procedure will be guided by the No Deforestation Joint Steering Group (NDJSG) between the RSPO and HCSA members. In HFCC

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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>- Critical (Major) compliance -</p>	<p>There is no new planting after November 2005 within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma. Simpang Perak Estate has planted since 1988 – 1991 while Buatan Plasma has planted since 1988 - 1993. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2023 and still continue until 2024.</p>	Not Applicable
7.12.2	<p><b>(C)</b> HCV and HCS forests, and other conservation areas are identified as follows:</p> <p>- Critical (Major) compliance -</p> <p>7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.</p>	<p>During this audit ASA 2.2 there is no change in the HCV assessment since there is no change in the scope of plantation and no expansion or activity change.</p> <p>PT Inti Indosawit Subur – Group Buatan has conducted the HCV identification in coordination with “Fakultas Kehutanan Institut Pertanian Bogor” on March – April 2009, under “Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT Inti Indosawit Subur, Kebun Buatan Provinsi Riau”. The HCV assessment conducted based on “Panduan Kawasan Bernilai Konservasi Tinggi di Indonesia”, issued by Konsorsium Revisi HCV Toolkit Indonesia dated 12/07/2008.</p> <p>Based on HCV identification total HCV area identified was 55.56 ha in Buatan Estate and Simpang Perak Estate.</p> <p>Simpang Perak Estate previously was include in Buatan Estate (Division IV, V, VI and VII). Curenly those division was separated from Buatan Estate (since 2021) and has its own estate namely Simpang Perak estate however the size of HCV area are remain same and not change. Division I, II and III as supply base Buatan I POM and Simpang Perak Estate Division (<i>previously was division IV, V, VI and VII currently changing to become division I - IV</i>) as supply base Buatan II POM. So that the HCV</p>	Complied



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		<p>area in Simpang Perak Estate as supply base Buatan II POM was 27.78 ha.</p> <p>HCV identified in Buatan Estate &amp; Simpang Perak Estate consist of:</p> <ul style="list-style-type: none"> <li>- HCV 1.1, 1.2 and 4.1: Riparian zone Kerinci Besar River (38.9 Ha);</li> <li>- HCV 1.1, 1.2 and 4.1: Riparian zone Laniago River (4.50 Ha);</li> <li>- HCV 1.2 and HCV 6: Conservation forest for Manggeris trees (Pohon Madu): 10.5 Ha;</li> <li>- HCV 1.2 and HCV 6: Conservation forest for Manggeris trees (Pohon Madu): 3.60 Ha;</li> <li>- HCV 6: ancient graveyard: 0.66 Ha;</li> </ul> <p>HCV identification was consulted to the relevant stakeholder and HCV maps is available and in place. HCV assessment also including Buatan Smallholder area and used in scheme smallholder operation.</p> <p>The HCV identification document has explained the general condition of landscape surrounding company's plantation: there is no protected forest/ecosystem that feasible for wildlife to maintain its viability. Therefore no recommendation for wildlife corridor.</p>	
	7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.	<p>There is no new land clearing or planting after November 2018 within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma. Simpang Perak Estate has planted since 1988 – 1991 while Buatan Plasma has planted since 1988 - 1993. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2023 and still continue until 2024.</p> <p>HCV assessment has been conducted in the existing plantation since 2009 according to explanation in indicator 7.12.2.a above.</p>	
7.12.3	<b>(C)</b> In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into	There is no new land clearing or planting after November 2018 within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma. Simpang Perak Estate has planted since 1988 – 1991	Not Applicable

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	<p>consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p> <p>- Critical (Major) compliance -</p>	<p>while Buatan Plasma has planted since 1988 - 1993. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2023 and still continue until 2024.</p> <p>HCV assessment has been conducted in the existing plantation since 2009 according to explanation in indicator 7.12.2.a above.</p> <p>According to HCV assessment there is no High Forest Cover Landscapes (HFCLs) identified in PT Inti Indosawit Subur Group Buatan.</p>	
<p><b>PROCEDURAL NOTE for 7.12.3:</b></p> <p>Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.</p>			
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>- Critical (Major) compliance -</p>	<p>There is no new land clearing or planting after November 2018 within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma. Simpang Perak Estate has planted since 1988 – 1991 while Buatan Plasma has planted since 1988 - 1993. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2023 and still continue until 2024.</p> <p>HCV assessment has been conducted in the existing plantation since 2009 according to explanation in indicator 7.12.2.a above.</p> <p>PT Inti Indosawit Subur – Simpang Perak Estate has develop the Conservation Management Plan 2023. 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 Buatan" Periode January – June 2022 and Juli – December 2022".</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</p>	Complied

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		<p>on December 2021. Sample seen: Wildlife monitoring in Block F89b, Block A90c, Riparian of Ianiago river, Riparian of Kerinci Kanan river, Block 52, found presence of animal such as: <i>Aethopyga siparaja</i>, <i>Halcyon pileata</i>, <i>Centropus sinensis</i>, <i>Naja sumatrana</i>, <i>Macaca fascicularis</i>, <i>Tupaia tana</i>. Monthly monitoring of HCV area condition and animal species also performed by Foreman HCV (Adi Surya P) and each Foreman Afdeling, animal presence recorded in "Daftar Temuan Satwa Liar.</p> <p>Evaluation to the effectiveness of management and monitoring plan implementation reported each semester in "laporan Monitoring tumbuhan dan Satwaliar PT Inti Indosawit Subur, Kebun Buatan". Evaluation result and recommendation of management and monitoring contain in the report. This recommendation give the feedback and improvement to conservation management plan. HCV socialization to Buatan II POM and Simpang Perak Estate has been conducted on 4 – 9 May 2022.</p> <p>Company also has implemented appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm, collect or kill these species. Sanction and process based on UU No. 5 tahun 1990. Based on interview with worker representative and field workers – workers have understand protection of plant and animal. The workers also aware of company policy prohibits hunting, raising and killing protected animal.</p> <p><b>Scheme Smallholder:</b></p> <p>Each KUD has appointed person in charge to monitor the RTE species presence in smallholder plantation area:</p> <ul style="list-style-type: none"> <li>- KUD Makarti Sawit: Surat Keputusan Pengurus KUD Makarti Sawit Nomor: 03/Kpts/MS/VII/2018 dated 10 July 2018 Tentang</li> </ul>	
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		<p>Penunjukan atau Pengangkatan Petugas Perlindungan dan Pengawasan Satwa Liar dan Tumbuhan Dilindungi. appointed person: Setiyadi.</p> <ul style="list-style-type: none"> <li>- KUD Mitra Usaha: Surat Keputusan Pengurus KUD Mitra Usaha Nomor:115/Kpts/KUD-MU/XI/2019 dated 12 November 2019 Tentang Penunjukan atau Pengangkatan Petugas Perlindungan dan Pengawasan Satwa Liar dan Tumbuhan Dilindungi. appointed person: Mulyana.</li> <li>- KUD Tani Rukun: Surat Keputusan Pengurus KUD Tani Rukun Nomor:01/Kpts/XII/2018 dated 18 Desember 2018 Tentang Penunjukan atau Pengangkatan Petugas Perlindungan dan Pengawasan Satwa Liar dan Tumbuhan Dilindungi. appointed person: Sariono.</li> <li>- KUD Mulus Rahayu: Surat Keputusan Pengurus KUD Mulus Rahayu Nomor:03/Kpts/MR/VII/2018 dated 10 July 2018 Tentang Penunjukan atau Pengangkatan Petugas Perlindungan dan Pengawasan Satwa Liar dan Tumbuhan Dilindungi. appointed person: Sunar.</li> </ul> <p>Monitoring for RTE species performed each month by PIC. Result of monitoring presented in "Daftar Temuan Satwa Yang Dilindungi Tahun 2022". During January – ytd June 2022, shown that in KUD Makarti Sawit, KUD Mitra Usaha, KUD Tani Rukun, KUD Mulus Rahayu there were presence of animal such as: Sanca Bodo (<i>Python bivittatus</i>), Kucing hutan (<i>Prionailurus bengalensis</i>), Biawak (<i>Varanus salvator</i>), Elang Tikus (<i>Elanus caeruleus</i>), Tupai tanah (<i>Tupaia sp</i>), Burung Madu (<i>Nectarinia jugularis</i>) and Cekakak Belukar (<i>Halcyon smyrnensis</i>).</p>	
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	There is no new land clearing or planting after November 2018 within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma. Simpang Perak Estate has planted since 1988 – 1991 while Buatan Plasma has planted since 1988 - 1993. Currently,	Not Applicable

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	<p>involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>replanting activities are still in progress. Replanting has been started since 2014 – 2023 and still continue until 2024.</p> <p>HCV assessment has been conducted in the existing plantation since 2009 according to explanation in indicator 7.12.2.a above.</p> <p>Based on HCV assessment report there is no HCV area identified within local communities land right, all HCV area identified were within company concession (HGU).</p>	
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>The company has established "Conservation Management Plan" to manage and to monitor of RTE's, latest conservation management plan updated in January 2023. It was note that according to HCV assessment there was found RTEs such as: Kucing kuwuk (<i>Prionailurus Bengalensis</i>), Burung Madu kelapa (<i>Anthreptes Malacensis</i>), Elang Brontok (<i>Nisaetus Cirrhatus</i>), Kuntul kecil (<i>Egretta garzeta</i>) and etc.</p> <p>Company has monitor the RTE species and HCV area regularly.</p> <p>Company has prepared a procedure for protection of flora and fauna, explained in Environmental Management System: Biodiversity (AA-432-002e-LT), IUCN red list (AA-432-006-LT), CITES list (AA-432-07-LT).</p> <p>HCV management and monitoring plan described measures taken for each HCV and its monitoring. Relevant laws were taken into account for determining appropriate measure including UU #5/1990 about Natural resources conservation, Peraturan Menteri Lingkungan Hidup dan Kehutanan No P.106/MENLHK/SETJEN/KUM.1/12/2018 Tahun 2018 about List of protected plan and wildlife, Kepres #32/1990, and PP #26/2008.</p> <p>Company also has implemented appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm, collect or kill these species. Sanction and process based on UU No. 5 tahun 1990. Based on interview with worker representative and field workers – workers have understand protection of plant and</p>	Complied

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		<p>animal. The workers also aware of company policy prohibits hunting, raising and killing protected animal.</p> <p>PT. Inti Indosawit Subur – Buatan II POM and Estate has a program to socialize the status of protected, rare, threatened or endangered (RTE) to all workers, it was also programed each year as per "Conservation Management Plan". Socialization has been conducted through master morning in each division by field assistant, latest refreshment to workers on 15 May 2023. Company also provides signboard regarding HCV protection and RTE species protection in the strategic place as a campaign to give awareness to the workers/people.</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>There is no new land clearing or planting after November 2018 within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma. Simpang Perak Estate has planted since 1988 – 1991 while Buatan Plasma has planted since 1988 - 1993. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2023 and still continue until 2024.</p> <p>HCV assessment has been conducted in the existing plantation since 2009 according to explanation in indicator 7.12.2.a above.</p> <p>HCV and RTE species management and monitoring plan has been develop as per conservation management plan updated in January 2023.</p> <p>HCV and wildlife/animal monitoring continuously conducted in a regular basis. Secondary monitoring conducted each month and primary monitoring conducted twice a year.</p> <p>Monitoring of animal/wildlife performed by HCV/Sustainability officer and field workers, result of monitoring presented in "LAPORAN MONITORING TUMBUHAN DAN SATWA LIAR (HCV)".</p> <p>Report of Management and Monitoring for HCV and RTEs is reported every 6 months and review is conducted regularly to ensure that monitoring is effective. Reports period semester I &amp; II year 2022 and semester I year 2023 can be demonstrated. Results of monitoring was</p>	Complied

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		<p>evaluated using trend evaluation. Monitoring RTE species in January – December 2022 observed type of mammal and two species was protected by law or IUCN Redlist such as Monyet ekor panjang (<i>Macaca fascicularis</i>), Elang tikus (<i>Ictinaetus malayensis</i>), cekakak belukar (<i>Halcyon smyrnensis</i>), burung pelatuk (<i>Dryocopus javensis</i>) etc. Report of management and monitoring also submitted to Balai Konservasi Sumberdaya Alam (BKSDA) North Sumatera Province on 30 January 2023.</p> <p>Result of monitoring gives the feedback into the management plan improvement. The results from monitoring of wildlife, environmental, and socio-cultural services gives feedback advice and recommendations to the management plan.</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>- Critical (Major) compliance -</p>	<p>There is no new land clearing or planting after November 2018 within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma. Simpang Perak Estate has planted since 1988 – 1991 while Buatan Plasma has planted since 1988 - 1993. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2023 and still continue until 2024.</p> <p>HCV assessment has been conducted in the existing plantation since 2009 according to explanation in indicator 7.12.2.a above.</p>	Complied

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#### Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2022** for **Buatan II POM** and supply base was calculated using the PalmGHG Calculator version 4.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2022** for **Buatan II POM** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct	Extraction	%
CPO	0.61	OER	19.30
PKO	0.61	KER	4.76

Production	t/yr	Land Use	Ha
FFB Process	<b>288,836.00</b>	OP Planted Area	14103.00
CPO Produced	55736	OP Planted on peat	0.00
PKO Produced	13758	Conservation (forested)	0.00
		Conservation (non-forested)	63.18
		<b>Total</b>	<b>14103.00</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	45155.95	0.18	0.00	0.00	0.00	0.00	45155.95	0.18
CO <sub>2</sub> Emission from fertilizer	6596.27	0.03	0.00	0.00	0.00	0.00	6596.27	0.03
NO <sub>2</sub> Emission	5260.52	0.02	0.00	0.00	0.00	0.00	5260.52	0.02
Fuel Consumption	2274.92	0.01	0.00	0.00	0.00	0.00	2274.92	0.01
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Sink</b>								
Crop Sequestration	-42801.84	-0.17	0.00	0.00	0.00	0.00	-42801.84	-0.17
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>16485.81</b>	<b>0.07</b>	0.00	0.00	<b>4114.60</b>	<b>0.00</b>	<b>20600.41</b>	<b>0.07</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	36052.04	0.12
Fuel Consumption	230.60	0.00
Grid Electricity Utilization	157.14	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	-14348.40	-0.05
Sales of EFB	0.00	0.00
<b>Total</b>	<b>22091.38</b>	<b>0.08</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.

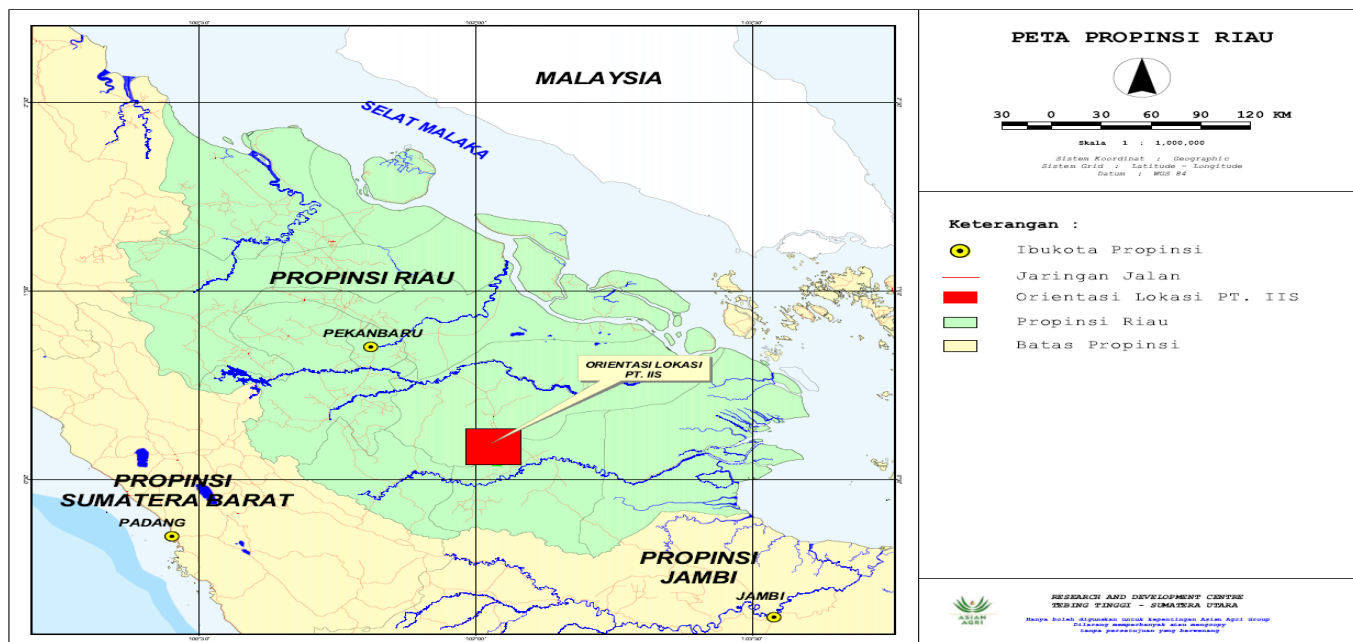
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

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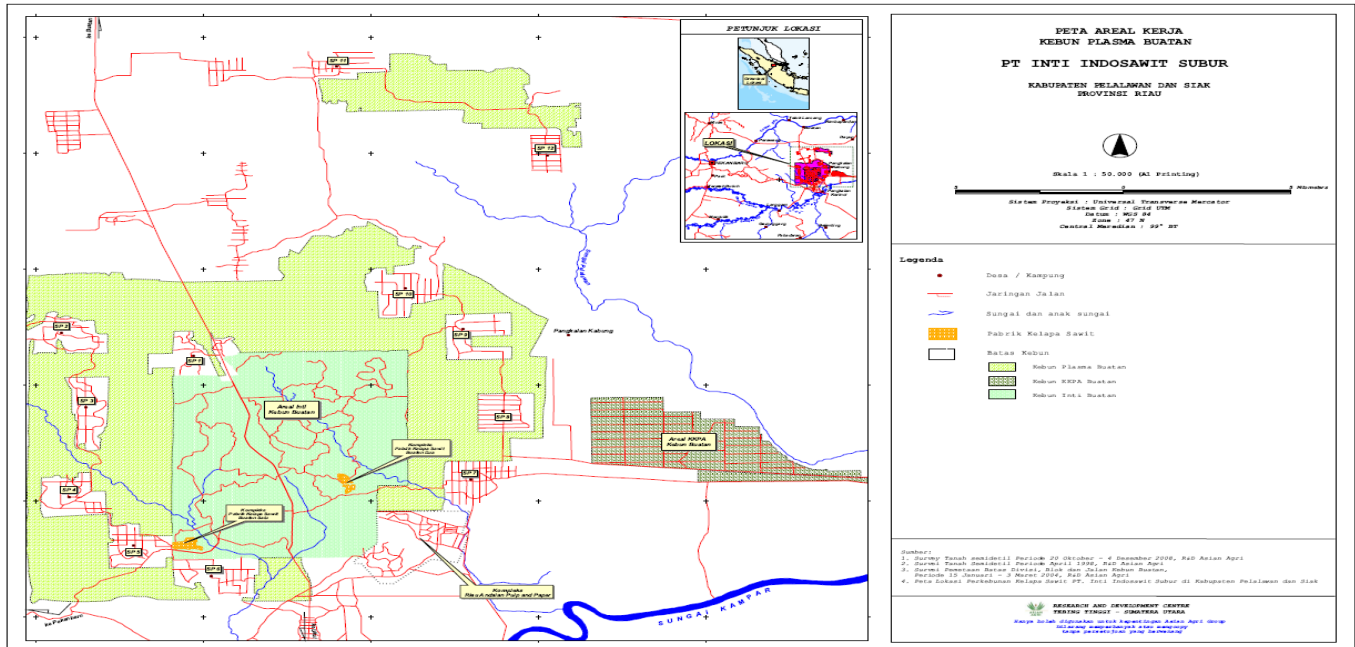
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#### Appendix C: Location Map of Certification Unit and Supply bases



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## Appendix D: Estate Field Map



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## Appendix E: List of Smallholder sampled

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 Sawit Harapan									
1	Sobiroh	Kerinci Kanan	0° 30' 45.586" N	101° 53' 17.040" E	2	2	36.26	1991	3799
2	Nurmala	Kerinci Kanan	0° 30' 45.473" N	101° 53' 13.857" E	2	2	36.62	1991	3800
3	Mulyadi	Kerinci Kanan	0° 30' 32.720" N	101° 53' 14.094" E	2	2	36.28	1991	3867
4	Samsuhardi	Kerinci Kanan	0° 30' 39.249" N	101° 53' 17.205" E	2	2	36.24	1991	3828
5	Sobiroh	Kerinci Kanan	0° 30' 39.265" N	101° 53' 20.299" E	2	2	35.96	1991	3829
6	Abner Padapotan	Kerinci Kanan	0° 30' 32.718" N	101° 53' 17.219" E	2	2	36.42	1991	3866
7	Miswan Yuli	Kerinci Kanan	0° 30' 32.720" N	101° 53' 14.094" E	2	2	36.44	1991	3867
8	Mohammad Nasrul	Kerinci Kanan	0° 30' 39.326" N	101° 53' 23.383" E	2	2	36.46	1991	3830
9	Siti Khotjiah	Kerinci Kanan	0° 30' 39.291" N	101° 53' 26.550" E	2	2	36.60	1992	3831
10	Saiman	Kerinci Kanan	0° 30' 33.046" N	101° 53' 26.414" E	2	2	36.22	1992	3863
11	Sitim	Kerinci Kanan	0° 30' 32.935" N	101° 53' 23.398" E	2	2	36.30	1992	3864
12	Boiman	Kerinci Kanan	0° 30' 32.727" N	101° 53' 20.350" E	2	2	36.46	1992	3865
KUD Mulus Rahayu									
1	Martiani	Kerinci Kanan	0° 31' 20,947" N	101° 49' 52,427" E	2	2	55.00	2016	184
2	Nucahya	Kerinci Kanan	0° 31' 20,960" N	101° 49' 55,518" E	2	2	54.68	2016	183
3	Nurpiah	Kerinci Kanan	0° 31' 27,317" N	101° 49' 55,441" E	2	2	54.46	2016	145
4	Pawito	Kerinci Kanan	0° 31' 21,355" N	101° 49' 48,556" E	2	2	54.28	2016	185
5	Soikun	Kerinci Kanan	0° 31' 14,597" N	101° 49' 58,739" E	2	2	54.50	2016	188
6	H Syamsir	Kerinci Kanan	0° 31' 14,759" N	101° 50' 1,981" E	2	2	54.24	2016	189
7	Aswin	Kerinci Kanan	0° 31' 8,545" N	101° 50' 5,148" E	2	2	54.48	2016	222
8	Gimin	Kerinci Kanan	0° 31' 8,516" N	101° 50' 2,200" E	2	2	54.60	2016	223
9	Ruslan Jamil	Kerinci Kanan	0° 31' 0,051" N	101° 50' 12,270" E	2	2	54.62	2016	234
10	Kurnia	Kerinci Kanan	0° 31' 0,374" N	101° 50' 9,956" E	2	2	54.52	2016	233
11	Sulis	Kerinci Kanan	0° 30' 55,561" N	101° 50' 20,966" E	2	2	54.54	2016	260
12	H Nasir	Kerinci Kanan	0° 30' 49,177" N	101° 50' 20,996" E	2	2	54.66	2016	265
KUD Bhirawa Bhakti									
1	Sunarto	Kerinci Kanan	0° 30' 33.442" N	101° 48' 33.898" E	2	2	35.10	1989	610
2	Sunarto	Kerinci Kanan	0° 30' 33.266" N	101° 48' 27.466" E	2	2	35.62	1989	612
3	Bambang Daryono	Kerinci Kanan	0° 31' 41.712" N	101° 47' 7.570" E	2	2	35.28	1990	1191
4	Imam Sujono	Kerinci Kanan	0° 31' 41.604" N	101° 47' 10.819" E	2	2	35.24	1990	1190
5	Ngariban	Kerinci Kanan	0° 31' 48.065" N	101° 47' 7.625" E	2	2	34.96	1989	1150
6	Sukimin	Kerinci Kanan	0° 31' 54.575" N	101° 47' 4.668" E	2	2	35.42	1989	1142
7	Uun Rundaya	Kerinci Kanan	0° 31' 54.407" N	101° 47' 14.164" E	2	2	35.44	2020	1139
8	Karni	Kerinci Kanan	0° 31' 54.455" N	101° 47' 10.934" E	2	2	35.46	2020	1140
9	Sakhirin	Kerinci Kanan	0° 32' 0.907" N	101° 47' 7.860" E	2	2	35.60	2020	1100
10	Kosma	Kerinci Kanan	0° 31' 54.473" N	101° 47' 7.764" E	2	2	35.22	2020	1141
11	Kudsi	Kerinci Kanan	0° 30' 33.392" N	101° 48' 30.675" E	2	2	35.30	2020	601

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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			
12	Anda Juanda	Kerinci Kanan	0° 30' 33.392" N	101° 48' 30.675" E	2	2	35.46	2020	611
<b>KUD Buatan Jaya</b>									
1	Isharno	Kerinci Kanan	0° 32' 28.635" N	101° 53' 39.961" E	2	2	36.46	1992	3465
2	Dwi Susanto	Kerinci Kanan	0° 32' 27.146" N	101° 53' 42.263" E	2	2	36.92	1992	3466
3	Yudi	Kerinci Kanan	0° 32' 26.443" N	101° 53' 44.978" E	2	2	36.94	1992	3467
4	Dwi Asmara	Kerinci Kanan	0° 32' 20.229" N	101° 53' 39.767" E	2	2	36.96	1992	3475
5	Yudi	Kerinci Kanan	0° 32' 19.263" N	101° 53' 42.345" E	2	2	36.10	1992	3474
6	Dwi Susanto	Kerinci Kanan	0° 32' 19.445" N	101° 53' 45.237" E	2	2	36.72	1992	3473
7	Sahuri	Kerinci Kanan	0° 31' 17.823" N	101° 53' 20.022" E	2	2	36.80	1991	3634
8	Sahuri	Kerinci Kanan	0° 31' 17.871" N	101° 53' 23.162" E	2	2	36.96	1991	3635
9	Hariono	Kerinci Kanan	0° 31' 17.853" N	101° 53' 26.259" E	2	2	36.50	1991	3636
10	Radisan	Kerinci Kanan	0° 31' 17.859" N	101° 53' 16.920" E	2	2	36.12	1991	3633
11	B. Sijabat	Kerinci Kanan	0° 31' 35.892" N	101° 53' 31.251" E	2	2	36.78	1991	3572
12	Kamal Aziz	Kerinci Kanan	0° 31' 31.049" N	101° 53' 29.371" E	2	2	36.74	1991	3582

**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