

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**☐ **Initial Assessment**☒ **Annual Surveillance Assessment (2_2)**☐ **Recertification Assessment** (Choose an item.)☐ **Extension of Scope**

Client Company Name / Parent Company: PT. Inti Indosawit Subur
Client Company / Parent Company Address: Jl Palembang Kav. 35 - 37, Jakarta Pusat 10230, DKI Jakarta, Indonesia
Certification Unit: PT Inti Indosawit Subur – Muara Bulian Palm Oil Mill Location of Certification Unit: Singoan Village, Bukit Sari Village, Bulian Jaya Village, Maro Sebo Ilir District, Batanghari Regency, Jambi Province, Indonesia
Date of Final Report: 24/09/2024

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	PT. Inti Indosawit Subur		
RSPO Membership Number	1-0022-06-000-00	Membership Approval Date	06/02/2006
Address	Jl Palembang Kav. 35 - 37, Jakarta Pusat 10230, DKI Jakarta, Indonesia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT Inti Indosawit Subur – Muara Bulian Palm Oil Mill		
Location / Address	Singoan Village, Bukit Sari Village, Bulian Jaya Village, Maro Sebo Ilir District, Batanghari Regency, Jambi Province, Indonesia		
Website	www.asianagri.com		
Management Representative	Mr. Putu Ghrayte Yonata Aksa	E-mail	Putu_Aksa@asianagri.com
Telephone	+6221 2301119	Facsimile	+6221 2301120

2. Certification Information			
Certificate Number	RSPO 594418	Certificate Start Date	28/08/2022
Date of First Certification	28/08/2012	Certificate Expiry Date	27/08/2027
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	<ul style="list-style-type: none"> Determination of the conformity of the client's management system, or parts of it, with audit criteria. Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_2) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 of the RSPO P&C 2018		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	60 MT/hours
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

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3. Other Certifications

Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
ID05/65250	ISO 14001:2015	SGS	10/06/2026
EU-ISCC-Cert-DE100-01647123	ISCC EU	SGS	31/08/2026
SGS-ID-ISPO-0032	ISPO	SGS	21/03/2025

4. Location(s) of Mill & Supply Bases

Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Muara Bulian POM	Bulian Jaya Village, Maro Sebo Ilir District, Batang Hari Regency, Jambi Province - Indonesia	1° 35' 09.65" S	103° 12' 9.76" E
Muara Bulian Estate	Bulian Jaya Village, Maro Sebo Ilir District, Batang Hari Regency, Jambi Province - Indonesia	1° 34' 49.00" S	103° 11' 43.00" E
KUD Barokah (615 members)	Karya Mukti Village, Maro Sebo Ilir District, Batang Hari Regency, Jambi Province - Indonesia	1° 32' 12.00" S	103° 11' 20.00" E
KUD Subur Makmur (560 members)	Tidar Kuranji Village, Maro Sebo Ilir District, Batang Hari Regency, Jambi Province - Indonesia	1° 34' 24.80" S	103° 07' 12.50" E
KUD Budi Sari (445 members)	Bukit Sari Village, Maro Sebo Ilir District, Batang Hari Regency, Jambi Province - Indonesia	1° 32' 43.00" S	103° 12' 37.00" E
KUD Makmur Rejeki (360 members)	Bulian Jaya Village, Maro Sebo Ilir District, Batang Hari Regency, Jambi Province - Indonesia	1° 36' 44.80" S	103° 10' 48.90" E
KUD Karya Lestari (350 members)	Kehidupan Baru Village, Maro Sebo Ilir District, Batang Hari Regency, Jambi Province – Indonesia	1° 35' 03.60" S	103° 05' 47.80" E
KUD Buah Sakato (1001 members)	Danau Embat Village, Maro Sebo Ilir District, Batang Hari Regency, Jambi Province - Indonesia	1° 39' 42.00" S	103° 08' 39.00" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No			<input type="checkbox"/> Yes	
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Muara Bulian Estate	1,643.00	104.18	108.82	1,856.00	88.52
KUD Barokah	1,224.00	0.00	0.00	1,224.00	100.00
KUD Subur Makmur	1,118.00	0.00	0.00	1,118.00	100.00
KUD Budi Sari	880.00	0.00	0.00	880.00	100.00
KUD Makmur Rejeki	710.00	0.00	0.00	710.00	100.00
KUD Karya Lestari	700.00	0.00	0.00	700.00	100.00
KUD Buah Sakato	1,584.00	0.00	0.00	1,584.00	100.00
Total	7,859.00	104.18	108.82	8,072.00	97.36
Note: There has been a reduction in the number of scheme smallholders with an area of 28 Ha due to their departure from the Plasma membership. The details are as follows: KUD Barokah with 6 Ha, KUD Subur Makmur with 2 Ha, KUD Budi Sari with 10 Ha, and KUD Makmur Rezeki with 10 Ha.					

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Muara Bulian Estate	0.00	1,643.00	0.00	0.00	1,643.00	0.00
KUD Barokah	412.00	0.00	812.00	0.00	812.00	412.00
KUD Subur Makmur	0.00	0.00	1,118.00	0.00	1,118.00	0.00
KUD Budi Sari	178.00	0.00	702.00	0.00	702.00	178.00
KUD Makmur Rejeki	130.00	0.00	182.00	398.00	580.00	130.00
KUD Karya Lestari	0.00	0.00	700.00	0.00	700.00	0.00
KUD Buah Sakato	0.00	0.00	1,584.00	0.00	1,584.00	0.00
Total (ha)	720.00	1,643.00	5,098.00	398.00	7,139.00	720.00
Note: Only Mature area is considered as production area						

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated Last Year (Aug 2023 – Jul 2024)	Actual (Jun 2023 – May 2024)		Forecast (Aug 2024 – Jul 2025)
		Previous License Period (Jun 2023 – Feb 2024)	Current License Period (Mar 2024 – May 2024)	
Muara Bulian Estate	47,322.00	30,118.00	6,054.00	40,295.00
KUD Barokah	8,689.00	3,893.00	184.00	8,167.08
KUD Subur Makmur	15,873.00	12,764.00	1,804.00	11,862.67
KUD Budi Sari	4,747.00	1,326.00	5.00	3,603.45
KUD Makmur Rejeki	5,070.00	5,713.00	1,427.00	7,031.61
KUD Karya Lestari	9,920.00	5,538.00	1,422.00	7,290.38
KUD Tuah Sakato	28,925.00	14,956.00	3,796.00	16,749.81
Total	120,545.00	89,000.00		95,000.00
Note :				
• KUD Barokah, KUD Budi Sari, KUD Makmur Rejeki, and KUD Karya Lestari: some areas are entering a replanting period in Y2024/2025, so the forecast is lower.				

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated Last Year (Aug 2023 – Jul 2024)	Actual (Jun 2023 – May 2024)		Forecast (Aug 2024 – Jul 2025)
		Previous License Period (Jun 2023 – Feb 2024)	Current License Period (Mar 2024 – May 2024)	
NIL		–	–	
Total		–		–
Note:				

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9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated Last Year (Aug 2023 – Jul 2024)	Actual (Jun 2023 – May 2024)		Forecast (Aug 2024 – Jul 2025)
		Previous License Period (Jun 2023 – Feb 2024)	Current License Period (Mar 2024 – May 2024)	
3 rd Party (PT Pratama Sawit Mandiri, PT Pasific Global Sejahtera, PT Gema Inti Jaya Semesta, and Kebun Tani Mandiri)	–	52,330.00	14,132.99	–
CSV (Perkumpulan Cahaya Buana and Putra Tunggal Bukit Sangkila)	–	47,889.00	8,185.01	–
Total	–	122,537.00		–
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	June 2023	10,186.00	12,662.00	22,848.00
2	July 2023	10,691.00	13,548.00	24,239.00
3	August 2023	9,243.00	13,719.00	22,962.00
4	September 2023	9,074.00	12,977.00	22,051.00
5	October 2023	8,814.00	13,008.00	21,822.00
6	November 2023	8,204.00	11,688.00	19,892.00
7	December 2023	6,707.00	9,166.00	15,873.00
8	January 2024	6,229.00	7,380.00	13,609.00
9	February 2024	5,160.00	6,071.00	11,231.00
10	March 2024	4,851.00	6,560.00	11,411.00
11	April 2024	4,912.00	7,074.00	11,986.00
12	May 2024	4,929.00	8,684.00	13,613.00
TOTAL		89,000.00	122,537.00	211,537.00
Note:				

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated Last Year (Aug 2023 – Jul 2024)	Actual (Jun 2023 – May 2024)		Forecast (Aug 2024 – Jul 2025)
	Previous License Period (Jun 2023 – Feb 2024)	Current License Period (Mar 2024 – May 2024)	
FFB	FFB		FFB
120,545.00 mt	74,308 mt	14,692 mt	95,000.00 mt
	TOTAL	89,000.00 mt	
CPO (OER: 23.74%)	CPO (OER: 23.66%)		CPO (OER: 23.00 %)
28,617.38 mt	17,505.58 mt	3,549.26 mt	21,850.00 mt
	TOTAL	21,054.84 mt	
PK (KER: 6.55%)	PK (KER: 6.04%)		PK (KER: 6.00 %)
7,895.69 mt	4,435.08 mt	944.76 mt	5,700.00 mt
	TOTAL	5,379.84 mt	
Note:			
• KUD Barokah, KUD Budi Sari, KUD Makmur Rejeki, and KUD Karya Lestari: some areas are entering a replanting period in Y2024/2025, so the forecast is lower.			

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	June 2023	2,316.75	596.71
2	July 2023	2,412.78	635.29
3	August 2023	2,199.06	548.17
4	September 2023	2,183.85	531.82
5	October 2023	2,124.80	538.51
6	November 2023	1,941.68	512.05
7	December 2023	1,586.18	399.79
8	January 2024	1,508.94	365.28
9	February 2024	1,231.55	307.47
10	March 2024	1,163.97	310.57
11	April 2024	1,177.79	327.79
12	May 2024	1,207.49	306.40
TOTAL		21,054.84	5,379.84
Note:			

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11. Summary of Actual Volume sold					
Current License period (Mar 2024 – May 2024)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	3,264.10	374.62	-	-	3,638.72
PK (MT)	798.08	-	-	-	798.08
Credits	-	-	-	-	-
Previous License period (Jun 2023 – Feb 2024)					
CPO (MT)	16,348.02	918.34	-	-	17,266.36
PK (MT)	4,567.04	-	-	-	4,567.04
Credits	-	-	-	-	-
Note:					

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. Padang Raya Cakrawala	RSPO_PO1000012289	7,302.87	-
2	PT. Asianagro Agungjaya	RSPO_PO1000014302	5,282.32	-
3	PT. Sari Dumai Sejati	RSPO_PO1000014052	7,026.93	-
4	PT. Inti Indosawit Subur – KCP Tungal Ulu	RSPO_PO1000006596	-	2,531.45
5	PT. Dasa Anugrah Sejati - KCP	RSPO_PO1000002916	-	2,833.67
TOTAL			19,612.12	5,365.12
Note:				

11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	PT. Sari Dumai Sejati	ISCC	1,292.96	-
TOTAL			1,292.96	-
Note				

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

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

12. Independent Smallholders Certified Tonnage (MT) / Volume									
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						

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (key in period)							
Credits				-	-	-	-
Physical	-	-	-				
Previous License period (key in period)							
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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Representative: Dr. Chaiyaporn Seekao (Chaiyaporn.Seekao@bsigroup.com)
Website: www.bsigroup.com

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 26 – 29 June 2024 and 1 – 3 July 2024. The audit programme is included as Section 2.3.

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

The Critical NC close out on-site assessment was conducted on 09/09/2024. The audit programs are included in Section 2.3.

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

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

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

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (RA 2)	Year 2 (ASA 2_1)	Year 3 (ASA 2_2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_4)
Muara Bulian POM	√	√	√	√	√
Muara Bulian Estate	√	√	√	√	√
KUD Barokah		√		√	
KUD Subur Makmur	√		√		√
KUD Budi Sari		√		√	√
KUD Makmur Rejeki	√		√		
KUD Karya Lestari	√		√		√
KUD Tuah Sakato		√		√	

Tentative Date of Next Visit: August 19, 2025 - August 25, 2025

Total Number of Mandays: 30.5 mandays

2.2 BSI Assessment Team

Name	Role	Competency
Nanang Rusmana (NR)	Team Leader	<p>Education: Holds a Bachelor Degree of Forestry, Bogor Agricultural University (IPB)</p> <p>Work Experience: 5 years working experience in palm oil industry as SHE Assistant at PT. Astra Agro Lestari Tbk. 3 years working experience in mining industry as Environment Coordinator and SHE Coordinator with PT. Kapuas Prima Coal Group. 6 years working experience as RSPO/ISPO auditor</p> <p>Training attended: Completed ISO 9001:2015 Lead Auditor Course, ISPO Auditor Course, ISO 14001:2015 Lead Auditor Course, ISO 45001:2018 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO Supply Chain Certification Lead Auditor Course, SMK3 Auditor Course, HCV Assessor Course, General OHS Expert Course, SMETA Requirements training, RSPO Independent Smallholder Training by RSPO Secretariat, and Endorsed RSPO Refresher Courses.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p>

		<input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)
Eko Prastio Ramadhan (EPR)	Team Member	<p>Education: Holds a Bachelor Degree in Forest Resources Conservation and Ecotourism from Forestry Faculty, Bogor Agricultural University (IPB).</p> <p>Work Experience: Over 4 years of working experience in biodiversity officer with Birdlife Indonesia and consultant with PT Inoa Konsultindo. Over 2½ years of working experience in palm oil estate with PT Salim Ivomas Pratama Tbk and Capitol Plantation Group implementing sustainability. Over 4½ years of working experience as RSPO P&C Certification Program Manager and auditor covering standard such as RSPO P&C, RSPO SCCS, ISPO, ISO 9001 and ISO 14001.</p> <p>Training attended: Completed ISO 14001:2015 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Social Impact Assessment Training, Endorsed RSPO SCC Auditor Lead Auditor Course, ISPO Auditor Batch 19 Training, ISO 9001 Lead Auditor Course, Endorsed RSPO Refresher Courses, RSPO Independent Smallholder Training by RSPO Secretariat, and Identification of HCV Areas Training.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit:</p> <input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements <input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)
Mujinius Jalaraya (MJ)	Team Member	<p>Education: Holds a Bachelor Degree majoring in Forest Resources Conservation and Ecotourism, Bogor Agricultural University (IPB).</p> <p>Work Experience: 6 years working experience in palm oil plantations as SHE Assistant at PT. Astra Agro Lestari Tbk and Sustainability Supervisor at Teladan Prima Group. 8 years working experience as RSPO Auditor / Lead Auditor.</p> <p>Training attended: Completed ISO 9001 Lead Auditor course, ISPO Lead Auditor course, Endorsed RSPO P&C Lead Auditor course, Endorsed RSPO SCCS Lead Auditor course, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISO 14001 Internal Auditor Training, ISO 45001 Lead Auditor course, OHS Expert Training, SMETA Requirements Training</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit:</p> <input type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements <input type="checkbox"/> Social <input type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)

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Edy Widodo (EWD)	Team Member	<p>Education: Holds a Bachelor Degree majoring Agricultural Technology from University of Padjadjaran, Bandung.</p> <p>Work Experience: 8 years working experience in palm oil industry as Agronomist and Assistant Manager in various companies. 9 year working experience as RSPO/ISPO auditor.</p> <p>Training attended: Completed ISO 9001 Lead Auditor Course, ISPO endorsed auditor course, Understanding ISO 14001 training, Auditing ISO 14001: 2004 training, Endorsed RSPO Supply Chain Certification Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, SMETA Requirements Training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, RSPO Independent Smallholder Training by RSPO Secretariat, and Endorsed RSPO Refresher Courses.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Sansan Suhendar (SS)	Team Member	<p>Education: Holds a Bachelor Degree of Forestry, Bogor Agricultural University (IPB)</p> <p>Work Experience: 5 years working experience in palm oil industry as SHE Assistant at PT. Astra Agro Lestari Tbk. 3 years working experience in mining industry as Environment Coordinator and SHE Coordinator with PT. Kapuas Prima Coal Group. 6 years working experience as RSPO/ISPO auditor</p> <p>Training attended: Completed ISO 9001:2015 Lead Auditor Course, ISPO Auditor Course, ISO 14001:2015 Lead Auditor Course, ISO 45001:2018 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO Supply Chain Certification Lead Auditor Course, SMK3 Auditor Course, HCV Assessor Course, General OHS Expert Course, SMETA Requirements training, RSPO Independent Smallholder Training by RSPO Secretariat, and Endorsed RSPO Refresher Courses.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>

Accompanying Persons:

Name	Role
-	-

2.3 Assessment Plan

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

Date	Time	Subjects	NR	EWD	EPR	SS	MJ
Wednesday, 26/06/2024	08.00 – 09.00	Opening Meeting Presentation by PT. IIS – Muara Bulian POM, Estate and Smallholder Presentation by BSI Indonesia	✓	✓	✓	✓	-
	09.00 – 12.00	Field Visit to Muara Bulian Estate: - Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, HCV's, riparian zones, etc. - Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, riparian zones, Hazardous Waste, waste management, etc. - Boundaries inspection, worker interviews, social amenities, etc. - Interview with: Labour Union and Gender Committee.	✓	✓	✓	✓	-
	12.00 – 14.00	Break	✓	✓	✓	✓	-
	14.00 – 17.00	Field Visit to Muara Bulian POM: 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.	✓	✓	✓	✓	-
Thursday, 27/06/2024	08.00 – 12.00	Field Visit to Scheme Smallholder: KUD Subur Makmur Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc.	✓	✓	✓	✓	-
	08.00 – 12.00	Stakeholder Consultation: Local government of Batanghari Regency (DLH, Disbun, Disnakertrans & BPN), Village head, surrounding community, NGO.	-	✓	-	-	-
	08.00 – 12.00	Stakeholder consultation: Internal stakeholder: Committee Gender, Labor Union	✓	✓	✓	✓	-
	12.00 – 14.00	Break	✓	✓	✓	✓	-

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	14.00 – 17.00	Document Review continue for Muara Bulian POM, Estate, and Scheme Smallholder	✓	✓	✓	✓	-
Friday, 28/06/2024	08.00 – 12.00	Field Visit to Scheme Smallholder: KUD Makmur Rejeki Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc.	✓	✓	✓	✓	-
	12.00 – 14.00	Break	✓	✓	✓	✓	-
	14.00 – 17.00	Document Review continue for Muara Bulian POM, Estate, and Scheme Smallholder	✓	✓	✓	✓	-
Saturday, 29/06/2024	08.00 – 12.00	Field Visit to Scheme Smallholder: KUD Karya Lestari Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc.	✓	✓	✓	✓	-
	12.00 – 14.00	Break	✓	✓	✓	✓	-
	14.00 – 17.00	Document Review Muara Bulian POM & Estate: - Occupational Health and Safety, HCV, Environment Aspect, time bound plan. - Social Aspect and workers welfare, worker consultation, Stakeholder Consultation, impact assessments, policies. - Best Management Practice for Mill and supply chain for mill. - Operation Procedure, organization commitments, Legal compliance, continuous improvement, long term business plan.	✓	✓	✓	✓	-
Sunday, 30/06/2024		Holiday (stay onsite)	✓	✓	✓	✓	-
Monday, 01/07/2024	08.00 – 12.00	Document Review Muara Bulian Scheme Smallholder: Cooperative (KUD) document review, management of smallholder, Group Manager, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc.	✓	✓	✓	✓	✓
	12.00 – 14.00	Break	✓	✓	✓	✓	✓

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Date	Time	Subjects	NR	EWD	EPR	SS	MJ
	14.00 – 17.00	Document Review Muara Bulian POM & Estate: <ul style="list-style-type: none"> - Occupational Health and Safety, HCV, Environment Aspect, time bound plan. - Social Aspect and workers welfare, worker consultation, Stakeholder Consultation, impact assessments, policies. - Best Management Practice for Mill and supply chain for mill. - Operation Procedure, organization commitments, Legal compliance, continuous improvement, long term business plan. 	✓	✓	✓	✓	✓
Tuesday, 02/07/2024	08.00 – 12.00	Document Review continue for Muara Bulian POM, Estate, and Scheme Smallholder	✓	✓	✓	✓	✓
	12.00 – 14.00	Break	✓	✓	✓	✓	✓
	14.00 – 17.00	Document Review continue for Muara Bulian POM, Estate, and Scheme Smallholder	✓	✓	✓	✓	✓
Wednesday, 03/07/2024	08.00 – 12.00	Document Review continue for Muara Bulian POM, Estate, and Scheme Smallholder	✓	✓	✓	✓	✓
	12.00 – 14.00	Break	✓	✓	✓	✓	✓
	14.00 – 15.00	Report Preparation	✓	✓	✓	✓	✓
	15.00 – 16.00	Closing Meeting	✓	✓	✓	✓	✓
	16.00	Travel to Jambi	✓	✓	✓	✓	✓

NCR Close out Visit Assessment Plan

Date	Time	Subjects	MJ
09/09/2024	08.00 – 08.30	Opening meeting	✓
	08.30 – 10.00	Field verification	✓
	10.00 – 11.00	Report Preparation	✓
	11.00 – 12.00	Closing Meeting	✓
Note: NCR Close Out Visit has carried out by Mujinius Jalaraya (MJ)			

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	PT Inti Indosawit Subur has explained the certification plan for all of its subsidiaries; indicating all palm oil mills, company-owned estates and scheme smallholder as the supply base.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	There are remaining mill and estates that have not certified yet, Bahilang Estate (Supply bases for Tanah Datar Mill) planned in year 2024 due to still in process of RACP. Teluk Panjie Estate (801ha) as supply bases for Teluk Panjie Mill planned in 2026 due to HGU still in process. Sentral Estate (Supply bases for Gunung Melayu II POM planned in 2024 due to still in process of RACP. Revision of TBP has been approved by RSPO on 19/04/2023	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	No, there is no new acquisition conducted by PT Inti Indosawit Subur and its subsidiary.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Yes, there is time bound plan revision dated 19 April 2023, signed by Management Representative. Justification available, it caused: <ul style="list-style-type: none"> Topaz Estate (Supply Bases for Topaz POM) with area 230 Ha the HGU is still on proses to Local Government and BPN Pusat, so the plan year for certification is 2026. Bahilang Estate (Supply Bases for Tanah Datar Mill) with area 1,019 Ha the concept note still on progress and submit to RACP team at Q2 2023. Target to conduct audit at Q1 2024. Teluk Panji Estate (Supply Bases for Teluk Panjie POM) with area 801 Ha the HGU still on progress since the estate under 2 different provinces, the final approval must come from National Authority (BPN Pusat). Target to conduct audit in 2026. Sentral Estate (Supply Bases for Gunung Melayu II POM) with area 2,996 Ha. Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024. 	Complied

	Revision of TBP has been approved by RSPO on 19/04/2023.	
<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required.</p> <p>Is this consistent with the ACOP reporting?</p>	<p>Yes, there is time bound plan revision dated 19 April 2023, signed by Management Representative. Justification available, it caused:</p> <ul style="list-style-type: none"> • Topaz Estate (Supply Bases for Topaz POM) with area 230 Ha. the HGU is still on proses to Local Government and BPN Pusat, so the plan year for certification is 2026. • Bahilang Estate (Supply Bases for Tanah Datar Mill) with area 1,019 Ha the concept note still on progress and submit to RACP team at Q2 2023. Target to conduct audit at Q1 2024. • Teluk Panji Estate (Supply Bases for Teluk Panjie POM) with area 801 Ha the HGU still on progress since the estate under 2 different provinces, the final approval must come from National Authority (BPN Pusat). Target to conduct audit in 2026. • Sentral Estate (Supply Bases for Gunung Melayu II POM) with area 2,996 Ha. Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024. • Revision of TBP has been approved by RSPO on 19/04/2023. 	Complied
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>There is not any isolated lapses in implementation of the plan. There are the changing on the plan due to RaCP process in Bahilang Estate and Sentral Estate and HGU issuance process for Teluk Panji Estate. Status of uncertified units :</p> <ul style="list-style-type: none"> • Topaz Estate (Supply Bases for Topaz POM) with area 230 Ha. the HGU is still on proses to Local Government and BPN Pusat, so the plan year for certification is 2026. • Bahilang Estate (Supply Bases for Tanah Datar Mill) with area 1,019 Ha the concept note still on progress and submit to RACP team at Q2 2023. Target to conduct audit at Q1 2024. • Teluk Panji Estate (Supply Bases for Teluk Panjie POM) with area 801 Ha the HGU still on progress since the estate under 2 different provinces, the final approval must come from National Authority (BPN Pusat). Target to conduct audit in 2026. • Sentral Estate (Supply Bases for Gunung Melayu II POM) with area 2,996 Ha. Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024. <p>Revision of TBP has been approved by RSPO on 19/04/2023.</p>	Complied

Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	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 obtain the HGU for Teluk Panji Estate. Topaz Estate (Supply Bases for Topaz POM) with area 230 Ha the HGU is still on proses to Local Government and BPN Pusat, so the plan year for certification is 2026.	Complied
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	According to Land Use change analysis, there are several area conversion cacao plantation in Bahilang Estate and Sentral Estate, no primary forest. Bahilang Estate (PT Nusa Pusaka Kencana/NPK). RaCP still under Process. Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024. Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planned on 2024. LUCA submission has been sent on 28 Dec 2020, latest update from RSPO email dated 18 March 2021 to company, LUCA still under review and report needs clarification and still follow up by company. Update for Sentral Estate : Concept Note still on Progress and submitted to RaCP team at Q2 2023. Teluk Panji Estate. HGU for this unit has not been obtained and still under process. Certification audit will be planned on 2026. Latest updated April 2023, HGU still on Progress, since the estate under 2 different province, the final approval must come from National Authority (BPN Pusat). Topaz Estate (Supply Bases for Topaz POM) with area 230 Ha. the HGU is still on proses to Local Government and BPN Pusat, so the plan year for certification is 2026. Revision of TBP has been approved by RSPO on 19/04/2023.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	According to Land Use change analysis, there are several area conversion cacao plantation in Bahilang Estate and Sentral Estate, no primary forest. <ul style="list-style-type: none"> Bahilang Estate (PT Nusa Pusaka Kencana/NPK). RaCP still under Process. Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024. Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planned on 2024. LUCA submission has been sent on 28 Dec 2020, latest update from RSPO email dated 18 March 2021 to company, LUCA still under 	Complied

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	<p>review and report needs clarification and still follow up by company.</p> <ul style="list-style-type: none"> Teluk Panji Estate. HGU for this unit has not been obtained and still under process. Certification audit will be planned on 2026. Latest updated April 2023, HGU still on Progress, since the estate under 2 different province, the final approval must come from National Authority (BPN Pusat) Topaz Estate (Supply Bases for Topaz POM) with area 230 Ha. the HGU is still on proses to Local Government and BPN Pusat, so the plan year for certification is 2026. 	
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	<p>Internal audit has conducted for Bahilang Estate on 29 January - 02 February 2024, Teluk Panji Estate on 06-11 November 2023 and Sentral Estate on 23-31 July 2024, Topaz was on 10 – 14 June 2024, there is no land conflict occur in this management unit. In addition, the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p> <p>According to the RSPO RaCP tracker (https://www.rspo.org/certification/remediation-and-compensation/racp-tracker) update 24 June 2024, PT Inti Indosawit Subur has:</p> <ul style="list-style-type: none"> MU's with potential liabilities: 4 units LUCA Submitted (MUs): 4 units LUCA review completed (MUs): 4 units Concept Note required (MUs): 3 units Concept Note submitted (MUs): 3 units Concept Note approved (MUs): 3 units Compensation Plan submitted (Mus): 0 Compensation Plan endorsed (MUs): 0 Remediation Plan required (MUs): 4 units Remediation Plan submitted (MUs): 1 Remediation Plan approved (MUs): 0 	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	<p>Internal audit has conducted for uncertified units, 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. Internal audit was on: Bahilang Estate on 29 January - 02 February 2024, Teluk Panji Estate on 06-11 November 2023 and Sentral Estate on 23-31 July 2024, Topaz was on 10 – 14 June 2024</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

	There are no ongoing case/s of grievances or complaint based on RSPO Complaint tracker (https://askrspo.force.com/Complaint/s/casetracker)	
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Internal audit was conduct frequently in annual basis. Internal audit has conducted for Bahilang Estate on 29 January - 02 February 2024, Teluk Panji Estate on 06-11 November 2023 and Sentral Estate on 23-31 July 2024, Topaz was on 10 – 14 June 2024, 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 was conduct frequently in annual basis. Internal audit has conducted for Bahilang Estate on 29 January - 02 February 2024, Teluk Panji Estate on 06-11 November 2023 and Sentral Estate on 23-31 July 2024, and Topaz was on 10 – 14 June 2024, 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. Report of internal audit are available. Result of internal audit: <ul style="list-style-type: none"> - 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 (https://www.rspo.org/certification/remediation-and-compensation/racp-tracker) update 24 June 2024, PT Inti Indosawit Subur has: <ul style="list-style-type: none"> • MU's with potential liabilities: 4 units • LUCA Submitted (MUs): 4 units • LUCA review completed (MUs): 4 units 	Complied

	<ul style="list-style-type: none"> • Concept Note required (MUs): 3 units • Concept Note submitted (MUs): 3 units • Concept Note approved (MUs): 3 units • Compensation Plan submitted (Mus): 0 • Compensation Plan endorsed (MUs): 0 • Remediation Plan required (MUs): 4 units • Remediation Plan submitted (MUs): 1 <p>Remediation Plan approved (MUs): 0 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?	<p>During internal audit stakeholders consultation already conducted. There is no issue.</p> <p>Update on internal audit:</p> <ul style="list-style-type: none"> • Topaz was on 10 – 14 June 2024 • Teluk Panji was on 06-11 November 2023 • Sentral Estate was on 23-31 Jul 2024 • Bahilang Estate was on 29 January – 02 February 2024. 	Complied

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<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>	<p>Yes, PT Inti Indosawit Subur Group has including 100% the scheme smallholder in their certification.</p>	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
		Sei Lala Estate*	Ukui Village, Ukui District, Pelalawan Regency, Riau	2011	*Split From Ukui & Soga Estate Since 1 January 2019, become supply bases of Ukui II Mill Re-certified in 2021

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Name of Mill	Mill Address	Name of Supply Bases	Location / Address	Time Bound for Certification	Status
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016 Re-certified in 2021
Ukui II Mill - PT Inti Indosawit Subur	Ukui Village, Ukui District, Pelalawan Regency, Riau	Soga Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016 Re-certified in 2021
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016 Re-certified in 2021
Tungkal Ulu Mill - PT Inti Indosawit Subur	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Tungkal Ulu Estate	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	2012	Certified on 15 August 2012 Re-Certification in August 2017 Re-certified in 2022
		Tungkal Ulu (Plasma)	Renah Mendalo, Merlung, Muara Papalik District, Tanjung Jabung Barat Regency,	2012	Certified on 15 August 2012 Re-Certification in August 2017 Re-certified in 2022
Muara Bulian Mill - PT Inti Indosawit Subur	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pemayung District, Batang Hari Regency, Jambi	Muara Bulian Estate	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pemayung District, Batang Hari Regency,	2013	Certified on 12 July 2013 Re-Certification in August 2017 Re-certified in 2022

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Name of Mill	Mill Address	Name of Supply Bases	Location / Address	Time Bound for Certification	Status
		Muara Bulian (Plasma)	Maro Sebo Ilir District, Batanghari Regency, Jambi	2013	Certified on 12 July 2013 Re-Certification in August 2017 Re-certified in 2022
Topaz Mill – PT Tunggal Yunus Estate	Petapahan Village, Tapung District, Kampar Regency, Riau	Topaz Estate	Petapahan Village, Tapung District, Kampar Regency, Riau	2015	Certified on 30 March 2015 Re-certified in 2020
		Topaz Estate (230ha)		2026	HGU is still in Process
Taman Raja Mill – PT Dasa Anugrah Sejati	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Vilage, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Taman Raja, Badang & Bernai Estate*	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Vilage, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	2015	Certified on 20 February 2015 *Bernai Estate Split From Taman Raja & Badang Estate Since 1 January 2019 Re-certified in 2020
Segati Mill – PT Mitra Unggul Pusaka	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan 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

Name of Mill	Mill Address	Name of Supply Bases	Location / Address	Time Bound for Certification	Status
Tanah Datar Mill – PT Supra Matra Abadi	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	Tanah Datar Estate	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	2015	Certified on 18 May 2015 Re-certified in 2020
		Bahilang Estate	Bahilang Village, Tebing Tinggi District, Serdang Bedagai Regency, North Sumatera	2024	*Bahilang Estate on Process RaCP
Aek Nabara Mill – PT Supra Matra Abadi	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera	Aek Nabara Estate	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera	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 Sumatera	Teluk Panjie Estate (3,885 Ha)	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera	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

Name of Mill	Mill Address	Name of Supply Bases	Location / Address	Time Bound for Certification	Status
					Re-certified in 2022
Tanjung Selamat Mill – PT Indo Sepadan Jaya	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Tanjung Selamat	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	Certified on 26 May 2015 Re-certified in 2020
		Pangkatan	Sennah Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	Certified on 26 May 2015 Re-certified in 2020
Gunung Melayu I – PT Saudara Sejati Luhur	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	Pulau Maria Estate	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	2015	Certified on 7 September 2015 Re-certified in 2020
Gunung Melayu II – PT Gunung Melayu	Gonting Malaha Village, Bandar Pulau District, Asahan 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"> • Certified on 23 December 2016 as Independent Mill • Audit in 2016 as Mill and Supply Base • 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		2018	

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Name of Mill	Mill Address	Name of Supply Bases	Location / Address	Time Bound for Certification	Status
		(501 Ha)			
Negri Lama, I Mill – PT Hari Sawit Jaya	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	*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"> • Certified on 8 April 2015 • Audit in 2016 as Independent Mill • Re-certified in 2020

3.3 Details of Nonconformities

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

During this Assessment there were one (1) Critical; two (2) Minor nonconformities and zero Opportunity For Improvement raised. The PT Inti Indosawit Subur – Muara Bulian POM Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment (not applicable for RSPO ISH standard/audit). The implementation of the Corrective Actions for the Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	2516479-202406-M1	Issued Date	03/07/2024
Due Date	02/10/2024	Closure Date	09/09/2024
Indicator & Category (Critical / Minor)	3.8.7 Major		
Statement of Nonconformity:	During document verification it was found that FFB receive from non certified source claimed in the weighbridge ticket as certified FFB.		
Requirement Reference:	Purchasing and Goods In i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.		
Objective Evidence:	Based on document review of FFB weighing ticket documents, there is information on FFB receipt that is inconsistent where TBS sourced from non-certified sources is recorded as certified/sustainable FFB: - Weighing Ticket, No: PMBA224103676, dated 25 June 2024, "Surat Pengantar TBS" Form A No. Seri 00008; volume: 5,060 kg; Sources: Koperasi Agro Sangkilan Mandiri. - Weighing Ticket, No: PMBA224101911, dated 27 June 2024, "Surat Pengantar TBS" Form A No. Seri 00387; volume: 3,421 kg; Sources: Koperasi Agro Sangkilan Mandiri. - Weighing Ticket, No: PMBA224103674, dated 25 June 2024, "Surat Pengantar TBS" Form A No. Seri 00788; volume: 4,772 kg; Sources: Koperasi Tuah Sakato – Hamparan 55, Desa Rantau Kapas. Furthermore, there are certified TBS weighing tickets sourced from plasma plantations but the RSPO certificate number is not included: - Weighing Ticket No: PMBA224101888, dated 25 March 2024, sources: kebun plasma KUD Makmur Rezeki, KT 07 Kutilang, volume TBS 2,988 kg. - Weighing Ticket No: PMBA224101941, dated 30 March 2024, sources: kebun plasma KUD Karya Lestari, KT 65 Mekar Tani, volume TBS 10,969 kg.		

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	- Weighing Ticket No: PMBA224101883, dated 25 March 2024, sources: kebun plasma KUD Buah Sakato, KT 31 Sei Bujang, volume TBS 7,147 kg.
Corrections:	Coordination with the IT Team to carry out system improvements and verify them.
Root Cause Analysis:	Coordination with the IT Team to carry out system improvements and verify them.
Corrective Actions:	<ul style="list-style-type: none"> • Monitor weigh tickets periodically every month regarding No. RSPO, and traceability data of FFB supplier. • Create a table of plasma overlay areas that are RSPO Certified and non-RSPO Certified. • Create programs related to SCCS training periodically every year.
Assessment Conclusion:	<ul style="list-style-type: none"> • PT IIS - Muara Bulian POM has made coordination with IT team to carried out the system improvement in weighbridge card operation. IT team has immediately improve the weighbridge system by making change the input of Agro Sangkilan Mandiri as the FFB source of Non certified. FFB receive from Koperasi Agor Sangkilan Mandiri Hamparan (KT) 40, 41, 48 and Koperasi Buah Sakato Hamparan 55 - 56 was input as Non RSPO FFB. Until NCR Close out conducted there is no FFB receive from Koperasi Agro Sangkilan Mandiri & Koperasi Buah Sakato Hamparan (KT) 55 - 56. However company submit the sample of FFB receive from Koperasi Agro Sangkilan Mandiri and Koperasi Buah Sakato Hamparan (KT) 55 - 56 on 10 Sept 2024. Sample seen for FFB receiving from Agro Sangkilan Mandiri/Koperasi Buah Sakato as record in Weighbridge ticket as below: <ul style="list-style-type: none"> ✓ Weighbridge Ticket #PMBA224105298 dated 10/09/2024, FFB from Koperasi Agro Sangkilan Mandiri KT-48, Nett weight 4,485 kg, commodity: FFB Plasma (non certified). ✓ Weighbridge Ticket #PMBA224105299 dated 10/09/2024, FFB from Koperasi Buah Sakato KT-55, Nett weight 4,860 kg, commodity: FFB Plasma (non certified). • PT IIS - Muara Bulian POM also has improve the weighbridge system by insert the certificate number for KUD Makmur Rejeki as the FFB source of certified FFB. Certificate number RSPO 594418. Sample seen for weighbridge ticket of FFB receiving from KUD Makmur Rejeki, KUD Karya Lestari and KUD Buah Sakato: <ul style="list-style-type: none"> ✓ Weighbridge ticket #PMBA224104998 dated 27/08/2024, FFB from KT-07 Kutilang (KUD Makmur Rejeki), Nett weight: 1,911 kg, commodity: FFB Plasma Sustainable (Certified), RSPO certificate number 594418. ✓ Weighbridge ticket #PMBA224205052 dated 30/08/2024, FFB from KT-65 Mekar Tani (KUD Karya Lestari), Nett weight: 7,234 kg, commodity: FFB Plasma Sustainable (Certified), RSPO certificate number 594418. ✓ Weighbridge ticket #PMBA224105151 dated 03/09/2024, FFB from KT-31 Sei Bujang (KUD Buah Sakato), Nett weight: 5,860 kg, commodity: FFB Plasma Sustainable (Certified), RSPO certificate number 594418. • PT IIS - Muara Bulian POM has conducted the RSPO SCCS training for weighbridge operator on 23/08/2024. Training conducted online by Welly Joel

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	<p>Candra from Jakarta Office. Interview with weighbridge operator (Latifah N. and Putri H.) confirmed that they have follow the training and aware about the weighbridge system to input the FFB receiving data from certified and non certified source. Training of RSPO SCCS was planned annually, training program 2025 are available and was sighted during audit.</p> <ul style="list-style-type: none"> PT IIS - Muara Bulian POM has made the monitoring of weighbridge ticket monthly by KTU and Sustainability Officer. Monitoring evidence can be shown in "Monitoring nomor sertifikat, Nilai GHG dan Batch number Region Jambi". Monitoring period August 2024 was sighted during audit. <p>Based on above evidence, the NC has been closed effectively on 09/09/2024.</p>
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Non-conformity			
NCR Ref #	2516479-202406-N1	Issued Date	03/07/2024
Due Date	Next assessment (ASA2_3)	Closure Date	"Open"
Indicator & Category (Critical / Minor)	3.7.3 Minor		
Statement of Nonconformity:	The company has not effectively provided training for FFB weigh ticket operator regarding the RSPO SCCS mechanism.		
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:	Interview to the WB Operator on behalf Latifah Nur Ramadhani, it was assessed that she has not understood the origin of certified and non certified FFB, especially the origin of FFB from scheme smallholder and third party. This was proven there is incorrect FFB information in the weigh ticket, where FFB that should have been non certified was recorded as certified.		
Corrections:	Make a schedule and carry out SCCS training for WB operator.		
Root Cause Analysis:	There are new WB Operator where RSPO SCCS training has not been carried out. Employees started working in October 2023, previously transferred from Taman Raja POM, which does not have a plasma area.		
Corrective Actions:	<ul style="list-style-type: none"> Create a RSPO SCCS P&C Training and Refresh program once a year or if there is a system change and if there is a change in personnel involved with Supply Chain activities. Make a table listing Certified and Non-Certified FFB Suppliers in detail and display it in the WB Operator's weighing room. Make an evaluation after implementing SCCS training for WB operators. 		
Assessment Conclusion:	To be verify in the next surveillance assessment.		

Non-conformity			
NCR Ref #	2516479-202406-N2	Issued Date	03/07/2024
Due Date	Next assessment (ASA2_3)	Closure Date	"Open"
Indicator & Category (Critical / Minor)	7.3.2 Minor		
Statement of Nonconformity:	There is domestic waste management that is not in accordance with the Waste Management Plan and established procedures.		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	<p>Based on a field visit to the landfill (TPSA) location in Afdeling 2 Block B18k, it was found that domestic waste disposal from employee housing was placed on the side of the block road and without a waste pit in accordance with procedures, namely a hole with the size of the TPS (Length x Width x Depth)</p> <p>(1) TPS 1: 3 m x 3 m x 4 m</p> <p>(2) TPS 2: 5 m x 3 m x 4 m</p>		
Corrections:	<p>Create a new landfill pit complete with information boards on the opening date and closing date of the old pit as well as coordinates. With landfill specifications (Length x Width x Depth) as follows:</p> <p>a. TPS type 1 : 3 m x 3m x 4 m</p> <p>b. TPS type 2 : 5 m x 3 m x 4 m</p>		
Root Cause Analysis:	There is no closure or opening of new landfills so that domestical waste continues to be collected at that location.		
Corrective Actions:	Monitoring Landfill every semester and closing and creating a landfill in accordance with the conditions and needs of the landfill of PT Inti Indosawit Subur Muara Bulian.		
Assessment Conclusion:	To be verify in the next surveillance assessment.		

Opportunity for Improvements	
OFI #	Description
OFI 1	

Positive Findings	
PF #	Description
PF 1	

3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2356799-202306-M1	Issued Date	19 June 2023
Due Date	18 September 2023	Closure Date	15 August 2023
Indicator & Category (Critical / Minor)	Critical Indicator 6.7.3		
Statement of Nonconformity:	During field visit it was found that workers were not using appropriate personal protective equipment (PPE) while working.		
Requirement Reference:	(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		
Objective Evidence:	<p>Based on field observation to Muara bulian Estate, Muara Bulian POM and Scheme Smallholder, it was found that workers were not using their PPEs while working, such as :</p> <ul style="list-style-type: none"> • 2 harvesters in Muara Bulian Estate were not using safety helmet during harvesting. • 3 workers from local contractor were not using PPEs during their activity as EFB transporter, details are 2 truck drivers not using safety shoes and 1 mini backhoe operator was not using safety helmet and safety shoes. • Based on interview with 2 harvester in KUD Barokah, it was noted that they not use safety helmet when they conducting harvesting activity. <p>PT IIS Muara Bulian POM, Estate and Scheme Smallholder has HIRADC document, updated 2023. According to HIRADC, PPE for each type of works has been determined.</p>		
Corrections:	<ul style="list-style-type: none"> • Give warning letters to supervision and 2 PMB employees found in the field • Provide warning letters to supervision and 3 KMB contractors found in the field • Provide a warning letter to harvesters to always use PPE when working • Provide a Notification Letter to plot owners located outside the local village to require their harvesters to use PPE • Providing PPE Helmets to 2 harvesters who were found • Proof of providing PPE to contractors at the POM • Make a statement of compliance regarding the use of PPE for contractors 		
Root Cause Analysis:	<ul style="list-style-type: none"> • Supervision is inconsistent in monitoring employee discipline in the use of PPE • The plot owner does not live in the local village so information about the obligation for harvesters to use PPE is not conveyed 		
Corrective Actions:	<ul style="list-style-type: none"> • Providing daily outreach regarding PPE to all employees during the morning master • Install a board calling for mandatory use of PPE for employees 		

	<ul style="list-style-type: none"> • Create a memorandum regarding sanctions for workers who do not use PPE when working in the field • Monitoring by the foreman and KT of the use of PPE during harvest rotation • Put up billboards urging the use of PPE for harvesters • Providing PPE stock in cooperatives
Assessment Conclusion:	<p>Verification:</p> <p>Correction</p> <ul style="list-style-type: none"> • There is evidence that the organization has given warning letters to supervisors and 2 employees of Muara Bulian Gardens who were found in the field regarding negligence in monitoring the use of PPE. The verified document is the Warning Letter document dated 24 June 2023 from the Afdeling Assistant to the Harvest Foreman, the document was signed by the Afdelign Assistant and the Harvest Foreman. • There is evidence that the organization has given a letter of warning to the Muara Bulian Garden contractor (ACC Contractor) found in the field, namely: • Warning Letter to ACC contractor (on behalf of Bagus Tarigan), dated July 24 2023. • There is evidence that the organization has provided a letter of warning to harvesters to always use PPE when working, the verified documents are: • Letter of Reprimand, from Assistant to Sopyan and Anis Nur Ahmad (Harvester), respectively dated June 24 2023. • There is evidence that the organization has provided Notification Letters to plot owners who are outside the local village to require their harvesters to use PPE, especially for owners who are outside the area, proof of socialization in the form of conversation information via Whatsapp messages by attaching a Letter of Appeal from KUD, proof of conversation Verified, for example, from organizations with Pak Cun Lang, Pak Surip, Agus Harianto, and Pak Tono. • There is evidence that the organization has provided PPE Helmets (new periodic provision) to 2 harvesters which became an audit finding. The verified document is Attachment #2 – 101.3B AA HSE 1013B Personal Protective Equipment Handover Form to Anis Nur Muhammad and Sopyan (harvester-Afd 2) The PPE provided was in the form of a Safety Helmet, given on July 17 2023 by AK3U and • There is evidence of providing PPE to the POM contractor in the name of Bagus Tarigan (Exca Mini Operator - ACC Contractor) in the form of PPE Safety Helmet, Rubber Safety Shoes on 24 July 2023. • The organization has provided a statement of compliance regarding the use of PPE for contractors, the verified document is a Statement Letter from the ACC Contractor dated July 24 2023 regarding compliance with the use of PPE in the work area. <p>Corrective Actions:</p> <ul style="list-style-type: none"> • There is evidence that the organization has provided daily socialization regarding PPE to all employees during the master morning, the verified documents are the list of attendance "K3L Socialization" and SM Memorandum dated 25 July 2023 and photos of activities.

- There is evidence that the organization has installed a board warning of the obligation to use PPE at the KUD, the verified document is the Minutes of Activities for installing Billboards Warning about the Use of PPE on July 26 2023 with details of KUD Barokah 2 units of billboards, KUD Budi Sari 2 units of billboards, KUD Subur Makmur (2 units of billboards), KUD Karya Lestari (2 units of billboards), KUD Makmur Rezeki (2 units of billboards), and KUD Tuah Sakato Cooperative (2 units of billboards).
- There is evidence that the organization has prepared a memorandum regarding sanctions for workers who do not use PPE when working in the field, the verified document is No. 010/MI-IIS/MEMO/7/23 dated 17 July 2023, addressed to the PMB Manager, POM Assistant, Traction Assistant and Afdeling Assistant from the Senior Manager. The memorandum explains the importance of using PPE and gradual sanctions if there are violations.
- There is evidence that the organization has carried out monitoring, namely by foremen and Farmer Groups, the use of PPE during harvest rotation, the verified document is the Checklist for Monitoring PPE for Harvesters in the Bulian Plantation on 5, 17 July and 3 August 2023 and in the KUD - Bulian, namely the KUD Barakah on July 24 and August 2, 10 2023, monitoring results showed that harvesting workers were wearing complete PPE.
- There is evidence that the organization has put up billboards calling for the use of PPE for harvesters in Afdeling, the verified document is the Minutes of Activities dated 20 July 2023, the location for installing the warning billboards is the Afdeling Office, 3 billboards, core employee housing, 2 billboards, Afdeling Block 1 (2 units), Afdeling Block 2 (2 units), Afdeling Block 3 (2 units).
- The organization has provided PPE stock in the Cooperative, the verified document is PPE Handover Form 101.3B from PT IIS Muara Bulian to the Chair of KUD Barokah, KUD Budi Sari and KUD Tuah Sakato on 17, 18 July 2023

Field Verification

- Based on the results of the field visit at the Block B18e Afdeling 2 – OP2018 Muara Bulian Estate harvest work, it was discovered that the harvest workers were using complete PPE. As a result of interviews with harvesters, they also know the importance of using PPE. The interview with the Harvest Foreman also revealed that the harvest foreman had carried out daily monitoring and from the monitoring results, the harvest workers had worn appropriate PPE. The results of the interview with the Assistant revealed that the Assistant had conveyed the socialization of the SM Memorandum, and emphasized the importance of using PPE during the Foreman's briefing and also randomly during morning roll call at the harvest block.
- Harvesting activities in the KUD Barokah rotation have also been verified, and the results are that workers have used PPE and the results of KT monitoring have shown that workers have used appropriate PPE. Interviews with harvest workers (Mr Iwan and Mr James B) at KUD Barokah and land owners (Hengki Saputra and Rupadi) at KUD Barokah have also been conducted, and the results of the interviews are that harvest workers and land/lot owners already understand the importance of using PPE.
- A visit to the Muara Bulian POM showed that workers and contractors were using complete PPE in accordance with HIRADC. Interviews with contractors were also conducted, and the contractors understood the importance of using PPE.

	Based on the CAP verification results, it was concluded that the critical finding could be closed.
Effectiveness Closure (for previous audit closed Critical NC):	During ASA2.2 audit, there is no issue related to this indicator. The corrective action has been implemented consistently.

Previous Audit Minor Non-conformity			
NCR Ref #	2356799-202306-N1	Issued Date	19 June 2023
Due Date	Next assessment (ASA2_2)	Closure Date	03/07/2024
Indicator & Category (Critical / Minor)	Indicator 3.3.2 Minor		
Statement of Nonconformity:	There is a replanting program carried out by farmers through the BDPKPS program initiated by the Jambi Province Plantation Service, however there is no evidence that the SOPs related to replanting and plant care were implemented by farmers who carried out the replanting.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	<p>Based on the results of field visits and interviews it is known as follows:</p> <ul style="list-style-type: none"> The results of interviews with the KUD Budi Sari management stated that there were approximately 5% of farmer plots that were no longer maintained and the results of field visits found that no maintenance was carried out, for example plot No. 513 Ishak KUD Budi Sari No. 520 Tumuji KUD Budi Sari) some are even no longer harvested, but there is no follow-up from the plasma management. It is known that there are plots of farmers who carry out replanting program through the BDPKPS program (initiation of the Jambi Province Plantation Service) found conditions that do not meet the SOP, including: uncontrolled weed conditions in Roman plots (KUD Budi Sari), there are other plants being treated (plants palawija) in several plots of KUD Barokah, based on the results of interviews with a sample of self-managed farmers from KUD Budi Sari and KUD Barokah it was conveyed that the dosage of fertilizer used no longer refers to Plasma SOP related to treatment. Furthermore, there is no mechanism to ensure consistency of implementation with procedures for that plots. 		
Corrections:	<ul style="list-style-type: none"> Provide notification letters to farmers who own plots to carry out plot maintenance (manual/mechanical) Create an MOU to carry out partnerships related to the management of oil palm plantations 		
Root Cause Analysis:	<ul style="list-style-type: none"> The plot owner does not live in the local village so the plot is not well maintained There is no socialization regarding standards for replanting that is carried out correctly The level of ability of farmers is not uniform, both financially, time, energy & knowledge 		

Corrective Actions:	<ul style="list-style-type: none"> • Provide a notification letter to KT to be involved in monitoring plot maintenance • Put up billboards calling for pre-replanting garden maintenance • Monitoring the condition of weeds per plot by the plasma foreman • Create billboards regarding best practices for replanting • Monitoring the condition of plots that have undergone self-managed replanting
Assessment Conclusion:	<p>During verification, organization was provide notification letters to farmers who own plots to carry out plot maintenance (manual/mechanical). Organization has also was install signboard related to plot maintenance and data monitoring related to the plot maintenance.</p> <p>Organization also has carried out monitoring for the members who have undergone self managed replanting, the data has been shown during audit.</p> <p>Based on field verification in sampled smallholder and document review during ASA2.2, the CAP has been implemented effectively. It was concluded that the minor finding could be closed.</p>

Previous Audit Minor Non-conformity			
NCR Ref #	2356799-202306-N2	Issued Date	19 June 2023
Due Date	Next assessment (ASA2_2)	Closure Date	03/07/2024
Indicator & Category (Critical / Minor)	Indicator 3.3.3 Minor		
Statement of Nonconformity:	There are no records related to monitoring the implementation of replanting and plant care carried out by farmers participating in the BPDPKS replanting program initiated by the Jambi Province Plantation Service.		
Requirement Reference:	Records of monitoring and any actions taken are maintained and available.		
Objective Evidence:	Based on the review of documents and the results of field visits, it is known that there are no records related to monitoring the implementation of replanting and plant care carried out by farmers participating in the BPDPKS replanting program initiated by the Jambi Province Plantation Service, namely in KUD Barokah and KUD Budi Sari.		
Corrections:	<ul style="list-style-type: none"> • Create training related to replanting implementation documents • Collect documents recording replanting activities 		
Root Cause Analysis:	Cooperatives do not have the competence to make records of replanting implementation		
Corrective Actions:	Create an MOU to carry out partnerships related to the management of oil palm plantations		
Assessment Conclusion:	<p>During audit, auditor team has also interviewed sample of smallholder representatives KUD Budi Sari, KUD Barokah obtain information that the company/KUD has provide monitoring the implementation of replanting and plant care carried out by farmers participating in the BPDPKS replanting program.</p> <p>Based on field verification in sampled smallholder, the CAP has been implemented effectively. It was concluded that the minor finding could be closed.</p>		

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

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1782771-201905-M1	Major	1.2.1	27/05/2019	Closed on 8/08/2019
1782771-201905-M2	Major	4.6.7	27/05/2019	Closed on 8/08/2019
1782771-201905-M3	Major	4.8.8	27/05/2019	Closed on 8/08/2019
1782771-201905-M4	Major	SCC 5.3.2	27/05/2019	Closed on 8/08/2019
1782771-201905-M5	Major	SCC 5.5.2	27/05/2019	Closed on 8/08/2019
1782771-201905-N1	Minor	2.1.2	27/05/2019	Closed on 09/07/2020
1782771-201905-N2	Minor	4.6.4	27/05/2019	Closed on 09/07/2020
1782771-201905-N3	Minor	5.2.4	27/05/2019	Closed on 09/07/2020
1928364-202007-M1	Critical	3.4.3	10/07/2020	Closed on 11/09/2020
1928364-202007-M2	Critical	6.6.2	10/07/2020	Closed on 11/09/2020
2108332-202109-M1	Minor escalated to Critical	6.7.3	08/09/2021	Closed on 04/12/2021
2108332-202109-N1	Minor	3.3.2	08/09/2021	Closed on 13/08/2022
2108332-202109-N2	Minor	7.3.2	08/09/2021	Closed on 13/08/2022
2235540-202208-N1	Minor	6.7.2	13/08/2022	Closed on 19/06/2023
2235540-202208-N2	Minor	7.2.5	13/08/2022	Closed on 19/06/2023
2356799-202306-M1	Critical	6.7.3	19/06/2023	15/08/2023
2356799-202306-N1	Minor	3.3.2	19/06/2023	Closed on 03/07/2024
2356799-202306-N2	Minor	3.3.3	19/06/2023	Closed on 03/07/2024
2516479-202406-M1	Critical	3.8.7	03/07/2024	Closed on 09/09/2024
2516479-202406-N1	Minor	3.7.3	03/07/2024	Next Audit
2516479-202406-N2	Minor	7.3.2	03/07/2024	Next Audit

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 – Muara Bulian POM Certification Unit's environmental and social performance, legal and any known dispute issues.

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Internal Stakeholders	Gender Committee: Ibu Lilis Simanjuntak (Head of Gender Committee of Muara Bulian Estate & Mill) Worker union/PUKFP-PPP-SPSI: Bpk. Janto Siburian	Face to face interview
Government Departments	<ul style="list-style-type: none"> ▪ Dinas Lingkungan Hidup Batang Hari Regency – Environmental Agency Bpk. Hendra Ibu Ade Okta Wahyuni ▪ Dinas Tenaga Kerja dan Transmigrasi Provinsi Jambi – Manpower Agency Bpk. Ilham ▪ Dinas Perkebunan Batang Hari Regency - Plantation Agency Bpk. Ismail Ramzi (Secretary of Agency) ▪ Badan Pertanahan Nasional Kabupaten Batanghari - Agrarian Agency Bpk. Abdi Saragih 	Phone interview Phone interview Face to face interview Phone interview
Communities representative	Head of Dusun 03 Kehidupan Baru Village Bpk. Maman Suratman Head of Tidar Kuranji Village	Face to face interview

	Bpk. Eko Handoko (Chairman of BPD: <i>Badan Permusyawaratan Desa</i>) Head of Bulian Jaya Village Bpk. Sayuti	
FFB Supplier	PT Gema Inti Jaya Semesta Mr. Naibaho	Phone interview

Stakeholders comment

#1	<p>Feedbacks:</p> <p><i>Dinas Lingkungan Hidup Kabupaten Tanjung Jabung Barat – Environmental Agency</i></p> <ul style="list-style-type: none"> Up to now, communication has gone well between Dinas Lingkungan Hidup Kabupaten Tanjung Jabung Barat and PT IIS Muara Bulian POM. Routine 6-monthly reports (environmental management – RKL/RPL) and 3-monthly (waste management) reports for both hazardous waste and liquid waste have been submitted on time. There was a warning from DLH Kab. Batanghari letter no. 07/2023 and repair and operational actions have been carried out on 8 March 2024. Head of departement of DLH Batanghari Regency has been issued the Decree No. 149 Year 2024 concering <i>Pencabutan Keputusan Kepala Dinas Lingkungan Hidup kabupaten Batang Hari No. 07 tahun 2023 regarding Penerapan Sanksi Adminsitratif Teguran Tertulis Kepada PT Inti Indosawit Subur.</i> There was an issue in online media on 21 May 2023, related to alleged pollution of Singoan river water by waste management at the Muara Bulian Mill by media online kabar18.com. <p>Based on reports of alleged pollution in the Singoan River in online media, DLH Batang Hari Regency has conducted a field inspection by taking river water samples at 2 points, namely upstream and downstream of the Singoan River. From the results of DLH Batang Hari Regency laboratory tests, it was stated that the river water was not polluted by Muara Bulian POM waste.</p> <p>Audit Team verification and response:</p> <p>The company has maintained good communication on environmental issue.</p> <p>Related to the warning letter from DLH Batanghari Regency in 2023, PT IIS Muara Bulian Mill has taken action, as follows:</p> <ul style="list-style-type: none"> - Nota Dinas no. 660.5/45/DLH/2023 regarding Pengawasan dan Penataan Lingkungan Hidup - No.660.5/45/DLH/2023 perihal Pengawasan dan Penataan Lingkungan Hidup, - Letter no. 07/2023 from DLH Batang Hari Regency regarding “Penerapan Sanksi administratif teguran tertulis kepada PT Inti Indosawit Subur”. - Letter from HSE of PT Inti Indosawit Subur No. 04/ES-KMB/EXT/II/2024 ddated 13 February 2024 regarding Report on the Implementation of Administrative Sanctions for Written Warnings of PT Inti Indosawit Subur – Muara Bulian in 2023. - Berita Acara Verifikasi progress field administrative sanctions written warning PT Inti Indosawit Subur dated 08 March 2024. - Verification report on fulfillment of administrative sanctions written warning against PT Inti Indosawit Subur dated 12 March 2024.
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Stakeholders comment

- Head of departement of DLH Batanghari Regency has been issued the Decree No. 149 Year 2024 concering *Pencabutan Keputusan Kepala Dinas Lingkungan Hidup kabupaten Batang Hari No. 07 tahun 2023 regarding Penerapan Sanksi Adminsitratif Teguran Tertulis Kepada PT Inti Indosawit Subur.*

Based on field visits and verification of the results of monitoring and environmental management by DLH Batang Hari Regency on 9 November 2023, there are several notes, as follows:

- 1) Making a waste water treatment flow diagram board, based on field verification, making the board has been carried out and is in accordance with DLH recommendations
- 2) Separating the flow of wastewater and rainwater is carried out by creating a new ditch specifically for rainwater. Wastewater flow separation has been implemented and is in accordance with DLH recommendations
- 3) Repair the IPAL information board and complete the information (emergency response system, logbook, daily pH and discharge data, as well as flow diagrams for the waste water treatment process. Waste water flow separation has been implemented and is in accordance with DLH recommendations
- 4) Renew the environmental permit regarding the addition of 2 ponds to the IPAL after the 5th pond. The company has submitted a study to emphasize compliance with waste water quality standards, in the form of using industrial waste water to add soil nutrients for cultivation (land application) through PT Anugrah Agung Nusantara Consultants as of 12 February 2024.
- 5) Have technical approval for emission disposal; The company has submitted a study to emphasize compliance with emission quality standards for palm oil industry activities through PT Anugrah Agung Nusantara Consultants as of 12 February 2024.

Related to the alleged pollution of the Singoan River on 21 May 2023 in online media:

PT IIS – Muara Bulian has taken corrective action as follow:

Based on interview with the staff of DLH Batang Hari Regency namely Ibu Ade Okta Wahyuni, obtained information that the laboratory test results cannot be published, however Mrs. Ade has stated that the test results show that the Singoan River has not identified any pollution caused by waste from Muara Bulian POM.

Dicuments verified:

1. Test Result Report from PT ITEK Solution Indonesia for surface water quality inspection dated 07 September 2023 with sample points from the Hulu Singoan River, quality standards based on Government Regulation no. 22/2021. Based on the test results, it does not exceed quality standards, there is no indication of river water pollution.
2. Test Result Report from PT ITEK Solution Indonesia for surface water quality inspection dated 07 September 2023 with sample points from the Hilir Singoan River, quality standards based on Government Regulation no. 22/2021. Based on the test results, it does not exceed quality standards, there is no indication of river water pollution.

Field verification carried out by auditor during ASA2.2 to the Singoan River, it was known that the upstream Block A17b and downstream Block B18b of Singoan River is in normal condition, the water looks normal, there is no visible water polution.

#2 Feedbacks:

Dinas Perkebunan Kabupaten Tanjung Jabung Barat - Plantation Agency

Stakeholders comment

- Until now there is still good communication.
- There are no issues related to pest attacks and endemic diseases.
- There are no issues related to land conflicts between the company and the surrounding community
- Both nucleus and plasma plantations have entered a period of *replanting* for oil palm plantations.
- The replanting program in Muara Bulian plasma was carried out with the government assistance program BDPKPS (*Badan Pengelola Dana Perkebunan Kelapa Sawit*). There are 2 patterns of Muara Bulian partnership replanting, namely an independent partnership pattern and a partnership pattern with PT IIS - Muara Bulian (continuing the previous PIRTRANS Program)

Audit Team verification and response:

Related to the replanting progress:

- Replanting has been carried out from end of 2020 until now
- In this period there were several small farmers who had carried out replanting using the Government assistance program, namely BDPKPS funds (Palm Oil Plantation Fund Management Agency). Thus the renewal of the partnership contract has been updated:
 - 1) Partnership Agreement for the Development of Palm Oil Plantations (KKPA) - *Surat Perjanjian Kerjasama Pembangunan Kebun Kelap Sawit Pola Kemitraan (KKPA)* between PT IIS and Koperasi Tuah Sakato dated 14/09/1998 and the period of time until the plant has not produced palm oil FFB
 - 2) Sustainable Partnership Agreement - *Perjanjian Kemitraan Berkelanjutan* between PT inti Indosawit Subur and Koperasi Unit Desa (KUD) Barokah dated 1 January 2024 and expired until one cycle of palm oil plantation (25 years).
 - 3) Cooperation Agreement between Village Unit Cooperative (KUD) Makmur Rezeki and PT Into Indosawit Subur regarding Replanting/PSR Stage 1 and management of Oil Palm Plantations using a Partnership Pattern (*Kemitraan*) dated 08/03/2022 with a period of one oil palm plant cycle or \pm 25 years.
 - 4) Cooperation Agreement between Village Unit Cooperative (KUD) Makmur Rezeki and PT Into Indosawit Subur regarding Replanting/PSR Stage 2 and management of Oil Palm Plantations using a Partnership Pattern (*Kemitraan*) dated 08/03/2022 with a period of one oil palm plant cycle or \pm 25 years.
 - 5) Cooperation Agreement between Village Unit Cooperative (KUD) Subur Makmur and PT Into Indosawit Subur regarding Replanting/PSR and management of Oil Palm Plantations using a Partnership Pattern (*Kemitraan*) dated 08/03/2022 with a period of one oil palm plant cycle or \pm 25 years.
 - 6) Sustainable Partnership Agreement - *Perjanjian Kemitraan Berkelanjutan* between PT inti Indosawit Subur and Koperasi Unit Desa (KUD) Subur Makmur dated 3 August 2023 and expired until one cycle of palm oil plantation (25 years).
 - 7) KUD Budi Sari has prepared an Application Letter which was signed by the Smallholder representative (Chairman of KUD Budi Sari Bpk. Nopriwan) dated March 23 2022 which states:
 - Area of 249 Ha (an area of 181 Ha has been planted) through BDPKPS funds requesting to continue cooperation to assist in garden maintenance before Tanama produces.
 - An area of 68 Ha with a condition that has not been cleared and requests to partner with PT IIS-Muara Bulian Plasma and agrees to use a RAB of IDR 61,133,251 per Ha

Stakeholders comment	
	8) Sustainable Partnership Agreement - <i>Perjanjian Kemitraan Berkelanjutan</i> between PT inti Indosawit Subur and Koperasi Unit Desa (KUD) Karya Lesatari dated 1 January 2024 and expired until one cycle of palm oil plantation (25 years).
#3	<p>Feedbacks:</p> <p>Badan Pertanahan Nasional Kabupaten Batanghari - Agrarian Agency Bpk. Abdi Saragih</p> <ul style="list-style-type: none"> Communication is established well. Recently, we collaborated with the Muara Bulian partnership for outreach regarding the legality of plasma partnership land and KKPA. PT IIS Muara Bulian telah memiliki hak alas berupa HGU yang masih berlaku: <ol style="list-style-type: none"> HGU Certificate No. 1 (22 Dec 2003); Reference: SK Kepala BPN No. 14/HGU/1992 (15 Sep 1992) area 1,256.18 Ha. Expired: 31 Dec 2027 HGU Certificate No. 4 (6 Oct 2003) reference SK HGU No: 51/HGU/BPN RI/2003 (10 Sep 2003), area 523.42 Ha. Expired: 6 Oct 2038. HGU Certificate No. 2 (13 Aug 2003) reference SK HGU No: 03.540.1-06-2003 (10 Jul 2003), area 324,800 m² (32.48 Ha). Expired: 13 Aug 2038. HGU Certificate No. 1 (13 Aug 2003) reference SK HGU No: 01.540.1-06-2003 (10 Jul 2003), area 272,700 M² (27.27 Ha). Expired: 13 Aug 2038. HGU Certificate No. 3 (13 Aug 2003) reference SK HGU No: 02.540.1-06-2003 (10 Jul 2003), area 170,900 M² (17.09 Ha). Expired: 13 Aug 2038. To date there are no land conflicts at PT IIS-Muara Bulian. There is no land included in the forest area. There is no overlap between other companies' HGUs <p>Audit Team verification and response: This is a positive response and does not require further verification.</p>
#4	<p>Feedbacks:</p> <p>Dinas Tenaga Kerja dan Transmigrasi Kabupaten Tanjung Jabung Barat – Manpower Agency</p> <ul style="list-style-type: none"> To date, there have been no industrial relations cases. The application of workers' wages is in accordance with applicable regulations and legislation. The company's obligations have been fulfilled regarding membership in BPJS Ketenagakerjaan and BPJS Kesehatan The company has created a program for hiring/promoting PHL workers (harvesters) to become permanent workers. Furthermore, the company has a mechanism for recruiting harvesters to become permanent workers with a trial period of 3 months (please see P&C 6.1.3 & 6.2.7). <p>Audit Team verification and response: The company has maintain good performance on manpower issue.</p>
	Feedbacks:

Stakeholders comment	
#5	<p>Lilis S. Simanjuntak – Gender Committee</p> <ul style="list-style-type: none"> • Communication is well established. • There are no cases or practices of discrimination, forced labor and child labor (underage workers). • To date there have been no cases of sexual harassment or violence against female workers. • The reproductive rights of female workers are still implemented by the company, for example: maternity leave for 3 months, menstrual leave for 2 days (if according to a medical examination they experience pain). • Pregnancy checks are carried out every month for female workers who work using chemicals (sprayers and fertilizer application workers). • The company has provided convenience and facilities to female workers regarding reproductive rights and breastfeeding rights for female workers who are breastfeeding, such as: The company provides the right to 3 months of maternity leave, provides 2 days of menstrual leave (with proof of examination from a doctor) and gives the right to breastfeed for 1.5 hours to female workers who are still breastfeeding. <p>Audit Team verification and response:</p> <p>The company has maintained good management of occupational and social policy, all feedback from workers union are positive as well as previous assessment, audit team acknowledge the positive feedback.</p>
#6	<p>Feedbacks:</p> <p>PT Gema Inti Jaya Semesta Mr. Naibaho</p> <ul style="list-style-type: none"> • The communication has gone well between PT IIS Muara Bulian POM dengan PT Gema Inti Jaya Semesta. • PT Gema Inti Jaya Semesta has an agreement with PT IIS Muara Bulian POM, the agreement has explained code of conduct of company, for example PT Gema Inti Jaya Semesta ensures that the FFB was comes from legal sources, does not employ child labor, salaries in accordance with minimum wage that determined by local government, make sure the driver has a driver's license and is valid, use the PPE while work. • There is no issue related to the FFB payment. <p>Audit Team verification and response:</p> <p>This is a positive response and does not require further verification.</p>
#7	<p>Feedbacks:</p> <p>Worker union/PUKFP-PPP-SPSI: Bpk. Janto Siburian</p> <ul style="list-style-type: none"> • There is no issue related to employment aspect. • Workers have been registered with <i>BPJS Kesehatan dan Ketenagakerjaan</i> (worker insurance and health insurance). • The final agreement will be held in June 2024; discussing closer communication with the management of PT IIS Muara Bulian POM. Change working day due to an accident so you don't work that day. Replacement day is Sunday.

Stakeholders comment	
	<ul style="list-style-type: none"> • Since June 2024, harvester recruitment will be permanent workers (PKWTT) with a probation period of 3 months. • Work equipment is provided free of charge, and if damage occurs, PPE can be immediately replaced. • No work accidents occurred • No human rights violations, violence against workers, discrimination and child labor were identified. <p>Audit Team verification and response:</p> <p>The company has maintained good management of occupational and social policy, all feedback from workers union are positive as well as previous assessment, audit team acknowledge the positive feedback.</p> <p>Regarding the promotion of daily workers (PHL) to permanent workers (SKUH), it has been explained in P&C 6.1.3 above. Promotion of daily workers (PHL) to permanent workers for example at Muara Bulian Estate period in 2023 period as much as 29 workers and in the first semester of 2024, 30 workers have been submitted for promotion of PHL (daily workers) to SKU (permanent workers) to the Medan Head Office HRD in May 2024. For Muara Bulian POM PHL Promotion Becomes SKU at Muara Bulian POM based on memorandum from Mill manager PMB No. 044/MI-PMB/MEMO/04/2024 dated 22 April 2024, as many 10 workers.</p>
#8	<p>Feedbacks:</p> <p>Head of Dusun 03 Kehidupan Baru Village Bpk. Maman Suratman</p> <p>Head of Tidar Kuranji Village Bpk. Eko Handoko (Chairman of BPD: <i>Badan Permusyawaratan Desa</i>)</p> <p>Head of Bulian Jaya Village Bpk. Sayuti</p> <ul style="list-style-type: none"> - So far there have been no land conflicts between communities and companies or between plasma farmers. - There has never been any act of violence, coercion and discrimination by the company against its workers. - There are no issues of environmental pollution in the village community. - The company has provided support to village communities for the development of oil palm plantations, namely in the form of the PIR-Trans partnership which is now entering the replanting period, the KKPA pattern and the CSV program for independent smallholder. - At Tidar Kuranji Village, the communication has gone well between village and KUD Subur Makmur - KUD Subur Makmur and PT IIS Muara Bulian has provided assistance for local community, for example in social aspect, religious aspect and health aspect. <p>Audit Team verification and response:</p> <p>The company has managed good relationship with local communities.</p> <p>There is no issues on land dispute, environmental or social conflict with village communities around the plantation.</p> <p>Related to the partnership with development of oil palm plantation with the communities, auditor team has verified for several documents:</p>

Stakeholders comment

- Partnership Agreement for the Development of Palm Oil Plantations (KKPA) - *Surat Perjanjian Kerjasama Pembangunan Kebun Kelap Sawit Pola Kemitraan (KKPA)* between PT IIS and Koperasi Tuah Sakato dated 14/09/1998 and the period of time until the plant has not produced palm oil FFB
- Sustainable Partnership Agreement - *Perjanjian Kemitraan Berkelanjutan* between PT inti Indosawit Subur and Koperasi Unit Desa (KUD) Barokah dated 1 January 2024 and expired until one cycle of palm oil plantation (25 years).
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- Sustainable Partnership Agreement - *Perjanjian Kemitraan Berkelanjutan* between PT inti Indosawit Subur and Koperasi Unit Desa (KUD) Subur Makmur dated 3 August 2023 and expired until one cycle of palm oil plantation (25 years).
- Sustainable Partnership Agreement - *Perjanjian Kemitraan Berkelanjutan* between PT inti Indosawit Subur and Koperasi Unit Desa (KUD) Budi Sari dated 1 January 2024 and expired until one cycle of palm oil plantation (25 years).
- Sustainable Partnership Agreement - *Perjanjian Kemitraan Berkelanjutan* between PT inti Indosawit Subur and Koperasi Unit Desa (KUD) Karya Lesatari dated 1 January 2024 and expired until one cycle of palm oil plantation (25 years).

In supporting CSV members for the certification program, especially RSPO Certification, the company has provided continuous assistances to 2 (two) CSVs who are members of the following organizations:

- Perkumpulan Cahaya Buana, by address Desa Tidar Kuranji, Kecamatan Maro SeboIlir, Kabupaten Batanghari, Provinsi Jambi, Kabupaten Batang Hari, 36655 Jambi, Indonesia covering areas 605 Ha. Not already got RSPO Certificate.
- Putra Tunggal Bukit Sangkilan, by address Desa Karya Mukti, Kecamatan Maro SeboIlir, Kabupaten Batanghari, Provinsi Jambi, Kabupaten Batang Hari, 36655 Jambi, Indonesia covering areas 638 Ha. Already got RSPO Certificate by BSI Services Malaysia Sdn. Bhd since 25 October 2022.

List of land owner / user contacted

Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
-	-	-	-	-	-



PT Inti Indosawit Subur – Muara Bulian POM has established since 1985 and has planting palm oil since 1987, 1988, 1989. Currently the palm oil has been replanting since 2017 – 2027.

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

3.5 Impartiality and conflict of interest

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

RSPO P&C Public Summary Report
Revision 15 (Nov 2023)**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 – Muara Bulian 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 – Muara Bulian POM is remain certified.	
Report prepared by	Acceptance of Assessment Conclusion
Name: Nanang Rusmana	Name: Putu Grhyate Yonata Aksa
Company Name : On behalf of BSI Services Malaysia Sdn. Bhd.	Company Name: PT. Inti Indosawit Subur – Muara Bulian POM
Title: Client Manager	Title: Sustainability Manager
Signature: 	Signature: <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> 
Date: 10/07/2024	Date: 24/09/2024

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Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Behave ethically and transparently Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.			
Criteria 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	(C) Management documents that are specified in the RSPO P&C are made publicly available. - Critical (Major) compliance -	<p>The list of documents that can be accessed by the public, has not changed, namely: <i>Daftar Dokumen dan Indormasi Untuk diakses Publik PT Inti Indosawit Subur – Muara Bulian Group</i> dated 10 June 2024. The documents are including: Environmental documents (EIA, Monitoring & Management Plan, Environmental Report, HCV Report, Land Use Right Permits. There are 32 types of documents that can be accessed by the public i.e Government, community, NGOs and stakeholders. Of these documents, only the "balance sheet audit report" document is not accessible to the public.</p> <p>Smallholders: Muara Bulian Plasma Plantation has established a list of documents that can be accessed by the public set by each KUD. This list of documents does not contain any changes from the previous year. In this surveillance audit, samples were taken, namely: List of Documents and Information for Public Access KUD Subur Makmur dated 1 January 2024, KUD Makmur Rejeki dated 23 Januaey 2024, and KUD Karya Lestari dated 23 January 2024, the documents included are Copy of landownership (SHM), Smallholders Plantation Registration (STD-B), Environmental Commitment (SPPL), Cooperative Legal Document,</p>	Complied

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		Cooperative Policies, Procedures and Flowchart, Cooperative Report, Management and Monitoring Member Report.	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	Based on document verification that <i>Daftar Dokumen dan Indormasi Untuk diakses Publik PT Inti Indosawit Subur – Muara Bulian Group</i> dated 10 June 2024. The provision of publicly available document segregates based on stakeholder category. PT Inti Indosawit Subur – both of Muara Bulian POM and Estate also smallholder has provided information in appropriate languages (Bahasa Indonesia) which can be understood and accessible by relevant stakeholders. Based on interview with surroundings stakeholders (e.g. Head of village Kehidupan Baru, Tidar Kuranji Village and Bulian Jaya Village, contractor of Transport FFB) that they understood of the list.	Complied
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	Verification of information request documents and responses that are well documented in the "Incoming Letter and Response" Logbook. In the period of 2023/2024 there is 4 requests for information letter from stakeholders that have been responded to, namely: <ol style="list-style-type: none"> 1. Request for information from the BPJS Kesehatan Batanghari Regency on 4 March 2024, related to requests for business entity compliance inspection. It has been responded on 4 March 2024 by providing the required data. 2. Request for information dated 14 May 2024 from BPJS Kesehatan Batanghari Regency, related to the gathering invitation of business entity compliance inspection. This request has been responded to on 14 May 2024 by providing the required data. 3. Request for information on 20 June 2024 from BPJS Kesehatan Batanghari Regency, related to the orderly administration of the JKN Program. This request has been responded to on 20 June 2024 by providing the required data. 	Complied

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		<p>Based on the verification of the above documents, that the company has responded to requests for information from stakeholders in accordance with established procedures Mekanisme Penanganan Permintaan Informasi Stakeholder "(No. SOP; AA-GL-5008.1-R1) dated 22 August 2011.</p> <p>Smallholder:</p> <p>KUD Subur Makmur, KUD Makmur Rejeki, KUD Karya Lestari: According to "Buku Surat Masuk – Surat Keluar" period 2023/2024, there is some request of information from stakeholders. Most requests for information to cooperatives or KUD are from farmers or farmer groups related to FFB prices, TUS work and for FFB delivery to PT IIS-Muara Bulian Mill, for example:</p> <ol style="list-style-type: none"> 1. Request for information dated 1 January 2024 from member (Sutrisno – KUD Makmur Rejeki), related to the replanting partners. This request has been responded to on 1 January 2024 by providing the required data. 2. Request for information dated 14 February 2024 from member (Abdul - KUD Makmur Rejeki), related to the origin of seeds for replanting activity (PSR). This request has been responded to on 14 February 2024 by providing the required data. 3. Request for information dated 26 February 2024 from member (Sutrisno- KUD Makmur Rejeki), related to the when the replanting activity will be implemented. This request has been responded to on 26 February 2024 by providing the required data. 4. Request for information dated 14 March 2024 from member (Tohiran - KUD Makmur Rejeki), related to the prices of FFB. This request has been responded to on 14 March 2024 by providing the required data. 5. Request for information dated 20 March 2024 from member (Jumadi - KUD Makmur Rejeki), related to the replanting obligation for 	
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		<p>members. This request has been responded to on 20 March 2024 by providing the required data.</p> <p>6. Request for information dated 10 April 2024 from member (Sanari - KUD Makmur Rejeki), related to the prices of FFB. This request has been responded to on 10 April 2024 by providing the required data.</p> <p>Sample of smallholder's scheme visited during this assessment are ongoing process for replanting, no information request was raised.</p>	
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p> <p>- Critical (Major) compliance -</p>	<p>Until this surveillance audit, there are no changes related to communication and consultation procedures with stakeholders, namely: "<i>Mekanisme Penanganan Permintaan Informasi Stakeholder</i>" (SOP No.; AA-GL-5008.1-R1) dated 22 August 2011. It is explained that information request can be receive by oral or written, or by representative of communities; the company will respond according to respective authorities, starts from KTU from Estate (Bpk. Chobar from Estate and Sopian B. from Mill), Estate/Mill manager, Group Manager and Regional Office.</p> <p>Based on the results of interviews with community representatives and village leaders, 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.</p>	Complied
1.1.5	<p>An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.</p> <p>- Minor compliance -</p>	<p>The list of stakeholders is always updated every year, the Certification unit has updated the list of stakeholders on 1 January 2024 which is divided into several regions: Provinces, Districts and Districts as well as local. The list records address, contact person, email address, number, telephone, relationship of interest.</p> <p>In the provincial area, there are 72 stakeholders consisting of related government offices, Jambi Regional Police and education agencies.</p>	Complied

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		<p>In the Batanghari Regency area, there are 11 stakeholders, including: district-level government offices, APKASINDO (Association of Palm Oil Farmers throughout Indonesia), social media (Media Batang Hari Express), NGOs (10 NGO local and National).</p> <p>In the sub-district area, there are 11 stakeholders, including: Polsek, Puskesmas, Sub-district and Maro Sebo Ilir Sub-District Cooperative Forum.</p> <p>In the surrounding village area, there are 32 cuttingholders, including: KUD which is a plasma/partnership with PT IIS, Village Head (11 villages around the Plantation).</p>	
Criteria 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p><i>There was no change related to the ethical conduct policy.</i></p> <p>Since 2019, the company has had policies related to the code of ethics and was signed by the Managing Director on December 1, 2019 which until this surveillance has not changed. The policy was disseminated to all employees through the company policy notice board and by direct socialization on 7 March 2024, socialization has conducted in Tungkal Ulu Estate and Tungkal Ulu POM.</p> <p>In the recruitment process, policies related to business ethics have been implemented as outlined in the Work Agreement, both PHL, PKWT, and in the Collective Labor Agreement (PKB period 2022-2024) as well, and its mentioned.</p> <p>Concerning Disgraceful Actions/Conducts of Workforce Causing the Termination of Work Agreements; "Performing and/or being involved directly or indirectly in a fraud and/or theft and/or embezzlement of goods and/or money belonging to the company, embezzling money belonging to the company, receiving money gifts from other parties because of work results".</p>	Complied

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		<p>The PKB for the 2022-2024 period has explained business ethics in article XXII concerning "Obligations of Companies and Employees"; among others: employers and workers must maintain good morals and not conflict with legal norms and moral values, employers and workers must comply with and enforce all applicable laws and regulations on Manpower.</p> <p>Based on interviews with several workers who had just joined PT IIS-Muara Bulian Mill and Estate, that in the recruitment process there was no set fee.</p> <p>Scheme Smallholders:</p> <p>There is no change regarding Code of Ethical Business Policy that included on "Kebijakan Koperasi" signed on 10 April 2023. This policy has been socialized or conveyed to all farmers in each koperasi.</p> <p>Disseminated to each member of Cooperative through the training of RSPO P&C and Socialization of ethical conduct "Kebijakan Etik KUD" was carried out by Koperasi for example on 8 February 2024 for KUD Subur Makmur, KUD Karya Lestari and KUD Makmur Rejeki attended by 13 members for KUD Subur Makmur, 12 members for KUD Karya Lestari and 11 members for KUD Makmur Rejeki. The smallholders where in point 2 stated "Committed to ethical conduct in business in overall transactions and business operations, prohibition all forms of corruption, bribery and fraud in the use of funds and resources".</p> <p>Document verification shows that all farmer members have stated approval of all policy issued by Smallholder Manager, including policy related to code of ethic which described in the Agreement Letter. Document seen: Member of KUD Subur Makmur, KUD Makmur Rejeki and KUD Karya Lestari.</p>	
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1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>PT IIS - Muara Bulian Group including plasma farmers has a mechanism regarding guarantees that the implementation of the code of ethics is carried out properly, there are several mechanisms to ensure that this code of ethics has been implemented, namely:</p> <ol style="list-style-type: none"> 1. Procedure AA-GL/510.1-R0 regarding reporting and disclosure of cases; where Field Assistant will convey the information to the GM and keep the reporting party confidential. GM and Public Relations provide a maximum response of 14 days. Based on interviews with stakeholders (including contractors and heads of villages around the plantation), that up to this surveillance audit there had been no cases of violations of the code of ethics. 2. For whistleblower cases, refer to related procedures: refer to procedure AA-GL-5009.1 R0 settlement with the local community and settlement of employee complaints related to employment refer to Procedure AA-HR-308.5-R0. Based on interviews with the heads of the trade unions and the gender committee, up to this surveillance audit there has been no violation of the code of ethics. 3. Procedure no. AA-SOP-ES-6001-R5 regarding Internal Audit, this mechanism is to ensure that company policies including the company's code of ethics have been implemented properly. <p>Internal audit Dept. Visit. Agronomy was carried out on 1 April 2024 and Dept. Engineering Visits were carried out on 9-12 January 2024.</p>	Complied
<p>Principle 2: Operate legally and respect rights</p> <p>Implement legal requirements as the basic principles of operation in any jurisdiction.</p>			
<p>Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	<p>(C) The unit of certification complies to relevant regulations.</p> <p>- Critical (Major) compliance -</p>	<p>The organization has provided a list of relevant laws and regulation and its compliance evaluation. The evaluation was conducted annually as per "Evaluasi Kepatuhan Peraturan Perundangan", the latest was updated</p>	Complied

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		<p>on 20 January 2024. No new regulation issued in 2024 so the latest regulations are:</p> <ul style="list-style-type: none"> • Peraturan Pemerintah (PP) Nomor 5 Tahun 2021 regarding Penyelenggaraan Perizinan Berusaha Berbasis Risiko. • Peraturan Pemerintah (PP) Nomor 6 Tahun 2021 regarding Penyelenggaraan Perizinan Berusaha di Daerah. • Peraturan Pemerintah (PP) Nomor 20 Tahun 2021 regarding Penertiban Kawasan dan Tanah Terlantar. • Peraturan Pemerintah (PP) Nomor 22 Tahun 2021 regarding Penyelenggaraan Perlindungan dan Pengelolaan Lingkungan Hidup. • Peraturan Pemerintah (PP) Nomor 26 Tahun 2021 regarding Penyelenggaraan Bidang Pertanian. • Peraturan Pemerintah (PP) Nomor 31 Tahun 2021 regarding Penyelenggaraan Bidang Pelayaran. • Peraturan Pemerintah (PP) Nomor 35 Tahun 2021 regarding Perjanjian Kerja Waktu Tertentu, Alih Daya, Waktu Kerja dan Waktu Istirahat, dan Pemutusan Hubungan Kerja. • Peraturan Pemerintah (PP) Nomor 36 Tahun 2021 regarding Pengupahan. • Peraturan Pemerintah (PP) Nomor 37 Tahun 2021 regarding Penyelenggaraan Program Jaminan Kehilangan Pekerjaan <p>Based on evaluation, the organizations have complied to the new regulations as mentioned as above.</p> <p>Scheme Smallholders:</p> <p>Compliance with laws and regulations, especially related to scheme smallholder oil palm plantations, has been carried out through several obligations or permits that must be fulfilled, such land legality,</p>	
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		organization establishment deed, tax ID and etc. In this surveillance audit, the samples of scheme smallholder were KUD Subur Makmur, KUD Makmur Rejeki and KUD Karya Lestari where all of them have their legal document. Based on interview with them (69 smallholders) obtained information they have their land legality document , the company only have a copied document.	
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>The evaluation of laws and regulation referred to SOP of Regulation Compliance "SOP Pemenuhan Peraturan Perundang- undangan dan Perubahannya No.AA-GL-5001.1-R0" dated 5 December 2009. The evaluation of laws and regulation mechanism:</p> <ul style="list-style-type: none"> - Law/ regulation owner will inform/announce of new laws/regulations. Information dissemination can be of different format. - PIC Law Compliance will extract and obtain hard copy/ soft copy of the new laws/ regulation. PIC Law Compliance shall perform socialization on the interpretation of new laws and regulation and the implementation foroperational purposes. - Respective Department shall ensure the new laws/ regulations be implemented in form of review and revised policy/ procedure/ work instruction and communicating the changes to relevant parties. <p>The organization has provided a list of relevant laws and regulation and its compliance evaluation. The evaluation was conducted annually as per "Evaluasi Kepatuhan Peraturan Perundangan", the latest was updated on 20 January 2024. No new regulation issued in 2024 so the latest regulations are:</p> <ul style="list-style-type: none"> • Peraturan Pemerintah (PP) Nomor 5 Tahun 2021 regarding Penyelenggaraan Perizinan Berusaha Berbasis Risiko. • Peraturan Pemerintah (PP) Nomor 6 Tahun 2021 regarding Penyelenggaraan Perizinan Berusaha di Daerah. 	Complied

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		<ul style="list-style-type: none"> • Peraturan Pemerintah (PP) Nomor 20 Tahun 2021 regarding Penertiban Kawasan dan Tanah Terlantar. • Peraturan Pemerintah (PP) Nomor 22 Tahun 2021 regarding Penyelenggaraan Perlindungan dan Pengelolaan Lingkungan Hidup. • Peraturan Pemerintah (PP) Nomor 26 Tahun 2021 regarding Penyelenggaraan Bidang Pertanian. • Peraturan Pemerintah (PP) Nomor 31 Tahun 2021 regarding Penyelenggaraan Bidang Pelayaran. • Peraturan Pemerintah (PP) Nomor 35 Tahun 2021 regarding Perjanjian Kerja Waktu Tertentu, Alih Daya, Waktu Kerja dan Waktu Istirahat, dan Pemutusan Hubungan Kerja. • Peraturan Pemerintah (PP) Nomor 36 Tahun 2021 regarding Pengupahan. • Peraturan Pemerintah (PP) Nomor 37 Tahun 2021 regarding Penyelenggaraan Program Jaminan Kehilangan Pekerjaan <p>Based on evaluation, the organizations have complied to the new regulations as mentioned as above.</p>	
2.1.3	<p>Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.</p> <p>- Minor compliance -</p>	<p>According to national regulations in Indonesia, land rights holders (HGU) must maintain the condition of boundary poles. PT IIS – Muara Bulian has maintained the poles and reported on <i>Laporan Pemeriksaan dan Perawatan Patok Batas</i> on June – December 2023 period; Report No. 002/LAP/KTU/SSL/023/XII/2023 dated 12 December 2023, as follow:</p> <ol style="list-style-type: none"> 1. HGU No. 01 - 540.1 - 06-2003; covering areas: 27.27, Ha as muach as 10 poles. 2. HGU No. 02 - 540.1 - 06-2003; covering areas: 17.09 Ha as muach as 10 poles. 3. HGU No. 03 - 540.1 - 06-2003; covering areas 32.48 Ha, as much as 8 poles. 	Complied

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		<p>4. HGU No. 14/HGU/1992; covering areas 1,256.26 Ha as much as 15 poles.</p> <p>The report was contained and explains number of poles, location (Block and Afdeling), poles condition and checking of coordinate number and corrective action deadline as well for not good poles conditions. Based on the report, there were 10 poles that has been maintained and and some are in unclean condition.</p> <p>During this surveillance audit conducted field observation to the several poles, as follow:</p> <table border="1"> <thead> <tr> <th rowspan="2">ID HGU pole</th><th rowspan="2">Location</th><th colspan="2">GPS Coordinates</th></tr> <tr> <th>S</th><th>E</th></tr> </thead> <tbody> <tr> <td>BPN 04</td><td>Block A17a, Afd. 5, borders Lampisi Village</td><td>1° 34' 28.48"</td><td>103° 12' 34.82"</td></tr> <tr> <td>BPN 14</td><td>Block C19e, Afd. 5, borders Lampisi Village</td><td>1° 35' 12.94"</td><td>103° 12' 31.54"</td></tr> <tr> <td>BPN 06</td><td>Block C19k, Afdeling 6, borders Lampisi Village and Smallholder plantation</td><td>1° 36' 10.75"</td><td>108° 13' 17.54"</td></tr> </tbody> </table>	ID HGU pole	Location	GPS Coordinates		S	E	BPN 04	Block A17a, Afd. 5, borders Lampisi Village	1° 34' 28.48"	103° 12' 34.82"	BPN 14	Block C19e, Afd. 5, borders Lampisi Village	1° 35' 12.94"	103° 12' 31.54"	BPN 06	Block C19k, Afdeling 6, borders Lampisi Village and Smallholder plantation	1° 36' 10.75"	108° 13' 17.54"	
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Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.																					
2.2.1	A list of contracted parties is available. - Minor compliance -	PT IIS – Muara Bulian Group has created and updated monthly basis of list of contractors for the 2024 period, including:	Complied																		

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		<ul style="list-style-type: none"> ✓ PT Aneka Sumatrindo (Heavy Equipment Contractor) ✓ PT Mitra Abadi Damai (PK Transporter) ✓ PT Trans Jaya Pertama (CPO, PK, CPKO Transporter) ✓ CV Anugrah Jaya (Civil/box culvert Contractor) ✓ Heru Prayetno (Housing Contractor) ✓ Koperasi Karyawan Jaya Abadi (Dump Truck Rental) ✓ PT Uniteda Arkato (Backhoe Loader Rental) ✓ CV Alam Cahaya Cemerlang (Excavator Mini Rental) 	
2.2.2	<p>All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.</p> <p>- Minor compliance -</p>	<p>During surveillance audit, verification was carried out on the cooperation contractor documents above (2.2.1), that related to the legal requirements described in Article 7: Responsibilities and Obligations, has mentioned on letter f: "<i>Comply with the applicable regulations in Rep. Indonesia and is not involved in forced labor and human trafficking. (mematuhi peraturan yang berlaku di Rep. Indonesia serta tidak terlibat dalam praktik kerja paksa dan perdagangan manusia)</i>".</p> <p>Based on document verification of third party contract Dharma Putera on behalf PT Aneka Sumatrindo as the heavy equipment contractor with agreement document No. 206/P3PMB/05/2024 dated 27 Mei 2024 and Andi Wijaya on behalf PT Mitra Abadi Damai as PK transporter with agreement document No. 05/VIII/MDA-IIS/2019 dated 2 August 2019 as PK transporter and Vincent Purba on behalf PT Trans Jaya Pertama No. 05/XII/TJP-IIS/2020 dated 1 December 2020 as CPO, PK and CPKO Transporter and obtained information that the contract contain specific clause as follows:</p> <ul style="list-style-type: none"> • Name and personal address both parties, date and kind of agreement. • Scope of agreement • Requirement 	Complied

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		<ul style="list-style-type: none"> • Duration • Detail of agreement • Price • Payment method • Measurement • Responsibilities • Contractor Guarantee; (covering statement to follow company procedure, registered their workers in worker insurance program, PPE usage, no child labour and other environmental procedures) • Sanction • End of agreement terms • Force majeure • Manipulation and bribery • Addendum • Court settlement • Signed both parties 	
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>Based on document verification and interviews with several contractors, Dharma Putera on behalf PT Aneka Sumatrindo as the heavy equipment contractor with agreement document No. 206/P3PMB/05/2024 dated 27 Mei 2024 and Andi Wijaya on behalf PT Mitra Abadi Damai as PK transporter with agreement document No. 05/VIII/MDA-IIS/2019 dated 2 August 2019 as PK transporter and Vincent Purba on behalf PT Trans Jaya Pertama No. 05/XII/TJP-IIS/2020 dated 1 December 2020 as CPO, PK and CPKO Transporter, that information related to child labor, forced labor and the labor trafficking has been stated in the contract document Article 12 and article 7; Responsibilities and Obligations, letters of:</p>	Complied

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		<p><i>d. do not employ minors (18 years)</i> <i>e. not involved in the practice of forced labor and labor trafficking.</i></p> <p>Based on interviews with several of the contractors (Pasipik Global Sejahtera and Kebun Tani Mandiri, they stated that they had complied with the requirements contained in the agreement document and based on field observations, they did not identify the practice of child labour, forced labor or labor trafficking.</p>	
Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> • Information regarding the geolocation of FFB origins; • Proof of ownership status, right/claim of the land by grower/smallholder; • If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. <p>- Critical (Major) compliance -</p>	<p>Based on document review and interview during ASA2.2, it was known that PT Inti Indosawit Subur – Muara Bulian POM has chosen Mass Balance Module, the supply bases as directly sourced of FFB are estate (Muara Bulian Estate), scheme smallholders (KUD Barokah, KUD Subur Makmur, KUD Budi Sari, KUD Makmur Rejeki, KUD Karya Lestari and KUD Tuah Sakato) and third party such as PT IKU, Kebun Tani Mandiri, PT Pratama Sawit Mandiri, Asosiasi Putra Tungga Bukit Sangkila, and Gapktan Swadaya Cahaya Buana. The information related geolocation, proof of ownership status, and trading license a cooperative has shown during audit. Verified document as follows:</p> <p>PT Pratama Sawit Mandiri</p> <ul style="list-style-type: none"> • Place of business permit/Izin Tempat Usaha: No. 517/1059-K-DPMPTSP-15.71.03.1004-2022 dated 19 October 2012 from Dinas Penanaman Modal Dan Pelayanan Terpadu Pemerintah Kota Jambi. • Geolocations: 103° 17' 16.90" E, 1° 35' 13.21" S. • Proof of ownership: SK HGU No.126 dated 13/09/2017 from Kepala Kantor Pertanahan Kabupaten/Kota Batanghari with area 29.96 Ha. SK HGU No.125 dated 13/09/2017 from Kepala 	Complied

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		Kantor Pertanahan Kabupaten/Kota Batanghari with area 259.59 Ha.	
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>During ASA2.2, there are third party's supplier as Indirectly sourced FFB, the suppliers are PT Pasific Global Sejahtera, PT Gema Inti Jaya Semesta, and Kebun Tani Mandiri.</p> <p>Based on document verification and interview with Third partys staff and Mill Manager obtained information that both suppliers have been verified and visited by FFB purchasing staff. By visited the suppliers land and tagged the coordinate, mill expected the FFB source comes from traceable and responsible area.</p> <p>Examples of verified documents during ASA2.2 as follows:</p> <p>PT Gema Inti Jaya Semesta Business/Trading Licenses</p> <ul style="list-style-type: none"> - NIB: No. 9120215231328 from Lembaga OSS dated 4 March 2020. - SIUP: Izin Usaha (Surat Izin Usaha Perdagangan) SIUP PT Gema Inti Jaya Semesta, from Lembaga OSS dated 31 December 2019. <p>Land legality:</p> <ul style="list-style-type: none"> - Surat Keterangan Jual Beli: on behalf Haryono, March 2005, area 1Ha, Geolocation: 103° 10' 11.91" E, 1° 32' 40.86" S. 	Complied
<p>Principle 3: Optimise productivity, efficiency, positive impact and resilience</p> <p>Implement plans, procedures and systems for continuous improvement.</p>			
<p>Criteria 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</p>			

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3.1.1	<p>(C) A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>During verified document revealed that the Certificate Holder has three years' management plan covering Own Estate, Mill and Smallholder's scheme updated 1 January 2024, as follow:</p> <p>1. Production (ton)</p> <table><tr><th>Description</th><th>Actual (Jan-Jun 2022)</th><th>Budget 2023</th><th>Budget 2024</th><th>Budget 2025</th><th>Budget 2026</th></tr><tr><td>FFB Production</td><td>36,273.15</td><td>44,946</td><td>49,440</td><td>51,912</td><td>59,699</td></tr><tr><td>FFB Processed</td><td>307,698</td><td>301,663</td><td>277,734</td><td>281,334</td><td>281,334</td></tr><tr><td>CPO</td><td>62,066</td><td>58,588</td><td>56,221</td><td>56,950</td><td>57,011</td></tr><tr><td>PK</td><td>16,442</td><td>16,591</td><td>15,277</td><td>15,475</td><td>15,491</td></tr><tr><td>OER</td><td>20.17</td><td>19.42</td><td>20.24</td><td>20.24</td><td>20.26</td></tr><tr><td>KER</td><td>5.34</td><td>5.50</td><td>5.50</td><td>5.50</td><td>5.50</td></tr></table> <p>2. Planting Material. MARIHAT: YoP 1991, 1992, 1993, 1994. TOPAZ: Year of Planting 2016, 2017, 2018 and 2019 (only for own estate).</p> <p>3. Production cost (IDR/MT CPO)</p> <table><tr><th>Cost Unit</th><th>Act (Jan-Jun 2022)</th><th>Budget 2023</th><th>Target 2024</th><th>Target 2025</th><th>Target 2026</th></tr><tr><td>Estate</td><td>779</td><td>857</td><td>1,286</td><td>1,543</td><td>1,852</td></tr><tr><td>Mill</td><td>229</td><td>204</td><td>374</td><td>235</td><td>430</td></tr><tr><td>Total</td><td>1,007</td><td>1061</td><td>1,660</td><td>1,778</td><td>2,282</td></tr></table>	Description	Actual (Jan-Jun 2022)	Budget 2023	Budget 2024	Budget 2025	Budget 2026	FFB Production	36,273.15	44,946	49,440	51,912	59,699	FFB Processed	307,698	301,663	277,734	281,334	281,334	CPO	62,066	58,588	56,221	56,950	57,011	PK	16,442	16,591	15,277	15,475	15,491	OER	20.17	19.42	20.24	20.24	20.26	KER	5.34	5.50	5.50	5.50	5.50	Cost Unit	Act (Jan-Jun 2022)	Budget 2023	Target 2024	Target 2025	Target 2026	Estate	779	857	1,286	1,543	1,852	Mill	229	204	374	235	430	Total	1,007	1061	1,660	1,778	2,282	Complied
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		<p>PT Inti Indosawit Subur has demonstrates financial report for fiscal year ends 31 December 2023 which was conducted on 22 April 2024. The financial report prepared by independent auditor Imelda & Partners, the report has been shown during audit. The auditor stated:</p> <p><i>"In our opinion, the accompanying consolidated financial statements present fairly, in all material respect, the financial position of PT Inti Indosawit Subur and its subsidiaries as of 31 December 2023, and their financial performance and cash flows for the year then ended, in accordance with Indonesian Financial Account Standards".</i></p>	
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>Based on interview to the management during ASA2.2 it was known that there is no replanting program for period 2023-2026 for Own estate the last replanting program is Y2019, the planting year is 2016, 2017, 2018 and 2019. And for smallholders, replanting program was started at Y2021 at KUD Makmur Rezeki (SP4).</p> <p>Smallholder has had the replanting program for period 2023 – 2026 as follows:</p> <ul style="list-style-type: none"> • 2023: 710 Ha • 2024: 568 Ha • 2025: - Ha • 2026: 2,248 Ha <p>According to the interview with smallholder representatives and document review, here is the realization of replanting:</p> <ul style="list-style-type: none"> • 2021: at KUD Barokah 210 Ha and at KUD Budi Sari 186 Ha • 2022: at KUD Makmur Rezeki 130 Ha • 2023: at KUD Barokah 270 Ha and at KUD Budi Sari 252 Ha • 2024: at KUD Barokah 168 Ha. 	Complied
3.1.3	<p>The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.</p>	<p>During ASA 2.2, organization has conducted management review annually. The management review stipulated in the procedure "AA-SOP-</p>	Complied

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	<p>- Minor compliance -</p>	<p>ES-6001-R5 dated 1 August 2020". The latest management review at Muara Bulian POM was conducted on 23 March 2024 and attended by 15 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> <ul style="list-style-type: none"> • Visit Agronomy Muara Bulian Estate: date of visit 1 -5 April 2024 by Sinnaiha G. There were no main issues in this estate, however current issues related to weeding control in circles/path and interrow, manuring, pest & disease, castration, supplying and consolidation, pruning, trenches, road/bridge and harvesting and administration. An action plan was developed to address these issues and closed in the last week of April 2024. • Visit Engineering Muara Bulian POM: 2 – 7 January 2024 by JC Enri Kusnadi. There were no pending issues in this mill. However, kesimpulan hasil VE tersebut menunjukkan pemenuhan hanya 77%. An action plan was developed to address these issues and closed on 30 April 2024. • Visit Agronomy Scheme Smallholders (gemba): Report of Visit Agronomy Scheme Smallholders on 20 June 2024 "Laporan Kunjungan Plasma KLM" by Andy Anggoro, Parasian Situmorang, Daud A Rambe and Eduard J Sitohang. • RSPO internal audit on 4-9 March 2024, with 5 non-conformance findings, where the non-conformance findings have received root causes, quick actions and final corrective actions in the third week of March 2024. 	
<p>Criteria 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p>			

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3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>Continues improvement were developed by Unit of Certification is by following up the non-conformities of the internal audit and certification audit. Also, they have CI report annually to create improvements in their activities Mill and Estate. The CI report already demonstrated during audit. For example, mill has established the program of CI related to reduce the use of POM electricity for lighting and controlling and reducing the use of fossil fuels.</p> <p>Unit of certification has annual improvement on operational activity. For example, there was a record of continuous improvement by the mill to reduce broken kernel from 20.9% to 18.50% by decreasing ripple mill rotation and ripple mill efficiency. This improvement has been implemented since July 2023. By Estate to increased harvest productivity from 1.58 tons/HK to 2.24 tons/HK with the integration of progressive pruning system</p> <ul style="list-style-type: none"> • Visit Agronomy Muara Bulian Estate: date of visit 1 -5 April 2024 by Sinnaiha G. There were no main issues in this estate, however current issues related to weeding control in circles/path and interrow, manuring, pest & disease, castration, supplying and consolidation, pruning, trenches, road/bridge and harvesting and administration. An action plan was developed to address these issues and closed in the last week of April 2024. • Visit Engineering Muara Bulian POM: 2 – 7 January 2024 by JC Enri Kusnadi. There were no pending issues in this mill. However, kesimpulan hasil VE tersebut menunjukkan pemenuhan hanya 77%. An action plan was developed to address these issues and closed on 30 April 2024. • Visit Agronomy Scheme Smallholders (gemba): Report of Visit Agronomy Scheme Smallholders on 20 June 2024 "Laporan Kunjungan Plasma KLM" by Andy Anggoro, Parasian Situmorang, Daud A Rambe and Eduard J Sitohang. 	Complied
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		<ul style="list-style-type: none"> RSPO internal audit on 4-9 March 2024, with 5 non-conformance findings, where the non-conformance findings have received root causes, quick actions and final corrective actions in the third week of March 2024. 	
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 2023 of PT Inti Indosawit Subur has been available in RSPO website under membership number 1-0022-06-000-00.</p> <p>At the time of the audit, the RSPO Metrics template has shown during audit and has been verified by the auditor.</p>	Complied
Criteria 3.3: Operating procedures are appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>There is no changes on the SOP's for Mill and Estate during ASA2.2. The procedures for estates is covering Nursery (SOP AA-APM-OP-1100.01-R4 dated 5 September 2016) upto Replanting (SOP AA-APM-OP-1100.20-R6). While, procedures on Mill are from FFB Receiving (SOP AA-MPM-OP-1400.02.R2) upto Storage of CPO and PK (SOP AA-MPM-OP-1400.14-R2).</p> <p>Own Estate:</p> <p>Estate has had Standard Operational Procedures (SOP) that covering entire operational activity as follows:</p> <ul style="list-style-type: none"> SOP AA-APM-OP-1100.01-R4 dated 5 September 2016: <i>Pembibitan</i> (Nursery). SOP AA-APM-OP-1100.02-R3 dated 10 June 2015: <i>Penanaman Areal Baru</i> (New Planting). 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); SOP AA-APM-OP-1100.04-R3 dated 7 Decmeber 2015: <i>Pembuatan dan Pemeliharaan Parit</i> (Drainage Construction and 	Complied

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		<p>Maintenance).</p> <ul style="list-style-type: none"> • SOP AA-APM-OP-1100.05-R3 dated 23 November 2016: <i>Konservasi Tanah dan Air</i> (Soil & Water Conservation). • SOP AA-APM-OP-1100.06-R6 dated 16 February 2017: <i>Menanam kacang</i> (Planting cover crops). • SOP AA-APM-OP-1100.07-R6 dated 16 February 2017: <i>Menanam Kelapa Sawit</i> (Planting Oil Palms). • SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed control). • SOP AA-APM-OP-1100.09. R5 dated 26 December 2018: <i>Pemupukan</i> (Fertilizer application). • SOP AA-APM-OP-1100.10. R6 dated 23 November 2016: <i>Pengendalian Hama dan Penyakit</i> (Pests & Disease Control). • SOP AA-APM-OP-1100.11. R1 dated 1 February 2009: <i>Pestisida dan Pengendaliannya</i> (Pesticide Handling). • SOP AA-APM-OP-1100.12. R3 dated 23 November 2016: <i>Kastrasi</i> (Palm castration) explain cutting all generative product (mal flower, female flower, all fruit, to support vegetative growth) – done 5-6 months before being harvested. • SOP AA-APM-OP-1100.13. R3 dated 4 March 2016: <i>Tunas Pokok</i> (Pruning). • SOP AA-APM-OP-1100.14. R3 dated 16 February 2017: <i>Sensus dan Identifikasi Pokok</i> (Census and Palm Identification). • SOP AA-APM-OP-1100.15. R2 dated 1 October 2010: <i>Sensus Produksi</i> (Production Census). • SOP AA-APM-OP-1100.16. R1 dated 1 February 2009: <i>Konsolidasi Pohon Tumbang</i> (Provision of Support to Fallen Palm). • SOP AA-APM-OP-1100.17. R1 dated 23 October 2014: <i>Pengelolaan</i> 	
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		<p><i>Air</i> (Water Management).</p> <ul style="list-style-type: none"> • SOP AA-APM-OP-1100.18.R3 dated 20 April 2015: <i>Potong Buah</i> (Harvesting). • SOP AA-APM-OP-1100.19.R1 dated 1 February 2009: <i>Pengelolaan Transport</i> (FFB Transport). • SOP AA-APM-OP-1100.20-R6 dated 1 May 2019: <i>Peremajaan</i> (Replanting). <p>Muara Bulian 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"> 1. SOP AA-MPM-OP-1400.02.R2 dated 1 September 2011: <i>Stasiun Penerimaan</i> for FFB Receiving Station; 2. SOP AA-MPM-OP-1400.03.R1 dated 1 February 2009: <i>Stasiun Rebusan</i> for Sterilizer; 3. SOP AA-MPM-OP-1400.04.R1 dated 1 February 2009: <i>Stasiun Pemisahan Berondolan</i> for Loose Fruit Separation; 4. SOP AA-MPM-OP-1400.05-R1 dated 1 February 2009: <i>Stasiun Pengadukan dan Pengempaan</i> for Pressing Station; 5. SOP AA-MPM-OP-1400.06-R1 dated 1 February 2009: <i>Stasiun Pemurnian</i> for Clarification; 6. SOP AA-MPM-OP-1400.07-R1 dated 1 February 2009: <i>Stasiun Pemisahan Nut dan Fiber</i> for Nut and Fiber Separation; 7. SOP AA-MPM-OP-1400.08-R1 dated 1 February 2009: <i>Stasiun Kernel</i> for Kernel Station; 8. SOP AA-MPM-OP-1400.09-R1 dated 1 February 2009: <i>Stasiun Boiler</i>; 9. SOP AA-MPM-OP-1400.10-R1 dated 1 February 2009: <i>Stasiun Engine Room</i>; 	
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		<p>10. SOP AA-MPM-OP-1400.11-R1 dated 1 February 2009: <i>Stasiun Water Treatment</i>;</p> <p>11. SOP AA-MPM-OP-1400.12-R1 dated 1 February 2009: <i>Laboratorium</i>;</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>Those documents above are available in each unit.</p> <p>Scheme Smallholder: Scheme smallholder has had best management practices procedure as follows:</p> <ul style="list-style-type: none"> • AA-PLASMA-PP-KS-01 <i>Pembibitan</i> (Nursery) • AA-APM-OP-1100.09-R3 <i>Pemupukan</i> (Manuring) dated 20 April 2015 • AA-PLASMA-PP-KS-04 <i>Potong Buah</i> (Harvesting) • AA-PLASMA-PP-KS-05 <i>Pengangkutan TBS</i> (FFB Transport) • AA-APM-OP-1100.10-R5 <i>Pengendalian Hama dan Penyakit</i> (Pest and Disease Control) dated 11 January 2016 	
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		<ul style="list-style-type: none"> • AA-APM-OP-1100.20-R5 <i>Peremajaan</i> (Replanting) dated 4 March 2016 • AA-MM-508-1-RO <i>Penerimaan TBS Plasma</i> (FFB Plasma Receiving) 1 September 2015 • AA-MM-508-2-RO <i>Penentuan Taksasi TBS Plasma</i> (FFB Plasma Estimation) • AA-APM-OP-1100.8-R5 <i>Pengendalian Gulma</i> (Weed Control) • AA-FA-220-2-RO <i>Stempel</i> (Stamp) • AA-MPM-OP-1400-17-R6 <i>Ketertelusuran</i> (Traceability) dated 1 September 2017 • AA-APM-OP-1100.02-R3 <i>Penanaman Area Baru</i> (New Planting) • AA-SOP-ES-6001-R4 <i>Audit Internal Sustainability</i> (Internal Audit Sustainability) • AA-KL-12-EFP <i>Restorasi Riparian dan Areal di Sekitar Danau/Waduk dan Mata Air Lainnya</i> (Restoration of Riparian Area or Near Area of Lake/Damp or Water Sources) dated 1 August 2010 • AA-HR-305.2-RO <i>Rekrutmen dan Seleksi Karyawan</i> (Recruitment and Selection of Employee). • Procedure of Internal Communication Group Certification (007/DOK/SOP/AA2016); • Procedure of Assessment and Inspection Member Group Plantation (013/DOK/SOP/AA/2016); • FFB sale Mechanism (020/DOK/SOP/AA/2016). <p>During onsite audit, auditor has conducted field visit to the Muara Bulian Estate as follows:</p> <ul style="list-style-type: none"> • Harvesting in Block C117c Afdeling III. 	
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		<p>The implementation was good, the harvester can demonstrate the best management practices for harvesting and also safety working procedure.</p> <ul style="list-style-type: none"> • Chemical weeding, Block B19h Afdeling II Circle and path, using micron herbi (Very Low Volume of sprayer) with pesticide Isopropyl <i>amina glifosat</i> and <i>metil metsulfuron</i>. • Fertilizer application Block B18g Afdeling II <p>According to fertilizer recommendation, Muara Bulian Estate conducted fertilizer application using Dolomite with dosage 3 kg/palm. The fertilizer applicator can demonstrate the application and safety working procedure.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor compliance -</p>	<p>Organization has conducted management review annually. The management review stipulated in the procedure "AA-SOP-ES-6001-R5 dated 1 August 2020". The latest management review at Muara Bulian POM was conducted on 23 March 2024 and attended by 15 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> <ul style="list-style-type: none"> • Visit Agronomy Muara Bulian Estate: date of visit 1 -5 April 2024 by Sinnaiha G. There were no main issues in this estate, however current issues related to weeding control in circles/path and interrow, manuring, pest & disease, castration, supplying and consolidation, pruning, trenches, road/bridge and harvesting and administration. An action plan was developed to address these issues and closed in the last week of April 2024. • Visit Engineering Muara Bulian POM: 2 – 7 January 2024 by JC Enri Kusnadi. There were no pending issues in this mill. However, kesimpulan hasil VE tersebut menunjukkan pemenuhan hanya 77%. 	Complied

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		<p>An action plan was developed to address these issues and closed on 30 April 2024.</p> <ul style="list-style-type: none"> • Visit Agronomy Scheme Smallholders (gemba): Report of Visit Agronomy Scheme Smallholders on 20 June 2024 "Laporan Kunjungan Plasma KLM" by Andy Anggoro, Parasian Situmorang, Daud A Rambe and Eduard J Sitohang. • RSPO internal audit on 4-9 March 2024, with 5 non-conformance findings, where the non-conformance findings have received root causes, quick actions and final corrective actions in the third week of March 2024. 	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor compliance -</p>	<p>During the ASA2.2 audit, auditor has observed the records of following action after Visit Agronomy and Visit Engineering. There is some action plan to follow up the findings.</p> <p>Certificate holder conducted monitoring of operational activity in all level of workers. Each field supervisor is equipped with monitoring sheets/worksheets. For example, harvesting supervisor collected harvesting record and quality of each harvester. The report submitted to estate manager daily. During audit, the records has been verified for period January – May 2024.</p> <p>Therefore, daily operational activity also recorded in daily worksheet by mill supervisor before reported to the mill manager. During audit, the records has been verified for period May 2024.</p> <p>To ensuring the result of operational activity in line with the procedures, mill/estate manager conducted regularly monitoring of and management review to solve the findings issues. All results of management review shall be implemented by respective staff. The latest management review at Muara Bulian POM was conducted on 23 March 2024 and attended by 15 persons.</p> <p>The company also showed evidence of monitoring the implementation of replanting in plasma as outlined in the form of minutes of the</p>	Complied

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		Contractor's work results, a list of monthly payment progress, progress on the realization of work on uprooting, chipping, digging holes, and maps of uprooting and chipping.	
Criteria 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	<p>(C) SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.</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>Environmental document:</p> <p>PT Inti Indosawit Subur – Muara Bulian has demonstrated the document of Analisis Mengenai Dampak Lingkungan (AMDAL) consist of document ANDAL, RKL and RPL as approved through "<i>Persetujuan Komisi Amdal Departemen Pertanian No.014/Andal/RKL-RPL/BA/V/1995 tentang Persetujuan ANDAL dan RKL-RPL perkebunan Kelapa Sawit dan Pabrik Minyak Kelapa Sawit PT Inti Indosawit Subur</i>" dated 3rd May 1995. The document covers scope of area of 32,000 Ha consist of Kuala Tungkal Estate 20,000 Ha and Muara Bulian Estate 12,000 Ha and palm oil mill capacity 90 Tonnes FFB/hour for Kuala Tungkal and 30 Tonnes FFB/hour for Muara Bulian.</p> <p>Revision on AMDAL document is available for PT Inti Indosawit Subur - Muara Bulian through "<i>Surat Persetujuan Kepala Badan Lingkungan Hidup Provinsi Jambi No. 474/BLHD/2010 tentang Persetujuan Revisi Rencana Pengelolaan Lingkungan Hidup (RKL) dan Rencana Pemantauan Lingkungan Hidup (RPL) PT Inti Indosawit Subur seluas 9,188 Ha dan Pabrik Minyak Kelapa Sawit Kapasitas 60 Ton/Jam di Kecamatan Maro Sebo Ilir, Kabupaten Batanghari, Provinsi Jambi</i>" dated 10th August 2010. The revision occurs due to changes in mill capacity from 30 Tonnes FFB/hour into 60 Tonnes FFB/hour, land application separation from Muara Bulian Group and social dynamics back in 2010.</p>	Complied

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		<p>PT Inti Indosawit Subur – Muara Bulian has also prepared Evaluation of Environmental Impact-Aspects (Environmental management system – EMS-431-003-LT) each year, latest assessment conducted on January 2023 for activities of Mill and estate including replanting activities which currently being undertaken by the company. Those utilized as tool to evaluate the implementation of environmental management and monitoring tools.</p> <p>Social impact assessment:</p> <p>PT Inti Indosawit Subur – Muara Bulian has social impact assessment with scope in Estate, Mill and Plasma/Smallholder in the same report. Social Impact Assessment was conducted as documented in “Social Impact Assessment PT Inti Indosawit Subur Kebun Muara Bulian including Scheme Smallholder” in 2011 by Fakultas Kehutanan Institut Pertanian Bogor. This social impact assessment is also done with a direct approach with affected communities by FGD method conducted on 5 to 10 March 2011.</p> <p>The social risk has been identified for some aspect:</p> <ul style="list-style-type: none">a. Tenurial aspectb. social aspect related infrastructurec. employment, industrial relation, and workforce absorption aspectd. environmental aspect <p>Social Environmental monitoring and management report reported in regular basis each semester in “<i>Laporan Pelaksanaan Izin Lingkungan</i>”. Receipt note of report delivery are available and has been reviewed.</p>	
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		<p>Smallholders:</p> <p>Environmental Impact Assessment and HCV of the Plasma Muara Bulian has identified the significant potential environmental impacts deriving from operational activities such as: fertilizing, weeds control, pest, and disease control, harvesting, FFB transportation, road and bridge maintenance, ditch maintenance, chemical storage and hazardous waste storage, office. Group Manager has provided the document of Evaluation of impact on the environment as per "<i>Evaluasi Aspek Dampak Lingkungan Kebun Plasma Muara Bulian</i>" updated on 15 January 2021. During audit, sampled smallholder can explain and understood the environmental aspect and impact and its control.</p> <p>All the members have attended the training for Environmental Risk which cover all the environmental impacts identified in the operations in their oil palm plantations. Interview with smallholder member showed that they can demonstrated that they have understanding on environmental aspect and impact in their operation such as: water pollution, soil pollution and biodiversity decreasing as well as social impact.</p> <p>The social impacts with the participation of internal and external stakeholders such as management, local communities, head of around village (Karya Mukti, Tidar Kuranji, Bulian Jaya, Kehidupan Baru, Danau Embat village etc.) farmers and workers and the government bodies relate. Evidence of participation with affected parties is to use a questionnaire conducted on 20 June 2011.</p> <p>Based on interview with farmers that generally farmers understood of the social risk of their operation.</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>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>	Complied

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		<p>Social Environment management and monitoring plan document is available in Environmental management plan (RPL-Rencana Pengelolaan Lingkungan) document. Document was approved as per "<i>Surat Persetujuan Kepala Badan Lingkungan Hidup Provinsi Jambi No. 474/BLHD/2010 tentang Persetujuan Revisi Rencana Pengelolaan Lingkungan Hidup (RKL) dan Rencana Pemantauan Lingkungan Hidup (RPL) PT Inti Indosawit Subur seluas 9,188 Ha dan Pabrik Minyak Kelapa Sawit Kapasitas 60 Ton/Jam di Kecamatan Maro Sebo Ilir, Kabupaten Batanghari, Provinsi Jambi</i>" dated 10th August 2010". Environmental management based on document includes:</p> <ul style="list-style-type: none"> • To prevent air quality decrease from POM operational and FFB transportation, company performed action: Reduce exhaust emissions from the engines by maintenance routine engine, dust bin installation in boiler stack and design the height of boiler stack as per regulation, planting the crops to reduce the pollutant/absorb the pollutant near POM, limiting the vehicle speed around POM • To prevent noise from machine and POM operation, company performed isolating the noise source and machine maintenance, planting the crops as a green belt in surrounding POM, regular noise measurement • To prevent water quality decrease, using Palm Oil Mill Effluent (POME) as organic fertilizer (land application), maintaining waste-water treatment plant (IPAL), maintain and monitoring land application; -> impact of Biogas development (Methane capture) • To prevent decreasing of biodiversity, company performed enhancing biodiversity in riparian by planting local species, placing signboard to prohibit illegal hunting in conservation area and around estate, awareness to employee and surrounding community to save the protected species. • To prevent social conflict, community perception and enhance the 	
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		<p>surrounding economic, company provide employment opportunities to the local community, the provision of supporting infrastructure for public economic activities, providing employment opportunities information to the public, optimizing the use of local labor, involving the local community as business partners.</p> <p>PT Inti Indosawit Subur – Muara Bulian has appointed Estate and Mill Manager together with Sustainability team to control and ensure the implementation of environment plan.</p> <p>Evaluation on Environment Aspect – Impact already conducted prior to replanting activities. Documented evidence using Environmental Management System - ISO 14001 (EMS-431-003-LT). This document is periodically revised internally according to changes in replanting activities. The latest amendment on January 2023.</p> <p>Social Environmental monitoring and management report reported in regular basis each semester in "<i>Laporan Pelaksanaan Izin Lingkungan</i>". Evidence of report submission can be demonstrated in "<i>Daftar Distribusi Eksternal</i>".</p> <p><u>Smallholder</u></p> <p>Plasma Muara Bulian has set the Environmental aspect and impact assessment as per "<i>Evaluasi Aspek Dampak Lingkungan Kebun Plasma Muara Bulian</i>". The mitigation plan for environmental aspect and impact has been defined, e.g:</p> <ul style="list-style-type: none"> • Manuring/Fertilizing – monitoring ex fertilizer sack, appropriate fertilizing as recommendation • Weeds control - Ex Herbicide container store in the hazardous waste storage. • Pest and disease handling: Ex pesticide container store in the 	
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		<p>hazardous waste storage</p> <ul style="list-style-type: none"> FFB transportation: optimizing FFB transportation by designed the TPH (FFB collecting place) in one way along collection road. <p>During site visit and interview with sampled smallholder observed they are well aware of the environmental impacts and the mitigation plan. For example, the ex-fertilizer sack must be handled by collected in Cooperative office to reuse as loose fruit container.</p>	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>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>The environmental analysis is based on AMDAL document and has been approved as per "Surat Persetujuan Kepala Badan Lingkungan Hidup Provinsi Jambi No. 474/BLHD/2010 tentang Persetujuan Revisi Rencana Pengelolaan Lingkungan Hidup (RKL) dan Rencana Pemantauan Lingkungan Hidup (RPL) PT Inti Indosawit Subur seluas 9,188 Ha dan Pabrik Minyak Kelapa Sawit Kapasitas 60 Ton/Jam di Kecamatan Maro Sebo Ilir, Kabupaten Batanghari, Provinsi Jambi" dated 10th August 2010".</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 – Muara Bulian. Based on verification on Environmental management and</p>	Complied

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		<p>monitoring report, confirmed that the management and monitoring plan has been well implemented accordingly. Data verified during audit:</p> <ul style="list-style-type: none">• Air quality and noisy monitoring from FFB processing performed by emission measurement against Boiler and generator each semester, ambient air quality measurement each semester, noisy measurement (indoor and outdoor) each semester, odour measurement each semester.• Air emission quality in Muara Bulian POM analyse by PT. ITEC Soution Indonesia for Semester I (January – June) 2023 and Semester II (July – December) 2023. The analysis results from January – December 2023 shown comply with regulation.• Surface water quality and water biota monitoring to prevent and control the physic and chemist quality of surface water comply to PP RI No 22 tahun 2021. Performed by wastewater quality monitoring each month, hazardous waste monitoring, land application monitoring, surface water quality monitoring each semester. Wastewater quality monitoring analyse by PT. Jambi Lestari Internasional. Wastewater analysis result since January – December 2023 shown comply with regulation.• Surface water quality test (Sungai Pematang River upstream and downstream) analyze by PT. ITEC Soution Indonesia for Semester I (January – June) 2023 and Semester II (July – December) 2023. The analysis results from January – December 2023 shown comply with regulation.• Erosion and sedimentation monitoring performed by erosion measurement according to USLE method. Measurement result since January – December 2023 has been verified during audit.• Flora fauna monitoring performed by wildlife monitoring and monitoring the conservation area each month. Based on monitoring shown that there were species 2 species of mammalia (Sus crofa,	
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		<p>Callosciurus sp); 13 species of Aves or Bird such as: Halcyon smirnensis, Geopelia striata, Pycnonotus aurigaster, Priminia familiaris, Centropus bengalensis; 2 species of Reptilia (Mabouya sp, Varanus salvator).</p> <ul style="list-style-type: none">• Community perception monitoring performed by community interview, employee data monitoring, interview with village head or public figure regarding their perception to company. Company has monitored the public perception through questioner each year. Questioner to public perception regarding the impact of company presence has been disseminated to surrounding community. Latest monitoring of public perception has been performed in 2023, questioner of public perception can be demonstrated and well documented in RKL-RPL report semester II 2023. Generally public perception was positive regarding the company presence and contribution to the surrounding community. No negative perception from public due to company involvement in local communities' livelihood such as scheme smallholder program and CSV (Create Shared Value) program that focuss in RSPO ISH Certification for independent smallholder outside the scheme smallholder organization (Koperasi). <p>All management and monitoring plan has been implemented well by company according to RKL-RPL document. The implementation report has been reviewed and reported to government agency per semester (six monthly).</p> <p>The management team will review the report before submitting the document and if there are any environment analysis result above the minimum standard, it will explain in the Environmental management and monitoring report the cause of it.</p>	
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		<p>During document verification and interview with management, it can be demonstrated that all the environmental monitoring plan was implemented as per the RKL-RPL document. The evaluation of environmental monitoring plan effectiveness was carried out and presented in RKL-RPL report semester II 2023 (July – December).</p> <p>Evaluation consists of:</p> <ul style="list-style-type: none">• Trend evaluation of air ambient quality, air emission, odor, ground water quality, waste water quality, surface water quality, soil erosion shown that the result of monitoring is all parameter is met with the standard of regulation. Trend evaluation of water usage still under the budget/standard; biodiversity trend evaluation shown that there were still found the presence of animal including protected animal; Social economic trend evaluation shown increasing each year. Overall, the trend evaluation shown the consistency and increasing in environmental performance.• Critical evaluation, the critical point in environmental monitoring is wastewater quality and surface water usage. Based on January - December 2023 result was met with regulation (BOD < 5,000 mg/l and pH 6 – 9).• Compliance evaluation to regulation. According to evaluation of impact against soil erosion, water quality, soil quality, air quality, biodiversity, surrounding social and economic, health and safety, indicated that PT Inti Indosawit Subur – Muara Bulian POM has complied with all relevant regulation.• Public perception monitoring for 2023 has been carried out and there is no negative perception occurred. <p>Certificate of environmental analysis in Semester II 2023 are available and has been reviewed.</p>	
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Criteria 3.5: 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>Since the recruitment procedures were established in 2009, there have been no changes in either content or structure, there are 2 procedures related to worker recruitment and promotion has been set by PT IIS – Muara Bulian Group, including:</p> <ol style="list-style-type: none"> 1. Procedure: AA-HR-305.7-R0 dated 1 August 2021 – regarding Recruitment, Selection and Promotion for Non-Staff Workers 2. Procedure for employee assessment (HRD C-002-00) <p>These procedures were available during ASA2.2 audit. This procedure refers to government regulations i.e. UU no. 13/2023 and Law no. 11/2021 Cipta Kerja. There was no identification of discrimination and recruitment processes with payment of fees to prospective workers.</p> <p>It was also explained that the recruitment process is based on the company's planned needs in accordance with the required competencies including the requirement for a health examination performed by dokters, hospital and clinic.</p> <p>Taken as a sample of the recruitment and promotion process:</p> <ol style="list-style-type: none"> 1. Worker recruitment process in April 2024 for the position of Harvester in Muara Bulian Estate; prospective worker on behalf of Erwin Naingolan. <p>Document verified, as follows:</p> <ul style="list-style-type: none"> • Personal data form of application on behalf of Erwin Naingolan i.e. Curriculum vitae • Recruitment requirements, including: photocopy of ID card, family card, job application letter, photocopy of diploma certificate, etc. • Results of health examinations by hospitals and clinics appointed by the company.

Complied

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		<ul style="list-style-type: none"> Daily working Agreement on behalf of Erwin Nainggolan <p>2. Promotion of daily workers (PHL) to permanent workers: For Muara Bulian Estate, promotion of PHL (non-permanent workers) to SKU (permanent workers) at Muara Bulian Estate in the 2023 period as many as 29 harvesters. In the first semester of 2024 as many 30 workers have been submitted for promotion of PHL (daily workers) to SKU (permanent workers) to the HRD Medan Head Office in May 2024.</p> <p>For Muara Bulian POM as many as 10 workers has been promotion as permanent workers as per memorandum from Mill manager PMB No. 044/MI-PMB/MEMO/04/2024 dated 22 April 2024.</p> <p>Scheme Smallholder: Most farmers usually manage their land independently. All workers are considered freelancers. Workers are hired based on verbal agreements regarding work unit rates, payment systems, provision of work equipment, etc. No work is done under a debt bond. Meanwhile, small farmers through their respective KUDs have policies related to employment which are stated in the "Cooperative Policy" which is signed by the Chairman of the Cooperative.</p> <p>Based on verification of sample documents and interviews with several samples of members of KUD (69 smallholders sampled), it was not identified that there was a process of employee attrition with discriminatory practices, forced labor or human trafficking.</p>	
3.5.2	Employment procedures are implemented and records are maintained. - Minor compliance -	During this ASA2.2 audit, Procedures related to employment that have been established by the company are still implemented/maintained and records of their implementation are maintained. There has been no change in supervision and is still consistently implemented by the company, including:	Complied

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		<ol style="list-style-type: none"> 1. Procedure: AA-HR-305.7-R0 dated 1 August 2021 – regarding Recruitment, Selection and Promotion for Non-Staff Workers. Explain that this procedure is a guide and provision related to the selection, acceptance, and appointment of non-staff workers; non-staff workers are field workers with the PHL (Freelance Daily Worker) / PKWT (Specified Time Work Agreement), and PKWTT (permanent workers) which is also known as SKU. This procedure has been well implemented by the company, please see verification in 3.5.1. 2. Promotion of PHL workers (daily workers) to SKU (permanent), has been implemented as stated in 3.5.1 above in relation to the example of promotion of PHL workers to SKUH (permanent): <ol style="list-style-type: none"> a. The employee promotion proposal has been approved through Mill Manager of PT IIS Muara Bulian according to Memorandum from RH Plantation No. 044/MI-PMB/MEMO/04/2024 dated 22 April 2024. b. The employee promotion proposal has been approved through HRD Dpt. Of PT IIS Muara Bulian according to Memorandum from RH Plantation No. 162/HR-R03/MEMO/SK/06/2023 dated 21 Juni 2023 c. The employee promotion proposal has been approved through HRD Dpt. Of PT IIS Muara Bulian according to Memorandum from RH Plantation No. 003/ES-KMB/INT/06/2024 dated 14 June 2024 for 30 daily workers to permanent (SKUH). 3. Procedure No. AA-HR-308.5-R1 regarding submission and resolutions of employee's complaint. Complaints can be submitted through representatives of the Workers' Union, or directly to their direct supervisor. Most employee complaints are complaints related to damage to infrastructure facilities (housing and other facilities) and the company has responded directly. 	
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		4. Procedure No AA-FA-219.I-R5 regarding wages; the application of wages is in accordance with reference to the stipulation of the Governor of Jambi. Workers are transparently given pay slips so that they can find out the components of wages, including benefits, premiums, overtime and deductions. Please see the wage verification on 6.2.2.	
Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur – Muara Bulian 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 February 2024 covering for all activities both in Muara Bulian 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 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>	Complied

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		<p>Mitigation plan to reduce and minimize the risk impact has been develop by company covering:</p> <ul style="list-style-type: none">• Elimination of risk. One of elimination risk is arrangement of FFB truck vehicles on loading ramp by installing a barriers sign to maintain a safe distance between cars and workers.• Substitution of material and process.• Engineering control.• Administrative control. Administrative control was performed by employee mutation/rotation, sanction for safety rules violation. Safety inspection was performed regularly to ensure the compliance of safety regulation.• Personal protective equipment. Company has provide PPE for all workers according to the type of work and risk. <p>PT Inti Indosawti Subur – Muara Bulian has prepared and documented the OHS Plan as in "Program Manajemen K3 Tahun 2023-24", such as:</p> <ul style="list-style-type: none">• Reducing the risk of work accidents: First aid training, basic safety training, basic fire training• Arrangement of the Assignment of First Aid Officers to the Manpower Office• Checking Apar, Hydrant, Evacuation Route, Assembly Point, Evacuation Controller Flag• Carry out a "Drill" for handling land fires and assess the readiness and measure the effectiveness of the Emergency Response Team's work• Safety induction and dissemination of SOP to new employees• Safety briefing• PPE monitoring checklist	
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		<p><u>Scheme Smallholder:</u></p> <p>During audit document HIRADC document for sampled KUD, were available and could be demonstrated.</p> <p>The document of "Hazard Identification and Risk Assessment and Control (HIRAC) – Analisis Risiko tahun 2023-2024", last review in February 2024. 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 2023-2024 has prepared as per "Rencana K3 (Keselamatan dan Kesehatan Kerja) majority to provide and control use of PPE, including socialization and monitoring, program such as:</p> <ul style="list-style-type: none"> – Inspection and monitoring on using of PPE for harvester – daily – Training on emergency and preparedness – once a year – Training of first aider and monitoring of first aid kit – Refresh training of OHS including risk assessment. <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 handgloves, egrek cover), OHS awareness for harvester and smallholder member.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>The health & Safety program, Goals and Targets have been set for 2023 and have been verified based on the P2K3LHS Program Y2023 document of PT Inti Indosawit Subur – Muara Bulian Estate. The health and safety program includes:</p> <ol style="list-style-type: none"> a. P2K3LHS meetings are held monthly b. Sending P2K3 reports to the Manpower Department is carried out every 3 months 	Complied

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		<ul style="list-style-type: none">c. Routine inspections of APAR and Bakortiba equipment are carried out every monthd. APAR and BAKORTIBA simulations are carried out annuallye. Health (physical) examinations by Company Doctors are carried out annuallyf. Health checks for chemical handlers are carried out every 6 monthsg. Health checks of all employees are carried out annuallyh. First aid training is carried out annually <p>This program updated annually.</p> <p>The effectiveness of the OHS Program to address health and safety risks have been monitored in the form of:</p> <ul style="list-style-type: none">a. Monthly OHS Committee meeting, to discuss and address current OHS issues.b. Quarter Report of P2K3 to governance body. Samples of document that has been reviewed during auditc. Documentation of accident record and the calculation of LTA, has been reviewed for period January – December 2023.d. Annual review of HIRADCe. Annual Review of OHS Program <p>Based on field visit during onsite audit for spraying workers and harvester workers, the risk impact probability was irritated and eyes disease, control by using appropriate PPE (eye wear/safety glasses, mask, and hand gloves) and regular training for sprayer workers.</p>	
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		<p>Discipline of PPE usage monitoring regularly conducted by Mill and Estate management to ensure all workers use the appropriate PPE during working. Monitoring record present in "Daftar Pemeriksaan APD Karyawan". Sample seen for PPE monitoring of sprayer and fertilizer workers period January – May 2024.</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> <p>Scheme Smallholder:</p> <p>Based on field visit to smallholder plots and interview with them, it was confirmed that they have aware regarding the risk for activity of harvesting and fertilizing in the field and the mitigation by PPE usage such as safety helmet and safety goggles for harvesting; masker and hand gloves for manuring. Safe working practices also implemented in the field. Monitoring of PPE usage and safe working practices also conducted by head of farmers group and supervisor from PT Inti Indosawit Subur.</p>	
Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender- specific needs, and which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training.</p> <p>- Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur – Muara Bulian has its own training institution assigned to arrange its training programmes. Asian Agri Learning assessing all the training need for each personnel – based on job description. The training plan prepared annually.</p> <p>Competence evaluation carried out by line managers, to evaluate competence level of each worker for relevant position. The matrix training is updated by HRD head office and AAA Learning Institute</p>	Complied

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		<p>annually. Based on minimum training requirement, AAA Learning institute, detailing training program in type of training, participants, PIC, number of participants, training schedule.</p> <p>Training program has been developed by company both mill and estate as per "Kalender Pelatihan Tahun 2023-2024 Learning & Development". Training program developed to enhance the hard skill and soft skill for employee and staff, such as:</p> <ul style="list-style-type: none"> • Training of Fire Danger Warning System (Sistem Peringatan Bahaya Kebakaran) • Basic Fire Training • Basic Safety Training • Sustainability (RSPO, ISPO, ISCC) • Refreshment training on safety use of pesticide and chemical • First Aider training 	
3.7.2	<p>Records of training are maintained, where appropriate on an individual basis.</p> <p>- Minor compliance -</p>	<p>Records of training in Muara Bulian Estate, Muara Bulian POM and Scheme Smallholder are kept and maintained by respective officer. For Muara Bulian Estate and POM handled by Sustainability Officer and HSE Officer. Meanwhile for scheme smallholder are handled by Smallholder Assisstant. All records of training are available and has been reviewed during audit.</p>	Complied
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor compliance -</p>	<p>Training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training attend by Mill manager, KTU (head of administration), production clerk, internal audit, Weighbridge clerk, security, dispatch operator. Evidence of training are available (attendance list, training material).</p>	Non-compliance

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		<p>During interview with weighbridge Clerk, KTU (head of administration), mill manager and dispatch operator Muara Bulian POM confirmed that they has understanding on RSPO supply chain.</p> <p>Nonconformance:</p> <p>The company has not effectively provided training for FFB weigh ticket operator regarding the RSPO SCCS mechanism.</p> <p>Objective Evidence</p> <p>Interview to the WB Operator on behalf Latifah Nur Ramadhani, it was assessed that she has not understood the origin of certified and non-certified FFB, especially the origin of FFB from scheme smallholder and third party. This was proven there is incorrect FFB information in the weigh ticket, where FFB that should have been non certified was recorded as certified.</p>	
<p>Criteria 3.8: Supply chain requirements for mills.</p> <p>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)</p>			
3.8.1	<p>Identity Preserved Module</p> <p>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.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>PT. Inti Indosawit Subur – Muara Bulian POM uses Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate (Muara Bulian Estate) and 6 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD).</p>	Not Applicable

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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 – Muara Bulian POM holds current RSPO P&C Certificate No. RSPO 5894418, first certification start on 28 August 2012, latest revision date 20 March 2024 and expired on 27 August 2027. In the current certificate, PT. Inti Indosawit Subur – Muara Bulian POM uses Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate (Muara Bulian Estate) and 6 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD). The proportion of non-certified FFB comes from third-party supplier (8 FFB suppliers) comprise of: PT Pacific Global Sejahtera, PT Gema Inti Jaya Semesta, Plasma Non Hamparan, PT IKU, Kebun Tani Mandiri, PT Pratama Sawit Mandiri, Asosiasi Putra Tunggal Sangkilan and Gapoktan Swadaya Cahaya Buana.</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&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 – Muara Bulian 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_PO1000000279.</p> <p>Below are the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year 2023/2024:</p> <p>Forecast volume (August 2023 – July 2024)</p> <p>FFB : 120,545 MT</p> <p>CPO : 28,617 MT (OER: 23.74%)</p> <p>PK : 7,895.69 (KER: 6.55%)</p> <p>Actual production volume since last audit (June 2023 – May 2024)</p> <p>FFB: 89,001 MT</p> <p>CPO: 21,054.84 MT</p> <p>PK: 5,379.84 MT</p> <p>Actual sold volume (June 2023 – May 2024)</p>	Complied

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		CPO: 19,612.12 PK: 5,505.27 MT (including previous stock June 2023: 512.58 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 – Muara Bulian 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 – Muara Bulian POM has meet all registration and reporting requirements. RSPO IT Platform/PalmTrace account RSPO_PO1000000279.	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ol style="list-style-type: none"> Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 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. The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<p>During this audit ASA 2.2, there is no change on the documented procedure of Muara Bulian POM.</p> <p>PT. Inti Indosawit Subur – Muara Bulian POM can demonstrate procedures as follow:</p> <ul style="list-style-type: none"> 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 Muara Bulian Estate and Smallholder, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years. Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4). The procedure explains method to check only certified product received. The book keeping mass balance stated every 3 months: January-March, April-June, July-September, and October-December each year. Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction. SOP for mill operation Mill Policy Manual: <ul style="list-style-type: none"> SOP AA-MPM-OP-1400.02.R2 <i>Stasiun Penerimaan</i> for FFB receiving station; 	Complied

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		<ul style="list-style-type: none"> - SOP AA-SOP-OP-101.5-R0 Grading; - SOP AA-MPM-OP-1400.03.R1 <i>Stasiun Rebusan</i> for sterilizer; - SOP AA-MPM-OP-1400.04.R1 <i>Stasiun Pemisahan Berondolan</i> for loose fruit separation; - SOP AA-MPM-OP-1400.05-R1 <i>Stasiun Pengadukan dan Pengempaan</i> for pressing station; - SOP AA-MPM-OP-1400.06-R1 <i>Stasiun Pemurnian</i> for clarification; - SOP AA-MPM-OP-1400.07-R1 <i>Stasiun Pemisahan Nut dan Fiber</i> for nut and fiber separation; - SOP AA-MPM-OP-1400.08-R1 <i>Stasiun Kernel</i> for kernel station; - SOP AA-MPM-OP-1400.09-R1 <i>Stasiun Boiler</i>; - SOP AA-MPM-OP-1400.10-R1 <i>Stasiun Engine Room</i>; - SOP AA-MPM-OP-1400.11-R1 <i>Stasiun Water Treatment</i>; - SOP AA-MPM-OP-1400.12-R1 <i>Laboratorium</i>; - SOP AA-MPM-OP-1400.13-R1 <i>Stasiun Pengelolaan Limbah</i> for palm oil mill effluent treatment; - SOP AA-MPM-OP-1400.14-R2 <i>Stasiun Penimbunan dan Pengiriman CPO dan Kernel</i> for CPO and PK bulking and despatch operation; SOP AA-MPM-OP-1400.15-R1 <i>Perawatan</i> for preventive maintenance; - SOP AA-MPM-OP-1400.18-R4 <i>Book Keeping</i> AA-MPM-OP-1400.17-R6 <i>Traceability</i> <p>PT. Inti Indosawit Subur – Muara Bulian POM is able to demonstrate complete and up-to-date records and report demonstrating compliance with the supply chain's general requirement and modular requirement, including training records.</p> <p>As per Procedure of Traceability (AA-MPM-OP-1400.17-R7), the responsible person in charge to the supply chain system is Mill Manager.</p>	
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		<p>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. Inti Indosawit Subur – Muara Bulian POM has a procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill, as described in SOP AA-MPM-OP-1400.17-R7 Traceability, dated 1 October 2019. However Tungkal Ulu POM is implementing MB for supply chain model.</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 – Muara Bulian POM has a procedure to conduct internal audit RSPO, including RSPO SCCS as per Procedure of Traceability (AA-MPM-OP-1400.17-R7) chapter 6.7, Sustainability Internal Audit Manager conducted internal audit annually, to ensure all operational and documentation activities are comply with the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. Internal audit for all scheme including RSPO SCCS also refer to SOP Internal Audit Nomor: AA-SOP-ES-6001-R5 dated 1 August 2020; Chapter 4.0 stated that Internal audit conducted minimum once a year considering the critical area.</p> <p>Internal audit RSPO including SCCS PT Inti Indosawit – Muara Bulian POM has been conducted on 4 - 9 March 2024 by Internal Audit departement (Lead Auditor Ridho Ilahi) and audit for RSPO market communication and claim on 18 March 2024. Internal audit report were evident, all issue raised during internal audit has been followed up by Corrective Action.</p> <p>Management review conducted once a year as per SOP Internal Audit Nomor: AA-SOP-ES-6001-R5 dated 1 August 2020. Management review has been conducted on 23 March 2024. Input of management review consist of:</p> <ul style="list-style-type: none"> - Internal audit result 	Complied

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		<ul style="list-style-type: none"> - Customer feedback - Proses performance and product conformity - Status of Corrective and Preventive Action - Follow up previous management review - Change that could effect to the management system <p>Output of management review has include:</p> <ul style="list-style-type: none"> - Recommendation for improvement - Resources needed. - Record of internal audit and management review are maintain and kept in the Tungkal ulu office by KTU (head of administration). 	
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 – Muara Bulian 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 – Muara Bulian POM receive FFB from certified and non-certified source. Certified source consist of own estate (Muara Bulian Estate) and 6 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD). FFB comes from third-party supplier (6 Supplier) comprise of 16 third party supplier e.g PT Pacific Global Sejahtera, PT Pratama Sawit Mandiri, PT IKU, Plasma Non Hamparan SP2 Farizal, Kebun Tani Mandiri, Asosiasi Putra Tunggal. FFB Non certified approximately 53% from total FFB received by Muara Bulian POM. 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>	Non-compliance

		<p>Certified FFB:</p> <ul style="list-style-type: none"> • Weighbridge ticket "Tiket Timbangan No.PMBA124102295" dated 30 May 2024, for 520 FFB bunches; nett weight 6,590 kg; from Muara Bulian Estate - Afdeling 1, block A16g, A16i and A17c; ID: KMB-1; FFB delivery note No.987 (with barcode number); vehicle number BH8789MX; Driver: Ali Hasanudin; RSPO certificate No.RSPO594418. • Weighbridge ticket "Tiket Timbangan No.PMBA124202237" dated 28 May 2024, for 427 FFB bunches; nett weight 4,340 kg; from Muara Bulian Estate - Afdeling 1, block A18a, A16a; ID: KMB-1; FFB delivery note No.987 (with barcode number); vehicle number BH8789MX; Driver: Dadang Utama; RSPO certificate No.RSPO594418 • Weighbridge ticket "Tiket Timbangan No.PMBA124202225" dated 27 May 2024, for 534 FFB bunches; nett weight 6,300 kg; from Muara Bulian Estate - Afdeling 1, block A16b; ID: KMB-1; FFB delivery note No.003 (with barcode number); vehicle number BH8649MZ; Driver: Midiantoni; RSPO certificate No.RSPO594418 • FFB delivery note: "Surat Pengantar TBS KUD Karya Lestari, Kelompok Tani Mekar Tani - Hamparan 65", Serial No. 00609 dated 30 Mar 2024 Vehicle Number AB8144AC, Driver: Febri Novianto, FFB amount: 447 bunches. Weighbridge ticket "Tiket Timbangan No.PMBA224101941" dated 30 March 2024, FFB amount: 447 bunches, nett weight 10,969 kg, FFB source from Kebun Plasma (KUD Karya Lestari –KT 65 Mekar Tani), ID KLM, Vehicle AB8144AC, Driver: Febri Novianto, RSPO certificate No.RSPO594418. • FFB delivery note: "Surat Pengantar TBS KUD Makmur Rezeki, Kelompok Tani Kutilang - Hamparan 07", Serial No. 00465 dated 25 Mar 2024 Vehicle Number BH8162BL, Driver: Rivan, FFB amount: 117 bunches. Weighbridge ticket "Tiket Timbangan No.PMBA224101888" dated 25 Mar 2024, FFB amount: 117 bunches, nett weight 2,988 kg, FFB source from Kebun Plasma (KUD Makmur Rezeki – KT 07 	
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		<p>Kutilang), ID KLM, Vehicle BH8162BL, Driver: Rivan, RSPO certificate No.RSPO594418. Informasi dalam SPB kosong</p> <ul style="list-style-type: none"> FFB delivery note: "Surat Pengantar TBS Koperasi Tuah Sakato, Kelompok Tani Sei Bujang - Hamparan 31", Serial No. 00390 dated 25 Mar 2024 Vehicle Number BH8437BI, Driver: Dani, FFB amount: 355 bunches. Weighbridge ticket "Tiket Timbangan No.PMBA224101883" dated 25 Mar 2024, FFB amount: 355 bunches, nett weight 7,147 kg, FFB source from Kebun Plasma (KUD Tuah Sakato – KT 31 Sei Bujang), ID KLM, Vehicle BH8437BI, Driver: Dani, RSPO certificate No.RSPO594418. <p>Non-certified FFB:</p> <ul style="list-style-type: none"> FFB delivery note: "Surat Pengantar TBS Koperasi Agro Sangkilan Mandiri", No. 00387 dated 27 Mar 2024. Vehicle code BH8052AJ; driver: Porada; carrying 209 bunches. Weighbridge ticket "Tiket Timbangan No.PMBA224101917" dated 27 Mar 2024, for 209 FFB bunches; nett weight 3,421 kg; FFB source from non-certified third party FFB supplier Koperasi Agro Sangkilan Mandiri ID KLN; Vehicle number BH8052AJ. FFB delivery note: "Surat Pengantar TBS Gapoktan Swadaya Cahaya Buana"; No. 001 dated 13 June 2023; Vehicle code BH6265SY; driver: Hasda; carrying 712 bunches. Weighbridge ticket "Tiket Timbangan No. PMBA524103070" dated 30 Mar 2024, for 574 bunches; nett weight 8,041 kg; FFB source from non-certified third party FFB supplier, ID A189; vehicle number BH8390BJ; Driver: Cakra Esmi Saputra. FFB delivery note: "Surat Pengantar TBS KT Mahang"; No. 00008 dated 25 June 2024; Vehicle code BH8835NU; driver: Supriadi; carrying 305 bunches. Weighbridge ticket "Tiket Timbangan No. PMBA224103676" dated 25 June 2024, for 305 bunches; nett weight 	
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		<p>5,060 kg; FFB source from non-certified third party FFB supplier Koperasi Agro Sangkilan Mandiri, ID KLM; vehicle number BH8835NU.</p> <p>Non conformance: During document verification it was found that FFB receive from non certified source claimed in the weighbridge ticket as certified FFB.</p> <p>Objective Evidence: Based on document review of FFB weighing ticket documents, there is information on FFB receipt that is inconsistent where TBS sourced from non-certified sources is recorded as certified/sustainable FFB:</p> <ul style="list-style-type: none"> - Weighing Ticket, No: PMBA224103676, dated 25 June 2024, "Surat Pengantar TBS" Form A No. Seri 00008; volume: 5,060 kg; Sources: Koperasi Agro Sangkilan Mandiri. - Weighing Ticket, No: PMBA224101911, dated 27 June 2024, "Surat Pengantar TBS" Form A No. Seri 00387; volume: 3,421 kg; Sources: Koperasi Agro Sangkilan Mandiri. - Weighing Ticket, No: PMBA224103674, dated 25 June 2024, "Surat Pengantar TBS" Form A No. Seri 00788; volume: 4,772 kg; Sources: Koperasi Buah Sakato – Hamparan 55, Desa Rantau Kapas. <p>Furthermore, there are certified TBS weighing tickets sourced from plasma plantations but the RSPO certificate number is not included:</p> <ul style="list-style-type: none"> - Weighing Ticket No: PMBA224101888, dated 25 March 2024, sources: kebun plasma KUD Makmur Rezeki, KT 07 Kutilang, volume TBS 2,988 kg. - Weighing Ticket No: PMBA224101941, dated 30 March 2024, sources: kebun plasma KUD Karya Lestari, KT 65 Mekar Tani, volume TBS 10,969 kg. 	
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		<ul style="list-style-type: none"> - Weighing Ticket No: PMBA224101883, dated 25 March 2024, sources: kebun plasma KUD Buah Sakato, KT 31 Sei Bujang, volume TBS 7,147 kg. 	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> The name and address of the buyer; The name and address of the seller; The loading or shipment / delivery date; The date on which the documents were issued; RSPO certificate number; A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; A unique identification number. 	<p>PT Inti Indosawit Subur – Muara Bulian POM shows SOP Traceability (AA-MPM-OP-1400.7.R7), section 6.2 indicating the Marketing manager creates Sales Contract and Delivery Order (DO) with information: name and address of production unit; name and address of buyer; contract number; type of product; transportation (air, land, sea); type of product CPO/PK certified or non-certified; quantity of product sold, CPO/PK certified or non-certified in MT; date of shipping; product quality specification CPO/PK (FFA, water content, dirt content); and Supply chain model (Mass Balance).</p> <p>At Mill site, weighbridge operator will printed out CPO/PK weighbridge card, based on DO from marketing indicating: Type of commodity, CPO certified or non-certified; country of origin: Indonesia; Supply Chain model: (Mass Balance); Certificate number of the mill; date of delivery, Product quality specification (moisture, FFA, dirt); Contract number/DO number; Quantity, Transport detail (driver name, vehicle number); and Buyer address.</p> <p>Sales Contract and Delivery Order indicates name and address of seller, name and address of buyer, loading date, supply chain certificate number and unique identification number.</p> <p>Sample seen:</p> <ul style="list-style-type: none"> • Sales contract "Kontrak Penjualan No.06025/CC10/02/23"; between PT. Inti Indosawit Subur – PMKS Muara Bulian (seller) and PT. Sari Dumai Sejati (buyer)" dated 9 June 2023 for sales of 500,000 kg commodity Minyak Kelapa Sawit (CPO) RSPO; Supply Chain Model Mass Balance; Certificate RSPO594418. Remarks: The seller is responsible for the delivery to the bonded area of PT. Sari Dumai 	Complied

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		<p>Sejati Lubuk Gaung with transportation costs borne by the buyer. Information contain in the sales contract:</p> <ul style="list-style-type: none"> ✓ Name and address of buyer: PT. Sari Dumai Sejati, Jl. Palembang Kav 35 - 37, Kebon melati, Tanah Abang, Jakarta Pusat, DKI Jakarta 10230. ✓ Name and address of seller: PT. Inti Indosawit Subur, Jl. Palembang Kav 35 - 37, Kebon melati, Tanah Abang, Jakarta Pusat, DKI Jakarta 10230. ✓ The loading date: Soon, expired 27 August 2023. ✓ Unloading Por address: Jl. Raya Pelabuhan Talang Duku RT. 010 RW.000, Talang Duku Taman Rajo, Kab. Muaro Jambi, Jambi. ✓ The date on which the documents were issued: 9 June 2023. ✓ A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Product Minyak Kelapa Sawit RSPO (CSPO). Supply Chain Model Mass Balance (MB). ✓ The quantity of the products delivered: 500.000 kg. ✓ Any related transport documentation: MT. TRF Bergen Voy in Jul 2023. ✓ Supply chain certificate number of the seller: RSPO Certificate No.RSPO594418. ✓ A unique identification number: 06025/CC10/02/23. <p>Delivery Order PT. Inti Indosawit Subur No. 06025/DC10/02/23 dated 9 June 2023, quantity 500,000 kg commodity Minyak Kelapa Sawit RSPO; Supply Chain Model Mass Balance; No.Ref. RSPO 594418.</p> <ul style="list-style-type: none"> • Sales contract "Kontrak Penjualan No.09002/CC10/12/23 PT. Inti Indosawit Subur dan PT. Padang raya Cakrawala" dated 1 September 2023 for sales of 500,000 kg commodity: Mintyak Kelapa Sawit RSPO 	
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		<p>(CSPO); Supply Chain Model Mass Balance; Certificate RSPO594418. Remarks: Loco Muara Bulian Palm Oil Mill, Jambi. Information contain in the sales contract:</p> <ul style="list-style-type: none"> ✓ Name and address of buyer: PT. Padang Raya Cakrawala, Jl. Palembang Kav 35 - 37, Kebon melati, Tanah Abang, Jakarta Pusat, DKI Jakarta 10230. ✓ Name and address of seller: PT. Inti Indosawit Subur, Jl. Palembang Kav 35 - 37, Kebon melati, Tanah Abang, Jakarta Pusat, DKI Jakarta. ✓ The loading date: Soon. Expired 27 Nov 2023 ✓ The date on which the documents were issued: 1 Sept 2023. ✓ A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Minyak Kelapa Sawit RSPO (CSPO). Supply Chain Model Mass Balance (MB). ✓ The quantity of the products delivered: 500.000 kg. ✓ Any related transport documentation: Transporter Trans Jaya Pertama. ✓ Supply chain certificate number of the seller: RSPO Certificate No.RSPO594418. ✓ A unique identification number: DO No. 09002/CC10/12/23. <p>Delivery Order PT. Inti Indosawit Subur No. 09002/DC10/12/23 dated 1 Sept 2023, instruction to PT. Inti Indosawit Subur – Muara Bulian POM to deliver 500,000 kg commodity Minyak Kelapa Sawit RSPO; Supply Chain Model Mass Balance; No.Ref. RSPO 594418.</p> <p>The Delivery Order 07004/DC10/13/22 was comprise of several Weighbridge ticket. Sample Weighbridge ticket from Muara Bulian POM to customer, delivery period Sept 2023, sample seen:</p>	
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		<ul style="list-style-type: none"> ✓ Weighbridge ticket No.PMBC123101104 dated 4 Sept 2023. Destination PT. Padang Raya Cakrawala. Commodity CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO594418. DO 09002/DC10/12/23. Transporter PT Trans Jaya Pertama, No. SP 822/TJP/II/23; Vehicle No. BK8639EK. Nett weight 29,070 kg. Batch No.RSPO 594418, Seal Number 6644537 - 6644543. • Sales contract "Kontrak Penjualan No.03002/CC10/13/24 PT. Inti Indosawit Subur dan PT. Dasa Anugrah Sejati" dated 4 March 2024 for sales of 200,000 kg commodity: Inti Kelapa Sawit RSPO (CSPK); Supply Chain Model Mass Balance; Certificate RSPO594418. Remarks: Loco Muara Bulian Palm Oil Mill, Jambi. Information contain in the sales contract: <ul style="list-style-type: none"> ✓ Name and address of buyer: PT. Dasa Anugrah Sejati, Jl. Palembang Kav 35 - 37, Kebon melati, Tanah Abang, Jakarta Pusat, DKI Jakarta 10230. ✓ Name and address of seller: PT. Inti Indosawit Subur, Jl. Palembang Kav 35 - 37, Kebon melati, Tanah Abang, Jakarta Pusat, DKI Jakarta 10230. ✓ The loading date: Soon. Expired 27 Aug 2024. ✓ The date on which the documents were issued: 4 March 2024. ✓ A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Inti Kelapa Sawit RSPO (CSPO). Supply Chain Model Mass Balance (MB). ✓ The quantity of the products delivered: 200.000 kg. ✓ Any related transport documentation: Transporter PT Mitra Abadi Damai. 	
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		<ul style="list-style-type: none"> ✓ Supply chain certificate number of the seller: RSPO Certificate No.RSPO594418. ✓ A unique identification number: DO No. 03002/CC10/13/24. <p>Delivery Order PT. Inti Indosawit Subur No. 03002/CC10/13/24 dated 4 March 2024, instruction to PT. Inti Indosawit Subur – Muara Bulian POM to deliver 200,000 kg commodity Inti Kelapa Sawit RSPO; Supply Chain Model Mass Balance; No.Ref. RSPO 594418.</p> <p>The Delivery Order 03002/DC10/13/24 was comprise of several Weighbridge ticket. Sample Weighbridge ticket from Muara Bulian POM to customer, delivery period Sept 2023, sample seen:</p> <p>Weighbridge ticket No.PMBC224100054 dated 07/03/2024. Destination PT. Padang Raya Cakrawala. Commodity CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO594418. DO 03002/DC10/13/24. Transporter PT Mitra Abadi Damai, No. SP 010/MAD/III/24; Vehicle No. BH8091NV. Nett weight 30,080 kg. Batch No.RSPO 594418, Seal Number 6957792 - 6957801.</p>	
3.8.9	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure</p>	<p>PT. Inti Indosawit Subur – Muara Bulian POM operate subcontractor for CPO transporter. Since latest audit until audit ASA2.2 there is no change in the outsourced company for CPO/PK transporter. The appointed outsourced company is PT. Mitra Abadi Damai and PT Trans Jaya Pertama. PT IIS Muara Bulian has a procedure to control the outsourced transporter through "SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019". Company has conducted the refreshment and socialization of the supply chain procedure to transporter March 2024. It was confirmed during interview with transporter</p> <p>Internal control for CPO and PK delivery by contractor has made as well by:</p>	Complied

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	<p>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"> ✓ Surat Izin Muat CPO dan Kernel, contain information of Driver name, Identity number, Car/Truck Number, CPO/PK Dispatch time, netto, incoming and outgoing time. ✓ Delivery Order Slip from Transporter, contain information of sales contract number, Truck number, destination, driver name, port destination. ✓ Daftar Periksa Kesiapan Pengiriman CPO/Kernel contain information of Truck number, driver name, date of inspection, item inspection including: driver identity and completeness of vehicle legality, completeness of physical standard of vehicle, number of seal. <p>PT IIS Muara Bulian has a contract agreement to ensure that transporter engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance. Contract agreement are as below:</p> <ul style="list-style-type: none"> - Perjanjian Pengangkutan No. 05/XII/TJP-IIS/2020 dated 1 December 2020; agreement contract between PT Inti Indosawit Subur and PT Trans Jaya Pertama. Transport commodity: CPO, PK and CPKO - Perjanjian Pengangkutan No. 05/VIII/TJP-IIS/2020 dated 2 August 2019; agreement contract between PT Inti Indosawit Subur and PT Mitra Abadi Damai. Transport commodity: PK. <p>In the contract agreement article 7 point k. stated that transporter "<i>Bersedia memenuhi persyaratan system sertifikasi rantai pasok pada saat pengangkutan bahan baku dan bersedia untuk diaudit oleh auditor internal pihak kedua dan auditor pihak eksternal dari badan sertifikasi yang ditunjuk oleh pihak kedua jika diperlukan</i>". Transporter are willing to comply with Supply Chain certification system during transport and willing to be audited by second party or external party from CB appointed by company if deemed necessary.</p>	
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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.	<div>PT Inti Indosawit Subur – Muara Bulian POM has recorded name and contact detail of all contractors, as follows:</div> <table><tr><td>Name of Transporter:</td><td>PT Trans Jaya Pertama</td><td>PT. Mitra Abadi Damai</td></tr><tr><td>Initial Name:</td><td>TJP</td><td>MAD</td></tr><tr><td>Address:</td><td>Kota Medan, Sumatera Utara</td><td>Jl. Sultan Syahril No.19 RT18, Kel. Talang Bakung, Jambi 36139</td></tr><tr><td>Contact Person:</td><td>Vincent Purba/Rudi</td><td>Andy Wijaya AS/Nastasya</td></tr><tr><td>Telephone:</td><td>08126041***</td><td>082323672***</td></tr></table>	Name of Transporter:	PT Trans Jaya Pertama	PT. Mitra Abadi Damai	Initial Name:	TJP	MAD	Address:	Kota Medan, Sumatera Utara	Jl. Sultan Syahril No.19 RT18, Kel. Talang Bakung, Jambi 36139	Contact Person:	Vincent Purba/Rudi	Andy Wijaya AS/Nastasya	Telephone:	08126041***	082323672***	Complied
Name of Transporter:	PT Trans Jaya Pertama	PT. Mitra Abadi Damai																
Initial Name:	TJP	MAD																
Address:	Kota Medan, Sumatera Utara	Jl. Sultan Syahril No.19 RT18, Kel. Talang Bakung, Jambi 36139																
Contact Person:	Vincent Purba/Rudi	Andy Wijaya AS/Nastasya																
Telephone:	08126041***	082323672***																
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.	<div>PT Inti Indosawit Subur – Muara Bulian POM aware to inform its CB regarding the name and contact detail of any new contractor prior to next assessment. The transporter mentioned above is not new transporter and has been exist since previous year (2019/2020).</div> <div>The site committed to inform CB related name and contact details of any new contractors as mentioned in Procedure “SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019”.</div>	Complied															
3.8.12	<div>Record keeping</div> <div>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.</div> <div>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.</div>	<div>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:</div> <div><ul style="list-style-type: none">- FFB delivery note- Weighbridge ticket for FFB receiving, CPO and PK delivery- Delivery Order- Sales contract- Shipping Announcement- Mass balance report</div>	Complied															

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	<p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>- Internal audit RSPO SCCS and Management review</p> <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> <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 Muara Bulian POM" period 2023: January – March, April – June, July – September, October – December; Period 2024: January – March, April – ytd 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.</p> <p>According to Mass balance Report, Muara POM only deliver Mass Balance sales from a positive stock (based on actual production).</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 FY2022/2023 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 – Muara Bulian 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 2024 as 19.89% (average) and KER as 5.50% (average).</p> <p>Actual OER year 2023 average was 20.50% and KER was 5.41%.</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The actual conversion ratio is monitored on daily basis through sounding result and documented in daily report. PT. Inti Indosawit Subur – Muara</p>	Complied

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		<p>Bulian POM is able to demonstrate the work instruction for analysis of oil content.</p> <p>Based on Laporan Harian Produksi dated 31 May 2024, the sounding result and production report shows that actual conversion ratios from FFB into CPO are:</p> <ul style="list-style-type: none"> a. For FFB from Muara Bulian Estate: 22.66% b. For FFB from Muara Bulian Plasma: 19.86% c. For FFB from third-party: 19.81% <p>And actual conversion ratios from FFB into PK are:</p> <ul style="list-style-type: none"> a. For FFB from Muara Bulian Estate: 5.03% b. For FFB from Muara Bulian Plasma: 4.98% c. For FFB from third-party: 4.99% <p>Budget vs Actual conversion ratios year 2023 (Jan – Dec) from FFB into CPO are:</p> <ul style="list-style-type: none"> a. For FFB from Muara Bulian Estate: budget 21.50%, actual 22.69% b. For FFB from Muara Bulian Plasma: budget 19.10%, actual 20.10% c. For FFB from third-party: budget 19.00%, actual 20.04% <p>And actual conversion ratios year 2023 (Jan – Dec) from FFB into PK are:</p> <ul style="list-style-type: none"> a. For FFB from Muara Bulian Estate: budget 5.50%, actual 5.41% b. For FFB from Muara Bulian Plasma: budget 5.50%, actual 5.42% c. For FFB from third-party: budget 5.50%, actual 5.41% 	
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>PT. Inti Indosawit Subur – Muara Bulian POM uses Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate (Muara Bulian Estate) and 6 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD).</p>	Complied

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3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>PT. Inti Indosawit subur – Muara Bulian POM has made shipping announcement inside PalmTrace transaction, sample seen for period June 2023 – May 2024:</p> <table><tr><th>Transaction ID</th><th>Buyer</th><th>Product</th><th>SC Model</th><th>Volume*</th><th>Status</th></tr><tr><td>TR-1c280c71-4f39</td><td>PT. IIS – Tungkal Ulu KCP</td><td>CSPK</td><td>MB</td><td>659.18</td><td>Confirmed</td></tr><tr><td>TR-34496b03-b386</td><td>PT DAS - Taman Raja KCP</td><td>CSPK</td><td>MB</td><td>441.77</td><td>Confirmed</td></tr><tr><td>TR-b36167f0-b644</td><td>PT. IIS – Tungkal Ulu KCP</td><td>CSPK</td><td>MB</td><td>1012.82</td><td>Confirmed</td></tr><tr><td>TR-fea31176-292c</td><td>PT DAS - Taman Raja KCP</td><td>CSPK</td><td>MB</td><td>1482.98</td><td>Confirmed</td></tr><tr><td>TR-f2807d44-3bdb</td><td>PT AAJ</td><td>CSPO</td><td>MB</td><td>624.56</td><td>Confirmed</td></tr><tr><td>TR-04b59296-18c4</td><td>PT AAJ</td><td>CSPO</td><td>MB</td><td>943.5</td><td>Confirmed</td></tr><tr><td>TR-50d1ab8e-65eb</td><td>PT AAJ</td><td>CSPO</td><td>MB</td><td>166.43</td><td>Confirmed</td></tr><tr><td>TR-4704db38-05a0</td><td>PT AAJ</td><td>CSPO</td><td>MB</td><td>3547.83</td><td>Confirmed</td></tr><tr><td>TR-c26d4586-31bf</td><td>PT PRC</td><td>CSPO</td><td>MB</td><td>1899.71</td><td>Confirmed</td></tr><tr><td>TR-3e98b4b2-a9c6</td><td>PT. IIS – Tungkal Ulu KCP</td><td>CSPK</td><td>MB</td><td>658.8</td><td>Confirmed</td></tr><tr><td>TR-7b83b31d-1763</td><td>PT DAS - Taman Raja KCP</td><td>CSPK</td><td>MB</td><td>481.86</td><td>Confirmed</td></tr><tr><td>TR-e2801260-1a60</td><td>PT SDS</td><td>CSPO</td><td>MB</td><td>339.99</td><td>Confirmed</td></tr></table>	Transaction ID	Buyer	Product	SC Model	Volume*	Status	TR-1c280c71-4f39	PT. IIS – Tungkal Ulu KCP	CSPK	MB	659.18	Confirmed	TR-34496b03-b386	PT DAS - Taman Raja KCP	CSPK	MB	441.77	Confirmed	TR-b36167f0-b644	PT. IIS – Tungkal Ulu KCP	CSPK	MB	1012.82	Confirmed	TR-fea31176-292c	PT DAS - Taman Raja KCP	CSPK	MB	1482.98	Confirmed	TR-f2807d44-3bdb	PT AAJ	CSPO	MB	624.56	Confirmed	TR-04b59296-18c4	PT AAJ	CSPO	MB	943.5	Confirmed	TR-50d1ab8e-65eb	PT AAJ	CSPO	MB	166.43	Confirmed	TR-4704db38-05a0	PT AAJ	CSPO	MB	3547.83	Confirmed	TR-c26d4586-31bf	PT PRC	CSPO	MB	1899.71	Confirmed	TR-3e98b4b2-a9c6	PT. IIS – Tungkal Ulu KCP	CSPK	MB	658.8	Confirmed	TR-7b83b31d-1763	PT DAS - Taman Raja KCP	CSPK	MB	481.86	Confirmed	TR-e2801260-1a60	PT SDS	CSPO	MB	339.99	Confirmed	Complied
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		<table><tr><td>TR-b7c70d30-01e0</td><td>PT PRC</td><td>CSPO</td><td>MB</td><td>5403.16</td><td>Confirmed</td></tr><tr><td>TR-fdf3a7c7-7a6f</td><td>PT SDS</td><td>CSPO</td><td>MB</td><td>499.46</td><td>Confirmed</td></tr><tr><td>TR-34669f3c-8381</td><td>PT SDS</td><td>CSPO</td><td>MB</td><td>187.5</td><td>Confirmed</td></tr><tr><td>TR-040cbdd5-8434</td><td>PT SDS</td><td>CSPO</td><td>MB</td><td>163.97</td><td>Confirmed</td></tr><tr><td>TR-7a8f6eea-b8dd</td><td>PT SDS</td><td>CSPO</td><td>MB</td><td>142.63</td><td>Confirmed</td></tr></table> <p>PT. Inti Indosawit Subur – Muara Bulian POM has removed RSPO certified CSPO from their PalmTrace account: Transaction ID ST-TR-29542c9e-c382, Volume CSPO remove 1,292.95 MT, Sold as ISCC.</p>	TR-b7c70d30-01e0	PT PRC	CSPO	MB	5403.16	Confirmed	TR-fdf3a7c7-7a6f	PT SDS	CSPO	MB	499.46	Confirmed	TR-34669f3c-8381	PT SDS	CSPO	MB	187.5	Confirmed	TR-040cbdd5-8434	PT SDS	CSPO	MB	163.97	Confirmed	TR-7a8f6eea-b8dd	PT SDS	CSPO	MB	142.63	Confirmed	
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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 – Muara Bulian POM has made off product claims regarding the support of RSPO certified oil palm products. The organization aware about the RSPO Rules on Market Communications and Claims.</p>	Complied																														
General corporate communications																																	
4.1	<p>A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a “non-product related” claim.</p>	<p>PT. Inti Indosawit Subur (with the brand Asian Agri), the parent company of Muara Bulian POM is highlighting its commitment to the principles of RSPO, and directly referring to RSPO website. The corporate communication can be found at http://www.asianagri.com.</p>	Complied																														
4.2	<p>In corporate communications, a member is allowed to:</p> <ul style="list-style-type: none">A. display its RSPO membership statusB. display the RSPO web address (www.rspo.org)C. state that the member supports the work of RSPOD. state the member’s history with regard to RSPO	<p>Corporate communication in Asian Agri website:</p> <ul style="list-style-type: none">• Display its RSPO membership status: On the website of Asian Agri, it was stated the company is RSPO Member since February 2006.	Complied																														

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	E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership	<ul style="list-style-type: none"> Display the RSPO web address: Not in direct manner. In Asian Agri website, company made a link to RSPO website. State the member supports the work of the RSPO: Not in direct manner. In the website, Asian Agri wrote "In 2006, Asian Agri became a member of the Roundtable of Sustainable Palm Oil (RSPO), a global multi-stakeholder certification system to develop and implement global standards for sustainable palm oil production. We received our 1st RSPO certification for our estate in 2010, and in 2012, the certification for our smallholder scheme." State the member's history with regards to the RSPO: In the website of Asian Agri, it was stated the company is RSPO Member since February 2006. Use of RSPO Trademark to promote its membership of the RSPO: in the website, the company display RSPO Trademarks with valid trademark license number 1-0022-06-100-00. 	
4.3	Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	Asian Agri website did not display the RSPO Corporate Logo.	Complied
4.4	In corporate communications, RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products.	In the Asian Agri website, stated that the company is RSPO Member since February 2006. However, it is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied
4.5	<p>Additionally, RSPO certified members are allowed to make statements that highlight their RSPO certification status and product-related claims in their corporate communication tools. Some permitted examples include:</p> <ul style="list-style-type: none"> "We have been sourcing RSPO certified palm oil since (YEAR)." "We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year." "We have been RSPO certified since (YEAR)." "We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil." 	In the Asian Agri website, stated that the company is RSPO Member since February 2006. However, it is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied

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	<ul style="list-style-type: none"> • "In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified." • "Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits." • "We are RSPO certified. Ask us for our RSPO certified products." 		
4.6	<p>RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following:</p> <p>A. Use the RSPO Trademark with a valid trademark licence number to promote its membership of RSPO. It is sufficient for non-certified members to indicate this only once in their communication.</p> <p>B. Claim statements are limited to the following examples:</p> <p>i. "The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR)."</p> <p>ii. X% of palm oil sourced by our organisation are certified through the Roundtable on Sustainable Palm Oil (RSPO) supply chains as (a) Identity Preserved, (b) Segregated, (c) Mass Balance, or (d) Book and Claim.</p> <p>C. In cases wherein an organisation/member would like to indicate their commitment to sourcing RSPO certified volumes, the statement shall be accompanied with a disclaimer: "This reported figure is not audited through RSPO Certification".</p>	PT Inti Indosawit Subur – Muara Bulian POM is a certified member as a subsidiary of RSPO registered member PT Inti Indosawit Subur. The corporate communication of PT Inti Indosawit Subur can be seen in the company website, under brand Asian Agri at the address www.asianagri.com . Asian Agri website display RSPO Trademarks with valid trademark licence number 1-0022-06-100-00. Therefore, this is not applicable.	Not Applicable
Product-specific communications			
5.1 General			
5.1.1	Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters,	PT Inti Indosawit Subur – Muara Bulian POM Product-specific communications made under sales contract, DO and weighbridge ticket/delivery note. Stated in sales documents that the product they sold is RSPO Certified model MB.	Complied

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	displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.		
5.1.2	Product-specific communications are voluntary.	PT Inti Indosawit Subur – Muara Bulian POM stated the supply chain model and certificate number, e.g. in sales contract, DO and weighbridge ticket/delivery note.	Complied
5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself.	PT Inti Indosawit Subur – Muara Bulian POM did not display the RSPO label for product-specific communications.	Complied
5.1.4	Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication.	PT Inti Indosawit Subur – Muara Bulian POM did not use RSPO trademark or any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products	Complied
5.1.5	<p>If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders or distributors, enters into any agreement whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO Trademark licence number, the following conditions shall be met as shown below</p> <ul style="list-style-type: none"> • RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field. • Both parties shall inform their certification body in writing about the agreement. • The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer. 	PT Inti Indosawit Subur – Muara Bulian POM is a palm oil mill; thus, this indicator is not applicable.	Not Applicable
5.1.6	Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit	PT Inti Indosawit Subur – Muara Bulian POM is a palm oil mill; thus, this indicator is not applicable.	Not Applicable

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	shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain.		
5.2 Off pack claims			
5.2.1	Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made.	PT Inti Indosawit Subur – Muara Bulian POM did not use RSPO trademark or logo in the product specific communication. PT Inti Indosawit Subur – Muara Bulian POM Product-specific communications made under sales contract, DO and weighbridge ticket/delivery note. Stated in sales documents that the product they sold is RSPO Certified model Mass Balance. PT Inti Indosawit Subur – Muara Bulian POM stated the supply chain model and certificate number, e.g. in sales contract, DO and weighbridge ticket/delivery note.	Complied
5.2.2	When confirming the sale of certified palm oil products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	It was verified that when selling certified oil palm product, PT Inti Indosawit Subur – Muara Bulian POM stated the supply chain model and certificate number, e.g. in sales contract, DO and weighbridge ticket/delivery note.	Complied
5.2.3	Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the requirements of the RSPO SCCS can follow either one of these two options: <ul style="list-style-type: none"> • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products, it is essential that customers are aware that the products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation. 	PT Inti Indosawit Subur – Muara Bulian POM is a palm oil mill; thus, this indicator is not applicable.	Not Applicable

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	<ul style="list-style-type: none"> If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. 		
5.3 On pack claims			
5.3.1	<p>Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.</p>	<p>PT. Inti Indosawit Subur – Muara Bulian 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.</p> <p>PT Inti Indosawit Subur – Muara Bulian POM sold its oil palm product in bulk, there was no on-pack claim used.</p>	Complied
5.3.2	<p>In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:</p> <p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p> <ul style="list-style-type: none"> RSPO IP/SG CERTIFIED* Contains RSPO IP/SG palm oil* Contains RSPO certified palm oil (IP/SG)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<p>PT Inti Indosawit Subur – Muara Bulian POM sold its oil palm product in bulk, there was no on-pack claim used.</p>	Complied
	<p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> RSPO MIXED* Contributes to the production of RSPO certified palm oil* Contains RSPO certified palm oil (MB)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<p>PT Inti Indosawit Subur – Muara Bulian POM sold its oil palm product in bulk, there was no on-pack claim used.</p>	Complied
	<p>C) For Partially Certified Products:</p> <ul style="list-style-type: none"> RSPO 50% MIXED* Contains at least 50% RSPO certified palm oil* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<p>PT Inti Indosawit Subur – Muara Bulian POM sold its oil palm product in bulk, there was no on-pack claim used.</p>	Complied

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	D) For Products covered with Book and Claim (B&C): <ul style="list-style-type: none"> • RSPO CREDITS* • Supports the production of RSPO certified palm oil* • Contains palm oil covered by the purchase of RSPO Credits* *Add RSPO TM Licence Number below or next to the claim.	PT Inti Indosawit Subur – Muara Bulian POM sold its oil palm product in bulk, there was no on-pack claim used.	Complied
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	PT Inti Indosawit Subur – Muara Bulian POM sold its oil palm product in bulk, there was no on-pack claim used.	Complied
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	The communication of PT Inti Indosawit Subur – Muara Bulian POM has not mentioned to consumers information about their suppliers' RSPO membership status.	Complied
5.3.5	Use of the RSPO Label is restricted to claims about RSPO certified sustainable palm oil contained in products and is not authorised for use in relation to any other ingredient.	PT Inti Indosawit Subur – Muara Bulian POM sold its oil palm product in bulk, up to this moment, PT Inti Indosawit Subur has not use RSPO label or trademark on their product.	Complied
5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	PT Inti Indosawit Subur – Muara Bulian POM sold its oil palm product in bulk, up to this moment, PT Inti Indosawit Subur has not use RSPO label or trademark on their product.	Complied
MODULE B – MASS BALANCE SPECIFIC RULES			
Mass Balance palm oil content			
	95% of the palm oil content must be RSPO MB-certified.	PT Inti Indosawit Subur – Muara Bulian POM is producing and selling CPO and PK; All certified product sold are 100 % content oil palm RSPO MB-certified. No such cases as the certified material is bulk intermediate product. By default, the material is either 100% claimed under RSPO or not RSPO.	Complied
	If 100% of RSPO MB certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified	There is no percentage of non-certified oil palm within the certified product. All certified product produced and sold are 100% MB.	Complied

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	palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.	PT Inti Indosawit Subur – Muara Bulian POM was not produce end consumer goods. The production are CPO and PK.	
Messaging			
	<p>Messaging ALLOWED in storytelling in product-specific communications includes:</p> <ul style="list-style-type: none"> • [Palm oil products]/[palm oil]/[palm kernel oil] from RSPO certified mills and plantations were mixed with non-certified palm oil products in the supply chain. <p>The volume of [palm oil products]/[palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations.</p>	PT Inti Indosawit Subur – Muara Bulian POM was not use storytelling in product-related communications.	Complied
Product-Specific Communications Labelling			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> • The RSPO Label MUST contain the tag "MIXED". The tag "MIXED" designates palm oil products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag "MIXED" on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO Label can also include the statement: "[The palm oil contained in this product] contributes to the production of certified sustainable palm oil". 	No product related communications are found. Information provided in Cooperate website includes the total certified units, traceability of the supply chain and commitment to have all units certified.	Complied
Principle 4: Respect community and human rights and deliver benefit Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.			
Criteria 4.1: The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and	There are no changes related to human rights policies that have been approved by the President Director, Mr. Kevin Tio on December 1 2019 in Medan which was approved by the Main Director (Kevin Tio). Policies	Complied

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	<p>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>relating to human rights, explained in the Company Policy in point 13, which states that: "The company respects human rights by treating all employees fairly, both in terms of acceptance, assessment, working conditions and environment, as well as representation without distinction of ethnicity.", caste, national origin, religion/belief, disability, gender, sexual orientation, trade union policy discount and/or age".</p> <p>Company policies are also published in the form of posters at strategic places in the Muara Bulian Plantation and Mill.</p> <p>Separately, the company also has policies related to human rights defenders, which are contained in the Internal Memorandum No. 049/HO/MEMO/INT/03/20 from Head Operational dated 20 March 2020: "Protection of reporters/defenders of human rights defenders from acts of revenge, intimidation, and hatred".</p> <p>This policy was socialized to all employees of PT Inti Indosawit Subur on 7 April 2024 at the Muara Bulian POM and Estate Muara Bulian (the list of participants can be shown during the audit) and to stakeholders</p> <p>Scheme Smallholder</p> <p>Its policy has been socialized to each member of Cooperative through the training of RSPO P&C and Socialization of ethical conduct "Kebijakan Etik KUD" was carried out by Koperasi for example on 8 February 2024 for KUD Subur Makmur, KUD Karya Lestari and KUD Makmur Rejeki attended by 13 members for KUD Subur Makmur, 12 members for KUD Karya Lestari and 11 members for KUD Makmur Rejeki</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>Until this ASA2.2, the auditor team did not identify any use of mercenaries and/or paramilitaries in the company's operational activities.</p> <p>Based on interviews with stakeholders (i.e. Government Agencies, Village Heads, Trade Unions & Labor Unions) as well as online searches</p>	Complied

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		there is no indication that the company has committed violence or used any form of harassment, including the use of paid soldiers and paramilitaries in their operational activities.	
Criteria 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>Since the procedure, there is no change related to the mechanism to handle complaint and grievance: <i>SOP Penanganan Keluhan dari Eksternal</i> No.AA-GL-5005-R0 01". This SOP explains mechanism to resolve external complaint. While for internal complaint/grievance is regarding complaint/grievance from employee/workers: <i>SOP Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i> No. AA-HR-308 0.5R0".</p> <p>Separately, the certification unit has also established a mechanism related to land conflict/dispute "<i>SOP Penanganan Konflik Lahan</i> AA-GL-5003.1-R1" effective date on 22/08/2011.</p> <p>Based on interview with several stakeholder during ASA2.2 audit (Kehidupan Baru Village, Bulian Jaya Village, Tidar Kuranji Village), that there is no land conflict noted.</p> <p>Scheme Smallholder:</p> <p>There were no changes related to internal and external complaint resolution mechanisms, namely the "<i>Mekanisme Komunikasi dan Konsultasi</i>" dated 16 January 2017, in the form of a Flowchart which describes the process of incoming information requests up to the responses provided. Based on interviews with a sample of farmers, the determination of this mechanism is through a meeting of representatives from farmers and also several community leaders as external parties.</p> <p>Each farmer member has a "<i>Buku Panduan dan Catatan Petani Plasma</i>", which explains the flow of the communication process. Both written and</p>	Complied

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		<p>oral communications are conveyed to the 'group management' through the Secretary of each KUD.</p> <p>For internal communication, the ICS Group Manager has set up a "<i>Komunikasi Internal Group Sertifikasi</i>" procedure. SOP No. 007/DOK/SOP/PT IIS KLU-AA/2016 dated 26 November 2016.</p> <p>The SOP describes internal communication mechanisms regarding group members, extension workers, farmer managers and group managers. The Group Manager is responsible for responding to internal Group communications.</p> <p>Based on interviews with a sample of farmers at (69 smallholders sampled), they stated that while working with the company (PT IIS – Muara Bulian) there was no intimidation, coercion and the process proceeded in accordance with informed consent. During the establishment of the oil palm plantation partnership with PT IIS, there were no complaints from the surrounding community, in fact it was quite significant in improving the community's economy.</p>	
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>When this audit is carried out, the complaint procedure document above 4.2.1 (SOP for Handling External Complaints No. AA-GL-5005-R0 01) can be shown and verified during the audit. Based on interviews with several stakeholders during the ASA2.2 audit, in general they understand enough about the channels/channels to be able to convey their complaints. Until this audit was carried out there were no changes related to the complaint's procedure, as follows:</p> <ol style="list-style-type: none"> Standard Operating Procedure (SOP) No. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015. SOP Penanganan Keluhan Masyarakat No: AA-GL-510.1-R0, dated 1 January 2013, stipulated that: <p><i>4.1 Reporting Public Complaints</i></p>	Complied

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		<p><i>4.1.1 General Scope: "Procedures ... for handling complaints from Concerned Parties including organizations, people, groups or institutions ...". In order for the Company to respond appropriately to the Parties' complaints in order to be identified, anonymous questions or complaints (without identity / cannot be traced by their identity) cannot be accepted. "</i></p> <p><i>4.2 Procedure for Handling / Resolving Community Complaints</i></p> <p><i>4.2.5 "This form identifies the person or organization that submitted the complaint, along with the basis of the complaint and the background of the acknowledgment (detailed description of the incident, name of the Party involved, the specific time when the event was the reason for the complaint and the basis of the complaint)."</i></p> <p><i>4.2.12 "... The company will endeavour to resolve complaints within 15 working days".</i></p> <p>c. The mechanism used for handling employee complaints is as outlined in the SOP document No. AA-HR-308.5-R0, Rev 0 (SOP for Submission and Resolution of Employee Complaints) signed by Management on December 11, 2009. In the SOP, the procedures for submitting and handling employee complaints have been described, starting from how to submit complaints, the time for giving responses, parties who is responsible for responding to every employee complaint and documenting every employee complaint.</p> <p>Resolves disputes system which developed by unit of certification has follows the RSPO Policy on respect for Human Right Defender (HRD) stated in the Human Rights Policy dated 1 December 2019 signed by Managing Director. Separately, the company has also had a policy related a Human Rights Defender, which is stated in the Internal Memorandum No. 049/HO/MEMO/INT/03/20 from Head Operational on</p>	
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		<p>20 March 2020: "Protection against the reporters/defenders of human rights defender from acts of revenge, intimidation and harassment.</p> <p>The external grievances and complaint handling was stipulated as per "<i>Mekanisme Keluhan</i>" which provided in the Website of Asian Agri and can be accessed by all stakeholder of Asian Agri at https://www.asianagri.com/id/panel-keberlanjutan/keluhan-pengaduan/.</p> <p>Asian Agri stakeholders include but are not limited to the Government, farmers, suppliers, vendors, academics, NGOs, media, etc., provided different complaint channels to report their complaints/findings. Reporters can submit complaints and information related to business violations, corruption, harassment, criminal acts, the environment, and others.</p> <p>Based on interview with several of worker, union labor and the stakeholder/local community of Village, that the procedure has been understood, as for the workers and society who cannot read (Illiterates) has been described verbally and in general already know and understand related to the complaint procedure.</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>As described in indicator 4.2.1 which explains that based on public consultations with community leaders in Head of Kehidupan Baru Village, Bulian Jaya Village, Tidar Kuranji Village and related agencies, until this surveillance there was no issues regarding complaints or grievances submitted by the surrounding community.</p> <p>In the ASA2.2 audit, there is information related to alleged pollution in the Singoan River as per online media on 21 May 2023. PT IIS – Muara Bulian POM has responded and take an action related to the complaint, as follows:</p> <p>Based on interview with the staff of DLH Batanghari Regency namely Ibu Ade Okta Wahyuni, obtained information that the laboratory test results cannot be published, however Mrs. Ade has stated that the test</p>	Complied

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		<p>results show that the Singoan River has not identified any pollution caused by waste from Muara Bulian POM.</p> <p>Dicuments verified:</p> <ol style="list-style-type: none"> 1. Test Result Report from PT ITEK Solution Indonesia for surface water quality inspection dated 07 September 2023 with sample points from the <u>Hulu Singoan River</u>, quality standards based on Government Regulation no. 22/2021. Based on the test results, it does not exceed quality standards, there is no indication of river water pollution. 2. Test Result Report from PT ITEK Solution Indonesia for surface water quality inspection dated 07 September 2023 with sample points from the Hilir Singoan River, quality standards based on Government Regulation no. 22/2021. Based on the test results, it does not exceed quality standards, there is no indication of river water pollution. 	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>As described in indicator 4.2.1 which explains that based on public consultations with community leaders in Head of Kehidupan Baru Village, Bulian Jaya Village, Tidar Kuranji Village) and related agencies, until this surveillance there was no issues regarding complaints or grievances submitted by the surrounding community.</p> <p>Based on interview with the Public Relations (Humas: Hubungan Masyarakat), that if any grievance or complaint, so they will receive conflict information (individuals, issues with surrounding communities, other representative institutions, media or newspapers), the company will analyze and map the problem through internal discussions (Estate manager, Managing Director, Regional Head and Stakeholder Relations), then Companies through Humas will provide opportunities access to relevant interested parties (Local Government, Legal Apparatus or legal advice) to obtain legal protection or independent technical assessments</p>	Complied

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		<p>(Relevant agencies, for example: Plantation Service, National Land Agency-BPN or Environmental Regency Service).</p> <p>In this conflict resolution process, it is carried out through the FPIC process (making an agreement together with the conflicting party and or the institution) that represents it and if this does not meet an agreement, then litigation will be carried out or settlement through legal channels.</p> <p>In the ASA2.2 audit, there is information related to alleged of pollution in the Singoan River, as follows: The alleged of pollution in the Singoan River as per online media on 21 May 2023. PT IIS – Muara Bulian POM has responded and take an action related to the complaint, as follows:</p> <p>Based on interview with the staff of DLH Batanghari Regency namely Ibu Ade Okta Wahyuni, obtained information that the laboratory test results cannot be published, however Mrs. Ade has stated that the test results show that the Singoan River has not identified any pollution caused by waste from Muara Bulian POM.</p> <p>Documents verified:</p> <ol style="list-style-type: none"> 1. Test Result Report from PT ITEK Solution Indonesia for surface water quality inspection dated 07 September 2023 with sample points from the <u>Hulu Singoan River</u>, quality standards based on Government Regulation no. 22/2021. Based on the test results, it does not exceed quality standards, there is no indication of river water pollution. 2. Test Result Report from PT ITEK Solution Indonesia for surface water quality inspection dated 07 September 2023 with sample points from the Hilir Singoan River, quality standards based on Government Regulation no. 22/2021. Based on the test results, it does not exceed quality standards, there is no indication of river water pollution. 	
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Criteria 4.3: The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local community are demonstrated.</p> <p>- Minor compliance -</p>	<p>PT IIS - Muara Bulian has a social awareness program for the surrounding community through the CSR (Corporate Social Responsibility) program, which is a form of the company's responsibility and contribution to the surrounding community. The preparation of this CSR program takes place every year and, in its formulation, involves the village community through representatives of the Village Head in the village year Musrembang discussion (<i>Musyawarah Perencanaan Pembangunan</i> - Development Planning Conference) i.e. In accordance with Law number 25 of 2004 concerning the National Development Planning System, Musrenbang is a forum between actors in order to prepare National development plans and Regional development plans. The last Musrembang was held in January 2024 in every village in Merlung District was attended by Public Relation (Bpk. Ayat Khumaini) to represent the company.</p> <p>CSR program for the 2023 period with a budget of IDR 75,827,357 and has been realized amounting to IDR 54,418,083 or 71.77%. Meanwhile, for the 2024 period, the budget for the CSR program is IDR 104,000,000. Until May 2024, the amount of IDR has been realized IDR 30,590,600 or 29,41%. CSR Program 2024 period has socialized to all Village on 9 January 2024.</p> <p>The following are the programs and realization of the CSR Program for the 2023 period:</p>	Complied

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		<table><tr><th>Project Type</th><th>Project name</th><th>Cost Realization Accumulative</th><th>Remaining Budget (%)</th><th>Realization Cost (%)</th></tr><tr><td>1 - Social</td><td>Religious/National Holiday Assistance (MTQ Activities in Moro Sebo Ilir District) PT IIS Muara Bulian</td><td>-</td><td>5,000,000</td><td>-</td></tr><tr><td>1 - Social</td><td>Assistance for Kompangan/Kuda Lumping Musical Instruments in Bulian Jaya Village</td><td>-</td><td>3,000,000</td><td>-</td></tr><tr><td>1 - Social</td><td>GAPKI Assistance/KMB Reserves</td><td>-</td><td>3,500,000</td><td>-</td></tr><tr><td>1 - Social</td><td>Assistance for Speeding District Boat Routes. Batang Hari PT. IIS KMB</td><td>5,000,000</td><td>-</td><td>100.00</td></tr><tr><td>1 - Social</td><td>Assistance for PKK Women's Activities in the MSI District Community Empowerment Program</td><td>2,000,000</td><td>1,000,000</td><td>66.67</td></tr><tr><td>2 - Economy</td><td>Alternative Economic Assistance for 3 Villages PT. IIS - KMB</td><td>18,900,000</td><td>-</td><td>100.00</td></tr><tr><td>2 - Economy</td><td>Assistance for Palm Oil Maintenance in Canal Village TBM-1</td><td>4,290,726</td><td>8,909,274</td><td>32.51</td></tr><tr><td>4 - Health</td><td>Free Medical Assistance for Tidar Kuranji Village</td><td>8,500,000</td><td>-</td><td>100.00</td></tr><tr><td>4 - Health</td><td>Assistance in Providing Supplementary Food to Pregnant Women and Toddlers (Stunting Prevention)</td><td>7,000,000</td><td>-</td><td>100.00</td></tr><tr><td>5 - Infrastructure</td><td>Assistance for Road Repairs in Bulian Jaya Village, MSI District</td><td>4,000,000</td><td>-</td><td>100.00</td></tr><tr><td>6 - Environment</td><td>Planting Reforestation Trees to maintain Ecosystem Balance</td><td>4,727,357</td><td>-</td><td>100.00</td></tr><tr><td colspan="2">Total CSR KMB</td><td>54,418,083</td><td>21,409,274</td><td>71.77</td></tr></table>	Project Type	Project name	Cost Realization Accumulative	Remaining Budget (%)	Realization Cost (%)	1 - Social	Religious/National Holiday Assistance (MTQ Activities in Moro Sebo Ilir District) PT IIS Muara Bulian	-	5,000,000	-	1 - Social	Assistance for Kompangan/Kuda Lumping Musical Instruments in Bulian Jaya Village	-	3,000,000	-	1 - Social	GAPKI Assistance/KMB Reserves	-	3,500,000	-	1 - Social	Assistance for Speeding District Boat Routes. Batang Hari PT. IIS KMB	5,000,000	-	100.00	1 - Social	Assistance for PKK Women's Activities in the MSI District Community Empowerment Program	2,000,000	1,000,000	66.67	2 - Economy	Alternative Economic Assistance for 3 Villages PT. IIS - KMB	18,900,000	-	100.00	2 - Economy	Assistance for Palm Oil Maintenance in Canal Village TBM-1	4,290,726	8,909,274	32.51	4 - Health	Free Medical Assistance for Tidar Kuranji Village	8,500,000	-	100.00	4 - Health	Assistance in Providing Supplementary Food to Pregnant Women and Toddlers (Stunting Prevention)	7,000,000	-	100.00	5 - Infrastructure	Assistance for Road Repairs in Bulian Jaya Village, MSI District	4,000,000	-	100.00	6 - Environment	Planting Reforestation Trees to maintain Ecosystem Balance	4,727,357	-	100.00	Total CSR KMB		54,418,083	21,409,274	71.77	
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Total CSR KMB		54,418,083	21,409,274	71.77																																																																
Criteria 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.																																																																				
4.4.1	(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior	During ASA2.2, the certificate holder can show legal ownership, including, there is no change related to the legal ownership until this audit:	Complied																																																																	

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	<p>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>	<ul style="list-style-type: none"> • Plantation permit refer to Keputusan Menteri Kehutanan Nomor: 494/Kpts-II/1991, tanggal 7 Aug 1991 <i>tentang Pelepasan Areal Hutan seluas 17,500 Ha di Kab. Tanjung Jabung dan 9,356 Ha di Kab. Batanghari Untuk Usaha Budidaya Perkebunan Dengan Pola PIR TRANS Atas Nama PT. Inti Indosawit Subur</i> • HGU Certificate No. 1 (22 Dec 2003); Reference: SK Kepala BPN No. 14/HGU/1992 (15 Sep 1992) area 1,256.18 Ha. Expired: 31 Dec 2027 • HGU Certificate No. 4 (6 Oct 2003) reference SK HGU No: 51/HGU/BPN RI/2003 (10 Sep 2003), area 523.42 Ha. Expired: 6 Oct 2038. • HGU Certificate No. 2 (13 Aug 2003) reference SK HGU No: 03.540.1-06-2003 (10 Jul 2003), area 324,800 m² (32.48 Ha). Expired: 13 Aug 2038. • HGU Certificate No. 1 (13 Aug 2003) reference SK HGU No: 01.540.1-06-2003 (10 Jul 2003), area 272,700 M² (27.27 Ha). Expired: 13 Aug 2038. • HGU Certificate No. 3 (13 Aug 2003) reference SK HGU No: 02.540.1-06-2003 (10 Jul 2003), area 170,900 M² (17.09 Ha). Expired: 13 Aug 2038. • SHM certificates for all scheme smallholder <p>PT. Inti Indosawit Subur 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</p>	
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		<p>party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>Scheme Smallholders</p> <p>Based on interview with sampled smallholder (69 smallholders) and relevant authority, Plantation Agency; there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary.</p>	
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>There are no changes of compliance statement compared to last year audit.</p> <p>PT. Inti Indosawit Subur – Muara Bulian is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. The land status is clear, and no land disputes raised. Copies of documents evidencing agreement-making processes and negotiated agreement detailing the FPIC process are obsolete.</p>	Complied
	<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>There are no changes of compliance statement compared to last year audit.</p> <p>PT. Inti Indosawit Subur – Muara Bulian is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. The land status is clear, and no land disputes raised. Copies of documents evidencing agreement-making processes and negotiated agreement detailing the FPIC process are obsolete.</p>	

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	4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities. Including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.	<p>There are no changes of compliance statement compared to last year audit.</p> <p>PT. Inti Indosawit Subur – Muara Bulian is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. The land status is clear, and no land disputes raised. Copies of documents evidencing agreement-making processes and negotiated agreement detailing the FPIC process are obsolete.</p>	
4.4.3	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>Use of the land for oil palm in PT Inti Indosawit Subur - Muara Bulian Estate and Mill based on land use title or HGU with total area is 8,814 Ha, which consist of 5 HGU certificate. All this area has mapped on "Peta Kebun PT IIS Muara Bulian Scale 1:30,000". FPIC mechanism and process is available in Land Dispute Resolution procedure (SOP AA-GL5003.1-R1 "<i>Penanganan Konflik Lahan</i>", dated 22 August 2011). FPIC mechanism is available on the flowchart and part of the process of conflict resolution.</p> <p>Based on interviews during ASA2.2 with the village heads of Bulian Jaya, it was confirmed that the plantations of PT IIS – Bulian Estate bordered the land of the village community and that village communities were allowed access to pass through the plantation areas of Muara Bulian Estate and Mill.</p> <p>Scheme Smallholders:</p> <p>An appropriate map is available in all ownership certificates (SHM) of the farmers. There are 3,118 ownership rights certificates (SHM) and the map of their plot within.</p>	Complied

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		Based on interviews during ASA2.2 with the village heads of Bulian Jaya Both Muara Bulian Estate, Mill and Smallholders, there is no traditional use or customary right within the certified area.	
4.4.4	All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements. - Minor compliance -	<p>There are no changes of compliance statement compared to last year audit.</p> <p>Muara Bulian Estate and Mill: PT Inti Indosawit Subur – Muara Bulian is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on reviewed of the statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Scheme Smallholder: In this ASA2.2 audit, the samples of scheme smallholder were KUD Subur Makmur, KUD Makmur Rejeki, KUD Karya Lestari and based on interview with them (69 smallholders) obtained information that there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have ownership certificates "SHM".</p>	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	<p>There are no changes of compliance statement compared to last year audit.</p> <p>Estate:</p>	Complied

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		<p>PT Inti Indosawit Subur – Muara Bulian has not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on reviewed of the statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Scheme Smallholder:</p> <p>In this surveillance audit, the samples of scheme smallholder were KUD Subur Makmur, KUD Makmur Rejeki, KUD Karya Lestari and based on interview with them (69 smallholders) obtained information that there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "<i>Transmigrasi</i>" in early 1980's, therefore all smallholders plots already have ownership certificates "SHM".</p>	
4.4.6	<p>There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>PT. Inti Indosawit Subur is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. The land status is clear, and no land disputes raised. Copies of documents evidencing agreement-making processes and negotiated agreement detailing the FPIC process are obsolete.</p>	Complied
<p>Criteria 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>Muara Bulian Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made.</p>	Complied

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		<p>Also, there is not acquired any new land for oil palm plantation. At that time, the requirement for FPIC was not available, but the company has follow the regulation for their legal document such as HGU Certificate.</p> <p>The company does not restrict local peoples access through the main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Muara Bulian Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>PT. Inti Indosawit Subur 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>Smallholder Scheme:</p> <p>In this surveillance audit, the samples of scheme smallholder were KUD Subur Makmur, KUD Makmur Rejeki and KUD Karya Lestari and based on interview with them (69 smallholders) obtained information that there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "<i>Transmigrasi</i>" in early 1980's, therefore all smallholders plots already have legal use rights.</p> <p>There is no new planting occurred within this scope.</p>	
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal	<p>Muara Bulian Estate:</p>	Complied

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	<p>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>	<p>Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. At that time, the requirement for FPIC was not available, but the company has follow the regulation for their legal document such as HGU Certificate.</p> <p>The company does not restrict local peoples access through the main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Muara Bulian Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>PT. Inti Indosawit Subur 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>Smallholder Scheme:</p> <p>In this ASA2.2, the samples of scheme smallholder were KUD Subur Makmur, KUD Makmur Rejeki, and KUD Karya Lestari and based on interview with them (69 smallholders) obtained information that there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program</p>	
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		<p>"<i>Transmigrasi</i>" in early 1980's, therefore all smallholders plots already have legal use rights.</p> <p>There is no new planting occurred within this scope.</p>	
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>	<p>Muara Bulian Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. At that time, the requirement for FPIC was not available, but the company has follow the regulation for their legal document such as HGU Certificate.</p> <p>The company does not restrict local peoples access through the main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Muara Bulian Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>PT. Inti Indosawit Subur 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>Smallholder Scheme:</p>	Complied

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		<p>In this ASA2.2, the samples of scheme smallholder were KUD Subur Makmur, KUD Makmur Rejeki, and KUD Karya Lestari and based on interview with them (69 smallholders) obtained information that there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p> <p>There is no new planting occurred within this scope.</p>	
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>	<p>Muara Bulian Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. At that time, the requirement for FPIC was not available, but the company has follow the regulation for their legal document such as HGU Certificate.</p> <p>The company does not restrict local peoples access through the main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Muara Bulian Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>PT. Inti Indosawit Subur 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</p>	Complied

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		<p>party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>Smallholder Scheme:</p> <p>In this surveillance audit, the samples of scheme smallholder were KUD Subur Makmur, KUD Makmur Rejeki, and KUD Karya Lestari and based on interview with them (69 smallholders) obtained information that there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "<i>Transmigrasi</i>" in early 1980's, therefore all smallholders plots already have legal use rights.</p> <p>There is no new planting occurred within this scope.</p>	
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>	<p>Muara Bulian Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. At that time, the requirement for FPIC was not available, but the company has follow the regulation for their legal document such as HGU Certificate.</p> <p>The company does not restrict local peoples access through the main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Muara Bulian Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>PT. Inti Indosawit Subur 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</p>	Complied

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		<p>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>Smallholder Scheme:</p> <p>In this surveillance audit, the samples of scheme smallholder were KUD Subur Makmur, KUD Makmur Rejeki, KUD Karya Lestari and based on interview with them (69 smallholders) obtained information that there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "<i>Transmigrasi</i>" in early 1980's, therefore all smallholders plots already have legal use rights.</p> <p>There is no new planting occurred within this scope.</p>	
4.5.6	<p>Evidence is available that the communities or their representatives gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p> <p>- Minor compliance -</p>	<p>Muara Bulian Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. At that time, the requirement for FPIC was not available, but the company has follow the regulation for their legal document such as HGU Certificate.</p> <p>The company does not restrict local peoples access through the main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Muara Bulian Estate area statement documents, interview with</p>	Complied

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		<p>communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities. PT. Inti Indosawit Subur 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>Smallholder Scheme:</p> <p>In this ASA2.2, the samples of scheme smallholder were KUD Subur Makmur, KUD Makmur Rejeki, KUD Karya Lestari and based on interview with them (69 smallholders) obtained information that there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "<i>Transmigrasi</i>" in early 1980's, therefore all smallholders plots already have legal use rights.</p> <p>There is no new planting occurred within this scope.</p>	
4.5.7	<p>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.</p> <p>- Minor compliance -</p>	<p>Muara Bulian Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. At that time, the requirement for FPIC was not available, but the company has follow the regulation for their legal document such as HGU Certificate.</p>	Complied

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		<p>The company does not restrict local peoples access through the main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Muara Bulian Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>PT. Inti Indosawit Subur 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>Smallholder Scheme:</p> <p>In this surveillance audit, the samples of scheme smallholder were KUD Subur Makmur, KUD Makmur Rejeki, KUD Karya Lestari and based on interview with them (69 smallholders) obtained information that there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "<i>Transmigrasi</i>" in early 1980's, therefore all smallholders plots already have legal use rights.</p> <p>There is no new planting occurred within this scope.</p>	
4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>Muara Bulian Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made.</p>	Complied

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		<p>Also, there is not acquired any new land for oil palm plantation. At that time, the requirement for FPIC was not available, but the company has follow the regulation for their legal document such as HGU Certificate.</p> <p>The company does not restrict local peoples access through the main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Muara Bulian Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>PT. Inti Indosawit Subur 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>Smallholder Scheme:</p> <p>In this ASA2.2, the samples of scheme smallholder were KUD Subur Makmur, KUD Makmur Rejeki, KUD Karya Lestari and based on interview with them (69 smallholders) obtained information that there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p> <p>There is no new planting occurred within this scope.</p>	
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Criteria 4.6: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.

4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>PT IIS – Muara Bulian has been built since 1980 through the PIR-TRANS program. To date, PT IIS – Muara Bulian has not expanded or acquired new land for oil palm plantations.</p> <p>However, land acquisition and compensation mechanisms are still available if a land dispute occurs as explained in indicator 4.2.1, the company will use the procedures as regulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 concerning Land Conflict Management which was approved by management on 08 May 2015.</p> <p>SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether or not customary, legal or other rights and its compensation calculation.</p> <p>Based on interviews with several stakeholders (government and village head around the plantation) during this audit, since building the plantation there are no customary or user rights at Muara Bulian Plantations.</p> <p>Smallholder Scheme:</p> <p>In this surveillance audit, the samples of scheme smallholder were KUD Karya Lestari, KUD Budi Sari and KUD Makmur Rezeki and based on</p>	Complied
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		interview with them (69 smallholders) obtained information that there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.	
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>PT IIS – Muara Bulian has been built since 1980 through the PIR-TRANS program. To date, PT IIS – Muara Bulian has not expanded or acquired new land for oil palm plantations.</p> <p>However, land acquisition and compensation mechanisms are still available if a land dispute occurs as explained in indicator 4.2.1, the company will use the procedures as regulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 concerning Land Conflict Management which was approved by management on 08 May 2015.</p> <p>SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether or not customary, legal or other rights and its compensation calculation.</p> <p>Based on interviews with several stakeholders (government and village head around the plantation) during this audit, since building the plantation there are no customary or user rights at Muara Bulian Plantations.</p>	Complied

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		<p>Smallholder Scheme:</p> <p>In this surveillance audit, the samples of scheme smallholder were KUD Karya Lestari, KUD Budi Sari and KUD Makmur Rezeki and based on interview with them (69 smallholders) obtained information that there is no land dispute within smallholders' area since the plantation developed. Smallholders land obtained based on government program "<i>Transmigrasi</i>" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	
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>There are no changes of compliance statement compared to last year audit.</p> <p>PT IIS – Muara Bulian has been built since 1980 through the PIR-TRANS program. To date, PT IIS – Muara Bulian has not expanded or acquired new land for oil palm plantations.</p> <p>However, land acquisition and compensation mechanisms are still available if a land dispute occurs as explained in indicator 4.2.1, the company will use the procedures as regulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 concerning Land Conflict Management which was approved by management on 08 May 2015.</p> <p>SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether or not customary, legal or other rights and its compensation calculation.</p> <p>Based on interviews with several stakeholders (government and village head around the plantation) during this audit, since building the</p>	Complied

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		<p>plantation there are no customary or user rights at Muara Bulian Plantations.</p> <p>Smallholder Scheme:</p> <p>In this surveillance audit, the samples of scheme smallholder were KUD Karya Lestari, KUD Budi Sari and KUD Makmur Rezeki and based on interview with them (69 smallholders) obtained information that there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "<i>Transmigrasi</i>" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	
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>There are no changes of compliance statement compared to last year audit.</p> <p>PT IIS – Muara Bulian has been built since 1980 through the PIR-TRANS program. To date, PT IIS – Muara Bulian has not expanded or acquired new land for oil palm plantations.</p> <p>However, land acquisition and compensation mechanisms are still available if a land dispute occurs as explained in indicator 4.2.1, the company will use the procedures as regulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 concerning Land Conflict Management which was approved by management on 08 May 2015.</p> <p>SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying</p>	Complied

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		<p>whether or not customary, legal or other rights and its compensation calculation.</p> <p>Based on interviews with several stakeholders (government and village head around the plantation) during this audit, since building the plantation there are no customary or user rights at Muara Bulian Plantations.</p> <p>Smallholder Scheme:</p> <p>In this surveillance audit, the samples of scheme smallholder were KUD Karya Lestari, KUD Budi Sari and KUD Makmur Rezeki and based on interview with them (69 smallholders) obtained information that there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "<i>Transmigrasi</i>" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	
Criteria 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>PT IIS – Muara Bulian has been built since 1980 through the PIR-TRANS program. To date, PT IIS – Muara Bulian has not expanded or acquired new land for oil palm plantations.</p> <p>However, land acquisition and compensation mechanisms are still available if a land dispute occurs as explained in indicator 4.2.1, the company will use the procedures as regulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 concerning Land Conflict Management which was approved by management on 08 May 2015.</p>	Complied

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		<p>SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether or not customary, legal or other rights and its compensation calculation.</p> <p>Based on interviews with several stakeholders (government and village head around the plantation) during this audit, since building the plantation there are no customary or user rights at Muara Bulian Plantations.</p> <p>Smallholder Scheme:</p> <p>In this surveillance audit, the samples of scheme smallholder were KUD Karya Lestari, KUD Budi Sari and KUD Makmur Rezeki and based on interview with them (69 smallholders) obtained information that there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "<i>Transmigrasi</i>" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>PT IIS – Muara Bulian has been built since 1980 through the PIR-TRANS program. To date, PT IIS – Muara Bulian has not expanded or acquired new land for oil palm plantations.</p> <p>However, land acquisition and compensation mechanisms are still available if a land dispute occurs as explained in indicator 4.2.1, the company will use the procedures as regulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 concerning Land</p>	Complied

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		<p>Conflict Management which was approved by management on 08 May 2015.</p> <p>SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether or not customary, legal or other rights and its compensation calculation.</p> <p>Based on interviews with several stakeholders (government and village head around the plantation) during this audit, since building the plantation there are no customary or user rights at Muara Bulian Plantations.</p> <p>Smallholder Scheme:</p> <p>In this surveillance audit, the samples of scheme smallholder were KUD Karya Lestari, KUD Budi Sari and KUD Makmur Rezeki and based on interview with them (69 smallholders) obtained information that there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	
4.7.3	<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 compared to last year audit.</p> <p>PT IIS – Muara Bulian has been built since 1980 through the PIR-TRANS program. To date, PT IIS – Muara Bulian has not expanded or acquired new land for oil palm plantations.</p>	Complied

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		<p>However, land acquisition and compensation mechanisms are still available if a land dispute occurs as explained in indicator 4.2.1, the company will use the procedures as regulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 concerning Land Conflict Management which was approved by management on 08 May 2015.</p> <p>SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighbouring the plantation and/or conflict land. Including, identifying whether or not customary, legal or other rights and its compensation calculation.</p> <p>Based on interviews with several stakeholders (government and village head around the plantation) during this audit, since building the plantation there are no customary or user rights at Muara Bulian Plantations.</p> <p>Smallholder Scheme:</p> <p>In this surveillance audit, the samples of scheme smallholder were KUD Karya Lestari, KUD Budi Sari and KUD Makmur Rezeki and based on interview with them (69 smallholders) obtained information that there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	
Criteria 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.			

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4.8.1	<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>There are no changes of compliance statement compared to last year audit.</p> <p>PT IIS – Muara Bulian was established since 1980 through the PIR-TRANS program and there is no indication that PT IIS – Muara Bulian is currently acquiring new land for oil palm plantations.</p> <p>If there is a land dispute as described in indicator 4.2.1, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p> <p>The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighbouring the plantation and/or conflict land. Including, identifying whether or not customary, legal or other rights and its compensation calculation.</p> <p>Smallholder Scheme:</p> <p>In this surveillance audit, the samples of scheme smallholder were KUD Karya Lestari, KUD Budi Sari and KUD Makmur Rezeki and based on interview with them (69 smallholders) obtained information that there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	Complied
4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties</p>	<p>There are no changes of compliance statement compared to last year audit.</p>	Complied

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	<p>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>PT IIS – Muara Bulian was established since 1980 through the PIR-TRANS program and there is no indication that PT IIS – Muara Bulian is currently acquiring new land for oil palm plantations.</p> <p>If there is a land dispute as described in indicator 4.2.1, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p> <p>The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighbouring the plantation and/or conflict land. Including, identifying whether or not customary, legal or other rights and its compensation calculation.</p> <p>Smallholder Scheme:</p> <p>In this surveillance audit, the samples of scheme smallholder were KUD Karya Lestari, KUD Budi Sari and KUD Makmur Rezeki and based on interview with them (69 smallholders) obtained information that there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	
4.8.3	<p>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).</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>PT IIS – Muara Bulian was established since 1980 through the PIR-TRANS program and there is no indication that PT IIS – Muara Bulian is currently acquiring new land for oil palm plantations.</p>	Complied

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	- Minor compliance -	<p>If there is a land dispute as described in indicator 4.2.1, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p> <p>The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighbouring the plantation and/or conflict land. Including, identifying whether or not customary, legal or other rights and its compensation calculation.</p> <p>Smallholder Scheme:</p> <p>In this surveillance audit, the samples of scheme smallholder were KUD Karya Lestari, KUD Budi Sari and KUD Makmur Rezeki and based on interview with them (69 smallholders) obtained information that there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "<i>Transmigrasi</i>" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	
4.8.4	<p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p> <p>- Minor compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>PT IIS – Muara Bulian was established since 1980 through the PIR-TRANS program and there is no indication that PT IIS – Muara Bulian is currently acquiring new land for oil palm plantations.</p> <p>If there is a land dispute as described in indicator 4.2.1, the company will use the procedure as stipulated in the Standard Operating Procedure</p>	Complied

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		<p>(SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p> <p>The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighbouring the plantation and/or conflict land. Including, identifying whether or not customary, legal or other rights and its compensation calculation.</p> <p>Smallholder Scheme:</p> <p>In this surveillance audit, the samples of scheme smallholder were KUD Karya Lestari, KUD Budi Sari and KUD Makmur Rezeki and based on interview with them (69 smallholders) obtained information that there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "<i>Transmigrasi</i>" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	
<p>Principle 5: Support smallholder inclusion</p> <p>Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p>			
<p>Criteria 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
5.1.1	<p>Current and previous period prices for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	<p>Based on interviews with management staff representatives during this surveillance audit, Public Relations staff, Sustainability Managers and plasma obtained information that actual prices were communicated directly to the plasma board or other FFB suppliers. The actual price is also informed via social media messengers such as WhatsApp or via telephone call.</p>	Complied

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		<p>PT IIS-Muara Bulian has a mechanism for receiving external FFB (agents/collectors) and setting prices for external FFB and plasma FFB, as follows:</p> <p>1) Determining prices for external FFB (agents/collectors): CPO prices – Transport x OER CPO 3rd party of FFB = X PK prices – Transport x OER PK 3rd party of FFB = Y Total= XY Processing cost= YY Bruto prices= XYYY Others cost= YX FFB prices= XYYYYX</p> <p>Note: The price of external FFB is influenced by market prices, compator factories and FFB conditions in the field.</p> <p>FFB Prices on May 2024 period</p> <table> <tr> <th>PMKS Date</th><th>PTU (IDR)/kg</th><th>PMKS Date</th><th>PTU (IDR)/kg</th></tr> <tr> <td>LM</td><td>2,540</td><td>16</td><td>2,540</td></tr> <tr> <td>1</td><td>2,560</td><td>17</td><td>2,520</td></tr> <tr> <td>2</td><td>2,560</td><td>18</td><td>2,520</td></tr> <tr> <td>3</td><td>2,560</td><td>19</td><td>2,520</td></tr> <tr> <td>4</td><td>2,560</td><td>20</td><td>2,520</td></tr> <tr> <td>5</td><td>2,560</td><td>21</td><td>2,540</td></tr> <tr> <td>6</td><td>2,560</td><td>22</td><td>2,540</td></tr> <tr> <td>7</td><td>2,560</td><td>23</td><td>2,540</td></tr> </table>	PMKS Date	PTU (IDR)/kg	PMKS Date	PTU (IDR)/kg	LM	2,540	16	2,540	1	2,560	17	2,520	2	2,560	18	2,520	3	2,560	19	2,520	4	2,560	20	2,520	5	2,560	21	2,540	6	2,560	22	2,540	7	2,560	23	2,540	
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			8	2,560	24	2,540				
			9	2,560	25	2,540				
			10	2,560	26	2,540				
			11	2,560	27	2,540				
			12	2,560	28	2,540				
			13	2,560	29	2,540				
			14	2,560	30	2,540				
			15	2,560	31	2,560				
						2) Plasma TBS pricing: Referring to the Minister of Agriculture Regulation no. 1 of 2018; concerning Guidelines for determining the purchase price of Fresh Fruit Bunches (FFB) for Palm Oil Produced by Planters, with the formula: $HTBS(P) = K(P-1) \{HCPO(P) \times RCPO(Tab) + (HPK(P) \times RPK(Tab))\}$ Information: <ul style="list-style-type: none">- HTBS(P): The price of FFB received by growers at the factory level, expressed in IDR/kg in the current period (P).- K(P-1): Proportion index which shows the share in percentage (%) in the previous period.- HCPO(P): The weighted average price of CPO realized by export sales (FOB) and local for each company in the current period, expressed in IDR/Kg.- HPK(P): The weighted average PK price of realized export sales (FOB) and local for each company in IDR/kg.- RSPO(Tab) CPO yield expressed in percentage (%).				

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		<p>- RPK(Tab) PK yield expressed in percentage (%).</p> <p>Koperasi Plasma Muara Bulian receives information on FFB prices from the Jambi Province FFB Pricing Team once every week.</p> <p>Taken as a sample, FFB prices for the period April – May 2024:</p> <table><tr><th rowspan="3">Oil Palm Age (year)</th><th colspan="4">FFB Price (Province Jambi)- IDR/Kg</th></tr><tr><th colspan="2">Apr-24</th><th>May-24</th><th></th></tr><tr><th>5-11*)</th><th>12-18*)</th><th>17-23</th><th>24-30</th></tr><tr><td>3</td><td>2,286.64</td><td>2,286.64</td><td>2,150.60</td><td>2,160.86</td></tr><tr><td>4</td><td>2,423.33</td><td>2,423.33</td><td>2,283.57</td><td>2,295.63</td></tr><tr><td>5</td><td>2,536.25</td><td>2,536.25</td><td>2,389.63</td><td>2,402.15</td></tr><tr><td>6</td><td>2,643.29</td><td>2,643.29</td><td>2,490.23</td><td>2,503.21</td></tr><tr><td>7</td><td>2,710.21</td><td>2,710.21</td><td>2,553.21</td><td>2,566.50</td></tr><tr><td>8</td><td>2,766.22</td><td>2,766.22</td><td>2,606.38</td><td>2,820.05</td></tr><tr><td>9</td><td>2,821.72</td><td>2,821.72</td><td>2,658.42</td><td>2,672.30</td></tr><tr><td>10-20</td><td>2,904.93</td><td>2,904.93</td><td>2,737.86</td><td>2,752.44</td></tr><tr><td>21</td><td>2,814.84</td><td>2,814.84</td><td>2,653.70</td><td>2,668.02</td></tr><tr><td>22</td><td>2,814.84</td><td>2,814.84</td><td>2,653.70</td><td>2,668.02</td></tr><tr><td>23</td><td>2,814.84</td><td>2,814.84</td><td>2,653.70</td><td>2,668.02</td></tr><tr><td>24</td><td>2,814.84</td><td>2,814.84</td><td>2,653.70</td><td>2,668.02</td></tr><tr><td>25</td><td>2,680.77</td><td>2,680.77</td><td>2,528.66</td><td>2,542.67</td></tr></table> <p><i>Note: *) Provincial TBS price determination. Jambi has agreed to be used for 2 weeks, due to the national holiday Eid al-Fitr 1445 H.</i></p>	Oil Palm Age (year)	FFB Price (Province Jambi)- IDR/Kg				Apr-24		May-24		5-11*)	12-18*)	17-23	24-30	3	2,286.64	2,286.64	2,150.60	2,160.86	4	2,423.33	2,423.33	2,283.57	2,295.63	5	2,536.25	2,536.25	2,389.63	2,402.15	6	2,643.29	2,643.29	2,490.23	2,503.21	7	2,710.21	2,710.21	2,553.21	2,566.50	8	2,766.22	2,766.22	2,606.38	2,820.05	9	2,821.72	2,821.72	2,658.42	2,672.30	10-20	2,904.93	2,904.93	2,737.86	2,752.44	21	2,814.84	2,814.84	2,653.70	2,668.02	22	2,814.84	2,814.84	2,653.70	2,668.02	23	2,814.84	2,814.84	2,653.70	2,668.02	24	2,814.84	2,814.84	2,653.70	2,668.02	25	2,680.77	2,680.77	2,528.66	2,542.67	
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		Based on interviews with a sample of farmers; KUD Karya Lestari, KUD Budi Sari, KUD Subur Makmur and KUD Makmur Rezeki and based on interview with them (69 smallholders), they stated that the FFB price determination is informed by PT IIS through field assistants to each farmer via the "Whatsup" application every week. They stated that the FFB price determination by PT IIS was in accordance with the determination by the Jambi Provincial Government.	
5.1.2	<p>(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>During ASA2.2, based on information gathered from the plasma manager and CSV staff obtained that the information of price directly informed by the purchasing department to the respective suppliers through the short message application such as via whatsapp.</p> <p>During the field visit to the respective KUD's has also informed that price updating by board of KUD's board was posted on the Buletin Board.</p> <p>In addition, the price information for outgrowers or CSV also updated by purchasing department. There were no issues on this.</p> <p>In the period 2021-2024 this is the period when replanting is carried out in plasma plantations. Muara Bulian Plasma has held training for farmers, namely "Training on Alternative Income When Replanting" in November 2019 and January 2020 at Bogor and in January 2021 and 2022 at each cooperative office.</p> <p>The aim of the training is to prepare farmers to face their monthly income situation during the replanting period. During the training, it was also explained regarding purchasing and setting prices for FFB to farmers (smallholders). In the period after replanting (TBM: Immature Plantation), in accordance with the MoU of cooperation with each cooperative/KUD, that after the first harvest up to 48 months (4 years) the farmer's income (in the form of TBS sales) will be included in the escrow account which will be disbursed in the 48th month or after the debt credit period has finished.</p>	Complied

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		Based on interview with the smallholder’s representatives known that the training has given the positive insight to the smallholders to facing the replanting period. Some smallholders have prepared the alternative income during the replanting with other business such as quail farm, goat and cows and domestic waste composting.																																																																					
5.1.3	<p>(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>During this Surveillance audit has verified that the Management of PT Inti Indosawit Subur – Muara Bulian Plasma has committed to share the RSPO premium price in accordance with the agreement with their smallholder. Premium sharing is not distributed in cash money, instead in smallholder’s empowerment activities aimed at increasing the competence and competitiveness of smallholders based on participatory suggest from the smallholders.</p> <p>During this audit obtained information that the premium sharing for Muara Bulian Plasma period 2023/2024 has been distributed, for example:</p> <table><tr><th colspan="6">Realization of RSPO Certified Premium Sharing Stone Procurement Year 2023-2024</th></tr><tr><th rowspan="2">Cooperative/KUD</th><th rowspan="2">Villages</th><th rowspan="2">Date</th><th colspan="2">Ralization</th><th rowspan="2">Total</th></tr><tr><th>Stones for Hamparan (Ton)</th><th>Access Road Stones (Ton)</th></tr><tr><td>KUD Barokah</td><td>Karya Mukti Village</td><td>19-May-23</td><td>38</td><td>20</td><td>58</td></tr><tr><td>KUD Subur Makmur</td><td>Tidar Kuranji Village</td><td>19-May-23</td><td>86</td><td>46</td><td>132</td></tr><tr><td>KUD Budi Sari</td><td>Bukit Sari Village</td><td>19-May-23</td><td>22</td><td>12</td><td>34</td></tr><tr><td>KUD Makmur Rezeki</td><td>Bulian Jaya Village</td><td>19-May-23</td><td>34</td><td>18</td><td>52</td></tr><tr><td>KUD Karya Lestari</td><td>Kehiduapan Baru Village</td><td>19-May-23</td><td>39</td><td>21</td><td>60</td></tr><tr><td>Danau Empbat Village</td><td>Danau Embat Village</td><td>19-May-23</td><td>108</td><td>58</td><td>166</td></tr><tr><td>Rantau Kapas Village</td><td>Rantau Kapas Village</td><td>19-May-23</td><td>15</td><td>8</td><td>23</td></tr><tr><td>Terusan Village</td><td>Terusan Viilage</td><td>19-May-23</td><td>32</td><td>17</td><td>49</td></tr><tr><td>T o t a l</td><td></td><td></td><td>374</td><td>200</td><td>574</td></tr></table> <p>For the FFB price has followed the prices that set by Dinas Perkebunan Province of Jambi as described on 5.1.1 above.</p>	Realization of RSPO Certified Premium Sharing Stone Procurement Year 2023-2024						Cooperative/KUD	Villages	Date	Ralization		Total	Stones for Hamparan (Ton)	Access Road Stones (Ton)	KUD Barokah	Karya Mukti Village	19-May-23	38	20	58	KUD Subur Makmur	Tidar Kuranji Village	19-May-23	86	46	132	KUD Budi Sari	Bukit Sari Village	19-May-23	22	12	34	KUD Makmur Rezeki	Bulian Jaya Village	19-May-23	34	18	52	KUD Karya Lestari	Kehiduapan Baru Village	19-May-23	39	21	60	Danau Empbat Village	Danau Embat Village	19-May-23	108	58	166	Rantau Kapas Village	Rantau Kapas Village	19-May-23	15	8	23	Terusan Village	Terusan Viilage	19-May-23	32	17	49	T o t a l			374	200	574	Complied
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5.1.4	<p>(C) Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and repayments through FFB price reductions for replanting and/or, other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>The smallholder's member of Muara Bulian Plasma originated from government transmigration program on 1990 – 1991. Mostly from East Java, West Java and local area (Jambi Province).</p> <p>Based on information obtained during the onsite audit 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>All smallholders which registered as supply bases to Muara Bulian POM have agreement with PT. Inti Indosawit Subur – Muara Bulian. The timeframe of the contract is 1 cycle period (25 years) since first planting. For the renewal contract has been shown during audit and the terms of contract been better then 1st cycle which can improved the livelihood of the smallholders.</p> <p>In this period there were several small farmers who had carried out replanting using the Government assistance program, namely BPDPKS funds (Palm Oil Plantation Fund Management Agency). Thus, the renewal of the partnership contract has been updated:</p> <ol style="list-style-type: none"> 1) Partnership Agreement for the Development of Palm Oil Plantations (KKPA) - <i>Surat Perjanjian Kerjasama Pembangunan Kebun Kelap Sawit Pola Kemitraan (KKPA)</i> between PT IIS and Koperasi Tuah Sakato dated 14/09/1998 and the period of time until the plant has not produced palm oil FFB 2) Sustainable Partnership Agreement - <i>Perjanjian Kemitraan Berkelanjutan</i> between PT inti Indosawit Subur and Koperasi Unit Desa (KUD) Barokah dated 1 Janaury 2024 and expired until one cycle of palm oil plantation (25 years). 3) Cooperation Agreement between Village Unit Cooperative (KUD) Makmur Rezeki and PT Into Indosawit Subur regarding Replanting/PSR Stage 1 and management of Oil Palm Plantations 	Complied

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		<p>using a Partnership Pattern (<i>Kemitraan</i>) dated 08/03/2022 with a period of one oil palm plant cycle or \pm 25 years.</p> <p>4) Cooperation Agreement between Village Unit Cooperative (KUD) Makmur Rezeki and PT Into Indosawit Subur regarding Replanting/PSR Stage 2 and management of Oil Palm Plantations using a Partnership Pattern (<i>Kemitraan</i>) dated 08/03/2022 with a period of one oil palm plant cycle or \pm 25 years.</p> <p>5) Cooperation Agreement between Village Unit Cooperative (KUD) Subur Makmur and PT Into Indosawit Subur regarding Replanting/PSR and management of Oil Palm Plantations using a Partnership Pattern (<i>Kemitraan</i>) dated 08/03/2022 with a period of one oil palm plant cycle or \pm 25 years.</p> <p>6) Sustainable Partnership Agreement - <i>Perjanjian Kemitraan Berkelanjutan</i> between PT inti Indosawit Subur and Koperasi Unit Desa (KUD) Subur Makmur dated 3 August 2023 and expired until one cycle of palm oil plantation (25 years).</p> <p>7) KUD Budi Sari has prepared an Application Letter which was signed by the Smallholder representative (Chairman of KUD Budi Sari Bpk. Nopriwan) dated March 23 2022 which states:</p> <ul style="list-style-type: none"> - Area of 249 Ha (an area of 181 Ha has been planted) through BPD PKS funds requesting to continue cooperation to assist in garden maintenance before Tanama produces. - An area of 68 Ha with a condition that has not been cleared and requests to partner with PT IIS-Muara Bulian Plasma and agrees to use a RAB of IDR 61,133,251 per Ha <p>Sustainable Partnership Agreement - <i>Perjanjian Kemitraan Berkelanjutan</i> between PT inti Indosawit Subur and Koperasi Unit Desa (KUD) Karya Lestari dated 1 January 2024 and expired until one cycle of palm oil plantation (25 years).</p>	
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5.1.6	<p>(C) 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>Smallholders received the daily and monthly report for FFB's that deliver to Muara Bulian POM. Price, weigh, deduction and amount paid are clearly described within the document. Payment to smallholders in monthly basis.</p> <p>Through the interview with FFB supplier (supplied to Muara Bulian POM) obtained information that the FFB price only updated if any changes. However, the FFB payments maximum 3 days after the mill received the FFB (according to the contract).</p> <p>Document review for FFB payment for KUD Subur Makmur, KUD Makmur Rezeki and KUD Karya Lestari on 12-18 April 2024 was shown that the FFB payment are in accordance with the FFB price the company has informed to KUD Subur Makmur, KUD Makmur Rezeki and KUD Karya Lestari, the FFB prices is IDR 2,680.77 /kg (Oil Palm Age: 25 Years) and IDR 2,286.64 /Kg for oil palm age of 3 years.</p> <p>There is no dispute related to FFB payments so far.</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>According to the Indonesian regulation, verification of weigh bridge conducted annually. Sighted the record of validation from Trade and Industry Agency – UPTD Metrologi Legal of Kota Jambi as follows:</p> <ul style="list-style-type: none"> • Certificate of test result No. DG 02.03/301/DPP/II/SKHP/2024 dated 20 March 2024 for weighbridge Avery Weight Tronix Type ZM 510 (capacity 50 MT), serial number 212051068 from UPTD Metrologi Legal, Dinas Perdagangan dan Perindustrian, Kota Jambi, valid until March 2025. • Certificate of test result No: DG.02.03/302/DPP/II/SKHP/2024 dated 20 March 2024 for weighbridge Avery Weight Tronik Type ZM 510 (capacity 50 MT), serial number 182050099 from UPTD Metrologi Legal, Dinas Perdagangan dan Perindustrian, Kota Jambi, valid until March 2025. 	Complied

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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&C requirements.</p> <p>For independent Smallholder, support is given in form of CSV (Create Share Value).</p> <p>In supporting CSV members for the certification program, especially RSPO Certification, the company has provided continuous assistances to 2 (two) CSVs who are members of the following organizations:</p> <ul style="list-style-type: none"> • Perkumpulan Cahaya Buana, by address Desa Tidar Kuranji, Kecamatan Maro SeboIir, Kabupaten Batanghari, Provinsi Jambi, Kebubatan Batanghari, 36655 Jambi, Indonesia. Not yet already RSPO Certificate. • Putra Tunggal Bukit Sangkila, by address Desa Karya Mukti, Kecamatan Maro SeboIir, Kabupaten Batanghari, Provinsi Jambi, Kebubatan Batanghari, 36655 Jambi, Indonesia. Already got RSPO Certificate by BSI Services Malaysia Sdn. Bhd since 25 October 2022. 	Complied
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>Based on document verification and information from agencies and stakeholders at the time of the interview, PT IIS-Muara Bulian has several dispute resolution procedures and up to this surveillance there have been no changes and they are still consistently applied up to now, i.e:</p> <ol style="list-style-type: none"> Standard Operating Procedure (SOP) No. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015. SOP Penanganan Keluhan Masyarakat No: AA-GL-510.1-R0, dated 1 January 2013, stipulated that: 	Complied

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		<p><i>4.1 Reporting Public Complaints</i></p> <p><i>4.1.1 General Scope: "Procedures ... for handling complaints from Concerned Parties including organizations, people, groups or institutions ...". In order for the Company to respond appropriately to the Parties' complaints in order to be identified, anonymous questions or complaints (without identity / cannot be traced by their identity) cannot be accepted. "</i></p> <p><i>4.2 Procedure for Handling / Resolving Community Complaints</i></p> <p><i>4.2.5 "This form identifies the person or organization that submitted the complaint, along with the basis of the complaint and the background of the acknowledgment (detailed description of the incident, name of the Party involved, the specific time when the event was the reason for the complaint and the basis of the complaint).</i></p> <p><i>4.2.12 "... The company will endeavour to resolve complaints within 15 working days".</i></p> <p>c. The mechanism used for handling employee complaints is as outlined in the SOP document No. AA-HR-308.5-R0, Rev 0 (SOP for Submission and Resolution of Employee Complaints) signed by Management on December 11, 2009. In the SOP, the procedures for submitting and handling employee complaints have been described, starting from how to submit complaints, the time for giving responses, parties who is responsible for responding to every employee complaint and documenting every employee complaint.</p> <p>Resolves disputes system which developed by unit of certification has follows the RSPO Policy on respect for Human Right Defender (HRD) stated in the Human Rights Policy dated 1 December 2019 signed by Managing Director. Separately, the company has also had a policy related a Human Rights Defender, which is stated in the Internal Memorandum No. 049/HO/MEMO/INT/03/20 from Head Operational on</p>	
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		<p>20 March 2020: "Protection against the reporters/defenders of human rights defender from acts of revenge, intimidation and harassment.</p> <p>The external grievances and complaint handling was stipulated as per "<i>Mekanisme Keluhan</i>" which provided in the Website of Asian Agri and can be accessed by all stakeholder of Asian Agri at https://www.asianagri.com/id/panel-keberlanjutan/keluhan-pengaduan</p> <p>Asian Agri stakeholders include but are not limited to the Government, farmers, suppliers, vendors, academics, NGOs, media, etc., provided different complaint channels to report their complaints/findings. Reporters can submit complaints and information related to business violations, corruption, harassment, criminal acts, the environment, and others.</p> <p>Based on document review and interview to the sample members during ASA2-2, it was known that there is no complaint by the smallholders raised up to May 2024.</p>	
Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	<p>The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p>	<p>The certification unit - PT IIS - Muara Bulian consulted with existing scheme smallholders and also some independent farmers to assess their need for support to improve their livelihoods and their interest in RSPO certification by circulating a letter of agreement to continue the replanting program with the company.</p> <p>Several activities have been carried out to provide knowledge about RSPO certification through training, for example:</p> <ul style="list-style-type: none"> - 8 January 2023 held training on Cooperative management which was attended by 93 participating farmers. - On 27 May 2023, training related to weed control management which was attended by 60 farmers. - On 11-12 April 2023, training related to land legality by BPN Batanghari Regency was attended by 65 farmers. 	Complied

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		Based on field observations and interviews with village heads around the plantation (PT IIS), that: small farmers and/or village residents who also own land and oil palm plantations around plantations owned by PT IIS-Muara Bulian, are also given free access can cross or collect grass in plantation areas to use as livestock.	
5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder). - Minor compliance -	<p>Several activities have been carried out to provide knowledge about RSPO certification through training, for example:</p> <ul style="list-style-type: none"> - 8 January 2023 held training on Cooperative management which was attended by 93 participating farmers. - On 27 May 2023, training related to weed control management which was attended by 60 farmers. - On 11-12 April 2023, training related to land legality by BPN Batanghari Regency was attended by 65 farmers. <p>Based on interviews with sample farmers during field visits, they had an understanding of plant maintenance, fertilization and weed control, either manually or chemically.</p>	Complied
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	<p>Several activities have been carried out to provide knowledge about RSPO certification through training, for example:</p> <ul style="list-style-type: none"> - 8 January 2023 held training on Cooperative management which was attended by 93 participating farmers. - On 27 May 2023, training related to weed control management which was attended by 60 farmers. - On 11-12 April 2023, training related to land legality by BPN Batanghari Regency was attended by 65 farmers. 	Complied

		Based on interviews with sample farmers during field visits, they had an understanding of plant maintenance, fertilization and weed control, either manually or chemically.	
5.2.4	<p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification has assigned chemical weeding team (Tim Unit Semprot/TUS) in each estate/unit to handling chemical weeding activity. The team member originated from own workers (for own estate) and local communities (for smallholder). They regularly attended training on pesticide handling that conducted by the pesticide supplier in collaboration with local pesticide committee.</p> <p>Based on document review and interview with random pesticide applicator known that they were attending the last training on pesticide handling i.e. 22 November 2023 at KUD Subur Makmur, KUD Karya Lestari and KUD Makmur Rezeki; training on weed control and pesticide handling including the types of pesticides used, this training was attended by 25 Smallholders.</p> <p>Based on interviews with several sample farmers, in general they have an understanding regarding the use and management of the pesticides used.</p>	Complied
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>Unit of certification regularly reviews and publicly reports on the progress of the smallholder support program by access website https://www.asianagri.com/id/panel-keberlanjutan/laporankeberlanjutan. That document is publicly available.</p> <p>Plasma manager Muara Bulian also described that PT Inti Indosawit Subur also helped the smallholder based on monthly management review of smallholder performance as follows:</p> <ul style="list-style-type: none"> Assisted the KUD's to achieve the production and upkeep target. Until this audit, plasma area has been achieved 28% below the target, this is because the plant is old and has entered the replanting 	Complied

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		<p>period where fertilization will no longer be carried out since 2023.</p> <ul style="list-style-type: none"> 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. 	
Principle 6: respect workers' rights and conditions Protect workers' rights and ensure safe and decent working conditions.			
Criteria 6.1: Any form of discrimination is prohibited.			
6.1.1	<p>(C) A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes regarding human rights policy i.e. "<i>Kebijakan Perusahaan</i>" signed by the President Director on December 1 2014. In point 13, it is stated: "The Company treats employees fairly, both in terms of recruitment, assessment, working conditions and environment, and representation without regard to race, ethnicity, caste, origin nationality, religion/belief, disability, gender, sexual orientation, trade union membership, political affiliation and/or age."</p> <p>This policy has been communicated to all employees and placed on a notice board in a public and easily accessible place.</p> <p>PT Inti Indosawit Subur – Muara Bulian also has a labor recruitment SOP. Based on SOP: AA-HR-305.2-R0 dated 1 February 2009 concerning "Acceptance of New Employees" (Employee Recruitment and Selection), the company will accept new employees based on their abilities and qualifications. This policy has been communicated to workers. The policy describes the organization as recognizing and respecting the rights of local, migrant, or urban workers.</p> <p>Workers who registered in POM and plantations stated that all workers came from different backgrounds (race, religion, gender, etc.). Ethnic diversity of workers and during interviews with workers, no discrimination was identified based on religion, ethnicity, gender. No evidence of discrimination was found during the audit.</p>	Complied

		<p>The company provides workers with work equipment that is relevant to the nature of the work carried out.</p> <p>The list of employees proves that the company does not discriminate in any form, employees are given the opportunity to work regardless of ethnicity, religion, origin and gender:</p> <p>Verified data:</p> <p>Employee List "Employee List" May 2024 found no evidence of discrimination and migrant workers.</p> <p>Workers at PT IIS-Muara Bulian for the period May 2024, consisting of several ethnic groups: Malayu, Batak, Javanese, Lombok, Minang, Nias, and others. Consists of 2 religions: 92% Islam and 8% Christianity and consists of 28% female workers and 72% male workers.</p> <p>Based on interviews with several workers during field visits, it was stated that there were nodiscriminatory practices and even the company provided equal opportunities to all its workers.</p> <p>Scheme Smallholder:</p> <p>Example KUDs (KUD Subur Makmur, KUD Makmur Rezeki and KUD Karya Lestari) have established policies regarding equal opportunities and treatment in work under the "Kebijakan Koperasi/KUD" dated 14 April 2022, signed by the Chairman of the Cooperative.</p> <p>In the Policy it is stated related to discrimination in point 8; State: Respect human rights by treating all employees of KUD/Cooperatives and farmers fairly, both in the form of acceptance, assessment, working conditions and environment and representation regardless of ethnicity, caste, national origin, religion/belief, disability, gender, sexual orientation, trade union membership, political affiliation and/age.</p> <p>This policy has been socialized to each member of Cooperative through the training of RSPO P&C and Socialization of ethical conduct "Kebijakan</p>	
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		<p>Etik KUD” was carried out by Koperasi for example on 8 February 2024 for KUD Subur Makmur, KUD Karya Lestari and KUD Makmur Rejeki attended by 13 members for KUD Subur Makmur, 12 members for KUD Karya Lestari and 11 members for KUD Makmur Rejeki</p> <p>Based on interviews with several sample farmers during field visits in this audit, there are no practices that contradict discrimination.</p>	
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes regarding human rights policy i.e. "<i>Kebijakan Perusahaan</i>" signed by the President Director on December 1 2014. In point 13, it is stated: "The Company treats employees fairly, both in terms of recruitment, assessment, working conditions and environment, and representation without regard to race, ethnicity, caste, origin nationality, religion/belief, disability, gender, sexual orientation, trade union membership, political affiliation and/or age."</p> <p>This policy has been communicated to all employees and placed on a notice board in a public and easily accessible place.</p> <p>PT Inti Indosawit Subur – Muara Bulian also has a labor recruitment SOP. Based on SOP: AA-HR-305.2-R0 dated 1 February 2009 concerning "Acceptance of New Employees" (Employee Recruitment and Selection), the company will accept new employees based on their abilities and qualifications. This policy has been communicated to workers. The policy describes the organization as recognizing and respecting the rights of local, migrant, or urban workers.</p> <p>Workers who registered in POM and plantations stated that all workers came from different backgrounds (race, religion, gender, etc.). Ethnic diversity of workers and during interviews with workers, no discrimination was identified based on religion, ethnicity, gender. No evidence of discrimination was found during the audit.</p> <p>The company provides workers with work equipment that is relevant to the nature of the work carried out. The list of employees proves that the</p>	Complied

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		<p>company does not discriminate in any form, employees are given the opportunity to work regardless of ethnicity, religion, origin and gender:</p> <p>Verified data:</p> <p>Employee List "Employee List" May 2024 found no evidence of discrimination and migrant workers.</p> <p>Workers at PT IIS-Muara Bulian for the period May 2024, consisting of several ethnic groups: Malayu, Batak, Javanese, Lombok, Minang, Nias, and others. Consists of 2 religions: 92% Islam and 8% Christianity and consists of 28% female workers and 72% male workers.</p> <p>Based on interviews with several workers during field visits, it was stated that there were nodiscriminatory practices and even the company provided equal opportunities to all its workers.</p> <p>Scheme Samllholder:</p> <p>Example KUDs (KUD Subur Makmur, KUD Makmur Rezeki and KUD Karya Lestari) have established policies regarding equal opportunities and treatment in work under the "Kebijakan Koperasi/KUD" dated 14 April 2022, signed by the Chairman of the Cooperative.</p> <p>In the Policy it is stated related to discrimination in point 8; State: Respect human rights by treating all employees of KUD/Cooperatives and farmers fairly, both in the form of acceptance, assessment, working conditions and environment and representation regardless of ethnicity, caste, national origin, religion/belief, disability, gender, sexual orientation, trade union membership, political affiliation and/age.</p> <p>This policy has been socialized to each member of Cooperative through the training of RSPO P&C and Socialization of ethical conduct "Kebijakan Etik KUD" was carried out by Koperasi for example on 8 February 2024 for KUD Subur Makmur, KUD Karya Lestari and KUD Makmur Rejeki</p>	
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		attended by 13 members for KUD Subur Makmur, 12 members for KUD Karya Lestari and 11 members for KUD Makmur RejekiBased on interviews with several sample farmers during field visits in this audit, there are no practices that contradict discrimination.	
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>Since the recruitment procedures were established in 2009, there have been no changes in either content or structure, there are 2 procedures related to worker recruitment and promotion has been set by PT IIS – Muara Bulian Group, including:</p> <ol style="list-style-type: none"> 1. Procedure: AA-HR-305.7-R0 dated 1 August 2021 – regarding Recruitment, Selection and Promotion for Non-Staff Workers 2. Procedure for employee assessment (HRD C-002-00) <p>These procedures were available during audit. This procedure refers to government regulations i.e. UU no. 13/2023 and Law no. 11/2021 Cipta Kerja. There was no identification of discrimination and recruitment processes with payment of fees to prospective workers.</p> <p>It was also explained that the recruitment process is based on the company's planned needs in accordance with the required competencies including the requirement for a health examination performed by doctors, hospital and clinic.</p> <p>Taken as a sample of the recruitment and promotion process: Worker recruitment process in April 2024 for the position of <i>Haravester</i> in Muara Bulian Estate; prospective worker on behalf of Erwin Naingolan.</p> <p><i>Documen</i> verified, such as:</p> <ul style="list-style-type: none"> • Personal data form of application on behalf of Erwin Naingolan i.e. Curriculum vitae • Recruitment requirements, including: photocopy of ID card, family card, job application letter, photocopy of diploma certificate, etc. 	Complied

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		<ul style="list-style-type: none"> Results of health examinations by hospitals and clinics appointed by the company. Daily working Agreement on behalf of Erwin Nainggolan <p>Promotion of daily workers (PHL) to permanent workers: For Muara Bulian Estate, promotion of PHL (non-permanent workers) to SKU (permanent workers) at Muara Bulian Estate in the 2023 period as many as 29 harvesters. In the first semester of 2024 as many 30 workers have been submitted for promotion of PHL (daily workers) to SKU (permanent workers) to the Medan Head Office HRD in May 2024. For Muara Bulian POM as many as 10 workers has been promotion as permanent workers as per memorandum from Mill manager PMB No. 044/MI-PMB/MEMO/04/2024 dated 22 April 2024.</p> <p>Scheme Smallholder: Most farmers usually manage their land independently. All workers are considered freelancers. Workers are hired based on verbal agreements regarding work unit rates, payment systems, provision of work equipment, etc. No work is done under a debt bond. Meanwhile, small farmers through their respective KUDs have policies related to employment which are stated in the "Cooperative Policy" which is signed by the Chairman of the Cooperative. Based on verification of sample documents and interviews with several samples of members of KUD (69 smallholders sampled), it was not identified that there was a process of employee attrition with discriminatory practices, forced labour or human trafficking.</p>	
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 certification unit - PT IIS Muara Bulian Group prohibits pregnant or breastfeeding women from spraying chemicals. To carry out mitigation, plantations carry out monthly pregnancy tests. So, this pregnancy check is not intended to discriminate against workers but is a check that must</p>	Complied

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		<p>be carried out on female workers who work using chemicals so that if there are pregnant female workers they can be transferred to work (which does not come into contact with chemicals) temporarily.</p> <p>Plantation management notes that spraying is not carried out by pregnant or breastfeeding women. Female workers voluntarily carry out their own menstrual cycle tests and notify the Polyclinic for review by nurses and recording every month. Pregnancy checks were carried out based on the Minutes of PT IIS- Kebun Muara Bulian Pregnancy Tests on 13 June 2024 checking the number of 76 female workers (for spraying and fertilizers activity).</p>										
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur – Muara Bulian has formed a Gender Committee at the Muara Biulian Estate and Mill. The gender committee consisting of representatives from all units in the Muara Bulian Group plays a role in: overcoming problems related to women's rights and providing counseling for female workers who experience acts of violence and sexual harassment as well as other problems related to female workers.</p> <p>PT IIS-Muara Bulian has a Gender Committee chaired by Lilis A. Simanjuntak and has an organizational structure guided by Mr. Chobar.</p> <p>In 2024, the Gender Committee's Work Program has been determined, including the issues that will be discussed at the meeting. The program has not changed much from the previous year (because this activity is a routine activity), including:</p> <table><tr><th>No</th><th>Program</th><th>Realization</th></tr><tr><td>1</td><td>Women's Reproductive Health Education</td><td>Has been done on Apr-24</td></tr><tr><td>2</td><td>Providing vitamins to female employees</td><td>Will be on Juli-24</td></tr></table>	No	Program	Realization	1	Women's Reproductive Health Education	Has been done on Apr-24	2	Providing vitamins to female employees	Will be on Juli-24	Complied
No	Program	Realization										
1	Women's Reproductive Health Education	Has been done on Apr-24										
2	Providing vitamins to female employees	Will be on Juli-24										

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		<table><tr><td>3</td><td>Socialize the importance of giving exclusive breast milk to babies & provide a special room for breastfeeding in the clinic</td><td>Will be on Agustus-24</td></tr><tr><td>4</td><td>Healthy exercise activities for mothers of PT IIS-Muara Bulian employees and staff</td><td>Once a month</td></tr></table> <p>Based on interviews with the chairman of the Gender Committee (Ms. Mariana) and a sample of female workers, awareness of issues of concern and ways to overcome them is carried out consistently. Such as: religious meetings at mosques, churches, or weekly meetings at complexes. It was also stated that until this time, there was no cases of harassment or violence against female workers</p>	3	Socialize the importance of giving exclusive breast milk to babies & provide a special room for breastfeeding in the clinic	Will be on Agustus-24	4	Healthy exercise activities for mothers of PT IIS-Muara Bulian employees and staff	Once a month	
3	Socialize the importance of giving exclusive breast milk to babies & provide a special room for breastfeeding in the clinic	Will be on Agustus-24							
4	Healthy exercise activities for mothers of PT IIS-Muara Bulian employees and staff	Once a month							
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	<p>Implementation of workers' wages, PT IIS – Muara Bulian refers to Decree of Governor of Jambi Province No. 999/KEP.GUB/DISNAKER-TRANS-3.3/2023 dated 20 November 2023 concerning Penetapan Upah Minimum Provinsi Jambi amount IDR 3,037,121.85 per month.</p> <p>Internally PT IIS has issued Memorandum through Regional Head Plt. 3 no. 003/HR-AAS/MEMO/01/24 dated 2 January 2024 related Wages for 2024 period amount IDR 3,037,121.85 per month or IDR 121,484.87 per day. Including the 2024 PLT-3 Monthly Employee Salary Scale with the smallest wage being IDR 3,126,381 per month (PB-4.1 Grade) and the largest being IDR 3,676,381 per month (PB-1.8 Grade).</p> <p>The company also provides rice allowances to its workers, namely 15 kg/month for each worker, 9 kg/month for the worker's wife, and 7.5 kg/month for the worker's children (maximum 3 children). Rice price in August 2021 IDR 9,500/kg.</p>	Complied						

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		<p>The company has provided employees with salary certificates/slips, salary slips containing basic salary, allowances, premiums, employee health insurance (BPJS Employment and Health) and deductions.</p> <p>Based on the document review during This Surveillance-2 audit, it can be seen that the company has provided equivalent wages/salaries for the same scope of work, including in-kind benefits.</p> <p>Taken as an example of salaries/pay slips for the period January-May 2024 for Muara Bulian Estate and Muara Bulian Mill workers (P&C 6.2.1 below).</p> <p>Based on a sample salary slip, the worker's wage per day is IDR 125,055 per day and is in accordance with the 2024 wage determination decision from Jambi Governor's Decree No. 1026/KEP.GUB/DISNAKERTRANS-3.3/2023 dated 30 November 2023; regarding: "Determination of the 2024 Jambi Province Minimum Wage".</p> <p>Scheme smallholder:</p> <p>KUD workers are paid a daily wage and are only paid when they have worked. However, individual members have adjusted their workers' salaries by referring to government regulations. The wages given each month are calculated based on the tonnage of FFB harvested per rotation, which is IDR 150,000 – 200,000/ton FFB, done 2-3 times to reach 1 ton. Based on verification of freelance worker wage data in Muara Bulian Plasma, it shows that these wages are in accordance with Jambi Province regional government regulations.</p>	
Criteria 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	(C) Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.	Implementation of workers' wages, PT IIS – Muara Bulian refers to Decree of Governor of Jambi Province No. 999/KEP.GUB/DISNAKER-	Complied

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	<p>- Critical (Major) compliance -</p>	<p>TRANS-3.3/2023 dated 20 November 2023 concerning Penetapan Upah Minimum Provinsi Jambi amount IDR 3,037,121.85 per month.</p> <p>Internally PT IIS has issued Memorandum through Regional Head Plt. 3 no. 003/HR-AAS/MEMO/01/24 dated 2 January 2024 related Wages for 2024 period amount IDR 3,037,121.85 per month or IDR 121,484.87 per day. Including the 2024 PLT-3 Monthly Employee Salary Scale with the smallest wage being IDR 3,126,381 per month (PB-4.1 Grade) and the largest being IDR 3,676,381 per month (PB-1.8 Grade).</p> <p>Wage payments at PT IIS-Muara Bulian Group are made using bank transfer system to all workers on the 1st-5th of the current month, who have previously been given salary slips. A pay slip is a detail of a worker's wage payment which includes basic salary, allowances, overtime pay, health and employment insurance benefits, premiums and deductions from health and employment insurance contributions.</p> <p>The following are several verification documents for payment of wages on May 2024 period, such as:</p> <ul style="list-style-type: none"> • Harvester: Ar*** Mas***, ID 06162, payslip May 2024 with take home pay IDR 3,085,440. • Harvester: Na*** Sur****, ID 06404, payslip May 2024 with take home pay IDR 3,085,440. • Warehouse administration, Name : T** M**, Payslip May 2024 with take home pay IDR 3,675,220. <p>Based on the verification of the salary slip document above, PT IIS – Muara Bulian Group has implemented wage payments in accordance with applicable regulations and laws; Jambi Governor's Decree No. No. 999/KEP.GUB/DISNAKER-TRANS-3.3/2023 dated 20 November 2023 concerning Penetapan Upah Minimum Provinsi Jambi amount IDR 3,037,121.85 per month and in accordance with the the UU No. 11 of</p>	
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		2020 and PERPU no. 6 of 2023; regarding UU Cipta Kerja and Peraturan Pemerintah no. 36 of 2021; about Wages.	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.</p> <p>- Critical (Major) compliance -</p>	<p>The employment contract and details of payment and terms of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday rights, maternity leave, reasons for dismissal, notice period, etc.) are available in the Collective Labor Agreement (PKB) for the year period 2023-2025. This PKB has been registered at the Batanghari Regency Manpower Service with no. 565/68/Naker/2023 dated 9 January 2023.</p> <p>Employment contract has been verified during ASA2_2 for example:</p> <ul style="list-style-type: none"> - Surat Perjanjian Kerja/Work Agreement Letter No. 006/PKWT/RO2/04/2024 dated 26 April 2024 on behalf Sa*** Ang***- Sprayer – Muara Bulian Estate; - Surat Perjanjian Kerja Waktu Tidak Tertentu / - Indefinite Time Work Agreement Letter No. 015/PKWT/RO2/05/2024 dated 07 May 2024 on behalf Ro** Ha**** Ka*** - Harvester at Muara Bulian Estate; This work agreement is for permanent permanent workers with a probation period of 3 months. <p>Determination of wages (including allowances and other allowances), working hours (including working hours and overtime pay) and working days are regulated in Article V; Wages - Wages, which explains:</p> <ul style="list-style-type: none"> A. Permanent workers are given wages whose amount is determined by the employer with conditions that are not lower than government regulations. B. 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. 	Complied

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		<p>C. Workers still receive additional wages (UMP/UMSK) and/or attendance incentives which are further regulated in separate provisions.</p> <p>The rice allowance given to workers is 15 kg/month for each worker, 9 kg/month for the wife and 7.5 kg/month for the worker's children (maximum 3 children).</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>Meanwhile, for daily workers, the company has established an Employment Contract for daily workers which is written in Indonesian, so that it can be understood by all parties. The Daily Worker Agreement explains the rights and obligations of workers, including: wages, social security (BPJS Employment and BPJS Health), facilities and work tools.</p> <p>Based on the verification of wage documents for the May 2023 period above (6.1.6 & 6.2.1), the application of wages at PT IIS is in accordance with statutory regulations.</p> <p>Based on the verification of the salary slip document above, PT IIS – Muara Bulian Group has implemented wage payments in accordance with applicable regulations and laws; Jambi Governor's Decree No. 1026/KEP.GUB/DISNAKERTRANS-3.3/2023 dated 30 November 2023 concerning Penetapan Upah Minimum Kabupaten Batanghari 2024, UU no. 11 of 2020 and PERPU no. 6 of 2023; regarding UU Cipta Kerja and Peraturan Pemerintah no. 36 of 2021; about Wages.</p>	
6.2.3	(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave,	Determination of wages (including benefits and other benefits), working hours (including hours and overtime pay) and working days have been regulated in the Collective Labor Agreement (PKB periode 2023-2025)	Complied

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	<p>reasons for dismissal, period of notice, and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Article V; Upah – Wages.</p> <p>The Company paid the wages of employees in 2023 is by minimum wage based on Decree of Governor of Jambi 1072/KEP.GUB/DISNAKERTRANS-3.3/2022 dated 7 December 2022; regarding: "<i>Penetapan Upah Minimum Kabupaten Batanghari Propinsi Jambi Tahun 2023</i>".</p> <p>Working hour is determined 40 hour per week (Monday – Saturday) with 7 hour per day.</p> <p>Document verification:</p> <p>Overtime</p> <ul style="list-style-type: none"> - Overtime Order dated 23 June 2024 (Sunday) for the Muara Bulian Mill, overtime on behalf of Benget Humisar S. (Sortation), 3 hours overtime (08.00-11.00) for repair and replacement of tractor bearings in the workshop. - Recapitulation of Overtime Hours of Muara Bulian Mill for the June 2024 period. - Attendance and Gang Activity Details Input dated 23/06/2024 <p>Leave:</p> <ul style="list-style-type: none"> - Application for annual leave in the name of paimin (NP: 00040) position: Upkeep Foreman, proposed leave on 12 - 15 February 2024. - Application for maternity leave in the name of Rini Susanti (NP: 04041) position: Teacher, proposed menstruation leave on 25 June - 7 August 2024. <p>Based on the overtime pay verification above, PT IIS has implemented overtime pay in accordance with applicable laws and regulations.</p>	
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		Based on the verification of the salary slip document above, PT IIS – Muara Bulian Group has implemented wage payments in accordance with applicable regulations and laws; UU no. 11 of 2020 and PERPU no. 6 of 2023; regarding UU Cipta Kerja and Peraturan Pemerintah no. 36 of 2021; about Wages.	
6.2.4	<p>(C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>From the last audit to the current surveillance audit, there has been no change in either the addition or construction of new public facilities.</p> <p>The company has prepared facilities for the workers, including the basic need such as electricity and water. Detail of company facilities for employees are as follows:</p> <p>PT Inti Indosawit Subur – Muara Bulian has provided adequate housing with electrical and clean water supply, medical clinic, sport facilities, religious facilities, education facilities and other amenities. Based on field inspection, the facilities found to be in good condition. The company has prepared facilities for their workers.</p> <p>Record seen:</p> <p>Data dan Layout of Public Facilities in Muara Bulian Estate and Mill year 2022-2023, such as:</p> <p>Muara Bulian POM</p> <ul style="list-style-type: none"> – Housing Type B/CM (1 unit), Type C (4 Unit), Type D (5 unit), type E (38 Unit). – Polyclinic (1 unit). – Mosque (2 units). – Church (1 unit). – School bus (1 unit). – Ambulance (1 unit). – Sport facilities. <p>Muara Bulian Estate</p>	Complied

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		<ul style="list-style-type: none"> – Housing: Staff (18 units), type D1(22 units), Type E1 (191 units). – Kindergarten (1 unit). – Clinic (2 units). – Mosque (3 units). – Church (1 units). – School bus (4 units). – Ambulance (1 unit). – <i>Koperasi</i> (1 units). – Employee hall (1 unit). – Sport facilities (football, volleyball, tennis, badminton). <p>The company annually evaluates the condition of employee housing using the Employee Home Condition Census Recapitulation Form, last conducted in January 2023. Based on interview with the employees who live in the employee housing, that there are no issues related to the housing. Whenever there is damage to employee housing, the company always responds and follows up on the damage and repairs it.</p> <p>For the smallholder scheme, there is no employee housing, because the use of labor in the smallholder scheme is to use local village communities that already have housing in the village.</p> <p>The company has carried out clean water testing at the PT Itec Solution Indonesia Laboratory, based on the Test Results Report dated March 15 2023 for the quality of drinking water from water sources at PMKS Muara Bulian based on water quality standards Permenkes no. 2/2023. Based on the test results, there are no parameters above the quality standards.</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>Company is able to demonstrate effort in providing access to adequate, sufficient and affordable food: provision of rice allowance – aside from monthly salary to all eligible workers, cooperative organization for employee providing basic food necessities (<i>Koperasi Jaya Abadi</i>). The</p>	Complied

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		<p>company also provides access to sellers of vegetables and food needs to be able to enter the PT Inti Indosawit Subur area every day, so that the workers can more easily get their daily food needs. And then the company also gives permission for its workers to open basic needs stores/ small shops at the workers' housing in their respective division, so that it also makes it easier for other employees to access basic needs. Once a month on the worker's payday, employee housing also opens a temporary market which is held monthly on the 5th-6th of each month.</p> <p>Based on interviews with several employees, that to get food needs every day there is no difficulty, because the company has provided this access for example through Koperasi Jaya Abadi, small shops in housing that are obtained by the company and a temporary market on the worker's payday.</p> <p>Scheme Smallholder</p> <p>The farmer members are a developed transmigration village. Provision of food can be obtained from existing markets in the village. Based on the results of field visits to the sample villages indicate that in the village was available markets and small shops that provide basic necessities.</p>	
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>Implementation of workers' wages, PT IIS – Muara Bulian refers to Decree of Governor of Jambi Province No. 999/KEP.GUB/DISNAKER-TRANS-3.3/2023 dated 20 November 2023 concerning Penetapan Upah Minimum Provinsi Jambi amount IDR 3,037,121.85 per month.</p> <p>Internally PT IIS has issued Memorandum through Regional Head Plt. 3 no. 003/HR-AAS/MEMO/01/24 dated 2 January 2024 related Wages for 2024 period amount IDR 3,037,121.85 per month or IDR 121,484.87 per day. Including the 2024 PLT-3 Monthly Employee Salary Scale with the smallest wage being IDR 3,126,381 per month (PB-4.1 Grade) and the largest being IDR 3,676,381 per month (PB-1.8 Grade).</p>	Complied

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		<p>The company also provides rice allowances to its workers, namely 15 kg/month for each worker, 9 kg/month for the worker's wife, and 7.5 kg/month for the worker's children (maximum 3 children). Rice price in August 2021 IDR 9,500/kg.</p> <p>In general, the PT Inti Indosawit Subur - Muara Bulian including smallholders have calculated the Decent Living Needs using the calculation method as set out in the "RSPO Guidance for Implementing a Decent Living Wage", June 1, 2019. The company has conducted an account of the DLW for the 2023 period with data collection from each Estate and POM.</p> <p>Based on the verification of documents the results of the 2024 DLW calculation shows that total cost of kind benefits for average is IDR 608,448 average monthly take home salary per worker is IDR 3,105,319 and total value of prevailing wage is IDR 3,713,767.</p>	
<p>PROCEDURAL NOTE:</p> <p>The RSPO has published guidelines on the calculation of Decent Living Wage (DLW) in June 2019. Since Indonesia does not have DLW benchmark yet, the RSPO Secretariat will conduct a DLW benchmark study in accordance with the Global Living Wage Coalition (GLWC) and Indonesian laws and regulations.</p> <p>In the meantime, until DLW benchmark for Indonesia is endorsed by the RSPO, the unit of certification carries out interim measures that was published by RSPO (dated 11 November 2019), including:</p> <ol style="list-style-type: none"> 1. Payment of minimum wages in accordance with applicable regulations 2. Assessment of wages paid (prevailing wages) and in-kind benefits. <p>Once the DLW benchmark is available, this procedural note is no longer applicable.</p>			
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 Memorandum from Senior Manager of PT IIS- Muara Bulian Group No. 208/SM-KTU/MEMO/VII/2020 dated 23 July 2020 and SOP No. AA-HR-305.2-R concerning Recruitment and Selection of Employees, including harvesters in plantation units, states that newly recruited workers will experience a 3-month trial period carried out by their immediate superior. No later than 15 days before the 3 (three) month</p>	Complied

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		<p>recruitment deadline, the section will provide a Probationary Period Evaluation form to the department concerned.</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>Based on interview with HRD during Surveillance-2 it was revealed that a mechanism for recruiting daily worker, especially harvesters as permanent workers with a probationary period of 3 months is carried out. This is in accordance with applicable laws and regulations exist in Indonesia, namely Law No. 11 of 2021 the "UU Cipta Kerja/Job Creation Law" and Perpu No. 6 of 2023.</p> <p>Until the period of May 2024, PT IIS – Muara Bulian, both Mill and Estate, has been promoting PHL particularly harvesters and processing operator, as follows:</p> <p>For Muara Bulian Estate, promotion of PHL (non-permanent workers) to SKU (permanent workers) at Muara Bulian Estate in the 2023 period as many as 29 harvesters. In the first semester of 2024 as many 30 workers have been submitted for promotion of PHL (daily workers) to SKU (permanent workers) to the Medan Head Office HRD in May 2024.</p> <p>For Muara Bulian POM as many as 10 workers has been promotion as permanent workers as per memorandum from Mill manager PMB No. 044/MI-PMB/MEMO/04/2024 dated 22 April 2024.</p> <p>Scheme Smallholder:</p>	
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		<p>Most farmers usually manage their land independently. All workers are considered freelancers. Workers are hired based on verbal agreements regarding work unit rates, payment systems, provision of work equipment, etc. No work is done under a debt bond. Meanwhile, small farmers through their respective KUDs have policies related to employment which are stated in the "Cooperative Policy" which is signed by the Chairman of the Cooperative.</p> <p>Based on verification of sample documents and interviews with several samples of members of KUD (69 smallholders sampled) it was not identified that there was a process of employee attrition with discriminatory practices, forced labor or human trafficking.</p>	
Criteria 6.3: The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			
6.3.1	<p>(C) A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Freedom of association policy is written in Bahasa Indonesia, as stated in "Kebijakan Perusahaan", dated 1st December 2014 "<i>Menghormati hak setiap karyawan untuk membentuk atau menjadi serikat pekerja sesuai dengan keinginannya dan untuk melakukan tawar menawar secara kolektif</i>".</p> <p>This policy has been informed to all employees and being placed into public area easily accessed.</p> <p>PT Inti Indosawit Subur – Muara Bulian has Labor Union registered in DISNAKERTRANS under Decree of Head of Social, Manpower and Transmigration Agency in Batang Hari Regency no. 568/506/DSKT on: Registration of PUK SPPP.SPSI PT Inti Indo Sawit Subur with registration number: no. 568/041/DSKT/2011, dated April 18, 2011 chaired by Mr. Janto Siburian.</p> <p>Structure of organization of labor union for period Y2022 – 2027 as per "Surat Keputusan PC F.SPPP-SPSI Jambi Province Nomor: KEP 11/PD.FSP.PP.K-SPSI/JAMBI/XII/2022 dated 23 December 2022</p>	Complied

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		<p>tentang Komposisi dan Personalia Pengurus Unit Kerja (PUK. SPPP-K.SPSI) PT Inti Indosawit Subur” for period 2022 – 2027.</p> <p>Scheme Smallholders: There is no labour union that formed by smallholders (N/A)</p>	
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.</p> <p>- Minor compliance -</p>	<p>Based on interview with chairman of labour union (Mr J*nt* S.) obtained information that there is no discrimination, pressure, or any form of negative treatment for the board of labour union. The member of labour union is freely elected.</p> <p>This organization structure is refers to Structure of organization of labor union for period Y2022 – 2027 as per “Surat Keputusan PC F.SPPP-SPSI Jambi Province Nomor: KEP 11/PD.FSP.PP.K-SPSI/JAMBI/XII/2022 dated 23 December 2022 tentang Komposisi dan Personalia Pengurus Unit Kerja (PUK. SPPP-K.SPSI) PT Inti Indosawit Subur” for period 2022 – 2027.</p> <p>The samples of minutes of meetings between the unit of certification with trade unions as follows:</p> <ul style="list-style-type: none"> • 28 July 2023, meeting regarding made formation of the Independence Day committee structure “Hari Ulang Tahun Kemerdekaan Republik Indonesia” • 20 June 2024, meeting regarding the Lucky Draw committee structure. <p>Scheme Smallholders: There is no labour union that formed by smallholders (N/A)</p>	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.</p>	<p>Based on interview with chairman of labour union during ASA2.2 obtained information that there is no interfere with the formation or</p>	Complied

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	- Minor compliance -	<p>operation of registered labour organizations/unions, or other freely elected representatives for all workers.</p> <p>Based on the labour union statutes, the right to become a member of a labour union is a permanent employee. Each member has voting rights (right to be elected and to vote).</p> <p>Scheme Smallholders:</p> <p>There is no labour union that formed by smallholders (N/A)</p>	
Criteria 6.4: 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>There are no changes related to company policy, including the formal policy for child protection, including the prohibition of child labor and remediation in the "Company Policy", signed by the President Director on 1 December 2019, in point 14 it is stated: All children are not allowed to work in any activity in the company. company".</p> <p>Company policy was also published to place posters in strategic places on the plantations (Muara Bulian Plantation and Muara Bulian Mill).</p> <p>All contracts, including contracts for the supply of FFB, contain special clauses regarding compliance with applicable legal requirements including regarding child labor/prohibition of employing children under 18 years, and this can be proven by a third party.</p> <p>Samples taken:</p> <p>Mill:</p> <ul style="list-style-type: none"> ✓ PT Aneka Sumatrindo (Heavy Equipment Contractor) ✓ PT Mitra Abadi Damai (PK Transporter) ✓ PT Trans Jaya Pertama (CPO, PK, CPKO Transporter) <p>Estate:</p> <ul style="list-style-type: none"> ✓ CV Anugrah Jaya (Civil/box culvert Contractor) 	Complied

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		<ul style="list-style-type: none"> ✓ Heru Prayetno (Housing Contractor) ✓ Koperasi Karyawan Jaya Abadi (Dump Truck Rental) ✓ PT Uniteda Arkato (Backhoe Loader & Motor Grader Rental) ✓ CV Alam Cahaya Cemerlang (Excavator Mini Rental) ✓ Suranta Barus (FFB and EFB transporter) <p>Scheme Smallholder:</p> <p>Plasma Muara Bulian has established a policy regarding the prohibition of employing children (under 18 years). Samples taken from KUD Barokah, KUD Budi Sari and KUD Tuah Sakato. The policy is explained in point 10; It is prohibited to employ children under the age of 18 in any plantation operational activities."</p> <p>Its policy has been socialized to each member of Cooperative through the training of RSPO P&C and Socialization of ethical conduct "Kebijakan Etik KUD" was carried out by Koperasi for example on 8 February 2024 for KUD Subur Makmur, KUD Karya Lestari and KUD Makmur Rejeki attended by 13 members for KUD Subur Makmur, 12 members for KUD Karya Lestari and 11 members for KUD Makmur Rejeki.</p> <p>Based on a review of documents (employee lists) of KUD Subur Makmur, KUD Makmur Rejeki, KUD Karya Lestari, it was found that the minimum age was met (the youngest harvester was born in 1996 – based on identity verification).</p>	
6.4.2	<p>(C) Documented evidence on the fulfilment of worker's minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification has established Company Policy dated 1 December 2019 and until this surveillance there was no change, that stated there is not allowed all children to work in every activities/process in company.</p> <p>Data seen:</p> <ul style="list-style-type: none"> - B Putra Sari (Nursery worker–Muara Bulian Estate), birthdate 2-06-2006 and joined on 05-10-2024 (21 y.o). 	Complied

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		<ul style="list-style-type: none"> - Salomo (helper operator) in Muara Bulian Mill, birthdate 08/09/2005 and joined on 12/07/2023 (19 y.o). <p>Based on document verification on List of Employee May 2024 "Daftar Karyawan", it was no found workers hired under 18 years.</p> <p><u>Scheme Smallholders:</u></p> <p>Plasma Muara Bulian have established policies related to the prohibition of employing children (under 18 years old). Samples taken for the KUD Subur Makmur, KUD Makmur Rejeki, KUD Karya Lestari. KUD/Cooperative Policy, explained in point 10; It is forbidden to employ children under the age of 18 in every plantation operational activity".</p> <p>Its policy has been socialized to each member of Cooperative through the training of RSPO P&C and Socialization of ethical conduct "Kebijakan Etik KUD" was carried out by Koperasi for example on 8 February 2024 for KUD Subur Makmur, KUD Karya Lestari and KUD Makmur Rejeki attended by 13 members for KUD Subur Makmur, 12 members for KUD Karya Lestari and 11 members for KUD Makmur Rejeki.</p> <p>Based on document review (list of employees) of KUD Subur Makmur, KUD Makmur Rejeki, KUD Karya Lestari, there were found that a minimum age met (the youngest of harvester born year 1997 – based on ID verification).</p>	
6.4.3	<p>(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>Based on List of Employee May 2024 "Daftar Karyawan Kebun Muara Bulian" and Memorandum #0113/HR-RO3/MEMO/05/2022, dated 18 May 2022, young workers are employed for non- hazardous work.</p> <p>Data seen:</p> <ul style="list-style-type: none"> - B Putra Sari (Nursery worker–Muara Bulian Estate), birthdate 2-06-2006 and joined on 05-10-2024 (21 y.o). - Salomo (helper operator) in Muara Bulian Mill, birthdate 08/09/2005 	Complied

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		and joined on 12/07/2023 (19 y.o).	
		Based on the verification of employee list documents for the period of May 2024 and interviews with 6 sprayers during field visits at Block B18h Afd II, there are no inexperienced/young workers who carry out work using chemicals. If there are female spraying workers who based on pregnancy checks (monthly bases) are positive for pregnancy, then the company will move/replace jobs that do not use chemicals (temporarily).	
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -	<p>There is no change in company policy regarding child labor.</p> <p>This policy has been communicated to all employees and placed on a notice board in a public and easily accessible place.</p> <p>This policy has been informed to all employees on 7 march 2024 in Muara Bulian Estate and Mill.</p> <p>Based on interview with worker, stated the policy has been communicated to them.</p> <p>Scheme Smallholder:</p> <p>Its policy has been disseminated to all head of cooperative chairman and smallholders, sample seen in February 2024 and attended by all member of each KUD.</p> <p>Based on interview with sampled smallholder (69 smallholders), stated the policy has been communicated to them.</p>	Complied
Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	There are no changes in company policy, including the policy to protect reproductive rights as stated in the company policy signed by the President Director, dated December 1 2014 and in one part of the policy it is stated that: "Preventing sexual disclosure and various forms of violence against women and protect their reproductive rights " - (To	Complied

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		<p>prevent sexual and physical harassment from occurring to women and to protect their reproductive rights)". Company policy was also published to place posters in strategic places on the plantations (Muara Bulian Estate and Mill).</p> <p>There is a gender committee that actively meets and discusses the general agenda and other issues related to handling sexual harassment, socializing the prevention of sexual harassment.</p> <p>The gender committee's regular monthly meeting was held on 10 Januari 2024, 23 March 2024 and 13 April 2024 which discussed protecting the rights of female workers including preventing sexual harassment and violence and all other forms of harassment and violence. The meeting was attended representatives of female workers from each job (a attendance list can be shown at the time of audit).</p> <p>This policy has been informed to all employees on 7 march 2024 in Muara Bulian Estate and Mill. Based on interview with worker during ASA2.2, stated the policy has been communicated to them.</p> <p>Scheme Smallholder:</p> <p>Most farmers manage their land independently. Therefore, the policy does not apply directly to them. The organization has a policy to prevent sexual harassment and violence against women in the "ICS Group Manager Policy" which states "Prevent sexual harassment and various forms of violence against women and protect their reproductive rights" - (prevent sexual harassment and violence and protect reproductive rights for women) woman). Its policy has been socialized to each member of Cooperative through the training of RSPO P&C and Socialization of ethical conduct "Kebijakan Etik KUD" was carried out by Koperasi for example on 8 February 2024 for KUD Subur Makmur, KUD Karya Lestari and KUD Makmur Rejeki attended by 13 members for KUD</p>	
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		<p>Subur Makmur, 12 members for KUD Karya Lestari and 11 members for KUD Makmur Rejeki.</p> <p>Based on interview with sampled smallholder (69 smallholders), stated the policy has been communicated to them.</p>	
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>There is no change in the company policy.</p> <p>A policy to protect the reproductive rights as it is found in company policy that's signed by Managing Director, dated 01st December 2014 and on one part of the policies stated that: "<i>Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya</i>" - (To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights)". The company's policy is also published to use posters at any strategic places in the plantations (Muara Bulian Estate and Mill).</p> <p>There is a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention.</p> <p>The gender committee's regular monthly meeting was held on 10 Januari 2024, 23 March 2024 and 13 April 2024 which discussed protecting the rights of female workers including preventing sexual harassment and violence and all other forms of harassment and violence. The meeting was attended representatives of female workers from each job (a list attendance list can be shown at the time of audit).</p> <p>This policy has been informed to all employees on 7 March 2024 for Muara Bulian Estate and Muara Bulian POM. Based on interview with worker, stated the policy has been communicated to them.</p> <p>Scheme smallholders:</p> <p>The scheme smallholder has set a policy for each cooperative. This cooperative policy has established policies related to protect the</p>	Complied

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		reproductive rights. Based on field visit and interview with smallholders during ASA2.2, it is known that they have understood the policy to protect the reproductive rights. The has been no violation of to protect the reproductive rights in smallholder's area.	
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>The company has identified female workers as new mothers and assessed their needs based on consultation with them.</p> <p>From the results of identifying the needs of new mothers in May 2024, it was known that there is no new mother for period Y2024, however for the previous year, the company has carried out the quistionare to the new mother for Y2022/2023, several needs were identified, including:</p> <ul style="list-style-type: none"> - There is a need for space for breastfeeding mothers, and this has been followed up by budgeting costs in the 2022 and 2023 budgets. - The need for time/permission for workers who are still breastfeeding has been followed up through the Estate Manager's policy by granting permission for 30 minutes to breastfeed their children (Memorandum from Seniro Manager No. 01/ES-KTU/MEMO/I/2021 regarding Rights of breastfeeding workers; Given time for 30 minutes from 10.00-10.30. - The need for health services for mothers and children has been followed up with Posyandu services once a month (which has been and is still running today) - Providing additional food to children under 5 years has been followed up during the implementation of Posyandu services by providing additional food in the form of baby porridge, eggs and bread and formula milk. <p>During ASA2.2 interviews with female workers in spraying, manuring activities and the head of the gender committee, it was explained that</p>	Complied

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		the company provides breastfeeding time in the workers' complex or childcare centre.	
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>Regarding the complaints and complaints mechanism, until the last audit there was no change i.e procedure No. SOP: HR-308.5-RO; Revision:0, 12/11/2009: Employee Complaints: Filing and Resolving.</p> <p>The complaint management mechanism that needs to maintain confidentiality for whistleblowers is contained in the company's draft policy, where one of the points of this policy states that: "to provide appropriate information to parties who ask questions and protect confidentiality for cases of whistleblowers" to comply with statutory regulations regarding issues environmental and social, food safety, occupational health and safety, so that they can participate more in the decision-making process to improve company performance.</p> <p>Records of certain grievances/complaints have been shown in the "Employee Complaint Book". The company has resolved all complaints according to procedures.</p> <p>This procedure has been conveyed to all workers at PT IIS Muara Bulian through the Employment Agreement document and also the Collective Labor Agreement (PKB). and based on interviews with several workers in the field during ASA2.2 field observations, that they generally understood the process for channelling complaints or grievances to management, mostly through the Labor Union which is basically in line with the complaint procedures established by the company.</p> <p>Based on interviews with several stakeholders around the Muara Bulian Group oil palm plantation, that until this ASA2.2 was carried out, there were no complaints from the community or other parties.</p> <p>Scheme Smallholder:</p>	Complied

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		<p>Plasma farmers have a consultation and communication mechanism in "Communication, consultation and complaint mechanism for Muara Bulian Group Plasma Plantations", established in April 2021.</p> <p>Based on the logbook in the form of "Reception of Complaints and Responses" for the period 2023/2024, no complaints were reported. Based on interview with sampled smallholder (69 smallholders), stated no complaint from them.</p>	
Criteria 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports; • Payment of recruitment fees; • Contract substitution without worker's consent • Involuntary overtime; • Lack of freedom of workers to resign • Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>During audit ASA2_2 and according to work contract, confirmed that all work is voluntary and there is no:</p> <ul style="list-style-type: none"> ○ Retention of identity documents or passports; ○ Payment of recruitment fees; ○ Contract substitution without worker's consent ○ Involuntary overtime; ○ Lack of freedom of workers to resign ○ Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement ○ Debt bondage ○ Withholding of wages <p>No form of forced labour occurs in PT IIS – Muara Bulian Group. Company has a policy to comply with manpower regulation UU No. 13 Tahun 2003 and UU no. 11 Tahun 2021 relate to UU Cipta Kerja.</p> <p>Company also has a policy to prevent and prohibit the forced labour as per "Kebijakan Perusahaan" signed by Managing Director on 1st December 2019. Stated in Company Policy point 17 "Tidak memberikan</p>	Complied

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		pekerjaan dibawah ancaman, sanksi atau hukuman dimana pekerja tidak memiliki kebebasan untuk menyepakati pelaksanaan pekerjaan".	
6.6.2	<p>(C) Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.</p> <p>- Critical (Major) compliance -</p>	<p>There is no migrant worker in PT IIS – Muara Bulian and there is no PKWT workers.</p> <p>There are 2 types of employees at PT IIS – Muara Bulian Group, namely Permanent Workers (SKUH and SKUB) as much as 226 workers and daily workers (PHL: Pekerja Harian Lepas - Casual Daily Workers) as much as 305 workers. PHL workers from 305 workers are as follows, namely upkeeping, pruning, manuring, spraying, IPM workers, and EFB application workers.</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>PT IIS – Muara Bulian Group has established mechanism/procedure related to recruitment; SOP no. AA-HR-305-2-00 dated 1 February 2009 – Recruitment and Selection and the management of PT IIS – Muara Bulian Group (Group Manager).</p> <p>Memorandum from Medan Head Office Management September 1, 2020 No. 034/MB/MEMO/IX/20 concerning Guidelines for Recruitment and Appointment of Employees of PT IIS - Muara Bulian Group are still consistently implemented and used as guidelines for disruption of PKWT /PHL workers, including explaining the determination of the maximum period of PKWT/PHL for 3 (three) years taking into account the feasibility evaluation.</p>	Complied

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		This memorandum is effective from 1 September 2020 and this memorandum is also based on reference to Law No. 11 of 2021 concerning <i>UU Cipta Kerja</i> .	
Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur – Muara Bulian POM and Estate has appointed the responsible person for H&S is identified as per P2K3 (Safety Committee Meeting). P2K3 organisation has been updated in 2023 and has an approval from Manpower and Transmigration Office.</p> <p><u>Muara Bulian POM:</u></p> <p>P2K3 Muara Bulian POM has been formed and has an endorsement/approval from Manpower Office Jambi Province according to "Keputusan Kepala UPTD Balai Pengawasan Ketenagakerjaan Wilayah I Nomor 18 Tahun 2022 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) pada Perusahaan PT Inti Indosawit Subur Muara Bulian" dated 27 January 2022. Safety committee meeting/P2K3 comprise of:</p> <p>Chairman: MT Akbar</p> <p>Secretary: Ahmad Alwi (OHS Expert)</p> <p>Supervision location: Hamzah Salafy, Ade Apri Angga, Riston Sitepu, Roni C Tarigan</p> <p>Member: 17 person from each station, office and laboratory including security.</p> <p>Safety Officer or "Ahli K3 Umum" OSH expert was assigned as P2K3 secretary. Safety Officer on behalf Ahmad Alwi has a license from Ministry of Manpower with decree letter Nomor 5/17478/AS.02.04/II/2022 dated 14 February 2022 Tentang Penunjukan Ahli K3 umum, valid until 14 February 2025.</p>	Complied

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		<p><u>Muara Bulian Estate:</u></p> <p>P2K3 Muara Bulian Estate has been formed and has an endorsement/approval from Manpower Office Jambi Province according to "Keputusan Kepala UPTD Balai Pengawasan Ketenagakerjaan Wilayah I Nomor 37 Tahun 2023 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) pada Perusahaan PT Inti Indosawit Subur Kebun Muara Bulian" dated 3 February 2023. Safety committee meeting/P2K3 comprise of:</p> <p>Chairman: Imam Setiyadi</p> <p>Secretary: Stefanus Ade Wijaya (OHS Expert)</p> <p>Member: Yopriadi, Ahmad Daulay, Ahmad Ansori, Rolly Situmeang, Iwan Putra</p> <p>Safety Officer or "Ahli K3 Umum" OSH expert was assigned as P2K3 secretary. Safety Officer on behalf Stefanus Ade Wijaya has a license from Ministry of Manpower with decree letter Nomor 5/19600/AS.01.03/XII/2022 dated 16 December 2022 Tentang Penunjukan Ahli K3 umum, valid until 16 December 2025.</p> <p>Safety meeting conducted in monthly basis. Records of safety committee meeting are available and has been reviewed during audit.</p> <p>Report of P2K3 meeting and OHS performance has reported to Manpower Agency in Batang Hari Regency each quarter (three-monthly), sample seen report P2K3 Muara Bulian POM and Estate period July – Sept 2023, Oct - Dec 2023 and Jan – March 2024. Evidence of report receipt can be demonstrated during audit as per "Daftar Distribusi Eksternal".</p> <p><u>Scheme Smallholder:</u></p>	
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		<p>Scheme smallholder has appointment the "Asisten Plasma" as person in charge for cooperative's health and safety aspects</p> <p>Safety Meeting in KUD has been conducted regularly. Meeting agenda consisting of training on PPE usage (Helmet, Goggles and Shoes and also harvest knife/Egrek equipped with Cover). Record of regular meeting management plasma can be demonstrated during audit.</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>No changes of compliance statement compared to last year audit.</p> <p>PT Inti Indosawit Subur – Muara Bulian has the mechanism on handling an accident investigation under procedure no: SOP AA-OP-SMK3-07-FM Accident Investigation SOP, August 3, 2017. In the accident investigation form include: the accident data, details of injuries/sections exposure, photographs/sketches, evidence of investigation (witnesses, positions, equipment, documents), sequence of events (pre-contact, contact, post-contact), type of incident, cause of accident (unsafe, unsafe) accidents (personal and work factors), corrective and preventive actions, investigative team. During audit verification, found that the accident form was complete and adequate.</p> <p>Procedure for first aid and emergency situation available under "Kesiagaan dan Tanggap Darurat" document, number AA-EMS-447-PR, dated December 2010. The emergency situation identified such as land and forest fire, fire at housing and mill, hazardous waste spillage, boiler explosion, gas tank explosion, earthquake, flood, landslide, etc. A team for emergency response has been established, headed by Mill Manager and Estate Manager Records of accidents maintained properly by safety officers and reported regularly to local authorities.</p> <p>SOP of accident and emergency procedure are available in Indonesia language and clearly understood by workers. Evacuation route and assembly point are available in Muara bulian POM and Muara Bulian Estate Office. During interview with workers, they understand the</p>	Complied

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		<p>evacuation route and assembly point and how to response during emergency situation.</p> <p>First aid equipment has been provided by Muara Bulian POM, Estate and Scheme Smallholder. List of first aid kit (include portable first aid) as in "Checklist inspeksi P3K". There are 6 First Aid kit at Muara Bulian Estate (at location Workshop/traksi, Warehouse, TPS LB3, Afdeling office I – III) and 12 portable first aid kit brought by Field Foreman. While in Muara Bulian POM there were 9 first aid kit located in Fuel storage/Warehouse, Workshop, Office, Warehouse central, Laboratory, engine room, chemical warehouse, WTP station, Hazardous waste storage.</p> <p>PT Inti Indosawit Subur – Muara Bulian has appointed a worker who have attended the First Aid training. Data verified:</p> <ul style="list-style-type: none"> - License for First Aider on behalf Lilis Aggreni Simanjuntak, register No. 001/P3K/Disnakertrans-3.1/2019 dated 5 August 2019. - License for First Aider on behalf Riston B. Sitepu, register No. Ser./UPTD I/Nakertrans/3.1.2/ 2021, dated 16 October 2021. <p>Records of all accidents are kept and periodically reviewed.</p>	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur - Muara Bulian POM, Estate and Scheme Smallholder has demonstrated the record of realization the OHS program 2023-2024 including the provision of PPE for workers according to risk analysis for each type of works. PPE provide by company for all workers free of charge. Evidence of PPE provision can be shown during audit.</p> <p>The use of appropriate personal protective equipment (PPE) also monitor by company to ensure that all workers using proper PPE during working. Monitoring checklist for PPE usage were sighted during audit.</p> <p>During field visit and interview with workers (sprayer workers and mill operator) it was confirmed that they have receive the PPE from company</p>	Complied

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		<p>free of charge. They also can asking for PPE change of their PPE are broken (free of charge).</p> <p>Sanitation facilities for pesticides operator are available in Muara Bulian Estate; workers can change out of PPE, wash and put on their personal clothing in the sanitation facilities. During field visit to Muara Bulian Estate it was found that sanitation facilities are sufficient with locker for each sprayer.</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>PT Inti Indosawit Subur – Muara Bulian has been provided insurance to all workers including non-permanent worker. Insurance covered by BPJS, as mandated by government regulation. Medical checkup provided for all workers (not only for high-risk worker).</p> <p>PT Inti Indosawit Subur – Muara Bulian has also provided clinic for all workers. Referral are made to nearest hospital should the case is severe/critical. Medical check-up has been conducted for all workers all in Muara Bulian The medical check-up including blood test, physical examination, audiometric test and spirometric test. Result of examination for worker is kept. Company also providing social and accident insurance in from BPJS Ketenagakerjaan – for all workers.</p> <p>Document verification:</p> <ul style="list-style-type: none"> • Transfer form to BPJS Ketenagakerjaan, month March - May 2024. • Rekapitulasi Rincian Pembayaran Iuran both BPJS Kesehatan dan Ketenagakerjaan month March – May 2024. <p>Scheme Smallholder:</p> <p>No workers being employ permanently by the smallholders. Provision of insurance in case of accident, through donation from smallholders and “Kelompok Tani”.</p>	Complied

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6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	PT Inti Indosawit Subur – Muara Bulian POM has shown the record of “Indeks K3 Pabrik/Kebun Muara Bulian January – December 2023.” Scheme Smallholder: The procedure for work incident has demonstrated as in document “Mekanisme Pertolongan Pertama Pada Kecelakaan”, document verified in KUD Subur Makmur, KUD Karya Lestari and KUD Makmur Rejeki has reviewed the procedure in January 2023. KUD/cooperatives record the work incident in “Rekaman kejadian Kecelakaan Kerja Tahun 2023”. Record of incident were also available in Puskesmas (Village clinic).	Complied
Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.			
Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	During ASA2.2 it was known that Integrated Pest Management Plan has been implemented and documented by PT Inti Indosawit Subur – Muara Bulian Estate. IPM Plan has been prepared within annual budget 2024. Muara Bulian Estate established Division Work Program annually for IPM for each Division/Afdeling. IPM plan includes detection and census of pest and diseases, weeds controlling, planting and upkeep of beneficial plant, use of pesticide and herbicide. IPM plan include the following: <ul style="list-style-type: none"> - Identification of potential pests and thresholds - The techniques used (cultural, biological, mechanical and physical methods) - The native species used as part of the biological control method - Reducing the use of chemicals over a period of time - Prophylactic use of pesticides 	Complied

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		<ul style="list-style-type: none"> - Minimization of pesticide use - Review on the plans to suit the present condition such as replanting <p>According to the Agricultural Policy Manual SOP AA-APM-OP-1100.10. R6 <i>Pengendalian Hama dan Penyakit</i> (Pests & Disease Control), certificate holder has plan to implement integrated pest management. According to the interview with pest control officer in Muara Bulian Estate obtain information that management has had a schedule to regularly monitored pest attack (census) as follows:</p> <ul style="list-style-type: none"> • Census of caterpillar/bag worm by monthly basis (the last census was in May 2024 with no infestation) • Census of <i>Ganoderma</i> annually (the last census was in May 2024 with no infestation) • Census rat infestation by recap the record of sortation in loading ramp. (the last census was in May 2024 with no infestation) • Census of Barn Owl Box occupation in three monthly bases. (the last census was in April 2024 with total 65 owl boxes and 73 owls) • Planting 8,898 meters of beneficial plants by 2023 and 4,664 by 2024. <p>During the field visit in own estate (Muara Bulian Estate block B18g, B18h afdeling II and C17c Afdeling 3) 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 attacks.</p> <p>Scheme Smallholder</p> <p>According to document verification and field visit to the smallholder's plot in 3 KUD's (KUD Subur Makmur, KUD Makmur Rejeki, and KUD Karya Lestari) pest monitoring and control sighted pest management</p>	
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		<p>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. There is no report of outbreak in their plot so far.</p> <p>Estate and scheme smallholders have implemented biological control to minimize or eliminate pest and disease, e.g. by use of barn owl and planting beneficial plants such as <i>Casia sp.</i>, <i>Antigonon leptopus</i> and <i>Turnera subulatta</i>.</p>	
7.1.2	<p>Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>During ASA2.2 it was known that 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 www.cabi.org on in global invasive species database http://www.iucngisd.org/gisd/search.php.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>Based on document verification, interview and field observation during ASA2.2 obtained information that there is no record use of fire for pest control.</p>	Complied
Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the document verification and interview with management during ASA2.2, 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). There is no change related to the SOP until this audit.</p>	Complied

		<p>During the audit, found some pesticide list that usually used with active ingredients such as lambda cyhalothrin, trichlopyr butoxy ethyl ester, isopropil amina glifosat, dimetoat, methyl metsulfuron and dimetilurea.</p> <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 http://pestisida.id/simpes_app/index.php.</p> <p>PT Inti Indosawit Subur – Muara Bulian already has a list of pesticides use that refers to the “Penggunaan Pestisida dan LD50 Tahun 2023-2024” as follows:</p> <table border="1"> <thead> <tr> <th>Brand</th><th>Active Ingredient</th><th>LD50 (mg/Kg)</th><th>Target use</th></tr> </thead> <tbody> <tr> <td>Polydor 25 EC</td><td>Lambda sihalotrin 25 gr/lit</td><td>>5,000</td><td>Broadleaf weeds, shrubs, woody weeds (wood saplings)</td></tr> <tr> <td>Supremo 480 SL</td><td>Isopropil amina glifosat 480 g/lit</td><td>>2,000</td><td>Weeds with broad leaf</td></tr> <tr> <td>Metaprima 20 WDG</td><td>Metyl metsulfuron</td><td>2,000</td><td>Weeds with broad and narrow leaf</td></tr> <tr> <td>Glumaron 80 WP</td><td>1.1-dimetilurea</td><td>>2,000</td><td>Weeds with broad leaf</td></tr> <tr> <td>Biolon 670 EC</td><td>Triclopir</td><td>2,120</td><td>Broadleaf weeds, shrubs, woody weeds (wood saplings)</td></tr> <tr> <td>Bionas 75 WG</td><td>Monoamonium Glifosat 75%</td><td>>5,000</td><td>Weeds with broad and narrow leaf</td></tr> <tr> <td>Glufo 150 SL</td><td>Amonium glufosianat 150 g/lit</td><td>5,000</td><td>Weeds with broad and narrow leaf</td></tr> </tbody> </table>	Brand	Active Ingredient	LD50 (mg/Kg)	Target use	Polydor 25 EC	Lambda sihalotrin 25 gr/lit	>5,000	Broadleaf weeds, shrubs, woody weeds (wood saplings)	Supremo 480 SL	Isopropil amina glifosat 480 g/lit	>2,000	Weeds with broad leaf	Metaprima 20 WDG	Metyl metsulfuron	2,000	Weeds with broad and narrow leaf	Glumaron 80 WP	1.1-dimetilurea	>2,000	Weeds with broad leaf	Biolon 670 EC	Triclopir	2,120	Broadleaf weeds, shrubs, woody weeds (wood saplings)	Bionas 75 WG	Monoamonium Glifosat 75%	>5,000	Weeds with broad and narrow leaf	Glufo 150 SL	Amonium glufosianat 150 g/lit	5,000	Weeds with broad and narrow leaf	
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		<p>Scheme Smallholder:</p> <p>During the ASA2.2 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. For period 2023-2024, the smallholders used pesticide with active ingredients isopropyl amine glyphosate, fluoroksifir and methyl metsulfuron. There is no record of parakuat diklorida usage.</p>																															
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Certificate holder has showed the record of LD50 calculation in each unit based on amount of pesticide used. For example, Muara Bulian Estate has calculated the LD50 based on amount of active ingredients applied per Ha and number of applications for Y2023 and Y2024 (until May 2024) as stated in the table below.</p> <p>Y2024 (until May)</p> <table><tr><th>Brand</th><th>Active Ingredient</th><th>LD50</th><th>Total Used</th><th>Total Active Ingredient</th></tr><tr><td>Polydor 25 EC</td><td>Lambda sihalotrin 25 gr/lit</td><td>>5,000</td><td>23</td><td>0.33027</td></tr><tr><td>Supremo 480 SL</td><td>Isopropil amina glifosat 480 g/lit</td><td>>2,000</td><td>2,743</td><td>756.1999</td></tr><tr><td>Metaprima 20 WDG</td><td>Metyl metsulfuron</td><td>2,000</td><td>106,060</td><td>12.1838</td></tr><tr><td>Glumaron 80 WP</td><td>1.1-dimetilurea</td><td>>2,000</td><td>35.5</td><td>0.016312</td></tr><tr><td>Biolon 670 EC</td><td>Triclopir</td><td>2,120</td><td>272.5</td><td>104.8679</td></tr></table>	Brand	Active Ingredient	LD50	Total Used	Total Active Ingredient	Polydor 25 EC	Lambda sihalotrin 25 gr/lit	>5,000	23	0.33027	Supremo 480 SL	Isopropil amina glifosat 480 g/lit	>2,000	2,743	756.1999	Metaprima 20 WDG	Metyl metsulfuron	2,000	106,060	12.1838	Glumaron 80 WP	1.1-dimetilurea	>2,000	35.5	0.016312	Biolon 670 EC	Triclopir	2,120	272.5	104.8679	Complied
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		Bionas 75 WG	Monoamonium Glifosat 75%	>5,000	4	0.001508	
		Glufo 150 SL	Amonium glufosianat 150 g/lt	5,000	61	5.2556	
		Kresna 24 WP	Metyl metsulfuron	2,000	70	0.009654	
		Y2023					
		Brand	Active Ingredient	LD50	Total Used	Total Active Ingredient	
		Nordox 86 WG	Cuprous oxide 86%	2,000	1	0.000494	
		Polydor 25 EC	Lambda sihalotrin 25 gr/lt	>5,000	20	0.009879	
		Supremo 480 SL	Isopropil amina glifosat 480 g/lt	>2,000	3,195	1.58	
		Metaprima 20 WDG	Metyl metsulfuron	2,000	335,560	165.75	
		Glumaron 80 WP	1.1-dimetilurea	>2,000	104,5	0.05162	
		Dithane M-45	Mancozeb 80%	>5,000	10	0.00494	
		Biolon 670 EC	Triclopir	2,120	372.25	0.18388	
		Bionas 75 WG	Monoamonium Glifosat 75%	>5,000	6	0.002964	
		Glufo 150 SL	Amonium glufosianat 150 g/lt	5,000	123	0.060709	

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7.2.3	<p>(C) 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 ASA2.2 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>Based on document review it was known that, 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>During ASA2.2, it was known that based on goods in and goods out data in pesticide store, obtained information that the certificate holder used several kind of pesticide (different active ingredients). As described in this indicator, the company no longer using <i>paraquat diklorida</i> since November 2019.</p> <p>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>	Complied
	<p>7.2.5b Why there is no other alternative which can be used.</p>	<p>According to IPM procedures, certificate holder always using biological approach in order to monitor 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>	

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	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	Certificate holder through Asian Agri's Research and Development Department has examined some pesticide in specific target. The result of examination and pesticide recommendation written in the SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control).	
	7.2.5d Process to limit the negative impacts of the application.	<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"> • Pesticide/herbicide selection to ensuring the application is effective. • Set up the appropriate nozzle in chemical weeding activity based on weed type, topography and availability of water. • Regularly spraying calibration to ensuring the application is effective and efficient. • Calculate pesticide/herbicide usage based on target (hectarage and weed type). • Spraying technic. 	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	<p>Based on document review and interview to the management, it was known that 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> <p>During audit, auditor team has also interviewed sample of smallholder representatives in KUD Subur Makmur, KUD Sumber Rejeki dan KUD Karya Lestari obtain information that the company has provide training</p>	

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		session for them on how to be handling pesticide safely, including the prohibition of paraquat.	
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides are always applied in accordance with the product label and storage instruction. Agrochemicals storage was locked in areas with limited access. The storage was ventilated. MSDS and hazard symbol label were provided nearby of agrochemicals. Emergency shower and eyewash were also provided to anticipate in case of an emergency of agrochemical handling. The possible spillage was managed. Secondary containment was provided around the chemical storage area. Spill kit was also provided in the area.</p> <p>PT Inti Indosawit Subur – Muara Bulian 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 (refresh) on 23 August 2023 that attended by 21 pesticides applicator. Some topics that discuss such as safety pesticide handling, national regulation related to pesticide, symbol and label awareness and emergency procedure if any contamination or poisonous. The worker can describe purpose of PPE usage, attending regularly medical check and safety working procedures.</p> <p>Workers that perform herbicide spraying in Block B18h Afdeling 2 Muara Bulian 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</p>	Complied

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		<p>the type of chemical for each weed type, the hazard, the application, and appropriate PPE use.</p> <p>Scheme Smallholder:</p> <p>Spraying works (pesticide application) in smallholder area were performed mostly by spraying team called TUS, which managed by PT Inti Indosawit Subur. Training records are kept by PT Inti Indosawit Subur. List of sprayer team of Plasma Muara Bulian was available. Training of pesticides spraying was provided and have training certificate were available issued by Pesticide Commission of Agriculture Department Jambi Province incorporated with agrochemical manufacturer.</p> <p>During audit, auditor team has also interviewed sample of smallholder representatives in KUD Subur Makmur, KUD Makmur Rejeki, and KUD Karya Lestari 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>(C) Storage of all pesticides in accordance with recognized best practices.</p> <p>- Critical (Major) compliance -</p>	<p>SOP for pesticide storage has been provided in SOP "Pengangkutan dan Penyimpanan Bahan Kimia AA-KL-02-EFP" dated 1 February 2008. Pesticides are stored in the determined area separated from fertilizer and other chemicals.</p> <p>Pesticide storage is provided in Divisions as well as in central storage. Agrochemical storage is locked areas with limited access. The storage is ventilated. MSDS and hazard symbol label are provided nearby of pesticides. Emergency shower and eyewash are also provided to anticipate in case of an emergency of agrochemical handling. PPE for handling of pesticides provided including boots, apron, safety glass, respiratory mask and hand gloves.</p>	Complied

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		<p>The possible spillage is managed. Secondary containment is provided around the pesticide storage area. Spill kit is also provided in the area. During field visit ASA2.2, it was known that storage of pesticides found to be in accordance with hazard identification and risk assessment and national guideline for limited pesticide use. Empty chemical containers had been used for mixing chemicals for spraying pesticides in the field. The management of waste material from empty pesticide container disposed through hazardous waste store as per procedure "Penanganan Limbah Industri B-3 AA-KL-06-EFP" dated 1 November 2008.</p> <p>The company has temporary hazardous waste storage where all hazardous waste from all estates and mills collected.</p> <p>Scheme Smallholder:</p> <p>Most of farmer members of Muara Bulian Smallholder were not directly conducting pesticide application and handling. Spraying works (pesticide application) in smallholder area were performed mostly by spraying team called TUS from PT Inti Indosawit Subur – Muara Bulian Estate. Some training records are kept by PT Inti Indosawit Subur. Muara Bulian Smallholder management ensured that all agrochemical usage and waste handling was performed by PT Inti Indosawit Subur.</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>SOP for proper disposal of pesticide waste material was described in "Penanganan Limbah Industri B-3 AA-KL-06-EFP" dated 1 November 2008. Pesticide waste was reuse as mixing water for the next spraying activity. All empty pesticides containers were triple rinsed and stored in the temporary storage of hazardous wastes.</p> <p>The management of waste material from empty pesticide container disposed through hazardous waste store according to the procedure. The company has licensed temporary hazardous waste storage where all empty pesticide containers from agrochemical storage collected.</p>	Complied

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		<p>Personnel interviewed during ASA2.2 can clearly explain the mechanism of pesticide waste handling including MSDS and personal protective equipment as well as first aid.</p> <p>Scheme Smallholder: Most farmer members of Muara Bulian Smallholder were not directly conducted pesticide application and handling. Spraying works (pesticide application) in smallholder area were performed mostly by spraying team called TUS from PT Inti Indosawit Subur – Muara Bulian Estate. Some training records are kept by PT Inti Indosawit Subur. Muara Bulian Smallholder management ensured that all agrochemical usage and waste handling was performed by PT Inti Indosawit Subur.</p>	
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>Based on interview with Estate Management, surrounding community and field observation during ASA2.2, there was no pesticide applied aerially in Muara Bulian Estate.</p> <p>Scheme Smallholder: Based on interview with Estate Management, surrounding community and field observation, there was no pesticide applied aerially in Muara Bulian Plasma.</p>	Complied
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Annual medical check-up was conducted for all workers handling with chemical, such as pesticide, herbicide, and fertilizer.</p> <p>Medical checkup records are available and has been reviewed during audit. The result of MCU are all workers in good or fit condition, no further medical examination required. The results have been communicated to related workers.</p>	Complied

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		<p>Scheme Smallholder:</p> <p>Most farmer members of Muara Bulian Smallholder were not directly conducted pesticide application and handling. Spraying works (pesticide application) in smallholder area were performed mostly by spraying team called TUS from PT Inti Indosawit Subur – Muara Bulian Estate.</p>	
7.2.11	<p>(C) No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives.</p> <p>- Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur – Muara Bulian and KUD's prohibits pregnant or breast-feeding women to perform chemical spraying. To mitigate, estate performed monthly pregnancy test.</p> <p>PT Inti Indosawit Subur – Muara Bulian and KUD's has also kept the record that spraying is not conducted by pregnant or breast-feeding women. The company has been conducting PP Test (pregnant test) every month.</p> <p>The last of pregnancy test conducted on January – May 2024. All the female sprayer in well condition and not being pregnant nor breast feeding.</p> <p>The company have a requirement to all workers that handling chemical substances such as qualification (trained sprayer/s, operator/s), have a good health condition based on medical check-up results and no pregnant or breastfeeding women work in that area. So, from the start, the worker with medical limitations already positioned in other area such as administration in office.</p> <p>Scheme Smallholder:</p> <p>Most farmer members of Muara Bulian Smallholder were not directly conducted pesticide application and handling. Spraying works (pesticide application) in smallholder area were performed mostly by spraying team called TUS from PT Inti Indosawit Subur – Muara Bulian Estate.</p>	Complied
Note For 7.2.11			

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

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

7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.</p> <p>- Minor compliance -</p>	<p>In this surveillance audit, no changes of procedure regarding waste management.</p> <p>Waste products has been identified and documented under the "<i>Evaluasi Aspek-Dampak Lingkungan</i>" (Environmental Aspect impacts EMS-431-003-LT). This document is updated once a year, last update is Revision 14, dated in January 2023. This document covering all operation in Estates and mill.</p> <p>All polluting activities has been assessed including emission from boiler and generator, effluent from mill waste-water, particulate from boiler stack, noise, used lubricant and filter, old battery, used laboratory chemical, clinical/medical waste, mill effluent, EFB, smoke, dust, fiber and shell, empty agrochemical container, boiler ash, scrap iron, used tires, waste water and domestic household refuse.</p> <p>PT Inti Indosawit Subur – Muara Bulian POM and Estate has a waste management plan, identifying type and source of waste and the disposal plan. PT Inti Indosawit Subur – Muara Bulian POM and Estate prepared a procedure to handle hazardous waste titled "<i>Prosedur Penanganan Limbah B3</i>" No. AA-KL06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third party transporter.</p> <p>PT Inti Indosawit Subur – Muara Bulian Group has been 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 Terpadu Satu Pintu Kabupaten Batang Hari Nomor: 503/02/IKPPLH-B3/DPMPTSP/2020), dated May 2020, the license valid for 5 years (Muara Bulian Estate). And, "Surat</p>	Complied
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		<p>Keputusan Badan Penanaman Modal dan Pelayanan Terpadu Satu Pintu Kabupaten Batang Hari Nomor: 503/03/IKPPLH-B3/DPMPTSP/2020), dated May 2020, the license valid for 5 years (Muara Bulian POM).</p> <p>There is a mechanism "<i>Mekanisme Penanganan Sampah Domestik</i>" to segregate organic and inorganic waste, further to re-use or re-cycle inorganic domestic waste (such as plastic) and composting the organic domestic waste. Company has disseminated the mechanism of domestic waste handling to all employee and resident of emplacement. Domestic waste resulted from domestic housing resident segregated activity. Company provided the organic and anorganic trash can in each housing area. There are personnel/workers who has been trained to collect the organic and anorganic waste and transport to landfill (TPSA).</p> <p>Scheme Smallholder</p> <p>All operational activities including spraying was conducted by TUS Team from Estate so no hazardous waste management in scheme smallholder.</p>	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>The hazardous waste is sent to the registered collector/transporter which is approved by Environmental Ministry. Document of agreements and third parties licenses:</p> <ul style="list-style-type: none"> • 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. • 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 	Non-compliance

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		<p>Investment Service and One Stop Integrated Licensing Service Number 660/1798.</p> <ul style="list-style-type: none"> • SPK for Transport and Management of LB3 between PT Inti Indosawit Subur and PT Hazmat Techno Indonesia and PT Putra Restu Ibu Abadi No. 08/SPJ/LEG-IIS/I/23 dated 2 January 2023. The agreement period starts from 1 January 2023 – 31 December 2024. • PT 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. • PT Pengolahan Limbah Industri Bekasi – B3 waste management services based on the Decree of the Minister of LHK RI No. S.31/Menlhk/Setjen/PLB.3/1/2019 dated January 21, 2019. • PT 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. • PT Putra Restu Abadi – B3 waste management services based on the Decree of the Minister of LHK RI No. S.575/Menlhk/Setjen/PLB.3/8/2020 dated 31 August 2020. • SPK for Transport and Management of LB3 between PT Inti Indosawit Subur with PT Hazmat Techno Indonesia and PT Trigunapratama Abadi No. 09/SPJ/LEG-IIS/I/23 dated 2 January 2023. The agreement period starts from 1 January 2023 – 31 December 2024 	
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		<ul style="list-style-type: none"> 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. <p>The electronic manifest of hazardous waste are available and has been reviewed during audit. Records of Quarterly report of hazardous waste was seen and reviewed for Triwulan III- IV Y2023 and Triwulan I Y2024.</p> <p>Based on interview with workers who handles pesticides, they understood the disposal of empty pesticides containers, such as: Empty chemical containers re-used only for mixing purposes, unusable are triple rinsed, punctured and disposed to the approval collector.</p> <p>Non conformance: There is domestic waste management that is not in accordance with the Waste Management Plan and established procedures.</p> <p>Objective Evidence: Based on a field visit to the landfill (TPSA) location in Afdeling 2 Block B18k, it was found that domestic waste disposal from employee housing was placed on the side of the block road and without a waste pit in accordance with procedures, namely a hole with the size of the TPS (Length x Width x Depth) 1) TPS 1: 3 m x 3 m x 4 m 2) TPS 2: 5 m x 3 m x 4 m</p>	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	Based on field observation in workers emplacement, landfill and other public facilities observed that there are no waste disposal using open fire. Organic waste is buried in a pit located behind the house, meanwhile anorganic waste transported to landfill.	Complied

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Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.</p> <p>- Minor compliance -</p>	<p>PT Inti Indosawit Subur – Muara Bulian Estate has procedures to maintain soil fertility to ensure optimal and sustained yield, e.g. SOP AA-APM-OP-1100.05-R3 dated 23 November 2016 (Konservasi Tanah dan Air explains Soil & Water Conservation); SOP AA-APM-OP-1100.06-R6 dated 16 February 2017 (Menanam kacang related to Planting cover crops); SOP AA-APM-OP-1100.09.R5 dated 5 September 2016 (Pemupukan related to Fertilizer application). There is no change of the SOP until ASA2.1.</p> <p>Leaf samplings are taken annually to accurately capture palm nutrient requirement (both macro and micronutrient) and serve as source for fertilizer recommendation – fertilizer application (inorganic, compost, POME application, and empty fruit bunch) follows fertilizer recommendation. Another effort is to plant legume cover crop during replanting to keep soil humidity.</p> <p>During the audit known that the management unit has applied fertilizer according to the fertilizer's recommendation issued by Asian Agri Research and Development Department. Based on field visit in Block B18g Afdeling 2 using Dolomite with dosage 3 kg/palm (this is in accordance with fertilizer's recommendation 2023).</p> <p>In addition, management unit also applied POME application especially in early mature area to maintain soil fertility and increase production. The POME applied with dosage 800 m3/Ha/year.</p> <p>Based on interview with smallholders, most of their plots is no longer applied with fertilizer due to in replanting preparation in 2023 – 2024.</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&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"> • The last soil sampling conducted on 3 June 2021. Parameter that tested is N, C, K, Ca, Mg and pH. • The last leaf sampling conducted on 11 April 2023. Parameter that tested is major element (Ash, N, P, K Mg, Ca) dan Minor element (B, Cu, Zn, Mn, Fe). <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 2024.</p>	
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>During ASA 2.2 audit, EFB, POME and others palm residue are still applied to the land as additional nutrient beside the periodical manuring. This treatment are apply for Muara Bulian Estate. Whether for smallholders, only apply fertilizer.</p> <p>During this audit, auditor has observed the application of organic and inorganic fertilizers. For example: there is application Dolomite in Block B18g Afdeling 2 with dosage 3 kg/palm (this is in accordance with fertilizer's recommendation 2024).</p> <p>Scheme Smallholder:</p> <p>According to the interview with smallholder representatives and document review,</p> <p>Whilst the (KUD Subur Makmur) was not applied the fertilizer for their whole areas due to replanting plan in the next two year.</p>	Complied
7.4.4	Records of fertilizer inputs are maintained.	Record of fertilizer application in estate are in places as follows:	Complied

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	- Minor compliance -	<table><tr><th colspan="3">Muara Bulian Estate Y2023</th></tr><tr><th>Type of Fertilizer</th><th>Actual (Kg)</th><th>% from recommendation</th></tr><tr><td>Urea</td><td>414,275</td><td>100%</td></tr><tr><td>RP</td><td>508,666</td><td>100%</td></tr><tr><td>MOP</td><td>954,003</td><td>100%</td></tr><tr><td>ZA</td><td>485,046</td><td>100%</td></tr><tr><td>Dolomite</td><td>561,862</td><td>100%</td></tr><tr><td>HGFB</td><td>29,709</td><td>100%</td></tr></table> <table><tr><th colspan="3">Muara Bulian Estate Y2024 (until May 2024)</th></tr><tr><th>Type of Fertilizer</th><th>Actual (Kg)</th><th>% from recommendation</th></tr><tr><td>MOP</td><td>472,358</td><td>50%</td></tr><tr><td>ZA</td><td>545,827</td><td>51%</td></tr><tr><td>Dolomite</td><td>240,242</td><td>40%</td></tr><tr><td>HGFB</td><td>13,728</td><td>45%</td></tr></table>	Muara Bulian Estate Y2023			Type of Fertilizer	Actual (Kg)	% from recommendation	Urea	414,275	100%	RP	508,666	100%	MOP	954,003	100%	ZA	485,046	100%	Dolomite	561,862	100%	HGFB	29,709	100%	Muara Bulian Estate Y2024 (until May 2024)			Type of Fertilizer	Actual (Kg)	% from recommendation	MOP	472,358	50%	ZA	545,827	51%	Dolomite	240,242	40%	HGFB	13,728	45%	
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Criteria 7.5: Practices minimise and control erosion and degradation of soils.																																													
7.5.1	(C) Maps that identify marginal and fragile soils, including steep sloped land are available. - Critical (Major) compliance -	Based on the ASA 2.2 audit results, there are no changes related to the map of marginal and fragile soil identification results. The document is still the same as the previous year's audit results. Based on soil survey 2009 (28/04/2009 – 13/05/2009), it was noted that no fragile soil (all mineral soil). Muara Bulian Estate demonstrates soil classification map	Complied																																										

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		<p>"Peta Sebaran Seri Tanah" with scale 1:25,000, indicating the soil classification composed of:</p> <ol style="list-style-type: none"> 1. Typic Dystrudepts, 2. Typic Endoaquepts, 3. Typic Endoaquults and 4. Typic Kandiuults. <p>The slope in the plantation, between 0-30%. (Steep slope categorized as >20° or 40%, Hilly slope between 13° – 20°. Terracing made in the slope 10° – 15°).</p> <p>Soil suitability analysis indicating the natural limitation in form of sandy texture, poor drainage, natural fertility, topography. The area of 563 Ha in Muara Bulian Estate is not suitable with requirement due to slope more than 30%.</p> <p>There is no change related to the result of soil survey 2009 until this audit.</p> <p>Scheme Smallholders:</p> <p>The soil map was available at plasma Muara Bulian office and KUD office with scale 1:40,000. There are 3 series of soil type defined by Research and Development Asian Agri based on soil survey on March 2014:</p> <ol style="list-style-type: none"> 1. Kompleks Typic Endoaquepts seri Singoan 2. Kompleks Typic Dystrudepts seri Bulian 3. Kompleks Typic Kandiuults seri Bulian <p>According to the type soil in Plasma Muara Bulian, there is no fragile soil identified in plasma area of Muara Bulian.</p>	
7.5.2	<p>The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>The last replanting program at Muarabulian Estate is Y2019, the planting year is 2016, 2017, 2018 and 2019.</p> <p>Scheme Smallholder</p>	Complied

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		<p>During this audit ASA2.2, auditor has been confirmed that there is replanting activity at plasma/KUD, here is the realization of replanting:</p> <p>2021: at KUD Barokah 210 Ha and at KUD Budi Sari 186 Ha</p> <p>2022: at KUD Makmur Rezeki 130 Ha</p> <p>2023: at KUD Barokah 270 Ha and at KUD Budi Sari 252 Ha</p> <p>2024: at KUD Barokah 168 Ha.</p> <p>Replanting activity in steep terrain area using a terrace contour for soil conservation.</p>	
7.5.3	<p>New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>There is no new palm oil planting in Muara Bulian Estate. The last replanting program is Y2019, the planting year is 2016, 2017, 2018 and 2019.</p> <p>Scheme Smallholder</p> <p>During this audit ASA2.2, auditor has been confirmed that there is replanting activity at plasma/KUD, here is the realization of replanting:</p> <ul style="list-style-type: none"> • 2021: at KUD Barokah 210 Ha and at KUD Budi Sari 186 Ha • 2022: at KUD Makmur Rezeki 130 Ha • 2023: at KUD Barokah 270 Ha and at KUD Budi Sari 252 Ha • 2024: at KUD Barokah 168 Ha. <p>Replanting activity in steep terrain area using a terrace contour for soil conservation.</p>	Not Applicable
Criteria 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	<p>(C) Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the ASA 2.2 audit results, there are no changes, the documents are still the same as the previous year's audit results.</p> <p>Based on soil survey 2009 (28/04/2009 – 13/05/2009), it was noted that no fragile soil (all mineral soil). Muara Bulian Estate demonstrates soil classification map "Peta Sebaran Seri Tanah" with scale 1:25,000,</p>	Complied

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		<p>indicating the soil classification composed of Typic Dystrudepts, Typic Endoaquepts, Typic Endoaquults and Typic Kandiodults.</p> <p>The slope in the plantation, between 0-30%. (Steep slope categorized as >20° or 40%, Hilly slope between 13° – 20°. Terracing made in the slope 10° – 15°).</p> <p>Soil suitability analysis indicating the natural limitation in form of sandy texture, poor drainage, natural fertility, topography. The area of 563 Ha in Muara Bulian Estate is not suitable with requirement due to slope more than 30%.</p> <p>Scheme Smallholders:</p> <p>The soil map was available at plasma Muara Bulian office and KUD office with scale 1:40,000. There are 3 series of soil type defined by Research and Development Asian Agri based on soil survey on March 2014:</p> <ol style="list-style-type: none"> 1. Kompleks Typic Endoaquepts seri Singoan 2. Kompleks Typic Dystrudepts seri Bulian 3. Kompleks Typic Kandiodults seri Bulian <p>According to the type soil in Plasma Muara Bulian, there is no fragile soil identified in plasma area of Muara Bulian.</p> <p>There is no change related to the SOP and Soil Map.</p>	
7.6.2	<p>Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan.</p> <p>- Minor compliance -</p>	<p>During this audit ASA2.2, auditor has been confirmed that there is no new planting (land extension) of PT Inti Indosawit Subur or plasma area. It is only replanting activity in plasma, here is the realization of replanting:</p> <ul style="list-style-type: none"> • 2021: at KUD Barokah 210 Ha and at KUD Budi Sari 186 Ha • 2022: at KUD Makmur Rezeki 130 Ha • 2023: at KUD Barokah 270 Ha and at KUD Budi Sari 252 Ha 	Complied

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		<ul style="list-style-type: none"> 2024: at KUD Barokah 168 Ha. Replanting activity in steep area using a terrace contour for soil conservation.	
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 the ASA 2.2 audit results, there are no changes, the documents are still the same as the previous year's audit results.</p> <p>Based on soil survey 2009 (28/04/2009 – 13/05/2009), it was noted that no fragile soil (all mineral soil). Muara Bulian Estate demonstrates soil classification map "Peta Sebaran Seri Tanah" with scale 1:25,000, indicating the soil classification composed of:</p> <ol style="list-style-type: none"> 1. Typic Dystrudepts, 2. Typic Endoaquepts, 3. Typic Endoaquults and 4. Typic Kandiodults. <p>The slope in the plantation, between 0-30%. (Steep slope categorized as >20° or 40%, Hilly slope between 13° – 20°. Terracing made in the slope 10° – 15°).</p> <p>Replanting activity in steep area using a terrace contour for soil conservation.</p>	Complied
Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<p>(C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the ASA 2.2 audit results, there are no changes, the documents are still the same as the previous year's audit results.</p> <p>Based on soil survey 2009 (28/04/2009 – 13/05/2009), it was noted that no fragile soil (all mineral soil). Muara Bulian Estate demonstrates soil classification map "Peta Sebaran Seri Tanah" with scale 1:25,000, indicating the soil classification composed of:</p> <ol style="list-style-type: none"> 1. Typic Dystrudepts, 2. Typic Endoaquepts, 	Complied

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		3. Typic Endoaquults and 4. Typic Kandiudults. The slope in the plantation, between 0-30%. (Steep slope categorized as >20° or 40%, Hilly slope between 13° – 20°. Terracing made in the slope 10° – 15°).	
7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018). - Minor compliance -	Based on the ASA 2.2 audit results, there are no changes, the documents are still the same as the previous year's audit results. Based on soil survey 2009 (28/04/2009 – 13/05/2009), it was noted that no fragile soil (all mineral soil). Muara Bulian Estate demonstrates soil classification map "Peta Sebaran Seri Tanah" with scale 1:25,000, indicating the soil classification composed of: 1. Typic Dystrudepts, 2. Typic Endoaquepts, 3. Typic Endoaquults and 4. Typic Kandiudults. The slope in the plantation, between 0-30%. (Steep slope categorized as >20° or 40%, Hilly slope between 13° – 20°. Terracing made in the slope 10° – 15°).	Complied
PROCEDURAL NOTE: Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).			
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	Based on the ASA 2.2 audit results, there are no changes, the documents are still the same as the previous year's audit results. Based on soil survey 2009 (28/04/2009 – 13/05/2009), it was noted that no fragile soil (all mineral soil). Muara Bulian Estate demonstrates soil classification map "Peta Sebaran Seri Tanah" with scale 1:25,000, indicating the soil classification composed of: 1. Typic Dystrudepts,	Not Applicable

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		<ol style="list-style-type: none"> 2. Typic Endoaquepts, 3. Typic Endoaquults and 4. Typic Kandiudults. <p>The slope in the plantation, between 0-30%. (Steep slope categorized as >20° or 40%, Hilly slope between 13° – 20°. Terracing made in the slope 10° – 15°).</p>	
7.7.4	<p>(C) Availability of implementation evidence of the water and land cover management program.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the ASA 2.2 audit results, there are no changes, the documents are still the same as the previous year's audit results.</p> <p>Based on soil survey 2009 (28/04/2009 – 13/05/2009), it was noted that no fragile soil (all mineral soil). Muara Bulian Estate demonstrates soil classification map "Peta Sebaran Seri Tanah" with scale 1:25,000, indicating the soil classification composed of:</p> <ol style="list-style-type: none"> 1. Typic Dystrudepts, 2. Typic Endoaquepts, 3. Typic Endoaquults and 4. Typic Kandiudults. <p>The slope in the plantation, between 0-30%. (Steep slope categorized as >20° or 40%, Hilly slope between 13° – 20°. Terracing made in the slope 10° – 15°).</p>	Not Applicable
7.7.5	<p>(C) Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better</p>	<p>Based on the ASA 2.2 audit results, there are no changes, the documents are still the same as the previous year's audit results.</p> <p>Based on soil survey 2009 (28/04/2009 – 13/05/2009), it was noted that no fragile soil (all mineral soil). Muara Bulian Estate demonstrates soil classification map "Peta Sebaran Seri Tanah" with scale 1:25,000, indicating the soil classification composed of:</p> <ol style="list-style-type: none"> 1. Typic Dystrudepts, 2. Typic Endoaquepts, 	Not Applicable

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	<p>suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation.</p> <p>- Critical (Major) compliance -</p>	<p>3. Typic Endoaquults and</p> <p>4. Typic Kandiuults.</p> <p>The slope in the plantation, between 0-30%. (Steep slope categorized as >20° or 40%, Hilly slope between 13° – 20°. Terracing made in the slope 10° – 15°).</p>	
<p>PROCEDURAL NOTE: For 7.7.5: Detailed information on the RSPO Drainability Assessment Guide along with related concepts and detailed actions is contained in the Guidelines currently being adjusted / tested by the RSPO Working Group on Peatlands (Peatland Working Group / PLWG). The final version must obtain PLWG approval in January 2019 and will include additional Guide on the steps to be followed after deciding not to replant and the consequences for other stakeholders, farmers, local communities, and the unit of certification concerned. It is recommended that the trial methodology period is proposed to be extended for 12 months for all relevant management units (ie management units that have plantations on peat) to utilize the methodology and provide input to PLWG so that existing procedures can be further refined as needed before January 2020. The unit of certification has the option to delay replanting until the issuance of the revised Guidelines for the guidelines. Additional guidance for alternative commodity crops and rehabilitation of natural vegetation will be regulated by the PLWG.</p>			
7.7.6	<p>(C) All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).</p> <p>- Critical (Major) compliance -</p>	<p>Based on the ASA 2.2 audit results, there are no changes, the documents are still the same as the previous year's audit results.</p> <p>Based on soil survey 2009 (28/04/2009 – 13/05/2009), it was noted that no fragile soil (all mineral soil). Muara Bulian Estate demonstrates soil classification map "Peta Sebaran Seri Tanah" with scale 1:25,000, indicating the soil classification composed of:</p> <ol style="list-style-type: none"> 1. Typic Dystrudepts, 2. Typic Endoaquepts, 3. Typic Endoaquults and 4. Typic Kandiuults. <p>The slope in the plantation, between 0-30%. (Steep slope categorized as >20° or 40%, Hilly slope between 13° – 20°. Terracing made in the slope 10° – 15°).</p>	Not Applicable
7.7.7	<p>(C) All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building</p>	<p>Based on the ASA 2.2 audit results, there are no changes, the documents are still the same as the previous year's audit results.</p>	Not Applicable

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	<p>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>Based on soil survey 2009 (28/04/2009 – 13/05/2009), it was noted that no fragile soil (all mineral soil). Muara Bulian Estate demonstrates soil classification map "Peta Sebaran Seri Tanah" with scale 1:25,000, indicating the soil classification composed of:</p> <ol style="list-style-type: none"> 1. Typic Dystrudepts, 2. Typic Endoaquepts, 3. Typic Endoaquults and 4. Typic Kandiuults. <p>The slope in the plantation, between 0-30%. (Steep slope categorized as >20° or 40%, Hilly slope between 13° – 20°. Terracing made in the slope 10° – 15°).</p>	
Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters:</p> <p>- Minor compliance -</p> <p>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>Company has obtained permit to use the surface water from Singoan River according to "Keputusan Menteri Pekerjaan Umum dan Perumahan rakyat Nomor 544/KPTS/M/2020 Tentang Pemberian Izin Pengusahaan Sumberdaya Air Kepada Perseroan Terbatas Inti Indosawit Subur Untuk Usaha Industri di Sei Singoan" dated 22 July 2020, valid until 5 years since issued.</p> <p>The Company has a water management document, both in the estate and mill. Monitoring the implementation of water management has been implemented on a regular basis, such as surface water quality monitoring each semester at Singoan river (upstream and downstream) are available in the report of RKL/RPL. Company has analyzed water quality each semester to ensure the compliance against PP No. 82 tahun 2001 regarding water quality standard, the result of water quality monitoring by Laboratory PT. ITEC Solution Indonesia (sample No. D.04.450-1.p-AP.21) shown that water quality is complies with national regulation.</p>	Complied

		<p>Procedure SOP AA-APM-OP-1100.05. R1 "Konservasi Tanah dan Air" has been established to maintain the quality and availability of water. Procedures was also established for protection and management of riparian buffer zones at or before replanting. Procedure mentioned that in 50m on the left and right side of riparian buffer zones, estates are prohibited to apply agrochemical, used manual manuring and river bank was planted by erosion barrier crop (planting of "vetiver" grass, Pheronema canescens and Bamboosa sp). The organisation also has policy that prohibits estates for planting in 50m on the left and right side of riparian buffer zones at or before replanting. Warning board placed regarding prohibition to apply agrochemicals and fertiliser in the buffer zone. Riparian buffers of small natural water courses were 50 metres wide on both sides of the rivers as defined in the procedure AA-KL-12-EFP "Restorasi Riparian dan Areal Sekitar Danau/Waduk atau Mata Air lainnya". Several evidence of maintaining quality and availability of water were evident, such as plan and realisation of riparian management, installation of warning boards, planting erosion prevention plan (e.g. Pheronema canescens, Terminalia cattapa, Bamboosa sp and vetiver grass) and monitoring of water quality.</p> <p>PT Inti Indosawit Subur – Muara Bulian does not limit access to clean water or does not pollute the water used by the community. Company has monitor clean water quality each semester to ensure the water use by community and employee are met with standard.</p> <p>Scheme Smallholder:</p> <p>For Smallholder, water management applied is focused on protection of riparian zone. The activity is only maintained the riparian zone from pesticides application.</p>	
	7.8.1b Workers have adequate access to clean water.	According to field visit, company provided housing complex that adequate facilities has been available for mill workers, including: housing	

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		<p>for staff, housing for workers (permanent and temporary), electricity from mill grid, clean water supply from water treatment plant (available for entire year), medical service in company's clinic, primary level education facility, religion and worship facility, and sport.</p> <p>Company provide the clean water for workers at housing area with clean water from Muara Bulian Mill. Regular water analysis was performed to monitor the water quality. Water analysis performed by accredited laboratory "PT. ITEC Solution Indonesia" each semester for Clean water.</p> <p>Interview with workers during onsite audit confirmed that they have adequate access to clean water provide by company.</p>	
7.8.2	<p>(C) Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes of compliance statement compare to last year audit.</p> <p>PT Inti Indosawit Subur – Muara Bulian has establish management plan to protect water courses and wetlands, including securing and maintaining appropriate riparian.</p> <ul style="list-style-type: none"> • Riparian restoration with forest vegetation plant/tree (<i>Pterocarpus indicus</i>, <i>phoronema canescens</i>, <i>vetiver</i>, <i>Terminalia cattapa</i>, <i>Ficus</i>). • Establish zone for zero chemical. No spraying and fertilizing along riparian zone. Based on visit in riparian zone (Sempadan Sungai Singoan) • Conserve the natural vegetation in riparian zone • Restricted to conduct replanting palm oil in riparian area <p>During field visit to riparian area in Muara Bulian Estate can be shown that riparian area are well maintained, no chemical application near to riparian, no disturbance on riparian, natural vegetation are protected and the signboard information and awareness are available.</p>	Complied

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7.8.3	Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations. - Minor compliance -	Effluent from Muara Bulian Mill applied to plantation area as Land Application. Monitoring of effluent conducted in monthly period. BOD Analysis performed by PT Jambi Lestari International, accredited by KAN LP-1129-IDN. Records of analysis area available and has been reviewed during audit. The results complied to the regulations (PermenLH 28/2003), for example period April 2024, pH 7.15 (quality std 6-9), BOD5 802.01 mg/L (quality std 5,000 mg/L); period March 2024 pH 7.50 (quality std 6-9), BOD5 482.37 mg/L (quality std 5,000 mg/L)	Complied
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	Records of water use and tonnage of FFB processed available in monthly report "Laporan Harian Produksi Pabrik Muara Bulian". Records for period of July – December 2023 and January – May 2024 are available and has been reviewed during audit.	Complied
Criteria 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised			
7.9.1	Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented. - Minor compliance -	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 2023-2024. To improving efficiency of the use of fossil fuels by doing monitoring on use of fossil fuels. Fossil fuel records were 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 purposes, including the efficiency analysis.	Complied
Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	(C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.	There are no changes regarding GHG identification and reduction plan.	Complied

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	- Critical (Major) compliance -	<p>PT Inti Indosawit Subur – Muara Bulian POM has identified the emission sources and pollution under document of “Environmental Aspect-Impacts (Evaluasi Aspek-Dampak Lingkungan) year 2024”.</p> <p>Identification of greenhouse gas (GHG) emissions sources both of Mill, Estate and Smallholders consist of emission from boiler and generator, effluent from mill wastewater, particulate from boiler stack, noise, fertilizer application, fossil fuels usage, transport of FFB.</p> <p>The assessment of pollution activities was documented in “Mitigasi Gas Rumah Kaca”. All the activities of mill and estate as well as the waste generated has been well documented, for examples the operational activity from generator is generates air emissions, the company conducts periodic generator maintenance and perform quality measurement of exhaust emissions each semester to ensure air quality is comply with standard regulation.</p> <p>The auditor team has verified the PalmGHG Calculator version 4.0.1 that has been carried out by the company. Based on the verification results, it is known that the PalmGHG 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</p>	
7.10.2	<p>(C) Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Muara Bulian Estate and Mill after November 2005. Currently, replanting activities still in progress.</p> <p>Year of Planting for Muara Bulian Estate: 1991, 1992 and 1994.</p> <p>Whereas, Year of Planting for Smallholders is 1991, 1992, 1993, 1994, 1995, 1996, 1999, 2000, 2001 and 2006.</p>	Complied
7.10.3	<p>(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>PT IIS – Muara Bulian POM has identified the significant pollutants and greenhouse gas (GHG) emissions. Significant pollutants and GHG such as: Emission, particulate, noise from boiler and generator, effluent from</p>	Complied

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		<p>mill wastewater, fertilizer application, chemical applicator and transport of FFB.</p> <p>Monitoring of air emissions and ambient air quality conducted every semester. Emissions test conducted testing by Accreditation Laboratory. The results of the analysis have been demonstrated and reported to Environmental Agency every six months. Air emission quality in Muara Bulian POM analyse by PT. ITEC Soution Indonesia.</p>	
Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur – Muara Bulian POM established Company Policy signed by Managing Director, Kevin Tio, on 1 December 2014. Point 6 of the policy stated the company uses Zero Burning practice in developing plantation and actively support initiative to prevent and monitor forest fire and haze.</p> <p>Based on field observation it was evident that no fire has been used for replanting in Muara Bulian Estate. The land preparation is using mechanical method. It can also demonstrate in the agreement contract between compay and subcontractor that all activity of replanting is performed manual and mechanically.</p> <p>Scheme Smallholder:</p> <p>The Smallholder Manager has prepared the policy that there were no land preparation by burning, as per “Kebijakan Manager Plasma Muara Bulian” dated 2 December 2020, in poin 6: “<i>Melakukan praktek tanpa bakar dalam kegiatan pembangunan perkebunan dan petani maupun desa secara aktif mendukung inisiatif mencegah mengawasi kebakaran hutan dan asap</i>” (Implementing non-burning practices in plantation development activities, farmers and villages actively support initiatives to prevent and control forest fires and smoke).</p> <p>Based on interview with smallholder (69 smallholders) for example from KUD Makmur Rezeki obtained information that there are no land</p>	Complied

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		preparation by burning, land preparation is carried out by mechanical method.	
7.11.2	The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification. - Minor compliance -	<p>PT Inti Indosawit Subur – Muara Bulian POM established Company Policy signed by Managing Director, Kevin Tio, on 1 December 2014. Point 6 of the policy stated the company uses Zero Burning practice in developing plantation and actively support initiative to prevent and monitor forest fire and haze.</p> <p>Replanting has been done mechanically, consisting of falling tree, chipping by excavator, terracing by excavator, digging, road construction, ditch/waterways construction, planting LCC and planting oil palm. The company established “Ketentuan Replanting areal Mineral” in 2016. In the mechanism explained that replanting must be conducted mechanically without burning.</p> <p>Based on field visit, 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>Scheme Smallholder:</p> <p>There was not any open burning was noted for land preparation. Replanting has been done mechanical.</p>	Complied
7.11.3	The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures. - Minor compliance -	PT Inti Indosawit Subur – Muara Bulian POM established Company Policy signed by Managing Director, Kevin Tio, on 1 December 2014. Point 6 of the policy stated the company uses Zero Burning practice in developing plantation and actively support initiative to prevent and monitor forest fire and haze. The policy has communicated to all smallholders remember and local community to engages stakeholders in adjacent locations for fire prevention and control measures.	Complied

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		<p>Replanting has been done mechanically, consist of falling tree, chipping by excavator, terracing by excavator, digging, road construction, ditch/waterways construction, planting LCC and planting oil palm. Company has established "Ketentuan Replanting areal Mineral" tahun 2016. In the mechanism explained that replanting must be conducted mechanically without burning.</p> <p>Based on interview with sampled smallholder and relevant authority, they understand the company policy .</p>	
<p>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.</p>			
<p>PROCEDURAL NOTE for 7.12:</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Procedures will be developed that are adapted to support the development of sustainable palm oil by indigenous peoples and local communities who have legal or customary rights. The procedure will apply in certain HFCC countries and in the High Forest Cover Landscape (HFCL) within it.</p> <p>The development of this procedure will be guided by the No Deforestation Joint Steering Group (NDJSG) between the RSPO and HCSA members. In HFCC countries, RSPO will work with governments, communities and other stakeholders to develop this procedure through participatory processes at national and regional levels. The duration of this activity is specified in the Terms of Reference for NDJSG and is publicly available.</p>			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests.</p> <p>Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Muara Bulian Estate and Mill after November 2005. Replanting activities started in year 2016 and has completed in 2019.</p> <p>Year of Planting for Muara Bulian Estate: 1991, 1992 and 1994 (replanting 2016 – 2019). Whereas, Year of Planting for Smallholders is 1991, 1992, 1993, 1994, 1995, 1996, 1999, 2000, 2001.</p>	Not Applicable

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	- Critical (Major) compliance -		
7.12.2	<p>(C) HCV and HCS forests, and other conservation areas are identified as follows:</p> <p>- Critical (Major) compliance -</p> <p>7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.</p>	<p>During this ASA2.2 audit, there is no change in terms of HCV assessment result from the previous audit.</p> <p>PT Inti Indosawit Subur Muara Bulian is an existing plantation, therefore no more expansion area or land development.</p> <p>Muara Bulian Estate:</p> <p>PT Inti Indosawit Subur Muara Bulian has conducted the HCV identification in coordination with "Fakultas Kehutanan Institut Pertanian Bogor" on February – March 2011 and final report on October 2011, under "Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT Inti Indosawit Subur – Muara Bulian Estate, Provinsi Jambi". The HCV assessment conducted based on "Panduan Kawasan Bernilai Konservasi Tinggi di Indonesia", issued by Konsorsium Revisi HCV Toolkit Indonesia dated 12/07/2008. HCV assessor were RSPO approved assessor consist of: Nyoto Santoso (leader) and member: M. Sayidina Ali, Udi Kusdinar, Sutopo, Eko Adhiyanto.</p> <p>The HCV identification carried out with public stakeholder consultation with surrounding communities. The HCV Identification report has been peer reviewed by WWF Indonesia (Mr. Deni Rahadian) on 22 September 2011.</p> <p>The presence of HCVs at PT IIS Muara Bulian is mainly under category HCV 1.1, HCV 1.2, HCV 4.1 and HCV 5 with total HCV areas of 76.18 Ha; where mostly the identified HCV areas were determined as riparian area and water catchment area. During audit ASA 1.2 the HCV area at Muara Bulian Estate were increase with additional of riparian area. Currently the HCV total was 104.18 ha, the additional HCV area was increasing of riparian zone along the river side which is not replanting by company and stated as HCV area with size of 28 ha.</p>	Complied

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		<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> <p>Scheme Smallholder:</p> <p>HCV assessment has been conducted by IPB facilitated by group manager and PT Inti Indosawit Subur on February – March 2011 in area Plasma Muara Bulian.</p>	
	7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Muara Bulian Estate and Mill after November 2005. Currently, replanting activities still in progress.</p> <p>Year of Planting for Muara Bulian Estate: 1991, 1992 and 1994 (replanting 2016 – 2019). Whereas, Year of Planting for Smallholders is 1991, 1992, 1993, 1994, 1995, 1996, 1999, 2000, 2001.</p>	
7.12.3	<p>(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p> <p>- Critical (Major) compliance -</p>	<p>During this audit, there is no change in terms of HCV assessment result from the previous audit.</p> <p>According to HCV assessment result, confirmed that there is no High Forest Cover Landscapes (HFCLs).</p> <p>The presence of HCVs at PT IIS Muara Bulian is mainly under category HCV 1.1, HCV 1.2, HCV 4.1 and HCV 5 with total HCV areas of 76.18 Ha; where mostly the identified HCV areas were determined as riparian area and water catchment area. During audit ASA 1.2 the HCV area at Muara Bulian Estate were increase with additional of riparian area. Currently the HCV total was 104.18 ha, the additional HCV area was increasing of riparian zone along the river side which is not replanting by company and stated as HCV area with size of 28 ha.</p> <p>The HCV identification document has explained the general condition of landscape surrounding company's plantation: there is no protected</p>	Not Applicable

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		forest/ecosystem that feasible for wildlife to maintain its viability. Therefore, no recommendation for wildlife corridor. Therefore, this is not applicable.	
PROCEDURAL NOTE for 7.12.3: Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.			
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Muara Bulian Estate and Mill after November 2005. Currently, replanting activities still in progress.</p> <p>Year of Planting for Muara Bulian Estate: 1991, 1992 and 1994 (replanting 2016 – 2019). Whereas, Year of Planting for Smallholders is 1991, 1992, 1993, 1994, 1995, 1996, 1999, 2000, 2001.</p> <p>Soil type of Muara Bulian Estate and Smallholders is mineral, there is no peatland within the unit of certification.</p> <p>PT IIS Muara Bulian has develop Conservation Management Plan as per "Conservation management and monitoring plan 2023". Company has determined conservation management and monitoring plan refer to HCV assessment result. Based on field verification, company has demonstrated effort for management and monitoring of HCV area to protect rare species and its habitat through planting of wooden tree, HCV area patrol, flora and fauna monitoring. The Estates have maintained notice-boards at the entrance to the properties and next to buffer zones or worker housing to prohibit the capture or hunting of fauna and disturbance of vegetation. Wildlife monitoring is conducted monthly by foreman and clerk afedling/division.</p> <p>The animal/species findings are recorded in the form "Daftar Temuan Satwa liar di Areal Kebun". Evidence of wildlife monitoring can be demonstrated and recorded in "Laporan Montoring Pengelolaan Tumbuhan dan Satwa – Nilai Konservasi Tinggi PT Inti Indosawit Subur Kebun Muara Bulian. Sample seen for monitoring report semester II year</p>	Complied

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		<p>2022 location at Sengoan river the presence of animal during monitoring: 4 species of mammalia (<i>Sus crofa</i>, <i>Macaca fascicularis</i>, <i>Callosciurus sp</i>, <i>Macaca nesmestrina</i>); 19 species of Aves or bird such as <i>Rhipidura javanica</i>, <i>Geopelia striata</i>, <i>Gracula religiosa</i>, <i>Alcedo meninting</i>, <i>Anthreptes malaccensis</i>, <i>Centropus bengalensis</i>, <i>Oriolus chinensis</i>; 2 species of Reptilia (<i>Mabouya sp</i>, <i>Varanus salvator</i>).</p> <p>Monitoring report semester II year 2022 location at Anak Sengoan river the presence of animal during monitoring: 2 species of mammalia (<i>Sus crofa</i>, <i>Callosciurus sp</i>); 13 species of Aves or Bird such as: <i>Halcyon smirnensis</i>, <i>Geopelia striata</i>, <i>Pycnonotus aurigaster</i>, <i>Priminia familiaris</i>, <i>Centropus bengalensis</i>; 2 species of Reptilia (<i>Mabouya sp</i>, <i>Varanus salvator</i>).</p> <p>Other sample monitoring on trees and vetiver grass maintenance or conservation on the river buffer zone (Sengoan river) has been done to enhance the HCV area and biodiversity. Monitoring and patroll of HCV area and installing identity signboard and warning signboard on the field also done for awareness and conservation campaign.</p> <p>HCV management and monitoring including Flora and fauna monitoring reported each semester to BKSDA (Natural Resources Conservation Body) Jambi Province, latest report semester II 2022 reported on 24 January 2023.</p>	
7.12.5	<p>Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>There is no rights of local communities identified in HCV areas. All HCV areas are inside the HGU of PT Inti Indosawit Subur – Muara Bulian.</p> <p>The presence of HCVs at PT IIS Muara Bulian is mainly under category HCV 1.1, HCV 1.2, HCV 4.1 and HCV 5 with total HCV areas of 76.18 Ha; where mostly the identified HCV areas were determined as riparian area and water catchment area. During audit ASA 1.2 the HCV area at Muara Bulian Estate were increase with additional of riparian area. Currently the HCV total was 104.18 ha, the additional HCV area was increasing of</p>	Not Applicable

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		<p>riparian zone along the river side which is not replanting by company and stated as HCV area with size of 28 ha.</p> <p>Therefore, this is not applicable.</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>Muara Bulian Estate:</p> <p>Based on HCV Identification Report, 2011 shows in area of Muara Bulian Estate, found 9 types of mamalia species, 5 species are protected such as: <i>Manis javanica</i>, <i>Fellis bengalensis</i>, <i>Helarctos malayanus</i>, <i>Cervus unicolor</i>, <i>Prionodon linsang</i>, 11 types of protected bird species such as: <i>Alcedo meninting</i>, <i>Anthreptes malaccensis</i>, <i>Arachnotera longiostra</i>, <i>Ardea purpurea</i>, <i>Egretta garzeta</i>, <i>Halcyon chloris</i>, <i>Rhipidura javanica</i>, <i>Spizaetus cirhatus</i>, etc; 4 types of reptile species such as: <i>Varanus salvator</i>, <i>Cuora amboinensis</i>, <i>Naja sumatrana</i>, <i>Phyton reticulatus</i>.</p> <p>PT IIS Muara Bulian has develop Conservation Management Plan as per "Conservation management and monitoring plan 2024". Company has determined conservation management and monitoring plan refer to HCV assessment result. Based on field verification during ASA2.2 at Block B18b and A17b, company has demonstrated effort for management and monitoring of HCV area to protect rare species and its habitat through planting of wooden tree, HCV area patrol, flora and fauna monitoring. The Estates have maintained notice-boards at the entrance to the properties and next to buffer zones or worker housing to prohibit the capture or hunting of fauna and disturbance of vegetation. Wildlife monitoring is conducted monthly by foreman and clerk afedling/division. The animal/species findings are recorded in the form "Daftar Temuan Satwa liar di Areal Kebun". Evidence of wildlife monitoring can be demonstrated and recorded in "Laporan Montoring Pengelolaan Tumbuhan dan Satwa – Nilai Konservasi Tinggi PT Inti Indosawit Subur Kebun Muara Bulian. Sample seen for monitoring report semester II year 2023 location at Sengoan river the presence of animal during</p>	Complied

		<p>monitoring: 3 species of mammalia (<i>Macaca fascicularis</i>, <i>Callosciurus sp</i>, <i>Macaca nesmestrina</i>); 19 species of Aves or bird such as <i>Rhipidura javanica</i>, <i>Geopelia striata</i>, <i>Gracula religiosa</i>, <i>Alcedo meninting</i>, <i>Anthreptes malaccensis</i>, <i>Centropus bengalensis</i>, <i>Oriolus chinensis</i>; 2 species of Reptilia (<i>Mabouya sp</i>, <i>Varanus salvator</i>).</p> <p>Monitoring report semester II year 2023 location at Anak Sengoan river the presence of animal during monitoring: 2 species of mammalia (<i>Sus crofa</i>, <i>Callosciurus sp</i>); 13 species of Aves or Bird such as: <i>Halcyon smirnensis</i>, <i>Geopelia striata</i>, <i>Pycnonotus aurigaster</i>, <i>Priminia familiaris</i>, <i>Centropus bengalensis</i>; 2 species of Reptilia (<i>Mabouya sp</i>, <i>Varanus salvator</i>).</p> <p>Other sample monitoring during ASA2.2 on trees and vetiver grass maintenance or conservation on the river buffer zone (Sengoan river) has been done to enhance the HCV area and biodiversity. Monitoring and patroll of HCV area and installing identity signboard and warning signboard on the field also done for awareness and conservation campaign.</p> <p>HCV management and monitoring including Flora and fauna monitoring reported each semester to BKSDA (Natural Resources Conservation Body) Jambi Province, latest report semester II 2023 reported on 10 January 2024.</p> <p>Scheme Smallholder:</p> <p>Group manager has determined HCV management and monitoring plan as recommended in HCV Assessment Report. Management plan to conserve RTE species for such as highlights members adjacent to protected areas/natural waterways/potential HCVs including as part of the regular field checks to ensure compliance, i.e clear boundaries and no encroachments, monitoring of RTE species. Presented in "Conservation Management Plan PT Inti Indosawit Subur, Plasma Muara</p>	
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		<p>Bulian Tahun 2024". List of HCVS and RTEs findings display on the notice board is available during onsite audit.</p> <p>Plasma Muara Bulian management has made the HCV management and monitoring plan Y2023 refer to recommendation of HCV identification report. Monitoring plan has no change from the last report, HCV management plan is apply in 6 KUD Plasma Muara Bulian. HCV management plan in each KUD consist of:</p> <ul style="list-style-type: none"> - Signboard placement of prohibition chemical application near to waterways/riparian area with distance 3 m in left and right side - Training and awareness of HCV against smallholder member regularly at minimum once a year - Monitoring of animal/wildlife <p>Conservation management plan has been disseminated to all KUD and socialized to all member of KUD on 10 April 2024. During audit and interview with sample smallholder member indicated that they have aware and understand regarding conservation management plan of KUD.</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 planting within certified area of PT Inti Indosawit Subur – Muara Bulian Estate and Mill after November 2005. Currently, replanting activities still in progress.</p> <p>Year of Planting for Muara Bulian Estate: 1991, 1992 and 1994 (replanting 2016 – 2019). Whereas, Year of Planting for Smallholders is 1991, 1992, 1993, 1994, 1995, 1996, 1999, 2000, 2001.</p> <p>PT Inti Indosawit Subur has monitor RTE species as well as HCV area according to Conservation Management Plan. Based on field verification during ASA2.2, company has demonstrated effort for management and monitoring of HCV area to protect rare species and its habitat through planting of wooden tree, HCV area patrol, flora and fauna monitoring.</p>	Complied

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		<p>The Estates have maintained notice-boards at the entrance to the properties and next to buffer zones or worker housing to prohibit the capture or hunting of fauna and disturbance of vegetation. Wildlife monitoring is conducted monthly by foreman and clerk afedling/division. The animal/species findings are recorded in the form "Daftar Temuan Satwa liar di Areal Kebun".</p> <p>Evidence of wildlife monitoring can be demonstrated and recorded in "Laporan Montoring Pengelolaan Tumbuhan dan Satwa – Nilai Konservasi Tinggi PT Inti Indosawit Subur Kebun Muara Bulian. Sample seen for monitoring report semester II year 2023 location at Sengoan river the presence of animal during monitoring: 4 species of mammalia (<i>Sus crofa</i>, <i>Macaca fascicularis</i>, <i>Callosciurus sp</i>, <i>Macaca nesmestrina</i>); 19 species of Aves or bird such as <i>Rhipidura javanica</i>, <i>Geopelia striata</i>, <i>Gracula religiosa</i>, <i>Alcedo meninting</i>, <i>Anthreptes malaccensis</i>, <i>Centropus bengalensis</i>, <i>Oriolus chinensis</i>; 2 species of Reptilia (<i>Mabouya sp</i>, <i>Varanus salvator</i>).</p> <p>Other sample monitoring on trees and vetiver grass maintenance or conservation on the river buffer zone (Sengoan river) has been done to enhance the HCV area and biodiversity. Monitoring and patroll of HCV area and manintain identity signboard and warning signboard on the field also done for awareness and conservation campaign.</p>	
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Muara Bulian Estate and Mill after November 2005 or without prior HCV- HCSA assessment since 15 November 2018.</p> <p>Currently, replanting activities has been completed.</p> <p>Year of Planting for Muara Bulian Estate: 1991, 1992 and 1994 (replanting 2016 – 2019). Whereas, Year of Planting for Smallholders is 1991, 1992, 1993, 1994, 1995, 1996, 1999, 2000, 2001.</p>	Complied

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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2023** for **PT Inti Indosawit Subur - Muara Bulian Palm Oil Mill** and supply base was calculated using the PalmGHG Calculator version 4.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2023** for **PT Inti Indosawit Subur - Muara Bulian Palm Oil Mill** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.34
PKO	0.34

Extraction	%
OER	20.50
KER	5.41

Production	t/yr
FFB Process	234,704
CPO Produced	48,120
PKO Produced	12,709

Land Use	Ha
OP Planted Area	7859.00
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	104.18
Total	7859.00

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	16227.30	0.43	14814.94	0.19	0.00	0.00	31042.24	0.62
CO ₂ Emission from fertilizer	1644.18	0.04	640.52	0.01	0.00	0.00	2284.70	0.05
NO ₂ Emission	1422.18	0.87	589.59	0.01	0.00	0.00	2011.77	0.88
Fuel Consumption	480.81	0.01	330.98	0.00	0.00	0.00	811.79	0.01
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-15381.32	-0.41	-12404.30	-0.16	0.00	0.00	-27785.62	-0.44
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	4393.15	0.12	3971.73	0.05	14448.72	0.00	22813.60	0.15

**Note: Includes both estates and smallholders*

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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	25930.58	0.10
Fuel Consumption	100.53	0.00
Grid Electricity Utilization	235.94	0.00
Credit		
Export of Grid Electricity	-0.08	0.00
Sales of PKS	-28272.20	-0.12
Sales of EFB	0.00	0.00
Total	-2005.24	-0.01

Summary of Kernel Crusher Emission and Credit (if applicable)

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

*This mill has no kernel crusher operation.

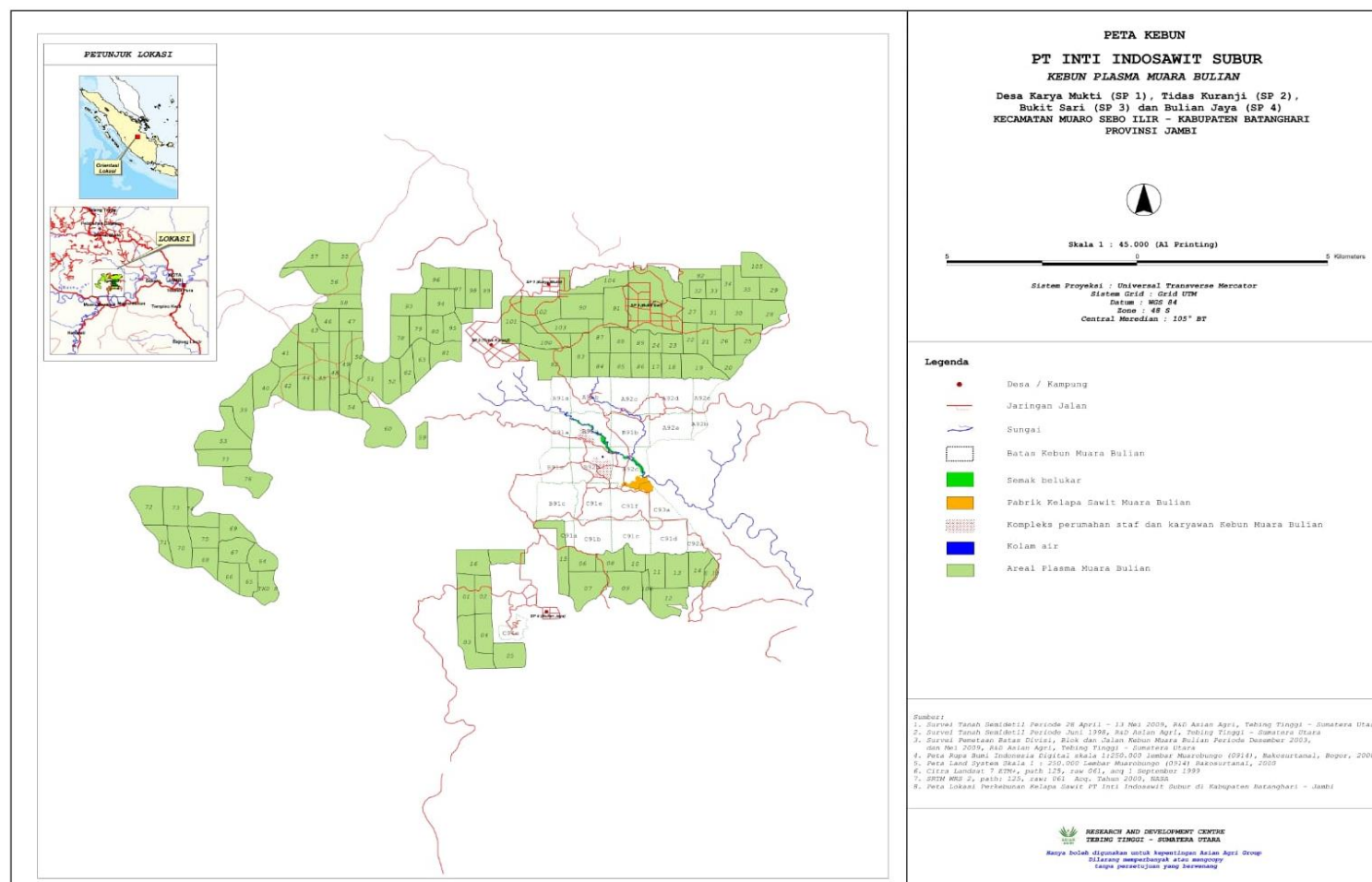
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

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

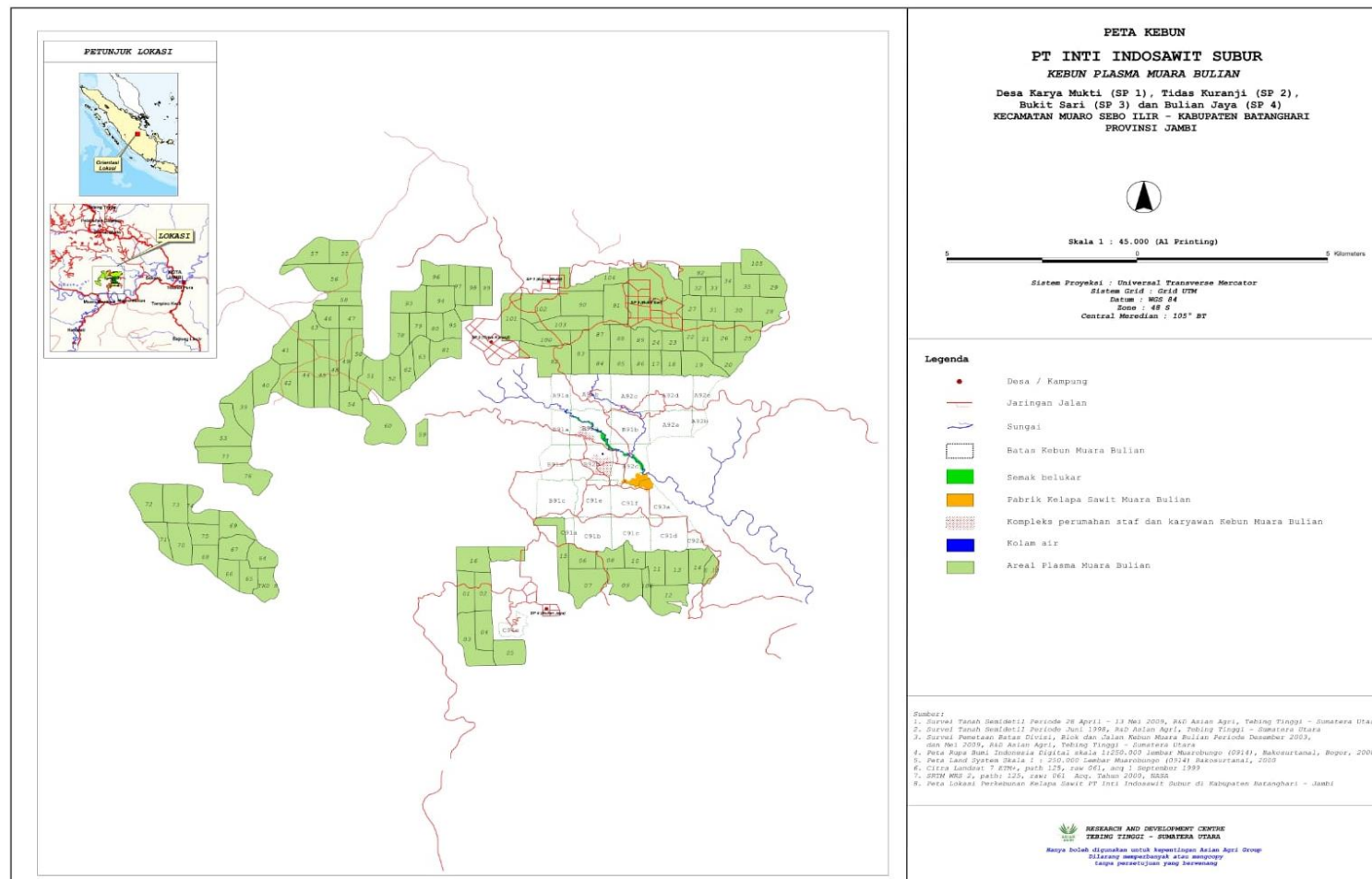
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Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map



Appendix E: List of Smallholder Registered and/or sampled

Sampling Group	Current Certification	Scope Extension	Other: <i>Please specify</i>
Risk Factor Applied	1.2 (medium risk)	N/A	N/A
Justification of Risk Factor Applied	No critical NC in previous audit, located in one landscape area, homogen	-	-
Number of samples	69 smallholders	-	-
Remarks			

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 Makmur Rejeki (SP4)									
1	MUHTAR	Desa Bulian Jaya	1° 37′ 29.956″	103° 10′ 8.017″	2.00	2.00	14.34	2017	060201100224
2	RIDUAN	Desa Bulian Jaya	1° 36′ 56.544″	103° 12′ 42.150″	2.00	2.00	18.56	2017	060201100220
3	MUKSIN	Desa Bulian Jaya	1° 37′ 34.336″	103° 9′ 54.404″	2.00	2.00	14.86	2017	060201100210
4	SUYATNO	Desa Bulian Jaya	1° 37′ 34.336″	103° 9′ 54.404″	2.00	2.00	14.58	2017	060201100211
5	BASUKI	Desa Bulian Jaya	1° 36′ 42.665″	103° 12′ 9.296″	2.00	2.00	14.22	2017	060201100217
6	M. MARBUN	Desa Bulian Jaya	1° 37′ 34.336″	103° 9′ 54.404″	2.00	2.00	14.90	2017	060201100249
7	KUSNI	Desa Bulian Jaya	1° 37′ 34.336″	103° 9′ 54.404″	2.00	2.00	14.64	2017	060201100216
8	SUTRISNO	Desa Bulian Jaya	1° 36′ 45.771″	103° 10′ 8.570″	2.00	2.00	14.98	2017	060201100219
9	DEDE RAHMAT	Desa Bulian Jaya	1° 36′ 46.790″	103° 9′ 52.649″	2.00	2.00	14.62	2017	060201100199
10	MUHTADI	Desa Bulian Jaya	1° 36′ 21.462″	103° 9′ 57.849″	2.00	2.00	14.90	2017	060201100684
11	JAIS BUDIONO	Desa Bulian Jaya	1° 36′ 25.354″	103° 13′ 9.909″	2.00	2.00	14.66	2017	060201100667
12	PAUZAN JAMAL	Desa Bulian Jaya	1° 36′ 25.354″	103° 13′ 9.909″	2.00	2.00	14.96	2017	060201100204
13	NELPAN	Desa Bulian Jaya	1° 36′ 45.771″	103° 10′ 8.570″	2.00	2.00	14.22	2017	060201100178
14	JAYIN	Desa Bulian Jaya	1° 36′ 56.544″	103° 12′ 42.150″	2.00	2.00	18.78	2017	060201100118
15	URIF WALUYO	Desa Bulian Jaya	1° 36′ 28.423″	103° 12′ 34.164″	2.00	2.00	18.32	2017	060201100117
16	G. LUMBAN BATU	Desa Bulian Jaya	1° 37′ 47.804″	103° 10′ 28.799″	2.00	2.00	18.86	2017	060201100665
17	SUNARTO HALIM	Desa Bulian Jaya	1° 37′ 47.804″	103° 10′ 28.799″	2.00	2.00	18.98	2017	060201100641
18	ATMAJAR	Desa Bulian Jaya	1° 36′ 18.716″	103° 11′ 33.841″	2.00	2.00	18.98	2017	060201100122
19	ENDIN ROSIDIN	Desa Bulian Jaya	1° 36′ 18.716″	103° 11′ 33.841″	2.00	2.00	18.32	2017	060201100124
20	TOIMAN	Desa Bulian Jaya	1° 36′ 39.951″	103° 11′ 39.924″	2.00	2.00	14.32	2017	060201100088
21	PRIADI LAMIDIN	Desa Bulian Jaya	1° 37′ 34.336″	103° 9′ 54.404″	2.00	2.00	14.86	2017	060201100233
22	TRI AYUNDA SARI-KARJANTO	Desa Bulian Jaya	1° 36′ 21.462″	103° 9′ 57.849″	2.00	2.00	14.76	2017	060201100692
23	ANJASMARA-HASAN	Desa Bulian Jaya	1° 37′ 29.956″	103° 10′ 8.017″	2.00	2.00	18.88	2017	060201100086
				Total	46	46	369.5		
KUD Subur Makmur (SP-2)									
1	WIRDI MAHMUDA-PI'I	Desa tidar Kuranjii	1° 33′ 8.676″	103° 9′ 16.895″	2.00	2.00	28.2	2017	060201100506
2	DEWI IMAWATI-SUHAIMI	Desa tidar Kuranjii	1° 33′ 8.676″	103° 9′ 16.895″	2.00	2.00	23.64	2017	060201100688

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			
3	FEBRI SUPRIANTO-SUWARNI	Desa tidar Kuranjii	1° 33′ 8.676″	103° 9′ 16.895″	2.00	2.00	26.4	2017	060201100679
4	ITA DIANA-H.ZEN	Desa tidar Kuranjii	1° 33′ 8.676″	103° 9′ 16.895″	2.00	2.00	25.44	2017	060201100672
5	MISLAMAH - BONAWI	Desa tidar Kuranjii	1° 34′ 15.571″	103° 8′ 45.512″	2.00	2.00	23.4	2017	060201100664
6	RAHMAT	Desa tidar Kuranjii	1° 33′ 8.676″	103° 9′ 16.895″	2.00	2.00	22.8	2017	060201100653
7	RM AMIN	Desa tidar Kuranjii	1° 33′ 58.833″	103° 6′ 46.534″	2.00	2.00	26.76	2017	060201100673
8	LERYANNA SAFEI	Desa tidar Kuranjii	1° 33′ 8.676″	103° 9′ 16.895″	2.00	2.00	25.44	2017	060201100680
9	DANAR RUBIYO	Desa tidar Kuranjii	1° 34′ 21.395″	103° 6′ 30.711″	2.00	2.00	23.88	2017	060201100670
10	NASRULLAH	Desa tidar Kuranjii	1° 34′ 21.395″	103° 6′ 30.711″	2.00	2.00	26.64	2017	060201100502
11	PARWATI-BOIMIN	Desa tidar Kuranjii	1° 33′ 8.676″	103° 9′ 16.895″	2.00	2.00	22.56	2017	060201100505
12	LUSIN LUASA-PRIYANTO	Desa tidar Kuranjii	1° 33′ 8.676″	103° 9′ 16.895″	2.00	2.00	25.2	2017	060201100676
13	SUGIARTO	Desa tidar Kuranjii	1° 33′ 29.050″	103° 8′ 32.972″	2.00	2.00	27	2017	060201100449
14	YUSI KARLINA-H LINDU	Desa tidar Kuranjii	1° 33′ 8.676″	103° 9′ 16.895″	2.00	2.00	25.68	2017	060201100675
15	KAMILAN	Desa tidar Kuranjii	1° 33′ 20.292″	103° 9′ 3.277″	2.00	2.00	22.44	2017	060201100677
16	SARMAN	Desa tidar Kuranjii	1° 33′ 20.292″	103° 9′ 3.277″	2.00	2.00	24	2017	060201100876
17	JASULI	Desa tidar Kuranjii	1° 33′ 20.292″	103° 9′ 3.277″	2.00	2.00	28.2	2017	060201100991
18	HATA	Desa tidar Kuranjii	1° 33′ 20.292″	E 103° 9′ 3.277″	2.00	2.00	25.32	2017	060201200325
19	KARSUM	Desa tidar Kuranjii	1° 33′ 31.133″	103° 8′ 50.943″	2.00	2.00	23.4	2017	060201200332
20	SUPRIYANTO	Desa tidar Kuranjii	1° 33′ 56.169″	103° 8′ 17.543″	2.00	2.00	22.44	2017	060201100337
21	SITI NADIRAH HASANAH-SUNARTO	Desa tidar Kuranjii	1° 33′ 8.676″	103° 9′ 16.895″	2.00	2.00	22.44	2017	060201100002
22	ATAR	Desa tidar Kuranjii	1° 33′ 31.133″	103° 8′ 50.943″	2.00	2.00	29.16	2017	060201200317
23	SUPRIANTO-SIMAN	Desa tidar Kuranjii	1° 33′ 31.133″	103° 8′ 50.943″	2.00	2.00	23.16	2017	060201200366
				Total	46	46	573.60		
KUD Karya Lestari (SP5)									
1	SUDARWAN	Desa Kehidupan Baru	1° 36′ 18.656″	103° 6′ 59.882″	2.00	2.00	23.52	2017	060201100418
2	UTAR	Desa Kehidupan Baru	1° 36′ 18.656″	103° 6′ 59.882″	2.00	2.00	22.56	2017	060201100434
3	NGATIRAN	Desa Kehidupan Baru	1° 36′ 18.656″	103° 6′ 59.882″	2.00	2.00	22.2	2017	060201100418
4	WALUYO	Desa Kehidupan Baru	1° 36′ 18.656″	103° 6′ 59.882″	2.00	2.00	25.44	2017	060201100353
5	WIDYA	Desa Kehidupan Baru	1° 35′ 57.294″	103° 6′ 10.690″	2.00	2.00	26.04	2017	060201100423
6	BASIR	Desa Kehidupan Baru	1° 36′ 3.738″	103° 5′ 52.497″	2.00	2.00	22.44	2017	060201100528
7	M. JAIS	Desa Kehidupan Baru	1° 36′ 3.738″	103° 5′ 52.497″	2.00	2.00	28.08	2017	060201100475

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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			
8	M. ROZI	Desa Kehidupan Baru	1° 36' 3.738"	103° 5' 52.497"	2.00	2.00	27	2017	060201100417
9	TATA S.	Desa Kehidupan Baru	1° 35' 23.480"	103° 6' 1.093"	2.00	2.00	25.8	2017	060201100444
10	ANIM	Desa Kehidupan Baru	1° 35' 23.480"	103° 6' 1.093"	2.00	2.00	26.52	2017	060201100532
11	MAT RUDIN	Desa Kehidupan Baru	1° 36' 32.841"	103° 6' 32.054"	2.00	2.00	26.4	2017	060201100690
12	SARMIDI	Desa Kehidupan Baru	1° 36' 32.841"	103° 6' 32.054"	2.00	2.00	27.84	2017	060201100556
13	SUKUR HASIBUAN	Desa Kehidupan Baru	1° 35' 23.480"	103° 6' 1.093"	2.00	2.00	25.44	2017	060201100415
14	SUNTIS	Desa Kehidupan Baru	° 35' 23.480"	103° 6' 1.093"	2.00	2.00	26.28	2017	060201100429
15	URIP SUDIYONO	Desa Kehidupan Baru	1° 35' 57.294"	103° 6' 10.690"	2.00	2.00	22.8	2017	060201100515
16	PONAWI	Desa Kehidupan Baru	1° 36' 32.841"	103° 6' 32.054"	2.00	2.00	23.76	2017	060201100463
17	TARSUN	Desa Kehidupan Baru	1° 36' 32.841"	103° 6' 32.054"	2.00	2.00	26.04	2017	060201100504
18	SUAR	Desa Kehidupan Baru	1° 35' 57.294"	103° 6' 10.690"	2.00	2.00	26.4	2017	060201100512
19	PRANJI	Desa Kehidupan Baru	1° 35' 57.294"	103° 6' 10.690"	2.00	2.00	24.96	2017	060201100506
20	CACA	Desa Kehidupan Baru	1° 35' 57.294"	103° 6' 10.690"	2.00	2.00	24.24	2017	060201100532
21	ABD. RIYADI	Desa Kehidupan Baru	1° 35' 57.294"	103° 6' 10.690"	2.00	2.00	23.88	2017	060201100537
22	KUSNANDANG	Desa Kehidupan Baru	1° 35' 23.480"	103° 6' 1.093"	2.00	2.00	22.2	2017	060201100433
23	SUMARYO	Desa Kehidupan Baru	1° 35' 1.559"	103° 6' 46.687"	2.00	2.00	24.00	2017	060201100501
Total					46	46	573.84		

Note: smallholders sampled in this ASA2.2 audit:

- KUD Subur Makmur, Desa Tidar Kuranji, Kecamatan Maro Sebo Ilir
- KUD Makmur Rejeki, Desa Bulian Jaya, Kecamatan Maro Sebo Ilir
- KUD Karya Lestari, Desa Kehidupan Baru, Kecamatan Maro Sebo Ilir

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