

RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

☐ Initial Assessment

☒ Annual Surveillance Assessment (2_4)

☐ Recertification Assessment (Choose an item.)

☐ Extension of Scope

Client Company Name / Parent Company: SIPEF GROUP
Client Company / Parent Company Address: Kasteel Calesberg, Calesbergdreef, Schoten, 5B2900, Belgium
Certification Unit: PT Tolan Tiga - Perlabian Palm Oil Mill Location of Certification Unit: Perkebunan Perlabian Village, Kampung Rakyat District, Labuhanbatu Selatan Regency, Sumatera Utara Province – 21463, Indonesia
Date of Final Report: 29/04/2024

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	SIPEF Group		
RSPO Membership Number	1-0021-05-000-00	Membership Approval Date	7/12/2005
Address	Kasteel Calesberg – Calesbergdreef 5, B-2900 Schoten – Belgium		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT Tolan Tiga - Perlabian Palm Oil Mill		
Location / Address	Perkebunan Perlabian Village, Kampung Rakyat District, Labuhanbatu Selatan Regency, 21463, Sumatera Utara Province, Indonesia		
Website	www.sipef.com		
Management Representative	Mr. Matthew Gerard Nowak	E-mail	mgnowak@sipef.com
Telephone	+62 61 415 2043	Facsimile	+62 61 452 0908

2. Certification Information			
Certificate Number	RSPO 555208	Certificate Start Date	17/05/2020
Date of First Certification	17/05/2010	Certificate Expiry Date	16/05/2025
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	The objective of the assessment was to conduct a surveillance assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the RSPO P&C standard are effectively addressed by the organisation's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organisation's specified objectives, as applicable with regard to the scope of the standard, and to confirm the on-going achievement and applicability of the forward strategic plan and where applicable to identify potential areas for improvement of the system.		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_4) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 of the RSPO P&C 2018		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	Mill Capacity	60 MT/hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

3. Other Certifications

Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-ID230-20230090	ISCC	PT SBC Asia Sertifikasi	03/12/2024
ISPO 611404	ISPO	PT BSI Group Indonesia	18/07/2026
00053944	ISO 9001:2015	PT Lloyd's Register Indonesia	02/07/2024

4. Location(s) of Mill & Supply Bases

Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Perlabian POM	Perkebunan Perlabian Village, Kampung Rakyat District, Labuhan Batu Selatan Regency, Sumatera Utara Province, Indonesia	2° 3' 40.98" N	100° 4' 57.19" E
Perlabian Estate	Perkebunan Perlabian Village, Kampung Rakyat District, Labuhan Batu Selatan Regency, Sumatera Utara Province, Indonesia	2° 3' 37.60" N	100° 4' 52.40" E
Tolan Estate	Perkebunan Perlabian Village, Kampung Rakyat District, Labuhan Batu Selatan Regency, Sumatera Utara Province, Indonesia	2° 0' 07.60" N	100° 2' 30.85" 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
Perlabian Estate	4,521.18	33.75	252.09	4,807.02	94.05
Tolan Estate	3,514.05	38.59	119.40	3,672.04	95.70
Total	8,035.23	72.34	371.49	8,479.06	94.77

Note:

- HCV area decreased compare to the previous assessment due to there is integrated HCV-HCS assessment in 2022 conducted by independent consultant PT Meganesia Tirta Foresta where the team led by assessor licensing scheme (ALS15005AS). Based on HCV-HCS assessment report that approved by HCVRN on 13 March 2023, HCV area in Perlabian Estate is 33.75 Ha and in Tolan Estate is 38.59 Ha.
- Planted area of Perlabian Estate increased due to replanting activity, there is preparation area categorized as other area has been change to immature area.
- Infrastructure & other area of Perlabian Estate and Tolan Estate increased due to re-delineation during HCV-HCS assessment in 2022, some area that already planted previously identified as "potential HCV" has now categorized into other area.
- Tolan Estate's Planted area decreased and Infrastructure & Other area increased due to replanting activity, some area with oil palms have been felled/cleared are not categorized as planted area (Mature of Immature) but categorized as other area.

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6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Perlabian Estate	900.48	2,536.17	907.93	176.60	3,620.70	900.48
Tolan Estate	199.92	311.17	2,177.37	825.59	3,314.13	199.92
Total (ha)	1,100.40	2,847.34	3,085.30	1,002.19	6,934.83	1,100.40
Note: Only Mature area is considered as production area						

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (May 2023 – Apr 2024)	Actual (Feb 2023 – Jan 2024)		Forecast (May 2024 – Apr 2025)
		Previous license period (Feb 2023 – Apr 2023)	Current license period (May 2023 – Jan 2024)	
Perlabian Estate	108,080.00	14,690.80	80,455.00	100,182.50
Tolan Estate	90,489.00	15,448.28	68,134.23	75,116.09
Total	198,569.00	178,728.31		175,298.59
Note:				
- Production forecast of Perlabian Estate is 27.67 Ton FFB/Ha, it is because the majority of planting age is in the productive age (4 – 14 years). Compare to the actual 26.28 Ton FFB/Ha it was increase 5.29%.				

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (May 2023 – Apr 2024)	Actual (Feb 2023 – Jan 2024)		Forecast (May 2024 – Apr 2025)
		Previous license period (Feb 2023 – Apr 2023)	Current license period (May 2023 – Jan 2024)	
Nil		0	0	
Total		0		
Note:				

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (May 2023 – Apr 2024)	Actual (Feb 2023 – Jan 2024)		Forecast (May 2024 – Apr 2025)
		Previous license period (Feb 2023 – Apr 2023)	Current license period (May 2023 – Jan 2024)	

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Nil	0	0	0	0
Total		0		0
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	February 2023	9,682.60	0.00	9,682.60
2	March 2023	11,362.88	0.00	11,362.88
3	April 2023	9,093.60	0.00	9,093.60
4	May 2023	16,043.86	0.00	16,043.86
5	June 2023	14,965.94	0.00	14,965.94
6	July 2023	18,342.58	0.00	18,342.58
7	August 2023	18,930.13	0.00	18,930.13
8	September 2023	17,752.07	0.00	17,752.07
9	October 2023	18,038.58	0.00	18,038.58
10	November 2023	16,357.58	0.00	16,357.58
11	December 2023	14,057.72	0.00	14,057.72
12	January 2024	14,100.77	0.00	14,100.77
TOTAL		178,728.31	0.00	178,728.31
Note:				

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (May 2023 – Apr 2024)	Actual (Feb 2023 – Jan 2024)		Forecast (May 2024 – Apr 2025)
	Previous license period (Feb 2023 – Apr 2023)	Current license period (May 2023 – Jan 2024)	
FFB	FFB		FFB
210,569.00 mt	30,139.08 mt	148,589.23 mt	175,298.59 mt
	TOTAL	178,728.31 mt	
CPO (OER: 23.00 %)	CPO (OER: 22.03 %)		CPO (OER: 22.50 %)
47,599.00 mt	6,723.65 mt	32,648.09 mt	39,442.18 mt
	TOTAL	39,371.74 mt	
PK (KER: 6.00 %)	PK (KER: 5.89 %)		PK (KER: 5.80 %)
11,521.00 mt	1,743.61 mt	8,783.23 mt	10,167.32 mt

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	TOTAL	10,526.84 mt	
Note:			

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	February 2023	2,162.69	566.58
2	March 2023	2,525.89	668.44
3	April 2023	2,035.07	508.59
4	May 2023	3,518.26	930.26
5	June 2023	3,276.48	852.65
6	July 2023	4,050.57	1,071.38
7	August 2023	4,195.98	1,113.35
8	September 2023	3,964.53	1,097.64
9	October 2023	3,955.05	1,083.99
10	November 2023	3,579.81	984.18
11	December 2023	3,108.36	826.72
12	January 2024	2,999.05	823.06
TOTAL		39,371.74	10,526.84
Note:			
- Previous stock CPO: 635.53 MT			
- Previous stock PK: 301.30 MT			

11. Summary of Actual Volume sold					
Current License period (May 2023 – Jan 2024)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	22,728.50	9,969.88	0	4.12	32,702.50
PK (MT)	9,093.47	0	0	0	9,093.47
Credits	0	0	0	0	0
Previous License period (Feb 2023 – Apr 2023)					
CPO (MT)	6,187.11	0	0	1.10	6,188.21
PK (MT)	1,691.54	0	0	0	1,691.54
Credits	0	0	0	0	0
Note:					

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- Conventional is RSPO certified material but sold as non-RSPO.
- Total RSPO certified CPO sold is 38,890.71 MT.
- Total RSPO certified PK sold is 10,785.01 MT; it was 258.17 MT over from the production volume because there was carry over stock from January 2023 as 301.30 MT.

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 IBP	RSPO_PO1000001472	5,139.88	-
2	PT IMT	RSPO_PO1000003168	17,734.84	-
3	PT IMT	RSPO_PO1000006558	-	8,445.28
4	PT MNA	RSPO_PO1000000150	6,040.89	-
5	PT SMT	RSPO_PO1000006555	-	2,339.73
TOTAL			28,915.61	10,785.01
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 IMT	ISCC	9,477.86	0
2	PT IBP	ISCC	492.02	0
TOTAL			9,969.88	0
Note:				

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

No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	Transporters	5.20	0
TOTAL		5.20	0
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
	Nil	0	0
TOTAL			0

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Note:

12. Independent Smallholders Certified Tonnage (MT) / Volume

	Estimated last year (May 2023 – Apr 2024)			Actual (Feb 2023 – Jan 2024)			Forecast (May 2024 – Apr 2025)		
Phase	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	
CSPK	N/A	N/A		N/A	N/A		N/A	N/A	

Note:

Not Applicable

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)
	Nil	0	0	0	0	0
TOTAL		0	0	0	0	0

Note: 1 mt = 1 credit

13. Independent Smallholders Actual Sold Tonnage / Volume

	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (key in period)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				
Previous License period (key in period)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				

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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)
	Nil	0	0	0	0	0	0
TOTAL			0	0	0	0	0
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)

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 27 February 2024 – 1 March 2024. The audit programme is included as Section 2.3.

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

The 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 PT Tolan Tiga Indonesia – Perlarian POM with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re-Certification 2)	Year 2 (ASA2-1)	Year 3 (ASA2-2)	Year 4 (ASA2-3)	Year 5 (ASA2-4)
Perlabian POM	X	X	X	X	X
Perlabian Estate	X	X	X	X	X
Tolan Estate	X	X	X	X	X

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

Total Number of Mandays: 13 mandays.

2.2 BSI Assessment Team

Name	Role	Competency
Eko Purwanto (EP)	Team Leader	<p>Education: Holds a Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, IPB University.</p> <p>Work Experience: Over 9 year working expiring in oil palm plantation with last position as Estate Manager. He has experience in implementing good agricultural practice including integrated pest management and limited pesticides uses. Over 11 years working experience as auditor since 2012 covering ISO9001, RSPO and ISPO.</p> <p>Training attended: Completed SMETA Requirements Training, ISPO Permentan 38/2020, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, CQI and IRCA Certified ISO 45001:2018 Lead Auditor Training Course, ISO 37001:2016 Anti-bribery Management System Implementing Training Course, RSPO P&C 2018 Refresher Training, Sustainability Reporting Assurance Training, RSPO P&C Lead Auditor Refresher Course, RSPO Supply Chain Certification Refresher Course, RSPO NEXT Training Course For Lead Auditor by RSPO Secretariat, Elaborating on the RSPO P&C Social and Labour Standards and the Mechanics of Social Auditing, RABQSA accredited Lead Auditor Training of Environment Management System, Endorsed RSPO Green House Gas (GHG) Training for Trainer, Endorsed RSPO P&C Lead Auditor Training, Understanding Environmental Management System (EMS), Indonesia Sustainable Palm Oil (ISPO) Lead Auditor Training, Endorsed RSPO Supply Chain Certification (SCC) Lead Auditor Training, RABQSA accredited Lead Auditor Training of Quality Management System.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit:</p> <p><input checked="" 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)
Pratama Agung Sedayu (PS)	Team Member	<p>Education: Holds a Bachelor Degree majoring Social Economic of Agriculture, University of Jenderal Soedirman.</p> <p>Work Experience: 12 years of practical auditing experience with several accredited Certification Bodies covering assessment against Organic programs, RSPO, FSC, Timber certification, ISO 9001 and ISO 14001. 2 years working experience as consultant on FSC and SVLK certification and independent verifier on BioCert, SDS under CAFÉ Practices program.</p> <p>Training attended: Completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISPO Lead Auditor endorsed Course and Endorsed RSPO P&C Lead Auditor Course and Endorsed RSPO SCCS Lead Auditor Course, SMETA Requirements training.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit:</p> <input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input 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)
Briyogi Shadiwa (BS)	Team Member	<p>Education: Diploma Degree, Oil Palm Plantation, from Institut Pertanian Bogor – Bogor, Indonesia.</p> <p>Work Experience: 6 Years working experience in palm oil sector as agronomist and managing the sustainability. Qualified RSPO & ISPO auditor since 2018.</p> <p>Training attended: RSPO P&C Lead Auditor Course on October 2018, RSPO ISH Training conducted by the RSPO Secretariat on March 2022, ISO 9001 Lead Auditor Course on March 2017, ISO 14001 Lead Auditor Course on Oct 2017, Social Accountability (SA 8000) Training on May 2018, OHS Expert Training (Ahli K3 Umum) on Jan 2016, and RSPO Refreshment Training on June 2023.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English.</p> <p>Aspect covered in this audit:</p> <input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements <input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)
Haikal Ramadhan Kharismansyah (HRK)	Team Member	<p>Education: Holds a bachelor degree in majoring Plant Pest and Disease from Padjadjaran University.</p> <p>Work Experience: 3 Years working experience in oil palm industry as Agronomy Assistant. More than five years working experience as RSPO Auditor and RSPO Lead Auditor.</p>

		<p>Training attended: Completed Endorsed RSPO P&C Lead Auditor Training Course, ISPO Auditor/Lead Auditor Course, RSPO P&C Social and Labour Standards and the Mechanics of Social Auditing Training, ISO 9001:2008, ISO 14001 : 2015 Auditor/Lead Auditor Course, RSPO ISH Standard Training Course and Endorsed RSPO Supply Chain Lead Auditor Training Course.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English.</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input checked="" 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>
Naila Karima (NK)	Team Member	<p>Education: Holds a bachelor's degree majoring Occupational Safety and Health, Faculty of Public Health, University of Indonesia.</p> <p>Work Experience: 10 years working experience as auditor since 2012 covering RSPO and ISPO.</p> <p>Training attended: Completed Endorsed RSPO P&C Lead Auditor Training Course, ISPO Auditor/Lead Auditor Course, SA8000, RSPO Labour Auditing Training, RSPO ISH Standard Training Course, ISO 9001, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course.</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 checked="" 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>

Accompanying Persons:

Name	Role
Nil	

2.3 Assessment Plan

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

Date	Time	Subjects	EP	PS	BS	HRK	NK
Monday, 26/02/2024	07.05-09.30	Flight Jakarta – Medan <i>By GA182</i>	√	√	√	√	√
	10.00-18.00	Travelling Medan – PT Tolan Tiga Indonesia	√	√	√	√	√
Tuesday, 27/02/2024	08.00-08.30	Opening Meeting (RSPO & ISPO): <ul style="list-style-type: none"> - Presentation by Lead Auditor. - Confirmation audit scope, requirements, document access permission and clarifying audit plan. 	√	√	√	√	√

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Date	Time	Subjects	EP	PS	BS	HRK	NK
	08.30-12.00	Document review: Perlabian POM General information; time bound plan; partial certification verification; RSPO P&C (Management Plan); Palm Oil Mill's Best Management Practices, Social policy and implementation, Continual Improvement.	√	√	-	√	√
		Stakeholder consultation - Stakeholder consultation to relevant agencies of Labuhanbatu Selatan Regency; - Stakeholder consultation with local community/villagers; - Stakeholder consultation with previous landowners; - Stakeholder consultation with gender committee and worker union.	-	-	√	-	-
	12.00-14.00	Lunch Break	√	√	√	√	√
	14.00-16.30	Field visit to Perlabian POM to verify (RSPO & ISPO): - Best Management Practice for Mill Processing and RSPO Supply Chain Certification Standard - Element for Palm Oil Mill – site visit to check on FFB receiving, - FFB process, CPO and PK dispatch, document, and record keeping. - Visit to Perlabian POM housing: house condition, water supplies, sanitation, access to affordable food, welfare amenities. - Implementation of OHS (loading ramp, processing stations, workshop, boiler, turbine, diesel bowser, material warehouse, fire-fighting equipment) - Implementation of Environmental and Waste Management Aspect (POME Pond, Empty Bunch Area, Reservoir/Intake Point, hazardous waste storage, Biogas Plant) - Interview with workers related to human resource management, worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc. - Interview with workers related to health and safety condition, training provision, worker right and condition, etc.	√	√	-	√	√
		Stakeholder consultation - Stakeholder consultation to NGO; - Stakeholder consultation with contractors;	-	-	√	-	-
	16.30-17.00	Wash up meeting and Reporting	√	√	√	√	√

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Wednesday, 28/02/2024	08.00-12.00	Field visit to Perlabin Estate to verify (RSPO & ISPO): <ul style="list-style-type: none"> - Visit to plantation activity and interview workers: harvesting, spraying, fertilizer application, EFB application, area with slope - Visit to plantation IPM implementation: barn owl boxes, beneficial plant nursery. - Interview with workers related to human resource management, health and safety condition, training provision, worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc. - Visit to worker housing: house condition, water supplies, sanitation, medical, access to affordable food, welfare amenities - Chemical warehouse, mixing bay, fertilizer store, workshop, fire-fighting equipment. - Visit to PT TTI HGU boundary poles, border with surrounding entities - Visit to HCV area, riparian zone 	√	√	√	√	√
	12.00-14.00	Lunch Break	√	√	√	√	√
	14.00-16.30	Document and Record Verification Perlabin Estate	√	√	√	√	√
	16.30-17.00	Wash up meeting and Reporting	√	√	√	√	√
Thursday, 29/02/2024	08.00-12.00	Field visit to Tolan Estate to verify (RSPO & ISPO): <ul style="list-style-type: none"> - Visit to plantation activity and interview workers: harvesting, spraying, fertilizer application, EFB application, area with slope - Visit to plantation IPM implementation: barn owl boxes, beneficial plant nursery. - Interview with workers related to human resource management, health and safety condition, training provision, worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc. - Visit to worker housing: house condition, water supplies, sanitation, medical, access to affordable food, welfare amenities - Chemical warehouse, mixing bay, fertilizer store, workshop, fire-fighting equipment. - Visit to PT TTI HGU boundary poles, border with surrounding entities - Visit to HCV area, riparian zone 	√	√	√	√	√
	12.00-14.00	Lunch Break	√	√	√	√	√
	14.00-16.30	Document and Record Verification Tolan Estate	√	√	√	√	√
	16.30-17.00	Wash up meeting and Reporting	√	√	√	√	√
Friday, 01/03/2024	08.00-12.00	Document and records verification (RSPO & ISPO) Document review and discussion if there any outstanding issues	√	√	√	√	√

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Date	Time	Subjects	EP	PS	BS	HRK	NK
	12.00-14.00	Lunch Break	√	√	√	√	√
	14.00-15.00	Document and records verification (RSPO & ISPO) Document review and discussion if there any outstanding issues	√	√	√	√	√
	15.00-16.00	Report Preparation	√	√	√	√	√
	16.00-17.00	Closing Meeting - Presentation of audit findings (Noteworthy Positive Component, Non-Conformities, OFI, Timeline of CAR's, Conclusion). - Comments, Responses and Questions.	√	√	√	√	√

Note: This audit was carried out by combining the RSPO and ISPO schemes, total mandays charged for RSPO is 13 mandays and for ISPO is 7 mandays.

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?	Yes. The timebound plan for SIPEF Group including all estate and mill. The data in timebound plan verified against the membership information in RSPO website.	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	No. Some estate waiting for land title issuance. RSPO Secretariat approval for estate and mill not yet certified obtained on 22 December 2022.	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 new acquisition. The latest acquisition for PT Agricinal in Bengkulu Province came under PT Mukomuko Agro Sejahtera have undergone RSPO NPP process.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	So far, the deviations periods are acceptable and justifiable. There was no deliberate delay by the company. RSPO Secretariat approval for estate and mill not yet certified obtained on 22 December 2022.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	No, there is no change of timebound plan since last assessment. The timebound plan is still relevant and consistent with ACOP reporting.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	All lapses of implanting the original plan are justified based on the awaiting for the land title (Hak Guna Usaha/HGU) and/or awaiting for full estate development.	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 as all delays are justified as stated in TBP.	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.	Previously prior to certification, a subsidiary of SIPEF Group namely PT Umbul Mas Wisesa and PT Toton Usaha Mandiri had liabilities. The compensation plan have been	Complied

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	approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015.	
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	<p>All the new development under the parent company SIPEF Group has undergone NPP and published in the RSPO website:</p> <p>PT Umbul Mas Wisesa (12 December 2014)</p> <ul style="list-style-type: none"> • https://rspo.org/public-consultation/sipef-group-pt-umbul-mas-wisesa/ <p>PT Agro Muara Rupit</p> <ul style="list-style-type: none"> • https://rspo.org/public-consultation/sipef-group-pt-agro-muara-rupit-iii-and-iv-pt-amr/https://rspo.org/public-consultation/sipef-pt-agro-muara-rupit-2/ <p>PT Agro Kati Lama</p> <ul style="list-style-type: none"> • https://rspo.org/public-consultation/sipef-pt-agro-kati-lama-phase-ii/ii/ <p>PT Agro Rawas Ulu</p> <ul style="list-style-type: none"> • https://rspo.org/public-consultation/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments-1/ <p>PT Bandar Sumatra Indonesia (PT BSI)</p> <ul style="list-style-type: none"> • https://rspo.org/public-consultation/sipef-pt-bandar-sumatra-indonesia-bandar-pinang-estate/ <p>PT Timbang Deli Indonesia (18 December 2014 and 11 February 2018)</p> <ul style="list-style-type: none"> • https://rspo.org/public-consultation/sipef-group-pt-timbang-deli-indonesia/ • https://rspo.org/public-consultation/pt-timbang-deli-indonesia-sipef-group/ <p>PT Mukomuko Agro Sejahtera (Sei Teramang Estate - 26 January 2022 & Batu Kuda Estate – 1 March 2023)</p> <ul style="list-style-type: none"> • https://rspo.org/public-consultation/sipef-pt-mukomuko-agro-sejahtera-pt-mmas/ <p>PT Mukomuko Agro Sejahtera (Batu Kuda Estate)</p> <ul style="list-style-type: none"> • SIPEF Group - PT Mukomuko Agro Sejahtera Batu Kuda Estate (PT MMAS) 	Complied

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	Batu Kuda) - Roundtable on Sustainable Palm Oil (RSPO)	
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>The assessment team has conducted a search in internet to confirm that there is a lodged land conflict that was recorded as complaint under RSPO Case Tracker; raised by individual on those units that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT Agro Kati Lama, date complaint submitted 22 January 2021. The complainant brought forward the issue of fraudulent land title to RSPO. The complainant claimed that his land was fraudulently sold by his cousin to PT Agro Muara Rupit, a subsidiary of SIPEF Group.</p> <p>On 16 June 2022, The Complaints Panel has reviewed and deliberated on the Mediation Settlement Agreement between the parties and reached a decision to close the Complaint. The Complaint is now formally closed. The complaint tracker available on link https://rspo.my.site.com/Complaint/s/case/5000o000039f18kAAA/detail</p> <p>There is no case reported since then.</p> <p>Based on RaCP tracker in RSPO website updated 5 February 2024 as follows:</p> <ul style="list-style-type: none"> • MU's with potential liability: 5 • LUCA submitted (MU's): 5 • LUCA's review completed (MU's): 5 • Concept Note required (MU's): 5 • Concept Note submitted (MU's): 4 • Concept Note approved (MU's): 4 • Compensation Plan submitted (MU's): 4 • Compensation Plan endorsed (MU's): 3 • Remediation Plan required (MU's): 1 • Remediation Plan submitted (MU's): 1 • Remediation Plan approved (MU's): 1 	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	<p>Audit team made review on those SIPEF Management Unit that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT Agro Kati Lama. The case tracker available on link</p>	Complied

	https://askrspo.force.com/Complaints/case/5000o000039fi8kAAA/detail Date complaints submitted 22 January 2021. Date complaints accepted 5 March 2021. On 16 June 2022, Complaint Panel has reviewed and deliberated on the Mediation Settlement Agreement between parties and reach decision to close the Complaint. Based on web search, audit team noted there was not active complaint related to labour dispute.	
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance noted. The assessment team has conducted a search in internet to confirm that there is not new comments or dispute raised by the communities on those units that have not been certified.	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 for PT Bandar Pinang Indonesia has been conducted on 4-5 October 2023. Report of internal audit completed on 7 October 2023 with reference to RSPO Certification System. Reference criteria of internal audit covered Criteria 2.1, 3.1, 3.7, 4.2, 4.3, 4.4, 4.5, 4.6, 4.7, 4.8, 6.1, 6.3, 6.7, 7.2 and 7.12. There were 1 Minor NC and 6 Observations issued by internal audit team. Internal audit for PT Citra Sawit Mandiri has been conducted on 9-10 October 2023. Report of internal audit completed on 12 October 2023 with reference to RSPO Certification System. Reference criteria of internal audit covered Criteria 2.1, 3.1, 3.7, 4.2, 4.4, 4.5, 4.6, 4.7, 4.8, 6.1, 7.2 and 7.12. There were 2 Minor NC and 5 Observations issued by internal audit team. Positive assurance statement already justified within the Internal Audit Checklist.	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?	Previously prior to certification, PT Umbul Mas Wisesa and PT Toton Usaha Mandiri had liabilities. The compensation plan have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	No negative comment from stakeholders including from NGO for un-certified units of SIPEF Group.	Complied

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Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	PT Tolan Tiga Indonesia – Perlabian POM does not have scheme smallholder. The plantation business permit for CH issued before 2007, hence no obligation for scheme smallholder.	Not applicable

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Approved Time Bound Plan

Name of company	Name of Mill	Location	Supply Base	TBP	Target Year for RSPO
PT Agro Muko	Muko Muko POM	Mukomuko Regency, Bengkulu Province, Indonesia	Muko Muko Estate, Sei Betung Estate, Tanah Rekah Estate, Talang Petai Estate, Sei Kiang Estate and KMD	2011	Certified
	Bunga Tanjung POM	Mukomuko Regency, Bengkulu Province, Indonesia	Bunga Tanjung Estate, Air Bikuk Estate, Air Buluh Estate and KMD	2011	Certified
Air Manjuntio Estate, Malin Deman Estate			2014	Certified	
PT Asri Rimba Wirabhakti (acquisition in 2018) – Sei Teramang Estate			2022	Certified June 2022	
PT Agricinal - Batu Kuda Estate			2025	30-days NPP ended 30 March 2023 without comment	
PT Tolan Tiga	Bukit Maradja POM	Simalungun Regency, North Sumatera, Indonesia	PT Eastern Sumatra Indonesia – Bukit Maradja Estate PT Kerasaan Indonesia – Kerasaan Estate	2010	Certified May 2010
			PT Timbang Deli Indonesia	2018	Certified in 2018 as supply base of Bukit Maradja POM
	Perlabian POM	Labuhan Batu Selatan Regency, North Sumatera, Indonesia	Perlabian Estate and Tolan Estate.	2010	Certified May 2010
PT Umbul Mas Wisesa	Umbul Mas Wisesa (UMW) POM	Labuhan Batu Selatan Regency, North Sumatera, Indonesia	UMW South Estate, UMW North Estate PT Toton Usaha Mandiri Estate	2014	Certified in March 2015
PT Agro Kati Lama	Kati Lama POM	Musirawas Regency, South Sumatera, Indonesia	Agro Kati Lama North Estate, Agro Kati Lama South Estate, Agro Kati Lama East Estate, Koperasi Beringin Jaya	2026	Certification to take place after obtaining HGU (HGU on progress); An NPP submitted in 2019 to cover new areas licenced at the end of 2018.
PT Agro Rawas Ulu	No mill	Musirawas Regency, South Sumatera, Indonesia	Agro Rawas Ulu East Estate, Agro Rawas Ulu West Estate, Koperasi Rawas Jaya.	2026	Part of Muara Rupit POM supply base;

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Name of company	Name of Mill	Location	Supply Base	TBP	Target Year for RSPO
					Certification to take place after obtaining HGU (HGU on progress), FPIC process.
PT Agro Muara Rupit	Muara Rupit POM	Musirawas Regency, South Sumatera, Indonesia	Agro Muara Rupit East Estate, Agro Muara Rupit West Estate, Agro Muara Rupit South Estate, Koperasi Rempan Jaya, Koperasi .	2026	Certification to take place after obtaining HGU (HGU on progress), FPIC process; An NPP submitted in 2019 to cover new areas licenced at the end of 2018.
Hargy Oil Palm Limited (HOPL)	Hargy POM	East of Bialla, West New Britain Province, PNG	Hargy Estate	2009	Certified in April 2009
	Navo POM	50 Kms East of Bialla, West New Britain Province, PNG	Navo Estate, Bakada Estate and Mengen Estate	2009	Certified in April 2009
	Barema POM	30 km East of Bialla, West New Britain Province, PNG	Barema Estate	2014	Certified in April 2014
PT Dendymarker Indah Lestari	Dendymarker POM	Musirawas Utara Regency, South Sumatera Province, Indonesia	Sei Mandang Estate, Sei Liam Estate	2015	Certified in 2015. PT Dendymarker Indah Lestari is already certified during acquisition by SIPEF Group on 1 August 2017.
		Musirawas Utara Regency, South Sumatera Province, Indonesia	Koperasi Tunas Mekar Sempurna, Koperasi Kardipa Batugajah Sejahtera, Koperasi Gaung Mas Bersatu, Koperasi Maju Mandiri Barokah, Koperasi Biru Makmur Mandiri, Koperasi Jaya Makmur Mandiri, Koperasi Bombay Maju Sejahtera, Koperasi Keluarga Serasan Sejahtera, Koperasi Mitra Bersama Serundingan	2025	Smallholder
PT Citra Sawit Mandiri	No mill	Labuhanbatu Regency, North Sumatera Province	Citra Sawit Mandiri Estate	2024	Certification to take place after HGU, following review by RSPO.

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Name of company	Name of Mill	Location	Supply Base	TBP	Target Year for RSPO
PT Bandar Sumatra Indonesia	No mill	Kecamatan Bintang Bayu, Kabupaten Serdang Bedagai, North Sumatra Indonesia	Bandar Pinang Estate	2025	Rubber plantation conversion. NPP submitted in July 2021.

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 nil (0) Critical; nil (0) Minor nonconformities and two (2) Opportunity For Improvement raised.

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

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

Opportunity for Improvements	
OFI #	Description
OFI 1	Indicator 4.4.1 The company already demonstrated document for ownership or leasing or control, and legal land user rights (HGU) for all its operational areas, however, without considering to monitor the process of extensions of land use rights (HGU) with related agencies, this could be but not necessary to lead to a future non-conformity if not addressed.
OFI 2	Indicator 6.2.3 The company has demonstrated evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements, however, without considering the right to adequate rest time for every workers, it can be but not necessary to lead a non-conformity if not addressed.

Positive Findings	
PF #	Description
PF 1	-

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3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

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

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

Previous Audit Opportunity for Improvement	
OFI#	Description
OFI 1	<p>OFI Statement:</p> <p>Indicator 7.3.2</p> <p>Company has prepared procedure for waste disposal; estate operation in worker housing has separate waste bag for organic and inorganic waste from domestic refusal; landfill prepared far from housing and water source; progress construction wastewater treatment installation demonstrated. Faster follow up on waste segregation by type in Perlavian Estate and Tolan Estate is expected.</p> <p>Verification / Follow-up actions:</p> <p>During ASA 2_4 conducted field visit to the housing compounds at Perlavian POM, Division 4 Perlavian Estate and Division 2 Tolan Estate; landfill at Block J13 for inorganic waste from Division 1 and 2 Perlavian Estate and landfill at Blok B19 Division 2 Tolan Estate. Observed that landfill equipped with fence, and signboard explaining the opening date and types of waste that are prohibited from being disposed into the landfill. Organic waste from the workers' compounds is buried at the backyard of their compound or the interrow of the oil palm. Based on interview with workers and their families, known that they have aware segregation and a proper disposal of waste material. Verified that there are no inorganic waste disposed to the organic waste pit, and no hazardous waste disposed to the landfill.</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1754048-201903-M1	Major	RSPO Supply Chain Certification Standard (June 2017) General Chain of Custody Requirement – Clause 5.7.2	30 March 2019	3 May 2019 (Closed)

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 Tolan Tiga Indonesia – Perlavian 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)
Governmental Department	Labor Agency of Labuhanbatu Selatan Regency	Phone Interview
	Environment Agency of Labuhanbatu Selatan Regency	Phone Interview
	Plantation Agency of Labuhanbatu Selatan Regency	Phone Interview
Contractor	CV Tua Gabe	Face to face interview
	CV Felindo	Face to face interview
NGO	LBHI Masmada Labusel & KTB (Kelompok Tani Bersatu)	Phone Interview
Communities	Air Merah Village Representative & Koperasi Air Merah Masyarakat Sejahtera (AIRMAS)	Face to face interview
	Perlabian Village Representative & Koperasi Produsen Petani Perlabian Sejahtera (KPPPS)	Face to face interview

Stakeholders comment	
1	<p>Feedbacks:</p> <p>Labor Agency of Labuhanbatu Selatan Regency</p> <ul style="list-style-type: none"> - Regarding the issue of workers on behalf of Ismail, the department revealed that there was no application letter regarding the tripartite meeting. - As far as the department is aware, the worker on behalf of Ismail was fired for committing FFB theft. - All employee wages refer to established regulations. - There are no negative employment issues in the Company. <p>Audit Team verification and response:</p> <p>Based on auditor verification for the worker on behalf of Ismail, a recording of a bipartite meeting between the Company and the workers' union was shown. From the verification results, the worker admitted to collaborating with the thieves by informing the thieves of the location of the FFB (company confidential information). The company has calculated the compensation provided in this regard and the compensation value is in accordance with the provisions of the Collective Labor Agreement (CLA).</p>
2	<p>Feedbacks:</p> <p>Environment Agency of Labuhanbatu Selatan Regency</p> <p>Based on the results of interviews with the Environmental Agency, information was obtained that the company had completed and fulfilled all the required licensing requirements and routinely reported the required environmental management results according to its schedule.</p> <p>There are no environmental issues from stakeholders, local communities or related NGOs.</p> <p>Audit Team verification and response:</p>

	There is no negative issue need further investigation.
3	<p>Feedbacks:</p> <p>Plantation Agency of Labuhanbatu Selatan Regency</p> <ul style="list-style-type: none"> - The company has submitted a report on plantation business activities every semester which includes CSR implementation activities. - The company has a plantation business assessment. - There is no issue of disruption to the company's plantation business. - The company has sufficient facilities and infrastructure to prevent and control land fires. - The company has carried out CSR activities including in the social, infrastructure, economic, etc. <p>Audit Team verification and response:</p> <p>There is no negative issue need further investigation.</p>
4	<p>Feedbacks:</p> <p>Contractor - CV Tua Gabe</p> <ul style="list-style-type: none"> - Contractors establish cooperation in the form of Replanting activities, empty bunches & CPO transportation. - The work agreement contains clauses related to compliance with regulations including compliance with BPJS, Minimum Wage and PPE, which are evaluated periodically by the company. - So far the cooperation has been quite good and there have been no complaints, including regarding payments. <p>Audit Team verification and response:</p> <p>There is no negative issue need further investigation.</p>
5	<p>Feedbacks:</p> <p>Contractor - CV Felindo</p> <ul style="list-style-type: none"> - Contractors establish cooperation in the form of CPO transportation. - The work agreement contains clauses related to compliance with regulations including compliance with BPJS, Minimum Wage and PPE, which are evaluated periodically by the company. - So far the cooperation has been quite good and there have been no complaints, including regarding payments. <p>Audit Team verification and response:</p> <p>There is no negative issue need further investigation.</p>
6	<p>Feedbacks:</p> <p>LBHI Masmada Labusel & KTB (Kelompok Tani Bersatu)</p> <ul style="list-style-type: none"> - Demand for land compensation by the Kelompok Tani Bersatu (KTB) in Tolan Estate. - There are problems related to the formation of partnerships and development of scheme smallholder (20% of the business area) - CSR realization is not used to empower the community, it is only ceremonial. - Propose to remove road access for the Perlarian Village Community from the Company's HGU. - Companies terminate employment relationships blindly without guidance. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> - Regarding to HGU issues has been describe on indicators 4.8.1. Below is the detail: Auditors carries out in-depth verification regarding the HGU map owned by the Company. From the results of overlapping the map contained in the HGU certificate in 1997 with actual conditions in the

field (via coordinates), it is known that there were no violations related to land rights owned by the Company. From the results of interviews with Masmada Labusel, they claimed that it was impossible for HGU to pass along provincial roads. However, from the facts known from the results of the review of the 1997 HGU map (Situation Picture Map 128/12/IV/1997, dated 14 March 1997), the location of the land rights in question (outside the provincial road) is included in the HGU certificate. This is also confirmed by the results of field observations of boundary markers number XXIX and XLII located at the Tolan Estate location, where these stakes are the boundaries set by BPN for HGU certificate no. 2 of 1997 covering an area of 6,062.71 ha.

The plaintiffs on behalf of KTB (Kelompok Tani Bersatu) also this day feel that the Company has not completed compensation for their land in the 1960s. Due to this, the company invited the plaintiff to take legal action. The legal process itself had previously been resolved based on Civil Decision document Number 56/Pdt. G/2013/PN-Rap by the Rantau Prapat District Court on 16 September 2014 by Martin Ginitng, S.H., M.H. as Chief Judge of the Panel. In the document decided:

- Declare that the Plaintiff's (Kelompok Tani Bersatu) claim is unacceptable (Niet Onvankijke ver klaard).
 - Reject the plaintiff's compensation claim in its entirety.
 - Neither the plaintiff/his attorney nor the defendant/his attorney/co-defendant I and co-defendant II filed a legal appeal against the decision of the Rantau Prapat District Court dated 16 September 2014 Number. 56/Pdt.G/2013/PN-RAP in accordance with deed number No. 56/Pdt.G/2013/PN-RAP dated 7 November 2014 therefore this decision has permanent legal force.
- Based on consultation stakeholder with head of cooperative (Koperasi Masyarakat Air Merah Sejahtera & Koperasi Perlambian Sejahtera), there's no negative issue related to cooperative. The management said that they freely and consciously signed a cooperative partnership agreement with the company without any coercion.
 - Based on document verification of CSR implementation, the CSR has been develop based on latest Social Impact Assessment. On that document, the company prepares a CSR plan by involving interested parties, one of which is the local community.
 - Replacement of the bridge with a new one will be carried out immediately and currently the bridge construction is in the tender process. This document has been shown to the auditor, and it is hoped that it will be completed by the company in the near future. PT Tolan Tiga Indonesia always maintains roads used by the community so that every road user feels comfortable when crossing. Basically, roads between villages built by the government are available, but access via company roads is closer and the road conditions are well maintained compared to government roads so that more people pass through roads in company areas.
 - Based on management interview and document review, PT Tolan Tiga Indonesia has implemented cooperation with smallholders in accordance with Minister of Agriculture Regulation No.98/Permentan/OT.140/9/2013 and Minister of Agriculture Regulation No. 18/2021. PT Tolan Tiga Indonesia has been active in providing training and assistance with agricultural equipment to smallholders. Currently the RSPO certification process of independent smallholders is underway where the Company has appointed a consultants to assist the farmers.
 - Based on public consultation with worker union and gender committee there's no negative issues related to worker welfare. They felt that company already fulfilled all right and obligations for all workers including compensation and wage.
 - Based on document review, PKWT Compensation payment of employee named July Fitriani has been made on 6 Sep 2023 and Termination of employee named Ismail is in accordance with PKB (Collective Labour Agreement) Article XXI (letter j) and PP. 35/2021 Regarding layoffs for urgent reasons due to leaking company secrets so that the person concerned is only entitled to severance payment and transportation replacement money. PT Tolan Tiga Indonesia in carrying out Termination of Employment

	Relations always refers to applicable regulations. Layoffs are the last resort for employees who have committed violations and have not shown any change even though training has been carried out.
7	<p>Feedbacks:</p> <p>Worker Union and Commite Gender</p> <ul style="list-style-type: none"> - All workers have been registered to BPJS Ketenagakerjaan and BPJS Kesehatan including contract worker (PKWT). - There are no workers under 18 years old. - Minimum wage based on government regulation. - Company has Bipartite Cooperation Institution. - Related to worker issues in the name of "Ismail", the worker union said that company has doing the settlement process correctly. The union also stated that the person concerned admitted to committing a criminal act by collaborating with the FFB thieves by informing the thieves of the location of the FFB. The company has calculated the compensation provided in this regard and the compensation value is in accordance with the provisions of the Collective Work Agreement. <p>Audit Team verification and response:</p>
8	<p>Feedbacks:</p> <p>Air Merah Village Representative & Koperasi Air Merah Masyarakat Sejahtera (AIRMAS)</p> <p>Perlabian Village Representative & Koperasi Produsen Petani Perlabian Sejahtera (KPPPS)</p> <ul style="list-style-type: none"> - There's fair agreement between cooperation and company. - The cooperation representative hope that will be RSPO certified soon. - No negative issue related to payment. - Currently, FFB from cooperation send to other POM. - Perlabian Village representative has already request to company regarding to bridge repairing. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> - Based on management interview and document review, PT Tolan Tiga Indonesia has implemented cooperation with smallholders in accordance with Minister of Agriculture Regulation No.98/Permentan/OT.140/9/2013 and Minister of Agriculture Regulation No. 18/2021. PT Tolan Tiga Indonesia has been active in providing training and assistance with agricultural equipment to smallholders. Currently the RSPO certification process of independent smallholders is underway where the Company has appointed a consultants to assist the farmers. - Replacement of the bridge with a new one will be carried out immediately and currently the bridge construction is in the tender process. This document has been shown to the auditor, and it is hoped that it will be completed by the company in the near future. PT Tolan Tiga Indonesia always maintains roads used by the community so that every road user feels comfortable when crossing. Basically, roads between villages built by the government are available, but access via company roads is closer and the road conditions are well maintained compared to government roads so that more people pass through roads in company areas.

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Nil					
Note: PT Tolan Tiga Indonesia have gone through 2nd RSPO Recertification and Third Cycle of planting, previous landowner is consider not applicable.					

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



3.5 Impartiality and conflict of interest

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

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Formal Signing-off of Assessment Conclusion and Recommendation

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that PT Tolan Tiga Indonesia – Perlabian 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 Tolan Tiga Indonesia – Perlabian POM is remain certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Eko Purwanto	Name: Matthew Gerard Nowak
Company Name: On behalf BSI Services Malaysia Sdn Bhd	Company Name: PT Tolan Tiga Indonesia
Title: Lead Assessor	Title: Director Sustainability Department
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: 28 March 2024	Date: 15 April 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 -	The company has set the documents that are made publicly available in each unit. Type of document that publicly accessible from Perlarian Estate and Tolan Estate update 29 January 2024 as follows: <ul style="list-style-type: none"> • Deed of establishment "Akta Pendirian PT Tolan Tiga Indonesia No.AHU-78579.AH.01.02" • Cultivation Right in form of "Surat Pendaftaran Usaha Perkebunan No.213/Menhutbun-VII/2000"; "Izin Usaha Tetap No.394/T/Kehutanan Perkebunan/1998" • Certificate of Land Rights in form of "Sertifikat No.2 Desa Kebun Perlarian/1997 dan Sertipikat No.2 Desa Pekan Tolan/1997" • Plan and Impact Assessment relating to Environmental and Social Impact as in "Dokumen Rencana Pemantauan Lingkungan (RKL) No.49/RKL-RPL/2006"; "Adendum ANDAL, RKL, Perkebunan Kelapa Sawit, Pabrik Kelapa Sawit, KCP 20 Ton/Jam dan Pengolahan Limbah Cair PKS menjadi Biogas untuk Pembangkit Listrik (3MW) PT Tolan Tiga Indonesia No.660/55/BLH/2/2016"; "Izin Lingkungan Perkebunan Kelapa Sawit, Pabrik Kelapa Sawit, KCP 20 Ton/Jam dan Pengolahan Limbah Cair PKS menjadi Biogas untuk Pembangkit Listrik (3MW) PT Tolan Tiga Indonesia No.503/981/BPPTPM-LS/P.I/2016"; "Laporan-laporan Pelaksanaan RKL/RPL setiap semester"; 	Complied

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		<ul style="list-style-type: none"> • Hazardous Waste Permit "<i>Izin Penyimpanan Sementara Limbah B3 No.503/004/DPMPTSP-LS/LB3/V/2020</i>" • OHS Program "<i>Program Kesehatan dan Keselamatan Kerja</i>" • Continuous Improvement Plan "<i>Rencana Perbaikan Berkelanjutan</i>" • Human Right Policy as in "<i>Kebijakan Perusahaan</i>" • Pollution and reduction plan "<i>Rencana Pengurangan dan Pencegahan Polusi</i>" • Public summary if the certification Assessment Report "<i>Rangkuman Publik dan Laporan Hasil Sertifikasi</i>" • Detail of Complaint and Grievance "<i>Rekaman Keluh Kesah Internal dan Eksternal</i>" • "<i>Prosedur Pemberian Tanggapan atas Permintaan Informasi No.ENC-01-11/04-03-2019/Rev.1</i>" <p>- Land compensation procedure "<i>Prosedur Ganti Rugi Lahan No.LCA 01-01/21-02-2022/Rev.3</i>"</p> <p>Type of document that publicly accessible from Perlabian POM update on 12 February 2024 as follows:</p> <ul style="list-style-type: none"> • Certificate of Land Rights/Cultivation Right in form of "<i>Perizinan Usaha Berbasis Resiko No.8120018062646; Surat Izin Mendirikan Bangunan No.503/1133/DMPPTSP-LS/X/2017 Lokasi PT Tolan Tiga Indonesia, Kebun Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan</i>" dated 23 October 2017; • Cultivation Right "<i>Izin Usaha Perkebunan No.213/Menhutbun- VII/2000</i>"; - Plan and Impact Assessment relating to Environmental and Social Impact as in "<i>Adendum ANDAL, RKL, RPL No.55/BLH/2/2016</i>" - Plan and Impact Assessment relating to Environmental and Social Impact as in "<i>Laporan-laporan Pelaksanaan RKL/RPL setiap semester</i>" 	
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		<ul style="list-style-type: none"> • Hazardous Waste Permit "<i>Izin Penyimpanan Sementara Limbah B3 PT Tolan Tiga Indonesia</i>" • OHS Program "<i>Program Kesehatan dan Keselamatan Kerja</i>" • Continuous Improvement Plan "<i>Rencana Perbaikan Berkelanjutan</i>" • Human Right Policy as in "<i>Kebijakan Perusahaan</i>" • Pollution and reduction plan "<i>Rencana Pengurangan dan Pencegahan Polusi</i>" • Public summary if the certification Assessment Report "<i>Rangkuman Publik dan Laporan Hasil Sertifikasi</i>" • Detail of Complaint and Grievance "<i>Rekaman Keluh Kesah Internal dan Eksternal</i>" • "<i>Prosedur Pemberian Tanggapan atas Permintaan Informasi No.ENC-01-11/04-03-2019/Rev.1</i>". 	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	Based on consultation with the stakeholders, review of Logbook of incoming mail and response, and review of mandatory report, it is known that the information provided to stakeholders delivered in Indonesian language, except for RSPO Audit Report. There is no migrant worker, and all surrounding communities understood Indonesian language.	Complied
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	The company have a procedure about request for information as stated in Procedure for Responding to Requests for Information ENC-01-11/04-03-2019/Rev.1 dated 18 March 2019. This procedure aims as a guideline for all operational units under the management of PT Tolan Tiga Indonesia to provide responses to requests for information/data from relevant stakeholders constructively and quickly as implementation of the principle of transparency. The request for information/data referred to in this procedure is a written request for information submitted via letter, fax, email and orally (conveyed directly by telephone including short messages received from plantation/mill/factory stakeholders. If the answer to the request for information is still under the authority of the Operational Unit Manager and the answer data	Complied

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		<p>is available in the operational unit, then requests for information can be answered directly by the Unit Manager.</p> <p>The SOP stated the request for information received by Operating Unit is forwarded to Regional Management Office immediately or at most within 3 working days; RMO is forwarding information to Head of Department at Head Office no later than 7 working days after receiving the letter from Operating Unit; An answer to request for information is to be provided no later than 25 working days.</p> <p>Requests for information and responses given are recorded in a register book which manually records incoming and outgoing letters containing information on sequence number, date of letter, letter number, subject, purpose and follow-up responses. Review of outgoing and incoming letters recorded in the log book during the 2023 period, there were no requests for information from stakeholders, communications recorded in the log book were related to requests for assistance from the community for road maintenance, and invitations to social activities.</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>The company have a procedure about request for information as stated in Procedure for Responding to Requests for Information ENC-01-11/04-03-2019/Rev.1 dated 18 March 2019. This procedure aims as a guideline for all operational units under the management of PT Tolan Tiga Indonesia to provide responses to requests for information/data from relevant stakeholders constructively and quickly as implementation of the principle of transparency.</p> <p>The request for information/data referred to in this procedure is a written request for information submitted via letter, fax, email and orally (conveyed directly by telephone including short messages received from plantation/mill stakeholders. If the answer to the request for information is still under the authority of the Operational Unit Manager and the answer data is available in the operational unit, then requests for information can be answered directly by the Unit Manager.</p>	Complied

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		<p>Documents available to the public and stakeholder can be provided to stakeholders according to their relevance through a written request to the organization.</p> <p>Person in Charge of Consultation and Communication is Estate or Mill Manager. Based on interview with relevant stakeholders, communication and consultation mostly conducted by phone and direct visit. Record of consultation and communication when direct visit is according to level of importance.</p>	
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 company have a list of contact and detailed stakeholder information and available in document "<i>Daftar Pemangku Kepentingan</i>/List of Stakeholder". This document update regularly and the last one was on 1 February 2024 (Perlabian POM), 29 January 2024 (Perlabian Estate), and 2 February 2024 (Tolan Estate). All of records has been reviewed and verified in this audit.</p> <p>Updated stakeholder list explains the name of the institution/organization, address, contact number and name of the serving personnel, such as contractors, labor unions, government institutions, villages around the company, etc. The person to be contacted clearly stated in the stakeholder list. From the results of interviews via telephone with stakeholders referring to the list, it can be connected, and the information found is valid.</p>	Complied
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>PT Tolan Tiga Indonesia has Code of Conduct (No.QMM-40-01-P19/21-08-2018/Rev.0) approved by President Director dated 28 September 2018. The code of conduct standards are the company internal guidelines for work ethics, commitment, and the enforcement of company internal guideline for work ethics, commitment and the commitment and the enforcement of company regulations for individuals when conducting business and other activities, as well as interacting with stakeholders. Basic attitudes of individuals, company employees will demonstrate: Compliance with company regulations, An ethical approach to their work, honesty and discipline at work, openness and willingness to improve themselves, mutual respect and courtesy towards others, egalitarian attitudes</p>	Complied

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		<p>and behaviour, willingness to be placed anywhere according to company requirements and prevailing conditions.</p> <ul style="list-style-type: none"> Regulates conduct as superior, employees in superior position must always be a good role model in words and actions, being fair and open with subordinates, establish open and constructive communication with subordinates, follow a policy of always trying to coordinate cooperative relationships, fostering harmonious teamwork, avoid using position or post for personal, group or any other party's interests. Regulates behaviour as a Subordinate, employees in subordinate positions are expected to always be respectful and polite to supervisor and loyal to the company when executing any given task, communicate with superior honestly, openly and ethically, perform actions that are only within their authority. Company records, documents and information must be accountable, accurate and timely, therefore, the individuals responsible for the management of records, documents and information must be honest, objective and responsible. <p>Dissemination of information related corporate/company policy concerning ethical are conducted to the employees regularly, the last one was on 12 January 2024 to Perlarian POM & Estate, on 10 January 2024 to Tolan Estate. Apart from that, the code of ethics was also socialized to stakeholders.</p> <p>Based on interview with workers and contractor, it's known that they had a good understanding towards code of ethic policy. Based on explanation above, company has policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p>	
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>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice conducting through internal audit. Several internal audits conducted by unit of certification, i.e. internal audit Sustainability and internal audit operation.</p>	Complied

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		<p>This system is available in Routine Visit and Internal Audit Procedure ENC-01-02/04-03-2019/Rev.2 dated 18 March 2019, that aims to:</p> <ul style="list-style-type: none"> • Providing support and supervision for the implementation of activities to fulfill the principles and criteria and requirements of a sustainable system or supply chain system and traceability. • To ensure that procedures, work instructions, including related documents are followed and implemented according to the sustainable system. • To determine the effectiveness of procedures, work instructions and related documents as well as important corrective actions • To ensure consistency in the implementation of systems, procedures and work instructions as well as other supporting documents. <p>Based on field observation to estate and mill, it was known that contractor used by company are CPO/PK transporter, civil contractor, testing inspection service, etc. Implementation towards safety and manpower aspect has regularly and evaluate periodically by estate or mill management.</p>	
Principle 2: Operate legally and respect rights Implement legal requirements as the basic principles of operation in any jurisdiction.			
Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The unit of certification complies to relevant regulations. - Critical (Major) compliance -	<p>The company shows evidence related to compliance with regulations currently in place in the Republic of Indonesia, including:</p> <ul style="list-style-type: none"> • HGU (Land Use Title) Certificate No. 2 covering an area of 6,042.44 Ha. Valid until 31 December 2023. • HGU (Land Use Title) Certificate No. 2 covering an area of 2,463.62 Ha. Valid until 30 June 2024. • Latest extension of Permanent Business Permit (IUT) No.394/T/Kehutanan Perkebunan/1998, dated 21 August 1998, with a land area of 8,479.06 ha, located in Kebun Perlabian Village and Tolan Pekan Village, Kampung Rakyat 	Complied

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		<p>District, Labuhan Regency Batu, North Sumatra Province;</p> <ul style="list-style-type: none"> • Plantation Business Registration Letter (SPUP) No.213/Menhutbun-VII/2000, dated 10 March 2000 with a Plantation License scope of 8,479.06 ha and PKS capacity as follows: Installed capacity of 75 tons of FFB/hour and permit capacity of 60 tons of FFB / hour, located in Kebun Perlabian Village and Tolan Pekan Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatra Province. This SPUP is valid as a Plantation Business License. • Plantation Business development Report for Semester II 2023 on 19 January 2024 to Minister of Agriculture Office. • Land and Building Tax (PBB): Notification of Tax Due dated April 14, 2023, in the name of PT Tolan Tiga Indonesia (NPWP 01.001.801.8-116.001). Proof of tax payment can be shown according to the Government receipt Evidence dated 10 October 2023. • Income Tax (PPH): Periodic Tax Return (SPT) Income Tax Article 21 and/or Article 26 for period December 2023 in the name of PT Tolan Tiga Indonesia (NPWP 01.001.801.8-116.001). Proof of tax payment can be shown according to the Government receipt Evidence dated January 10 2024. • Submission of electronic yearly notice letter for PPN (Increasing Value Tax) period December 2023 on 30 January 2024 (No. 42018106045240302416) • Implementation of minimum wage according to government regulation Number 36 of 2021 concerning Wages. • Implementation of overtime pay in accordance with Government Regulation Number 35 of 2021 concerning Work Agreements for Certain Time, Outsourcing, Working Time and Rest Time, and Termination of Employment. • Deed No. 1 dated September 1 2023 by Notary July concerning Statement of Decision of the Shareholders of the Limited Liability Company PT Tolan Tiga Indonesia regarding changes in directors and commissioners re-appointment. The deed has been registered and accepted in the legal entity administration system of the Ministry of Law and Human Rights of the 	
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		Republic of Indonesia on September 7 2023 according to Company Register Number AHU-0175994.AH.01.11.TAHUN 2023.																	
2.1.2	A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor. - Minor compliance -	Regulatory updates are carried out at least once a year (last updated January 2024). The officers responsible for updating the list of regulations according to the SOP are Identification of regulations at the national level by SND RMO department. The document describes the company's compliance with the regulations in force in the Republic of Indonesia, for example the fulfilment of the latest regulations such as the Minister of Health Regulation No. 2 2023 about Environmental Health.	Complied																
2.1.3	Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries. - Minor compliance -	The company carries out stake monitoring activities recorded in the 2024 HGU Pole Maintenance Record. The company carries out routine monitoring and maintenance by ranger officers every 2 months. The report on the inspection and maintenance of the boundary markers has provided complete information regarding the number of markers, condition of markers, location of markers, coordinates of markers and corrective actions as well as the target time for repairs if there are damaged or missing marker. In the monitoring report, it is known that all HGU marker are available. The results of field observations on the boundary pole for example No. XX, XXI, XXXVIII, XLVI, VII and VI Perlabian Estate & No. XXXIX, XLI, V, IX and XLII Tolan Estate are found and that the condition of the boundary poles is well maintained.	Complied																
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 -	<table> <tr> <th colspan="4">A list contracted parties of Perlabian POM update on 10 February 2024, i.e:</th></tr> <tr> <th>No</th><th>Contractor</th><th>Address</th><th>Services</th></tr> <tr> <td>1</td><td>CV. Sahabat Abadi</td><td>Jalan Besar Kisaran Medan Km 5 Sidomulyo, Pulo Bandring</td><td>CPO Transport</td></tr> <tr> <td>2</td><td>CV. Felindo</td><td>Jl. Krakatau Ujung No. 62</td><td>CPO Transport</td></tr> </table>	A list contracted parties of Perlabian POM update on 10 February 2024, i.e:				No	Contractor	Address	Services	1	CV. Sahabat Abadi	Jalan Besar Kisaran Medan Km 5 Sidomulyo, Pulo Bandring	CPO Transport	2	CV. Felindo	Jl. Krakatau Ujung No. 62	CPO Transport	Complied
A list contracted parties of Perlabian POM update on 10 February 2024, i.e:																			
No	Contractor	Address	Services																
1	CV. Sahabat Abadi	Jalan Besar Kisaran Medan Km 5 Sidomulyo, Pulo Bandring	CPO Transport																
2	CV. Felindo	Jl. Krakatau Ujung No. 62	CPO Transport																

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		3	CV. Angkutan Sahabat	Jl. Petumbuk Dusun III. Jaharun B- Galang. Deli Serdang	CPO Transport		
		4	CV. Sejahtera Abadi	Jl. Jati No. 65 Pilo Brayan Bengkel Kec. Medan Timur	CPO Transport		
		5	PT Sumatra Lintas Asia	Jl. Wiliem Iskandar No 138-D	CPO Transport		
		6	PT Atmino	Jl. Sei Belumai KM 2,4 N0 30-38, Desa Dagang Kelambir Tanjung Morawa	Fabrication		
		7	PT Tengger Jaya Teknik	Jl. D.I Panjaitan No 44/50 Medan 20154	Fabrication		
		8	PT Tri Royal Jayua Teknik	Komplek Krakatau Homy Block A No.8 Jl. Alumunium I Tanjung Mulia	Fabrication		
		A list contracted parties of Perlabian Estate update on 10 January 2024, i.e:					
		No	Contractor	Address	Services		
		1	CV Astron Raksa Family	Jl. Arjuna Lohsari I Kec. Kampung Rakyat	EFB & FFB Transport		
		2	UD Putra Labuhanbatu Jaya	Jl. Paindoan No.189 Rantau Prapat	EFB & FFB Transport		
		3	AWS	Desa Perk. Perlabian Kec. Kampung Rakyat	Security		
		4	Koperasi Jasa Karyawan	Desa Perk. Perlabian Kec. Kampung Rakyat	Upkeep Workers		
		5	General Auto Teknik	Rantau Prapat Labuhan Batu	Supplier of Building Materials & Civil Work Service		

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		<table> <tr> <td>6</td><td>CV. Siniburang 71</td><td>Perum. PND PT HSJ No. 02D</td><td>Civil Work</td></tr> <tr> <td>7</td><td>Tua Gabe</td><td>Jl. Darusallam No.25 Medan</td><td>Raplanting Op. 2023</td></tr> <tr> <td>8</td><td>CV Sulong Jaya</td><td>Jl. Sumber Beji Rantau Prapat</td><td>Civil Work</td></tr> <tr> <td>9</td><td>Koperasi Serba Usaha</td><td>Desa Perk. Perlabian Kec. Kampung Rakyat</td><td>procurement of goods needed by employees</td></tr> </table> <p>A list contracted parties of Tolan Estate update on 10 January 2024, i.e:</p> <table> <tr> <th>No</th><th>Contractor</th><th>Address</th><th>Services</th></tr> <tr> <td>1</td><td>CV TUA GABE</td><td>Rantau Prapat</td><td>Program Replanting</td></tr> <tr> <td>2</td><td>KOPERASI SERBA USAHA</td><td>Perlabian</td><td>procurement of goods needed by employees</td></tr> <tr> <td>3</td><td>KOPERASI JASA KARYAWAN</td><td>Perlabian</td><td>Upkeep Workers</td></tr> <tr> <td>4</td><td>CV ASTRON RAKSA FAMILY</td><td>Lohsari</td><td>FFB Transport</td></tr> <tr> <td>5</td><td>CV SIBINURANG 71</td><td>Rantau Prapat</td><td>Civil Work</td></tr> </table>	6	CV. Siniburang 71	Perum. PND PT HSJ No. 02D	Civil Work	7	Tua Gabe	Jl. Darusallam No.25 Medan	Raplanting Op. 2023	8	CV Sulong Jaya	Jl. Sumber Beji Rantau Prapat	Civil Work	9	Koperasi Serba Usaha	Desa Perk. Perlabian Kec. Kampung Rakyat	procurement of goods needed by employees	No	Contractor	Address	Services	1	CV TUA GABE	Rantau Prapat	Program Replanting	2	KOPERASI SERBA USAHA	Perlabian	procurement of goods needed by employees	3	KOPERASI JASA KARYAWAN	Perlabian	Upkeep Workers	4	CV ASTRON RAKSA FAMILY	Lohsari	FFB Transport	5	CV SIBINURANG 71	Rantau Prapat	Civil Work	
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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>Work Agreement Letter Number 01/TTI/KJK/1/2024 between PT Tolan Tiga Indonesia and the Koperasi Jasa Karyawan Tolan Tiga dated 02 January 2024, with a validity period of 1 year and can be extended according to the agreement of the parties. In the Agreement it is stated that the cooperative is obliged to register casual daily worker for BPJS Ketenagakerjaa and BPJS Kesehatan membership, must pay minimum wages in accordance with applicable regulations, provide PPE and casual daily worker must use PPE while on duty, it is not permitted to employ children under the age of 18 and workers from trafficking in humans.</p>	Complied																																								

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		<p>Work Agreement Letter Number 01/RMO-TLE/ARF/I/2024 between PT Tolan Tiga Indonesia and CV Astron Raksa Family regarding FFB Transport, dated 02 January 2024, with a validity period until 30 June 2024. In the Work Agreement Article 5</p> <ul style="list-style-type: none">• Point 3 complies with Company policy, especially in terms of "Child Labor Policy", contractor is not permitted to employ children under the age of 18 years and workers who come from human trafficking.• Point 5 for OHS, contractor workers when on duty are required to wear PPE that can be adapted to OHS specifications and standards.• Point 6, contractor is required to pay workers' wages according to the applicable Minimum Wage.• Point 7, contractor is obliged to support the strict implementation of Indonesian Government laws and regulations regarding sexual harassment which can occur as a result of physical contact, comments, jokes and displays or other behavior. <p>Checklist for Evaluation of Fulfilment of RSPO Standards for Contractors on 29 December 2023 CV Astron Reksa Family, FFB Transportation business sector. Things that are evaluated in the checklist include contractor permits (deed, HO permit, NPWP, driver's license/STNK for drivers), completeness of workers' PPE, no workers under 18 years, wages according to the applicable minimum wage, workers included in BPJS Employment. The evaluation results show that the CV Astron Reksa Family contractor complies with the provisions set by the Company.</p> <p>Agreement Letter Number 01/RMO-PLI/TG/I/2024 between PT Tolan Tiga Indonesia and CV Tua Gabe regarding Replanting OP 2024 dated 02 January 2024 with a validity period of 90 calendar days. In the Agreement Article 1 stated:</p>	
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		<ul style="list-style-type: none"> Point 4 complies with Company policy, especially in terms of "Child Labor Policy", contractor is not permitted to employ children under the age of 18 years and workers who come from human trafficking. Point 5 for OHS, contractor workers when on duty are required to wear PPE that can be adapted to OHS specifications and standards. Point 6, contractor is required to pay workers' wages according to the applicable Minimum Wage. Point 8, contractor is obliged to ensure that heavy equipment operators are trained and have OHS License. Point 13, contractor is obliged to support strict implementation of the laws and regulations of the Indonesian Government regarding sexual harassment which can occur as a result of physical contact, comments, jokes and displays or other behavior. <p>Checklist for Evaluation of Fulfilment of RSPO Standards for Contractors dated 28 December 2023 CV Tua Gabe, 2024 replanting contractor business sector. Things evaluated in the checklist include contractor permits (deed, HO permit, NPWP, SIM/STNK for drivers), completeness of worker PPE, no there are workers under 18 years, wages according to the applicable minimum wage, workers are included in BPJS Employment. The evaluation results show that the CV Astron Reksa Family contractor complies with the provisions set by the Company. As proof of evaluation, the Company shows supporting documents for CV Tua Gabe for example:</p> <ul style="list-style-type: none"> OHS License Reg. 189745-OPK3-LT/PAA/VII/2021 in the name of Khorul Bakti Harahap valid until 02 July 2026. Heavy equipment operator salary slip for December 2023, wages received are IDR. 3,772,500, BPJS Ketenagakerjaan membership number 1210 1422 0562 0002. 	
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		Based on the explanation above, contracts between companies and contractors are available which contain specific clauses regarding compliance with relevant legal requirements and this can be demonstrated by third parties.	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. - Minor compliance -	<p>The company can show contracts with contractors that contain clauses prohibiting child labor, forced labor and human trafficking.</p> <p>Work Agreement Letter Number 01/TTI/KJK/1/2024 between PT Tolan Tiga Indonesia and the Koperasi Jasa Karyawan Tolan Tiga dated 02 January 2024, with a validity period of 1 year and can be extended according to the agreement of the parties. In the Agreement it is stated that the cooperative is obliged to register casual daily worker for BPJS Ketenagakerjaa and BPJS Kesehatan membership, must pay minimum wages in accordance with applicable regulations, provide PPE and casual daily worker must use PPE while on duty, it is not permitted to employ children under the age of 18 and workers from trafficking in humans.</p> <p>Work Agreement Letter Number 01/RMO-TLE/ARF/I/2024 between PT Tolan Tiga Indonesia and CV Astron Raksa Family regarding FFB Transport, dated 02 January 2024, with a validity period until 30 June 2024. In the Work Agreement Article 5</p> <ul style="list-style-type: none"> • Point 3 complies with Company policy, especially in terms of "Child Labor Policy", contractor is not permitted to employ children under the age of 18 years and workers who come from human trafficking. • Point 5 for OHS, contractor workers when on duty are required to wear PPE that can be adapted to OHS specifications and standards. • Point 6, contractor is required to pay workers' wages according to the applicable Minimum Wage. • Point 7, contractor is obliged to support the strict implementation of Indonesian Government laws and regulations regarding sexual harassment which can occur as a result of physical contact, comments, jokes and displays or other behavior. 	Complied

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		<p>included in BPJS Employment. The evaluation results show that the CV Astron Reksa Family contractor complies with the provisions set by the Company. As proof of evaluation, the Company shows supporting documents for CV Tua Gabe for example:</p> <ul style="list-style-type: none"> OHS License Reg. 189745-OPK3-LT/PAA/VII/2021 in the name of Khorul Bakti Harahap valid until 02 July 2026. Heavy equipment operator salary slip for December 2023, wages received are IDR. 3,772,500, BPJS Ketenagakerjaan membership number 1210 1422 0562 0002. 													
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>PT Tolan Tiga Indonesia does not purchase and process FFB from smallholder and/or uncertified sources. Perlavian POM receives all FFB's from its own Estates. All relevant supply bases are attached in RSPO certificate of Perlavian POM.</p> <p>Geolocation of direct FFB suppliers that supplied to Perlavian POM:</p> <table border="1"> <thead> <tr> <th>No</th><th>Estate</th><th>Address</th><th>Geo-Location</th></tr> </thead> <tbody> <tr> <td>1</td><td>Perlavian Estate</td><td>Perkebunan Perlavian Village, Kampung Rakyat District, Labuhan Batu Selatan Regency, Sumatera Utara Province, Indonesia</td><td>2° 3' 37.60" N 100° 4' 52.40" E</td></tr> <tr> <td>2</td><td>Tolan Estate</td><td>Perkebunan Perlavian Village, Kampung Rakyat District, Labuhan Batu Selatan Regency, Sumatera Utara Province, Indonesia</td><td>2° 0' 07.60" N 100° 2' 30.85" E</td></tr> </tbody> </table>	No	Estate	Address	Geo-Location	1	Perlavian Estate	Perkebunan Perlavian Village, Kampung Rakyat District, Labuhan Batu Selatan Regency, Sumatera Utara Province, Indonesia	2° 3' 37.60" N 100° 4' 52.40" E	2	Tolan Estate	Perkebunan Perlavian Village, Kampung Rakyat District, Labuhan Batu Selatan Regency, Sumatera Utara Province, Indonesia	2° 0' 07.60" N 100° 2' 30.85" E	Complied
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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>Up to this ASA2_4, PT Tolan Tiga Indonesia – Perlavian POM and its supply base does not use collection centers, agents or other intermediaries. Verified that all FFB are sourced from certified supplier only. Perlavian POM does not receive FFB from others scope, including agents or other intermediaries.</p>	Complied												
Principle 3: Optimise productivity, efficiency, positive impact and resilience															

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Implement plans, procedures and systems for continuous improvement.

Criteria 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.

3.1.1	<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>Tolan Estate showed "Business Plan 2023-2032" based on estimate data year 2023.</p> <table><tr><th>Year</th><th>FFB production</th><th>Cost per kg</th></tr><tr><td>2023</td><td>82,043</td><td>462</td></tr><tr><td>2024</td><td>76,784</td><td>462</td></tr><tr><td>2025</td><td>70,607</td><td>462</td></tr><tr><td>2026</td><td>66,315</td><td>462</td></tr><tr><td>2027</td><td>65,151</td><td>462</td></tr><tr><td>2028</td><td>63,871</td><td>462</td></tr><tr><td>2029</td><td>65,193</td><td>462</td></tr><tr><td>2030</td><td>65,834</td><td>462</td></tr><tr><td>2031</td><td>66,486</td><td>462</td></tr><tr><td>2032</td><td>67,346</td><td>462</td></tr></table> <p>For development of smallholder in Tolan Estate, company prepared budget for 2023/2024: supervision officer; office and go down expenses; preparation for cooperative establishment; training and meeting expenses; provision of PPE for smallholder; access road maintenance for smallholder plantation area.</p> <p>Perlabian Estate showed "Business Plan 2024-2034" based on estimate data year 2024.</p> <table><tr><th>Year</th><th>FFB production</th><th>Cost per kg</th></tr><tr><td>2024</td><td>97,272</td><td>763</td></tr><tr><td>2025</td><td>107,964</td><td>708</td></tr></table>	Year	FFB production	Cost per kg	2023	82,043	462	2024	76,784	462	2025	70,607	462	2026	66,315	462	2027	65,151	462	2028	63,871	462	2029	65,193	462	2030	65,834	462	2031	66,486	462	2032	67,346	462	Year	FFB production	Cost per kg	2024	97,272	763	2025	107,964	708	Complied
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3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	<p>Annual replanting program for Perlarian Estate is prepared "Program Replanting 2024-2030"</p> <table><tr><th>Replanting program</th><th>Planting Year</th><th>Division</th><th>Hectarage</th></tr><tr><td>2024</td><td>1995</td><td>IV</td><td>176.60</td></tr><tr><td>2025</td><td>N/A</td><td>N/A</td><td>Planting holiday</td></tr><tr><td>2026</td><td>N/A</td><td>N/A</td><td>Planting holiday</td></tr><tr><td>2027</td><td>N/A</td><td>N/A</td><td>Planting holiday</td></tr><tr><td>2028</td><td>N/A</td><td>N/A</td><td>Planting holiday</td></tr><tr><td>2029</td><td>2005</td><td>V</td><td>201.50</td></tr><tr><td>2030</td><td>2006</td><td>II</td><td>279.53</td></tr></table> <p>Replanting review: The latest replanting Perlarian Estate carried out for 178.40 Ha in Division IV for year 2023. There was Visit from Regional Director to review replanted oil palm 2022 and preparation for replanting oil palm 2023 in Perlarian Estate.</p>	Replanting program	Planting Year	Division	Hectarage	2024	1995	IV	176.60	2025	N/A	N/A	Planting holiday	2026	N/A	N/A	Planting holiday	2027	N/A	N/A	Planting holiday	2028	N/A	N/A	Planting holiday	2029	2005	V	201.50	2030	2006	II	279.53	Complied
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Visit and review dated 26 May 2023: oil palm 2022 in Division IV yellowish – action plan to build fishbone water drainage; to apply urea on top of EFB. Apply rat baiting for oil palm 2021 and 2022 – action plan lining planting point followed with slashing harvesting path for rat baiting application. For preparation of planting oil palm 2023 – purification of *Mucuna* and application of Glyphosate to reduce weed; re-plan the drainage (completed in July 2023).

Visit and review dated 11 September 2023: Check on drainage for replanting area oil palm 2023 – mapping and prepare inventory of bad drainage area, indicate the outflow (completed in October 2023).

Annual replanting program for Tolan Estate is prepared “Program Replanting 2020-2033”

Replanting program	Planting Year	Division	Hectarage
2020	N/A	N/A	Planting holiday
2021	N/A	N/A	Planting holiday
2022	N/A	N/A	Planting holiday
2023	2002, 2004, 1994, 1998	II	199.92
2024	1994, 1998	II	98.10
2025	1994, 1998	II	78.56
2026	1994, 1998	II	249.10
2027	1996, 1998	III	207.49
2028	1998, 1999	III	225.60
2029	1999	III	197.11
2030	1997, 2001	IV	199.60
2031	1999, 2000, 2001	III, IV, V	196.69
2032	2000	V	225.13

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		2033	2001	IV	214.43	
		<p>Replanting review: The latest replanting Tolan Estate carried out for 199.92 Ha in Division II for year 2023. There was Visit from Agronomy to review replanted oil palm 2023 and preparation for replanting oil palm 2024 in Tolan Estate.</p> <p>Visit and review dated 1 February 2024: oil palm 2023 in Division II identified with high rat infestation – action plan: supplying on dead plant; rat baiting on time; rat baiting officer received re-training on rat baiting follow up (not more than 4 days). Verified training record for Pest & Disease Officer, attended by 10 officers. The training material related to rat baiting and identifying rat infestation, <i>Oryctes</i> infestation, <i>Apogonia</i> infestation (completed 2 February 2024).</p> <p>Visit and review dated 1 February 2024: Oil Palm 2023 in Division II identified with nettle caterpillar attack (<i>Setora nitens</i>) with average > 5 caterpillars per frond – action plan: provide re-training on early warning system to Pest & Disease worker; to apply <i>Klorantraniliprol</i> (completed 2 February 2024).</p>				
3.1.3	<p>The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.</p> <p>- Minor compliance -</p>	<p>Perlabian POM demonstrate Management review carried out 15 February 2024. The input discussed during management review: internal audit findings and the correction; evaluation of waste and pollution in Perlabian POM; analysis on domestic wastewater quality; analysis on domestic waste volume; POME volume and quality monitoring; Water use per tonne FFB processed; social issues; FFB process performance, throughput, oil losses and kernel losses.</p> <p>Tolan Estate demonstrate Management review carried out 2 October 2023. The input reviewed discussed during management review: internal audit result correction and corrective action; pesticide use evaluation 2021 & 2022 vs 2023; fertilizer use evaluation 2021 & 2022 vs 2023; waste management evaluation; water and electricity use evaluation; HCV and HCS management and monitoring; social issues evaluation; FFB production and quality evaluation. Management Review session attended by 12 persons including Tolan Estate Manager.</p> <p>Minutes of Management Review Tolan Estate, dated 17-19 February 2024, discussing internal audit result (1 NC Minor, 11 Observation, 19 OFI); evaluation</p>				Complied

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		of pesticide use; evaluation of fertilizer use; evaluation of waste management; evaluation of water use; social issues; productivity and performance evaluation. Attendance list available.	
Criteria 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.			
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>Tolan Estate's Continuous Improvement Plan "Program Perbaikan Berkelanjutan Tahun 2023" prepared 3 January 2023 consist of: Monitoring & Evaluation of Plantation BMP – every month; Management & Monitoring Chemical use and hazardous waste handling – every month; Interview with community members for social aspect/impact – May 2023; GHG Mitigation and reduction – every month; Socialization of conservation area and RTE species – July 2024. Implementation: interview with 15 persons from Pekan Tolan village, Meranti village and Perkebunan Perlavian village.</p> <p>Tolan Estate's Continuous Improvement Plan "Program Perbaikan Berkelanjutan Tahun 2024" prepared January 2024 consist of: Monitoring & Evaluation of Plantation BMP – every month; Management & Monitoring Chemical use and hazardous waste handling – every month; Interview with community members for social aspect/impact – May 2024; GHG Mitigation and reduction – every month; Socialization of conservation area and RTE species – June 2024; Wastewater treatment repair – July 2024. Implementation: sighted budget for wastewater treatment repair and recondition of pipes, allocated budget of Rp.12,000,000.</p> <p>In Tolan Estate: Road maintenance program 2023 for 910 meters collection road; 361 meters main road width 3 meters/10 ft; 3089 meters main road width 5 meters/15 ft. Implementation from 28 August – 9 November 2023: 910 meters collection road; 361 meters main road width 3 meters/10 ft; 2,569 meters main road width 5 meters/15 ft in block 05D02- 94D13 and block 03C34 up to 03C37.</p> <p>Perlavian Estate's Continuous Improvement Plan "Program Perbaikan Berkelanjutan Tahun 2023" prepared 3 January 2023 consist of: Monitoring & Evaluation of Plantation BMP – every month; Management & Monitoring</p>	Complied

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		Chemical use and hazardous waste handling – every month; Interview with community members for social aspect/impact – May 2023; GHG Mitigation and reduction – every month; Socialization of conservation area and RTE species – July 2024. Implementation: interview with 25 persons from Lohsari I village, Gunung Selamat village, Pekan Tolan village, Siluang village, Air Merah village, Tanjung Selamat village and Perkebunan Perlabian village.	
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template. - Minor compliance -	PT Tolan Tiga Indonesia prepared RSPO Metrics Template. The spreadsheet covers 1 POM and 2 Estates.	Complied
Criteria 3.3: Operating procedures are appropriately documented, consistently implemented and monitored.			
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place. - Critical (Major) compliance -	The procedures documented in "Oil Palm Agricultural Manual" (latest revision in April 2023), where it contains all sub section of the process, such as: Nursery, land clearing, planting in peat soil and mineral soil with zero burning, planting legume cover crops, terracing, upkeep (fertilizer and pesticides, included safe working practices), water level management, riparian and watercourse management, harvesting, replanting and FFB transport. Documented SOP are as follows: 1. OPM-01-00/02-10-2017/Rev.2 dated 20 November 2017; Biology of Oil Palm. 2. OPM-02-00/02-10-2017/Rev.2 dated 20 November 2017; General Information: Oil Palm Nursery. 3. OPM-02-01/02-10-2017/Rev.2 dated 20 November 2017; General Information: Land Preparation of Oil Palm Nursery 4. OPM-02-02/02-10-2017/Rev.2 dated 20 November 2017; Oil Palm Pre Nursery 5. OPM-02-03/02-10-2017/Rev.2 dated 20 November 2017; Oil Palm Main Nursery	Complied

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		<p>6. OPM-03-00/02-10-2017/Rev.2 dated 20 November 2017; General Information: New Development Area and Replanting</p> <p>7. OPM-03-01/02-10-2017/Rev.2 dated 20 November 2017; Survey and Mapping</p> <p>8. OPM-03-02/02-10-2017/Rev.2 dated 20 November 2017; Land Clearing</p> <p>9. OPM-03-03/02-10-2018/Rev.3 dated 4 February 2019; Land Preparation</p> <p>10. OPM-03-04/02-05-2021/Rev.3 dated 4 February 2019; Legume Cover Crop <i>Mucuna bracteata</i></p> <p>11. OPM-03-05/02-10-2017/Rev.2 dated 20 November 2017; Field Planting</p> <p>12. OPM-04-00/02-10-2017/Rev.2 dated 20 November 2017; General Information: Density Management</p> <p>13. OPM-04-01/02-10-2017/Rev.2 dated 20 November 2017; Palm Supplying</p> <p>14. OPM-04-02/02-10-2017/Rev.2 dated 20 November 2017; Thinning Out and Removing Palm</p> <p>15. OPM-05-00/02-10-2018/Rev.3 dated 4 February 2019; General Information: Fruit Production</p> <p>16. OPM-05-01/02-10-2018/Rev.3 dated 4 February 2019; Ablation, Castration and Sanitation</p> <p>17. OPM-05-01/30-03-2023/Rev.7; dated 18 April 2023; Ablation, Castration and Sanitation</p> <p>18. OPM-05-02/30-03-2023/Rev.7 dated 18 April 2023; Harvesting</p> <p>19. OPM-05-03/17-07-2019/Rev.4 dated 23 July 2019; FFB and Loose Fruit Delivery</p> <p>20. OPM-05-04/18-07-2019/Rev.3 dated 23 July 2019; Frond Pruning</p> <p>21. OPM-05-05/19-03-2020/Rev.4 dated 23 March 2020; Black Bunch Count</p> <p>22. OPM-05-06/02-10-2017/Rev.2 dated 20 November 2017; <i>Elaeodobius kamerunicus</i> Management</p>	
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		<p>23.OPM-06-00/02-10-2017/Rev.2 dated 20 November 2017; General Information: Fertilizer</p> <p>24.OPM-06-01/30-03-2023/Rev.4 dated 4 August 2023; Inorganic Fertiliser</p> <p>25.OPM-06-02/15-02-2023/Rev.4 dated 18 April 2023; Organic Fertiliser</p> <p>26.OPM-06-03/02-10-2017/Rev.2 dated 20 November 2017; Leaf Sample Unit (LSU) and Rachis Sample Unit (RSU) - Palm Marking</p> <p>27.OPM-06-04/02-10-2017/Rev.2 dated 20 November 2017; Leaf Sampling Unit (LSU) and Rachis Sampling Unit (RSU)</p> <p>28.OPM-06-05/07-02-2023/Rev.0 dated 18 April 2023; Inorganic Fertilizer Sampling</p> <p>29.OPM-07-00/02-10-2017/Rev.2 dated 20 November 2017; General Information: Pest and Disease</p> <p>30.OPM-07-01/20-03-2020/Rev.4 dated 23 March 2020; Detection and Census</p> <p>31.OPM-07-02/02-10-2017/Rev.2 dated 20 November 2017; Pest Control</p> <p>32.OPM-07-03/02-10-2017/Rev.2 dated 20 November 2017; Disease Control</p> <p>33.OPM-07-04/17-07-2019/Rev.3 dated 23 July 2019; Integrated Pest Management</p> <p>34.OPM-08-00/02-10/2017/Rev.2 dated 20 November 2017; General Information: Weeds in Oil Palm Plantation</p> <p>35.OPM-08-01/22-09-2021/Rev.6 dated 12 October 2021; Weed Control</p> <p>36.OPM-09-00/02-10-2017/Rev.2 dated 20 November 2017; General Information: Environmental Management</p> <p>37.OPM-09-01/19-02-2019/Rev.3 dated 22 February 2019; Water management in Peat Soil</p> <p>38.OPM-09-02/02-10-2017/Rev.2 dated 20 November 2017; Management of Riparian Area</p>	
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		<p>39.OPM-09-03/15-07-2019/Rev.5 dated 23 July 2019; Using and Storing Agrochemicals</p> <p>40.OPM-10-01/01-02-2018/Rev.0 dated 4 February 2019; General Information: Field Quality Control</p> <p>41.OPM-10-01/01-02-2018/Rev.0 dated 4 February 2019; Field Quality Control</p> <p>42.OPM-10-01/17-07-2019/Rev.0 dated 23 July 2019; General Upkeep</p> <p>SOP for Palm Oil Mill as in Palm Oil Mill Operational Manual:</p> <ol style="list-style-type: none"> 1. POM-01-00/17-05-2021/Rev.1 dated 18 June 2021; General Information of Reception 2. POM-01-02/17-05-2021/Rev.4 dated 18 June 2021; Reception in Perlavian Palm Oil Mill 3. POM-01-06/11-08-2022/Rev.0 dated 10 August 2022; Weighing & Dispatch of CPO and Kernel in Palm Oil Mill 4. POM-02-00/02-10-2017/Rev.0 dated 2 November 2017; General Information of Sterilizer 5. POM-02-02/29-04-2020/Rev.3 dated 6 May 2020; Sterilizer in Perlavian POM 6. POM-03-00/02-10-2017/Rev.0 dated 2 November 2017; General Information on Threshing 7. POM-03-02/29-04-2020/Rev.2 dated 6 May 2020; Threshing in Perlavian POM 8. POM-04-00/02-10-2017/Rev.0 dated 2 November 2017; General Information of Pressing 9. POM-04-02/29-04-2020/Rev.2 dated 6 May 2020; Pressing in Perlavian POM 10. POM-05-00/02-10-2017/Rev.0 dated 2 November 2017; General Information of Clarification 11. POM-05-02/29-04-2020/Rev.2 dated 6 May 2020; Clarification in Perlavian POM 	
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		<p>12.POM-06-00/02-10-2017/Rev.0 dated 2 November 2017; General Information of Kernel Plant</p> <p>13.POM-06-02/28-01-2022/Rev.5 dated 8 March 2022; Kernel Plant in Perlavian POM</p> <p>14.POM-07-02/29-04-2020/Rev.2 dated 6 May 2020; Steam Plant in Perlavian POM</p> <p>15.POM-08-02/29-04-2020/Rev.2 dated 6 May 2020; Power Plant in Perlavian POM</p> <p>16.POM-09-02/29-01-2022/Rev.3 dated 8 March 2022; Water Treatment Plant in Perlavian POM</p> <p>17.POM-10-02/12-03-2019/Rev.1 dated 18 March 2019; Effluent Plant in Perlavian POM</p> <p>18.POM-11-02/10-05-2021/Rev.5 dated 18 June 2021; Storage and Tank Cleaning in Perlavian POM</p> <p>19.POM-12-02/18-02-2022/Rev.3 dated 8 March 2022; Workshop in Perlavian POM</p> <p>20.POM-14-02/29-04-2020/Rev.2 dated 6 May 2020; Biogas Plant in Perlavian POM</p> <p>According to the interview with operational workers obtain information that the procedure disseminate regularly by their field staff and staff supervisor. The dissemination conducted in every morning during morning muster call activity.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor compliance -</p>	<p>Organization refers to Sustainability Department procedure Routine Visit and Internal Audit No.ENC-01/04-03-2019/Rev.2 dated 18 March 2019. In the procedure stated internal audit carried out minimum once per year, and the non-conformity finding categorized into Major, Minor and Observation.</p>	Complied
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p>	<p>Internal audit report for Perlavian POM carried out 9-10 February 2024. There were 12 Observations identified during the visit. As at check by audit team 26 February 2024, the findings were all closed/rectified. Finding sampled verified:</p>	Complied

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	<p>- Minor compliance -</p>	<p>Monitoring of contractor's legal compliance for PT Tenggerraja Jaya has not completed. Evidence: Perlabian POM demonstrated Surat Perjanjian No.06/PLM-HO/ENG/2023 between PT Tolan Tiga Indonesia and PT Tenggerraja Jaya Teknik dated 13 April 2023 for work scope replacement of cake breaker conveyor and repair fruit distribution conveyor; Perlabian POM demonstrated check of contractor's workers ID (no under 18 years); provision of insurance "Kepesertaan Jamsostek" dated 18 July 2023; evidence of job safety analysis dated 4 January 2024.</p> <p>Result from Vice President Engineering/VPE to Perlabian POM dated 6 July 2023. Comments followed up: drain pipe sand cyclone Alfa was leaking – repaired and no leakage 20 July 2023; Feeding vibrating No.2 output not inline – repaired chute feeding sludge vibrating on 21 July 2023; V-belt fan in Nut & Kernel Recovery not covered – cover protecting moving parts installed 17 July 2023.</p> <p>Agronomy visit to Tolan Estate, dated 1 February 2024. Monitoring result: In Division III, found weed <i>Syngonium podophyllum</i> >40% in sampled field; <i>Stenochlaena palustris</i>, <i>Hoya carnososa</i> >90% and Volatile Oil Palms (VOP) >70% in the sampled field – action plan: selective spraying using <i>Tryclopheir</i>, <i>Glyphosate + Methyl metsulfuron</i>; and VOP using <i>Glyphosate</i> 400-500cc/knapsack + <i>Methyl metsulfuron</i> 10 gram/knapsack. The selective weeding team have been deployed and control the weed – evident "Rencana Kerja Harian" dated 2 February 2024 indicated infuse <i>Ficus</i> team consist of 2 sprayers conduct the <i>Ficus</i> eradication; Stock Issue Request for Garlon 1 liter on 2 February 2024. Evident "Rencana Kerja Harian" dated 9 & 15 February 2024 indicated <i>Stenochlaena</i> team consist of 3 sprayers conduct the selective weeding work; Stock Issue Request for Basta 150 SL 2.2 liters and Metsulindo @180 gram on 9 February 2024. Another "Rencana Kerja Harian" dated 5-6 February 2024 indicated allocation of 4 workers for manual weeding to eradicate VOPs.</p> <p>Internal audit for Tolan Estate carried out by Sustainability Department North Sumatera Region, dated 30-31 January 2024, using standard RSPO P&C 2018 – INA NI 2020. There were 1 NC Minor, 30 Observations identified during the visit. As at check by audit team February 2024, there were all closed/rectified.</p>	
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		<p>Sampled verified: smallholder training program has not been realised. Evidence: Smallholder training program for 2024 has been prepared in February 2024.</p> <p>Minutes of Management Review Tolan Estate, dated 17-19 February 2024, discussing internal audit result (1 NC Minor, 11 Observation, 19 OFI); evaluation of pesticide use; evaluation of fertilizer use; evaluation of waste management; evaluation of water use; social issues; productivity and performance evaluation.</p>	
Criteria 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	<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>The unit of certification, committed to upholding sustainable and ethical standards across its operations, has proactively undertaken a Social and Environmental Impact Assessment (SEIA). This assessment was conducted independently and with the active engagement of all stakeholders, including the local communities and government officials impacted by the operations. Acknowledging the indispensable role of relevant stakeholders, the certification unit emphasizes their involvement as crucial for ensuring the credibility and efficacy of the assessment process.</p> <p>The SEIA process using analysis of the potential social and environmental impacts of the operation on the surrounding communities and environment. Through consultation and engagement with local stakeholders, the unit of certification was able to gather comprehensive data and feedback on the operation's effects. This information was then carefully analysed and documented to ensure a clear understanding of the potential impacts.</p> <p>During this Annual Surveillance Assessment 2_4, verified that PT Tolan Tiga Indonesia already has an Environmental Permit in form of a Revised Environmental Management Plan (RKL) and Environmental Monitoring Plan (RPL) which has been approved by the Head of the Regional Environmental Impact Management Agency (Bapedalda) of Labuhan Batu Regency in accordance with Letter No.660/326/BPDL- LB/Set/2006 dated 21 July 2006 regarding Approval of Revision of RKL-RPL of PT Tolan Tiga Indonesia, Perlakuan and Tolan Plantation.</p>	Complied

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		<p>In the document, the scope of the study covers an area of 8,479.06 Ha and a Palm Oil Mill (PKS) with a capacity of 60 tons FFB/hour. PT Tolan Tiga Indonesia has shown an Environmental Permit (formerly an AMDAL / UKL-UPL document) in accordance with statutory provisions.</p> <p>On 16 November 2016, PT Tolan Tiga Indonesia received an Environmental Feasibility Permit in accordance with the Decree of the Head of the Environmental Agency of Labuhanbatu Selatan Regency No.660/55/BLH/2/2016 concerning Environmental Feasibility Addendum ANDAL, RKL-RPL for Oil Palm Plantation, Palm Oil Mill, Kernel Crushing Plant 20 Tons/Hour and Mill Effluent into Biogas for power plants (± 3 MW) PT Tolan Tiga Indonesia in Perlarian Plantation Village, Kampung Rakyat District.</p> <p>On 18 November 2016, PT Tolan Tiga Indonesia received an Environmental Permit from the Head of the Integrated Licensing and Investment Services Agency, Labuhanbatu Selatan Regency according to Decree No.503/981/BPPTPM-LS/P.I/2016. The scope of this environmental permit on an area of 8,479.06 Ha includes:</p> <ul style="list-style-type: none"> - Oil palm plantation - Palm Oil Mill - Kernel Crushing Plant with a capacity of 20 tons per hour - Processing of POM's Liquid Waste into Biogas for power generation (± 3 MW). <p>On 15 August 2023, PT Tolan Tiga Indonesia submitted revised SEIA document named "Dokumen Evaluasi Lingkungan Hidup", based on letter No.G.435/SND-PT.TTI/VIII/2023, to Ministry of Environment and Forestry. Updated document regarding operation of oil palm plantation and palm oil mill, and addition of supporting facility include Storage Tank No.4, club house, sports center, golf course, hazardous and clinic waste management, and 2 building of clinic at Perkebunan Perlarian Village.</p>	
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		<p>Minutes of Meeting dated 18 July 2023 by video conference, attended by stakeholder/representatives from environmental agency of Labuhanbatu Selatan Regency and Sumatera Utara Province, Ministry of Environment and Forestry (KLHK), Ministry of Health, etc. Meeting resulted recommendation to add regarding license, HGU, justification of development, map, WWTP, temporary hazardous waste storage, information about community farm, plantation, housing, access road, etc.</p> <p>Letter of PT Tolan Tiga Indonesia No.G.003/SND-TTI/I/2024, dated 12 January 2024 to Ministry of Environment and Forestry, stated that the company has implemented follow up of DELH after Meeting of DELH evaluation and has been submitted to Ministry of Environment and Forestry on 16 August 2023. PT Bawana Rekatama Consultant and DELH Consultant of PT Tolan Tiga Indonesia has informed in letter No.003/Ket/BRC-TTI/I/2024 dated 8 January 2024 that DELH of PT Tolan Tiga Indonesia has passed evaluation by KLHK Team and related stakeholder on 18 July 2023, and Environmental Permit of PT Tolan Tiga Indonesia is at the stage of publishment by KLHK.</p> <p>PT Tolan Tiga Indonesia carried out interview with community members from surrounding the plantation, including smallholders to prepare Social Impact monitoring period 2023. Available Social Impact Assessment Report period 2023. Scope of assessment covers all element of operation including nursery, planting oil palm, immature and mature upkeep, harvesting, transport, palm oil mill activities, waste management. Area of assessment covers Village of Perlabian, Perkebunan Perlabian, Pekan Tolan, Tolan 1 & 2, Air Merah, Tanjung Medan, Tanjung Selamat and Gunung Selamat. The report informing the status of workforce in company and the provision of work opportunity within company operations in 2023 (156 workers in Perlabian POM and Estate; 33 workers in Tolan Estate). The report also informing the aid/donation/contribution from company to school, smallholder cooperative, village and religious institution; indirect contribution to cattle farmer in form of grass and solid from palm oil mill.</p>	
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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>The documentation of the Environmental Permit, the ANDAL Addendum, and the RKL-RPL report constitutes a crucial measure in fostering transparency and accountability throughout the certification process. Available documents encompass the social and environmental management plan, along with its monitoring framework, which were developed in collaboration with affected stakeholders to ensure their participation and input.</p> <p>The management plan and its monitoring have been developed with participation of affected stakeholders. The unit of certification have involved relevant stakeholders such as employees, local communities, and other interested parties in the process. By doing so, they ensure that the plan is comprehensive, effective, and reflective of the needs and concerns of all relevant parties. The unit of certification has shown Minutes of Meeting dated 18 July 2023 by video conference, attended by stakeholder/representatives from environmental agency of Labuhanbatu Selatan Regency and Sumatera Utara Province, Ministry of Environment and Forestry (KLHK), Ministry of Health, etc. Meeting resulted recommendation to add regarding license, HGU, justification of development, map, WWTP, temporary hazardous waste storage, information about community farm, plantation, housing, access road, etc, as participation of affected stakeholders.</p> <p>The unit of certification has prepared report on Environmental Management and Monitoring implementation including social (Laporan RKL-RPL) and submit to the government regularly (per semester).</p> <ol style="list-style-type: none"> 1. Report on the Implementation of RKL-RPL PT Tolan Tiga Indonesia Semester II of 2023 has been submitted to the Ministry of Environment (ID TTE SIMPEL: 1709003852-2171, for period 01/07/2023 – 31/12/2023. 2. Report on the Implementation of RKL-RPL PT Tolan Tiga Indonesia Semester II of 2023 has been submitted to the Environmental Office of Sumatera Utara Province, letter dated 23 February 2024. 	Complied
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		<p>3. Report on the Implementation of RKL-RPL PT Tolan Tiga Indonesia Semester II of 2023 has been submitted to the Environmental Office of Labuhanbatu Selatan Regency, letter dated 23 February 2023.</p> <p>Recommendation from respective stakeholder has been documented in RKL-RPL report document, e.g. from communities of Pekan Tolan Village, Meranti Village, Perkebunan Perlarian Village, Lohsari I Village, Gunung Selamat Village, and Pekan Tolan Village. Occupation of respondent consist of farmers, entrepreneurs, government, traders, etc including unemployed.</p> <p>The Management Plan incorporated in the "Rencana Pengelolaan Lingkungan 2023", consist of:</p> <ul style="list-style-type: none"> - Reducing noise, ambient air, and odors - Recreational Park management - Management of palm oil mill effluent - Reducing groundwater quality decline - Hazardous waste (B3) management - Preserving soil fertility - Domestic waste management - Minimizing the potential for land fires - HCV area management - Responsibility towards the community (CSR). 	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The unit of certification has adopted a participatory approach in implementing, reviewing, and updating the social and environmental management and monitoring plan (RKL-RPL). This approach involves active engagement with relevant stakeholders, including employees, local communities, and other interested parties. Through this inclusive process, the unit ensures that the plan is comprehensive, effective, and responsive to the needs and concerns of all stakeholders.</p>	Complied

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		<p>Regular reviews and updates of the RKL-RPL are essential to maintaining its relevance and effectiveness in addressing the social and environmental impacts of the unit's operations. By proactively undertaking these measures, the unit demonstrates its commitment to minimizing negative impacts and enhancing positive contributions to society and the environment. The unit of certification has shown Minutes of Meeting with respective stakeholder, questionnaire to communities around the plantation.</p> <p>This dedication to sustainability and responsible management not only benefits the environment and society but also strengthens the business in terms of reputation, stakeholder trust, and long-term viability.</p> <p>PT Tolan Tiga Indonesia has consistently reports the implementation of Environmental Management and Monitoring periodically in 6 months interval and reported to the Environmental Office of Sumatera Utara Province, Labuhanbatu Selatan Regency and through the electronic reporting application Electronic Reporting Information System (SIMPEL) to the Ministry of Environment and Forestry, e.g.:</p> <ol style="list-style-type: none"> 1. Report on the Implementation of RKL-RPL PT Tolan Tiga Indonesia Semester II of 2023 has been submitted to the Ministry of Environment (ID TTE SIMPEL: 1709003852-2171, for period 01/07/2023 – 31/12/2023. 2. Report on the Implementation of RKL-RPL PT Tolan Tiga Indonesia Semester II of 2023 has been submitted to the Environmental Office of Sumatera Utara Province, letter dated 23 February 2024. 3. Report on the Implementation of RKL-RPL PT Tolan Tiga Indonesia Semester II of 2023 has been submitted to the Environmental Office of Labuhanbatu Selatan Regency, letter dated 23 February 2023. <p>Based on field observation to Perlabian POM, Perlabian Estate and Tolan Estate, verified that parameters described in Management and Monitoring Plan (RKL-RPL) have been implemented, such as: Reducing noise, ambient air, and odors; Recreational Park management; Management of palm oil mill effluent; Reducing</p>	
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		groundwater quality decline; Hazardous waste (B3) management; Preserving soil fertility; Domestic waste management; Minimizing the potential for land fires; HCV area management; Responsibility towards the community (CSR).	
Criteria 3.5: A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation. - Minor compliance -	<p>The company shows procedures related to Human Resources, for example shown by:</p> <ul style="list-style-type: none"> - HRD-01-00 General recruitment - HRD-01-03 Recruitment for <i>PKWT</i> - HRD-01-04 Promotion to <i>SKU</i> - HRD-02-05 Training conducted by OU - HRD-04-06 <i>SKU</i> Disciplinary Action - HRD-04-07 <i>SKU</i> withdrawal - HRD-04-08 Retired <i>SKU</i> - HRD-04-09 Collective Labor Agreement (PKB) <p>Policies related Human Resource</p> <ul style="list-style-type: none"> - Human Rights Policy dated 03 October 2022 PT Tolan Tiga Indonesia recognizes that Human Rights are universal and apply to all without any form of difference - Occupational Safety and Health Policy dated 22 August 2022 PT Tolan Tiga Indonesia realizes that the safety and health of employees is a priority by always providing personal protective equipment for workers and providing health clinics for treatment for workers. - Equal employment opportunity policy dated 22 August 2022 PT Tolan Tiga Indonesia is committed to creating a work environment that is non-discriminatory and complies with applicable laws - Reproductive Rights Protection Policy dated 22 August 2022 	Complied

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		<p>PT Tolan Tiga Indonesia guarantees the reproductive rights of workers and also provides reproductive health services</p> <ul style="list-style-type: none"> - Policy on Forced Labor or Trafficked Labor dated 22 August 2022 PT Tolan Tiga Indonesia does not use forced labour or labour that is trafficked either directly or by third parties - Child Labor Policy dated 22 August 2022 PT Tolan Tiga Indonesia is committed to not employing minors who will damage the child's future - Sexual Harassment Policy dated August 22, 2022 PT Tolan Tiga Indonesia is committed to a harmonious work environment and a work environment that is free from sexual harassment <p>Collective labour agreement PT Tolan Tiga Indonesia has a Collective Work Agreement with the Management of the Tolan Tiga Mandiri Workers Union (SPTTM) for the period 2022 – 2024. The PKB has been ratified in accordance with the Decree of the Head of the Labuhan Batu Selatan Regency Employment Service Number 560/564/Naker/XI/2022 dated 25 November 2022. The contents of the collective labour agreement include:</p> <ul style="list-style-type: none"> • The environment in which the employment agreement applies • Organizational recognition • Recruitment and Transfer of Workers • Working time • Wages • Contract Work • Help on sick days • Absent from work 	
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		<ul style="list-style-type: none"> • Overtime work time and overtime wages • Provisions regarding premiums • Religious Holiday Allowances and Bonuses • Social Security and Social Assistance • Work Equipment, Occupational Safety and Health • Special Provisions for Motor Vehicle Workers • Workers imported from outside the area • Type of work • Work termination • Severance payment • Company and Employee Obligations • How to Settle Labor Disputes and Work Strikes • Transition Provisions • Entry into force and expiration of the Collective Labor Agreement <p>Submission of Part of the Work to Third Parties</p> <p>Based on the results of document reviews, interviews and field visits, it is known that PT Tolan Tiga Indonesia handed over part of the work to the Tolan Tiga Employee Services Cooperative. In this regard, several supporting documents have been presented as follows:</p> <ul style="list-style-type: none"> ○ Employment Agreement Letter No.01/TTI/KJK/I/2024 between PT Tolan Tiga Indonesia and the Tolan Tiga Employee Services Cooperative regarding Cooperation in providing plant maintenance/cleaning, Mature, Immature, Preparation, Nursery and building cleaning work with the validity period of the agreement 1 year and can be extended according to agreement 	
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		<ul style="list-style-type: none"> ○ Proof of reporting on types of supporting work Number: 560/204/Naker/I/2024 from the Head of the Labuhan Batu Selatan Regency Employment Service dated January 29 2024 ○ Attachment to PT Tolan Tiga Indonesia Employee Services Cooperative business permit NIB 0220306151759 date of issue of first project business permit 15 January 2020 with KBLI 47219 (Retail trade in other agricultural products) and KBLI 46209 (Wholesale trade in agricultural products and other live animals) ○ NIB 0220306151759 issued by the OSS Institute with KBLI (01611) Land Processing Services, KBLI 016012 (Fertilization services, planting seeds and pest and weed control), KBLI 01613 (Harvesting Services), KBLI 46209 (Wholesale of agricultural and animal products other living), KBLI 47219 (Retail trade in other agricultural products), and KBLI 49431 (Motorized transportation for general goods) <p>The handover of part of the work is in accordance with what is stated in Minister of Manpower Regulation 11 of 2019 concerning the Second Amendment to Regulation of the Minister of Manpower and Transmigration Number 19 of 2012 concerning Conditions for Handing Over Part of the Work to Another Company</p>	
3.5.2	<p>Employment procedures are implemented and records are maintained.</p> <p>- Minor compliance -</p>	<p>The company can demonstrate the implementation of its employment procedures, for example:</p> <p>Employee Promotion</p> <ul style="list-style-type: none"> - Letter No: 35/PLE/II/2024 dated 24 January 2024 from EM PLE regarding the request for the appointment of FL employees as PKWT for 49 people because the 2024 budget is still available and new workers are needed - Letter from EM-TLE appointment of Firmiwanto as division 4 harvesting supervisor <p>PKWT Agreement</p>	Complied

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		<ul style="list-style-type: none"> - Specific Time Work Agreement (PKWT) dated 01 September 2021 between the employer and Dermawan Syahputra for replanting work is valid until 03 December 2021. The work agreement has been extended several times until the updated work agreement is 02 January 2024 to 31 January 2024 with upkeep field work. By extending the <i>PKWT</i> period, the company can show proof of compensation payments when the PKWT ends, for example calculating compensation on December 30 2023 for the 12 month work period. Proof of compensation payment is shown via Bank Mandiri transfer to the worker's account. - Specific Time Work Agreement dated 01 February 2024 between the employer and Dimas Dwi Pratama Sitorus for work in nursery is valid until 01 February 2024. This work agreement is the first SPK. 	
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>OHS Policy</p> <p>SIPEF Group has established an Occupational Health and Safety Policy (QMM-40-01-P04/22-08-2022/Rev.2) that was signed by President Director dated 22 August 2022. The policy states that the company prioritizes occupational safety and health and is committed to creating a safe and healthy work environment for all workers and all other stakeholders.</p> <ul style="list-style-type: none"> • The company supports the implementation of all applicable regulations and laws in the Republic of Indonesia as well as international standards and agreements relating to Occupational Safety and Health. • The company will continue to improve their health and safety and achieve this through: <ol style="list-style-type: none"> a. Identify and reduce hazards and risks in operations. b. Provision of adequate resources for effective implementation of occupational safety and health programs and procedures including rigorous compliance reviews and field supervision/inspections. c. Ensure that OHS policies and procedures are integrated with all other 	Complied

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		<p>policies and procedures in the company.</p> <ul style="list-style-type: none"> This policy will be socialized to all workers and accessible to the public and interested parties. The company will ensure that all workers, contractors, and employees understand and care about their respective OHS rights and obligations. <p>This policy has been disseminated to all workforce regularly, the last one was on 10 & 12 January 2024.</p> <p>OHS Procedure</p> <p>The company has an Occupational Health and Safety Procedure approved by the President Director, including:</p> <ul style="list-style-type: none"> Hazard Identification Risk Analysis Determining Control of OHS (SOP Code OHS-01-01/04-02-2019/Rev.0) Hot Work (SOP Code OHS-01-02/26-11-2019/Rev.1) Potential Hazard (SOP Code OHS-01-03/04-02-2019/Rev.0) <i>Pertolongan Pertama pada Kecelakaan</i> (SOP Code OHS-01-04/04-02-2019/Rev.0) Confined Space (SOP Code OHS-01-05/27-11-2019/Rev.1) Working At Heights (SOP Code OHS-01-06/04-02-2019/Rev.0) <i>Prosedur Pengelolaan Gas Bertekanan</i> (SOP Code OHS-01-07/04-02-2019/Rev.0) <i>Prosedur Pelaporan Insiden</i> (SOP Code OHS-01-08/06-07-2022/Rev.1) <i>Standar Pemasangan Rambu-Rambu Keselamatan</i> (SOP Code OHS-01-09/18-02-2022/Rev.1) Personal Protective Equipment (SOP Code OHS-01-10/23-07-2019/Rev.1) Fire Emergency Procedure on 10th Floor Forum Nine Building (SOP Code OHS-01-11/10-05-2019/Rev.0) 	
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		<ul style="list-style-type: none"> • Land Fire Prevention and Control (SOP Code OHS-01-12/13-04-2022/Rev.2) • Safety Talk (SOP Code OHS-01-13/15-02-2021/Rev.0) • Safety Inspection Checklist (SOP Code OHS-01-14/25-01-2021/Rev.0) • General Information: Fleet Safety (SOP Code OHS-02-00/08-07-2019/Rev.0) • Safety Vehicle Operating Procedure (SOP Code OHS-02-01/08-07-2019/Rev.0) • Safety Vehicle Equipment Operating Procedure (SOP Code OHS-02-02/08-07-2019/Rev.0) • Emergency Response (SOP Code OHS-03-01/28-02-2020/Rev.0) • Emergency Response in Tank Terminal (SOP Code OHS-03-02/18-02-2020/Rev.0) <p>OHS Plan</p> <p>The company has Hazard Identification Risk Analysis Determining Control of OHS (SOP Code OHS-01-01/04-02-2019/Rev.0) approved by the President Director on 04 February 2019, this procedure aims to:</p> <ul style="list-style-type: none"> • Identify activities, products and services throughout the company area that have or could pose a risk of hazard to occupational health and safety. • Determine which risks have or can pose critical risks to occupational health and safety. • Determine risk management methods for OHS. <p>The Mill and Estates has established document of the Hazard Identification Risk Assessment and Determining Control (HIRADC) document for all the operational activity (routine, non-routine, emergency). Those documents prepared by the OHS expert in each unit in consideration with the input from workers and field supervisor. To ensure the hazard are align with the policy and procedures, those documents reviewed annually. The last review was on 13 February 2024 for Perlarian POM, on 19 February 2024 for Perlarian Estate and Tolan Estate. This</p>	
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		document has been disseminated to all workforce regularly, the last one was on 21 February 2024. Based on field observation and interview with workers, the HIRADC has been implemented in the field such as by giving regular dissemination of OHS awareness and provision of appropriate PPE.	
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 company has established of OHS program in each operational units (Mill and Estate) cover about:</p> <ul style="list-style-type: none"> • P2K3LHS Meeting and OHS Inspection, frequency every month. • Monthly meetings and OHS inspections. • Submission of the P2K3LHS report to the Manpower Office of Regency and Province per quarter. • PPE inspection of all workers. • Fire drill and fire fighting training which will be held once a year. • Medical check up for high-risk workers. • Training of first aid, PPE, HIRADC, and pesticide handling. • Socialization of company policies, risk assessment and environmental impact aspects. <p>The effectiveness of the OHS Program to address health and safety risks have been monitored in the form of:</p> <p>a. Monthly OHS Committee meeting, to discuss and address current OHS issues. Samples of document that has been reviewed during audit such as meeting on 20 January 2024 (Perlabian POM), on 04 December 2023 (Perlabian Estate) and 13 January 2024 (Tolan Estate) with a discussion agenda including reviewing the results of previous meetings, presentations regarding work accidents, identification of potential work accidents in estate and mill, discussion of the results of the P2K3LHS checklist, and other OHS issues.</p> <p>b. Quarter Report of P2K3 to Manpower Office of Sumatera Utara Province (DPTP PK WIL IV). Samples of document that has been reviewed during audit</p>	Complied

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		<p>such as:</p> <ul style="list-style-type: none"> Letter No. 11/PLM-II/2024 dated 19 February 2024 regarding reporting of the P2K3 Report Perlarian POM for the four quarter of 2023. Letter No. G/09/PLE/2024 dated 19 February 2024 regarding reporting of the P2K3 Report Perlarian Estate for the four quarter of 2023. Letter No. G/25/PLE/2023 dated 17 October 2023 regarding reporting of the P2K3 Report Perlarian Estate for the thirs quarter of 2023. Letter No. 001/I/TLE-Disnaker/2024 dated 29 January 2024 regarding reporting of the P2K3 Report Tolan Estate for the four quarter of 2023. <p>c. Documentation of accident record and the calculation of LTA Mill and Estate has been reviewed for period January to December 2023.</p> <p>d. Annual review of HIRADC, last review was on 13 February 2024 for Perlarian POM, on 19 February 2024 for Perlarian Estate and Tolan Estate.</p> <p>e. Annual Review of OHS Program, the last one was on 11 January 2024.</p> <p>Based on the results of interviews with workers of Mill (process operator) and Estate (harvester, pesticide operator, manuring, and nursery), it is known that every day when the morning muster is carried out, the supervisor will check the completeness of the PPE of the workers and will deliver a safety briefing. Meanwhile, every month an OHS inspection is held to see how it applies to all units.</p> <p>Based on the explanation above, it can be concluded that the certification unit has monitored the effectiveness of the OHS plan to handle OHS risk to people.</p>	
Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.			
3.7.1	(C) A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender- specific needs, and which	In Perlarian POM, training program prepared on annual basis "Annual Training Program 2024" dated 2 January 2024. Verified: RSPO/ISPO/ISCC training planned January 2024; ISO9001:2015 training planned May 2024; First Aid training planned February 2024; Hazardous waste handling training planned	Complied

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	<p>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>April 2024; MSDS training for storekeeper planned February 2024; Palm Oil Mill Maintenance training planned August 2024; Emergency response training planned February 2024; Loading Ramp Work Instructions training planned June 2024; Sterilizer Work Instructions training planned June 2024; Hoisting Crane Work Instructions training planned July 2024; Press Station Work Instructions training planned July 2024; Clarification Station Work Instructions training planned August 2024; Kernel Plant Work Instructions training planned August 2024; Biogas Plant Work Instructions training planned November 2024; Laboratory Work Instructions training planned December 2024.</p> <p>In Perlarian Estate, training program prepared on annual basis and the training record maintained and updated. Training program for year 2023 verified: Harvesting and FFB standard planned for February 2023; Spraying training planned for January 2023; Manuring training planned for January 2023; MSDS training planned for October 2023; Pest & disease, Ganoderma Treatment training planned for April 2023; Leaf Sampling Unit training planned for December 2023; Sprayer calibration training planned for January 2023; Safety driving training planned for February 2023; Hazardous waste handling training planned for April 2023; RSPO and ISPO P&C training planned for December 2023; First Aid Training planned for February 2023.</p> <p>Training program for year 2024 verified: Harvesting and FFB standard planned for June 2024; Spraying training planned for April 2024; Manuring training planned for May 2024; MSDS training planned for October 2024; Pest & disease, Ganoderma Treatment training planned for April 2024; Leaf Sampling Unit training planned for December 2024; Sprayer calibration training planned for January 2024; Safety driving training planned for July 2024; Hazardous waste handling training planned for June 2024; RSPO and ISPO P&C training planned for December 2024; First Aid Training planned for February 2024.</p> <p>In Tolan Estate, training program prepared on annual basis and the training record maintained and updated. Training program for year 2023 verified: Harvesting and FFB standard planned for July 2023; Spraying training planned for March and September 2023; Manuring training planned for January and July</p>	
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		<p>2023; MSDS training planned for October 2023; Pest & disease, Ganoderma Treatment training planned for March, April, June, September, October and December 2023; Training for operating vehicle, heavy machineries, generator planned for March 2023; Hazardous waste handling and MSDS training planned for August 2023; ISCC, RSPO and ISPO P&C training planned for July 2023; First Aid Training planned for May 2023; HCV training planned for December 2023.</p> <p>Training program for year 2024 verified: Harvesting and FFB standard planned for July 2024; Harvesting near Electric Lines training planned for February and August 2024; Spraying training planned for March and September 2024; Manuring training planned for January and July 2024; MSDS training planned for October 2024; Pest & disease (LSU) training planned for January 2024; Pest & disease (Ganoderma) training planned for April and November 2024; Black Bunch Census training planned for March, June, September, December 2024; Vehicle Operation training planned for May 2024; MSDS and Hazardous waste handling training planned for August 2024; RSPO and ISPO P&C training planned for July 2024; First Aid Training planned for May 2024; HCV training planned for December 2024.</p> <p>Training program for smallholder nurtured by PT Tolan Tiga Indonesia year 2024: RSPO P&C socialization, fertilizer training, harvesting training, weed control and integrated pest management training planned for April and November 2024.</p>	
3.7.2	<p>Records of training are maintained, where appropriate on an individual basis.</p> <p>- Minor compliance -</p>	<p>Training record for Perlabian POM in year 2023 verified:</p> <ul style="list-style-type: none"> - Kernel Plant Work Instructions training dated 5 June 2023. The trainer is the Head of Process, training attended by 3 kernel station operators. The training material comprise of: SOP Kernel Plant (Doc No.POM-06-02/28-01-2022/Rev.5 Kernel), HIRADC, Environmental Aspect-Impact for Kernel Plant. - Sterilizer station Work Instructions training dated 20 June 2023. The trainer is the Mill Head Assistant, training attended by 8 sterilizer station operators. The training material comprise of: SOP Sterilizer Plant (Doc No.POM-02- 	Complied

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		<p>02/29-04-2022/Rev.3 Sterilizer), HIRADC, Environmental Aspect-Impact for sterilizer.</p> <p>The training program in Perlavian POM year 2024 have partially delivered as per program. Verified: Boiler Station Work Instructions training, dated 1 February 2024. The trainer is Mill Head Assistant, with training participants 3 boiler attendants. Training material sighted comprise of Work Instruction Steam Plant (Doc No.POM-07-01/29-04-2020/Rev.3 Steam Plant), HIRADC for boiler station, Aspect-Impact for boiler station activity, Emergency Response Plan for boiler station.</p> <p>Training record verified:</p> <ul style="list-style-type: none"> - For Perlavian Estate: Training Black Bunch Census and Leaf Sampling Unit, carried out 18 April 2023; attended by 6 pest and disease workers; 6 Field Assistants. Training material based on SOP Leaf Sampling Unit (LSU) and Rachis Sample Unit (RSU) No.OPM-06-03/02/10-2017/R2. - For Perlavian Estate: Training Vehicle Check carried out on 17 February 2024; attended by 17 workers. Training material and attendance list sighted. The training material based on "Pemeriksaan dan Perawatan Harian Kendaraan" listed an explanation of checklist for vehicle road-worthiness. - For Tolan Estate: MSDS and NFPA training for Hazardous Waste handling carried out 29 August 2023, attended by 13 sprayer team and 1 safety officer. - For Tolan Estate: RSPO, ISPO, ISCC training carried out 22 September 2023, attended by Estate Manager, 9 Field and Office Assistants; 2 Clerks. - For Tolan Estate: Harvesting near Electric Lines training carried out on 6 February 2024, attended by 7 harvesters Division I, II, III, IV 	
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		<p>Training records for sampled employees verified:</p> <p>Perlabian POM:</p> <ul style="list-style-type: none"> - Agus Herianto (Clarification station): ISO 9001 training 4 November 2009; Emergency Response Plan training 30 January 2010; Production machines maintenance training 8 February 2012; Clarification station work instructions training 13 September 2013; RSPO training 4 March 2016; Work Instructions-Aspect & Impact-HIRADC training 14 September 2017, 13 August 2018, 19 August 2019, 21 August 2021; Company policy training 22 July 2021. - Arfansyah (Mechanic): Training repair hydrant pump 22 July 2020; SCBA use training 4 May 2021; Palm Oil Mill maintenance and HIRADC training 26 July 2022; Fire fighting simulation and fire extinguisher use training 6 February 2023; - Rino Anggoro (Kernel station): Work instruction and laboratory format training 13 March 2011; Chemical labelling system training 20 October 2012; Boiler water analysis, CPO dirt and standardization training 5 June 2013; Godown work instructions training dated 6 March 2014; Kernel Plant Work Instructions training-HIRADC-Aspect & Impact 19 October 2018, 10 October 2019, 16 October 2020, 22 September 2021, 10 August 2022. - Ucok Merdeka (Hoisting crane): Training Mill Processing 16 August 2016; Hoisting Crane and Thresher training 16 November 2016, 5 August 2019, 18 July 2020, 23 July 2021, 21 June 2022 <p>Perlabian Estate:</p> <ul style="list-style-type: none"> - Arbianto (Mandore Upkeep): training on principle & criteria dated 13 May 2017; training LSU 12 August 2019; Training Ganoderma identification 21 October 2019; first aid kit training 7 February 2023; Training Fire Fighting 13 February 2024. - Kriswanto (sprayer): Socialization SA-15 knapsack 15 November 2017; training spraying 2 September 2019; training spraying 4 March 2020; MSDS training 26 February 2020; MSDS training 20 December 2021; sprayer 	
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		<p>calibration training 20 July 2022; sprayer calibration training 24 January 2024.</p> <ul style="list-style-type: none"> - Sujarmin (sprayer): Training Sprayer Calibration 20 July 2022; Training spraying 16 January 2023; Training MSDS 10 October 2023; Sprayer calibration training 24 January 2024; - Heri Kuswanto (Harvester): Harvesting training & FFB quality 15 October 2020; Harvesting training & FFB quality 5 October 2021; Training FFB quality 10 February 2024. - Edwin (harvester): Harvesting training & FFB quality 15 October 2020; Harvesting training & FFB quality 5 October 2021; Training FFB quality 10 February 2024. <p>Tolan Estate:</p> <ul style="list-style-type: none"> - Juliadi (Godown keeper): MSDS training 28 September 2016; Hazardous waste training 15 December 2017; HCV training 9 September 2019; Symbol and label for hazardous waste training dated 4 October 2019; First aid training dated 2 June 2023. - Suryono (transport worker): Operating vehicle training 30 April 2021; Operating heavy machinery training 23 July 2022; Operating generator training 21 September 2023. - Abdul Haris Sagala (workshop): Operating vehicle training 30 April 2021; Operating heavy machinery training 23 July 2022; Operating generator training 21 September 2023. - Wildan Marpaung (Hospital Assistance): MSDS Training and Hazardous waste training 4 October 2019; First Aid Kit Training 11 May 2020; First Aid Kit Training 27 February 2021; First Aid Kit Training 2 June 2023. - Nirwansyah Saragih (tractor driver): Certification Training for Lifting and Carrying Vessel by CV Esti Makarya Citra Oetama, Certificate "Sertifikat Pembinaan Teknik Keselamatan dan Kesehatan Kerja Bidang Pesawat Angkat 	
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		<p>dan Angkut Operator K3 Traktor" dated 24 June 2016. License under extension process.</p> <ul style="list-style-type: none"> - Sugeng Tuwono (backhoe loader driver): Certification Training for Lifting and Carrying Vessel by PT Elbana Industrial, Certificate "Sertifikat Pembinaan Teknik Keselamatan dan Kesehatan Kerja Bidang Pesawat Angkat dan Angkut Operator K3 Backhoe Loader" dated 28 March 2014. License valid until 16 December 2024. 	
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> <ul style="list-style-type: none"> - Minor compliance - 	<p>RSPO Supply Chain training is part of annual training program in each Operating Unit. In year 2023, Perlabian POM conducted "Supply Chain RSPO & ISCC Training" dated 25 August 2023. The training attended by 8 personnel including weighbridge operators, mill head assistant, office assistant. The training module includes information on general supply chain requirements, track and trace principle, supply chain options, RSPO Supply Chain Certification Standard 2020. Weighbridge operators, CPO and PK dispatch officer confirmed they received training and socialization on supply chain principles for RSPO, ISPO and ISCC. Supply Chain socialization for CPO transporter's drivers carried out 20 February 2024 for 5 drivers from Sahabat and 2 drivers from CV Jasa Sahabat Abadi; carried out 23 February 2024 for 3 drivers CV Felindo and 2 drivers from Bersama Karya Transport.</p>	Complied
<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</p>	<p>PT Tolan Tiga Indonesia – Perlabian POM implementing RSPO SCCS module Identity Preserved; the palm oil mill only received and processed FFB from certified supply base (company-owned): Perlabian Estate and Tolan Estate.</p>	Complied

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	used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.		
3.8.2	<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 Tolan Tiga Indonesia – Perlabian POM implementing RSPO SCCS module Identity Preserved; the palm oil mill only received and processed FFB from certified supply base (company-owned): Perlabian Estate and Tolan Estate.</p> <p>The certificate holder is not implementing RSPO SCCS module Mass Balance.</p>	Not Applicable
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&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 estimate annual tonnage for certified FFB, CPO and PK are available in the Estate and Mill annual production budget for 12 months since last surveillance assessment. The FFB tonnage received from all certified supply bases. Perlabian POM received certified raw material (Fresh Fruit Bunch) from its own estate: Perlabian Estate and Tolan Estate.</p> <p>The certification of Estates is fall under PT Tolan Tiga Indonesia – Perlabian POM with certificate number RSPO 555208, first certification started on 17 May 2010, second certification started on 17 May 2015 and third certification started on 17 May 2020, certificate for PT Tolan Tiga Indonesia-Perlabian POM valid until 16 May 2025.</p> <p>Currently the unit of certification was being audit for fourth Annual Surveillance Assessment after the second recertification.</p>	Complied
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>PT Tolan Tiga Indonesia – Perlabian Palm Oil Mill has been registered in RSPO IT Platform with registered ID number RSPO_PO1000000099.</p>	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the</p>	<p>PT Tolan Tiga Indonesia has a written procedures and/work instruction for ensuring the implementation of RSPO Supply Chain Standard. The procedure is SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-</p>	Complied

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	<p>applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<p>2019/Rev.0 dated 18 March 2019. Procedure completed with the flow diagram of FFB receiving, processing in POM, Receiving and shipping of CPO. Person responsible for implementation of RSPO Supply Chain standard at the POM is the Mill Manager. The procedure is complete and up to date covering the implementation of all elements in the supply chain requirements, such as:</p> <ul style="list-style-type: none"> a. Sales process, covering from contract approval to delivery of oil palm product (CPO and PK) including information of supply chain mechanism; b. Process at the estates, covers harvesting, FFB and loose fruit delivery include harvesting record and delivery to the Palm Oil Mill; c. Process at Palm Oil Mill covers FFB and loose fruit receiving, identification, production process, delivery of product and recording; d. Evaluation by CB; e. Transportation records; f. Internal control; g. Contractor control. <p>The mill only receives and process certified FFB, therefore the procedure for receiving and processing non-certified FFB is not applicable.</p> <p>The mill has complete and up to date records and reports that demonstrated compliance with the Identity Preserved requirements including training records. Record seen data of FFB received, CPO and PK stock, production, dispatch, OER, KER.</p> <p>In year 2023, Perlavian POM conducted "Supply Chain RSPO & ISCC Training" dated 25 August 2023. The training attended by 8 personnel including weighbridge operators, mill head assistant, office assistant. The training module includes information on general supply chain requirements, track and trace principle, supply chain options, RSPO Supply Chain Certification Standard 2020.</p> <p>Available records and report that demonstrated compliance with the RSPO supply chain requirement, e.g. Daily Production Figure for 31 August 2023: FFB</p>	
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		<p>received month todate was 18,930.13 MT; year todate was 110,197.82 MT. CPO produced month todate was 4,202.96 MT; year todate was 24,920.02 MT. PK produced month todate was 1,113.35 MT; year todate was 6,368.08 MT. OER month todate was 22.24%; year todate was 22.08%. KER month todate was 5.89%; year todate was 5.79%. CPO dispatched month todate was 5,170.29 MT; year todate is 23,723.20 MT. PK dispatched month todate was 1,180.18 MT; year todate was 6,241.34 MT.</p> <p>Monthly production report is available containing records of FFB received by Perlabian POM from Perlabian Estate and Tolan Estate. All FFB received by Perlabian POM are certified. The record contains CPO and PK production, dispatch and stocks. Extraction rate of CPO and PK are recorded as well.</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>Procedure for Internal Audit refer to SOP Routine Visit and Internal Audit No.ENC-01-02/04-03-2019/Rev.2 date 18 March 2019. In the procedure, Section 6. Frequency and Timing stipulates the internal audits are conducted at least once a year according to the standards referred to.</p> <p>Section 5.4 Implementation of Routine/Internal Audit Visits stipulates: <i>In general, non-conformities in each of the principle and criteria, rules and requirement of the sustainable system are categorized under major, minor and observation. Such findings must be immediately followed up. The unit manager may undertake to implement corrections and may also plan improvements according to result of internal audit. Recommended improvement must be completed with timeframe. A review of the non-compliance found in a previous internal audit should be made on the next visit.</i></p> <p>Internal audit report for Perlabian POM carried out 9-10 February 2024, audit was against RSPO P&C 2018 Indonesia National Interpretation 2020. The internal auditor assessed Criteria 3.8 related to RSPO SCCS. There were 12 Observations identified during the visit. As at check by audit team 26 February 2024, the findings were all closed/rectified.</p>	Complied

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		<p>Perlabian POM demonstrate Management review carried out 15 February 2024. The input discussed during management review: internal audit findings and the correction; evaluation of waste and pollution in Perlabian POM; analysis on domestic wastewater quality; analysis on domestic waste volume; POME volume and quality monitoring; Water use per tonne FFB processed; social issues.</p> <p>Management review has discussed:</p> <ul style="list-style-type: none"> • Results of internal audits; internal audit in Perlabian POM conducted on 9-10 February 2024, by SND RMO NS Team, summary of finding and corrective action have been documented in Visit Report SND Team. • Customer feedback: Based on review of customer feedback conducted by Marketing Department, there is no complaint related CPO and PK quality sold by Perlabian POM. • Process performance and product conformity. FFB process performance, throughput, oil losses and kernel losses. • Status of preventive and corrective actions. All finding discussed in this Management Review have been closed and attached in the minutes of management review. • Follow-up actions from management reviews. Result of previous management review were always discussed, mostly regarding performance, target achievement and FFB quality. • Changes that could affect the management system. Installing hydraulic door for sterilizer. • Recommendations for improvement: follow up process for FFB quality and losses, installing hydraulic door for sterilizer. 	
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>PT Tolan Tiga Indonesia prepare a weighbridge system in Perlabian POM that only RSPO certified FFB received. These FFB source are certified under PT Tolan Tiga Indonesia – Perlabian POM certificate (RSPO 555208). Based on interview with weighbridge operators, Perlabian POM only received certified FFB from company-owned plantation: Perlabian Estate and Tolan Estate.</p>	Complied

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	<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 Tolan Tiga Indonesia – Perlavian POM has verified the status of the supply base certificate during Internal Audit on 9-10 January 2024, with certificate number RSPO 555208, valid until 16 May 2025.</p> <p>The unit of certification has demonstrated SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. Chapter 5.2 of the procedure indicates the Weighbridge Clerk has responsibility to input data and print "Receiving Slip" based on FFB Delivery Note, 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>The procedure explains Operating Unit can coordinate to an evaluation with CB about the quota between the OU and the CB (projected overproduction). During this annual surveillance assessment, Perlavian POM was not over sold the CPO and PK production.</p> <p>The procedure explains control of product non-conformity refer to Marketing Department Manual - SOP Customer Complaint Handling No.MKT-03-02/26-04/2018/rev.1 dated 30 April 2018. The procedure covers returned of all non-conforming product and/or documents. The responsible is Operating Unit Manager and Senior Manager Marketing. Based on audit, Perlavian POM only receive and processed sustainable FFB. There has been no complaint from buyer.</p> <p>Records of purchasing goods in available:</p> <ul style="list-style-type: none"> - Delivery FFB from Estate "SPB TBS" No.TLE/129608 dated 31 Agustus 2023, from Tolan Estate, Blok D8; OP 2004, total 301 bunches. Stamp Sustainable Product-IP. Receiving Slip/weighbridge ticket No.FFB23016971W, dated 31 August 2023; Truck BK8466YF; Tolan Estate; product FFB; D/O No.129608; nett weigh 6,650 kg, Block 04D08, Division F02, total 301 bunches. - Delivery FFB from estate "SPB TBS" No.PLE/001465 dated 31 August 2023, from Division F3, Perlavian Estate, Blcok B21A; OP 2008; total 458 bunches; Truk No. BK8141YH. Stamp Sustainable Product-IP. Receiving 	
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		<p>Slip/weighbridge ticket No.FFB23016935W, 31 August 2023; from Perlarian Estate; product FFB; D/O No.001465; nett weight 6,570 kg, Block 05B21A, Divisi F03, total 433 bunches.</p> <ul style="list-style-type: none"> - Delivery FFB from Estate "SPB TBS" No.PLE/003646 dated 31 January 2024, from Perlarian Estate, Division 2, Block 12J21A; OP 2012, total 480 bunches. Stamp Sustainable Product-IP. Receiving Slip/Weighbridge ticket No.FFB24002055W, 31 January 2024; Truck ID No.BK8031YN; from Perlarian Estate; Product FFB; D/O No.003646; nett weight 5,690 kg; Block 12J21A, Division 2, total 480 bunches. - Delivery FFB from Estate "SPB TBS" No.PLE/136040 dated 31 January 2024, from Division 2 Tolan Estate, Block 98E16; OP 1998; total 302 bunches; Truck ID BK8030YN. Stamp Sustainable Product-IP. Receiving Slip/Weighbridge ticket No.FFB24002066W, dated 31 January 2024; Tolan Estate; product FFB; D/O No.136040; nett weight 6,910 kg, Block 98E16, Division 2, total 302 bunches; Truck No. BK8030YN. 	
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; 	<p>The SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019 regulated that several information required by the standard must be available in the sales and goods out document. Sales and goods out documents seen are as follows:</p> <p>CSPO</p> <ul style="list-style-type: none"> - Contract No.2023/CPO/TTI-MM/11 between Seller: PT Tolan Tiga Indonesia (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT Intibenua Perkasa Tama (address Lubuk Gaung, Dumai, Riau, Indonesia); dated 13 October 2023; for sales of 250 MT Crude Sustainable Palm Oil – RSPO SG; Certificate No. RSPO 555208. - Delivery Order No.2023/TTI-CPO/LTC/DO/IBP/21 dated 19 October 2023, ordering shipment of 250 MT CPO – RSPO IP, from PT Tolan Tiga Indonesia – Perlarian POM to buyer PT Intibenua Perkasa Tama. 	Complied

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	<p>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</p> <p>g) The quantity of the products delivered;</p> <p>h) Any related transport documentation;</p> <p>i) A unique identification number.</p>	<ul style="list-style-type: none"> - Dispatch Slip No.CPO23001110W, dated 19 October 2023; from PT Tolan Tiga Indonesia – Perlabian POM; product CPO; quantity 27.50 MT; DO No.2023/TTI-CPO/LTC/DO/IBP/21; Certificate RSPO 555208; Module Sustainable Product IP; Vehicle ID No. BK8827VY; CV Jasa Sahabat Abadi; - Shipping Announcement, with transaction ID No. TR-662a7abf-2995 for 461.63 MT CSPO Segregated; from PT Tolan Tiga Indonesia – Perlabian POM (RSPO_PO1000000099) as Seller to PT Intibenua Perkasa Tama-Lubuk Gaung (RSPO_PO1000001472) as Buyer. Shipping date 31 October 2023; Contract 2023/LTC-CPO/TTI-MM/11; Confirmation date 10 November 2023. - Contract No.2023/PL-CPO/04 between Seller: PT Tolan Tiga Indonesia (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT Multimas Nabati Asahan (address Kuala Tanjung, Riau); dated 3 April 2023; for sales of 250 MT Crude Sustainable Palm Oil – RSPO IP; Certificate No. RSPO 555208. - Delivery Order No.2023/TTI-CPO/DO/07 dated 5 April 2023, ordering shipment of 250 MT CPO – RSPO IP, from PT Tolan Tiga Indonesia – Perlabian POM to buyer PT Multimas Nabati Asahan. - Dispatch Slip/Weighbridge ticket No.CPO23000304W, dated 10 April 2023; from PT Tolan Tiga Indonesia – Perlabian POM; product CPO; quantity 28.24 MT; DO No.2023/TTI-CPO/DO/07; Certificate RSPO 555208; Module Sustainable Product IP; Vehicle ID No.BK8414FT; CV Sahabat; - Shipping Announcement, with transaction ID No. TR-5120cf81-695d for 471.90 MT CSPO IP; from PT Tolan Tiga Indonesia – Perlabian POM (RSPO_PO1000000099) as Seller to PT Multimas Nabati Asahan (RSPO_PO1000000150) as Buyer. Shipping date 17 May 2023; Contract 2023/PL-CPO/04; Confirmation date 26 May 2023. 	
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		<ul style="list-style-type: none"> - Contract No.2023/LTC-CPO/TTI/03 between Seller: PT Tolan Tiga Indonesia (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT Ivo Mas Tunggal (address Jalan Kelapa RT17, Kelurahan Lubuk Gaung, Kecamatan Sungai Sembilan, Dumai, Riau); dated 20 January 2023; for sales of 1,000 MT Crude Sustainable Palm Oil – RSPO IP; Certificate No. RSPO 555208. Separated into 4 DO: No.2023/TTI-CPO/LTC/DO/07, 08, 09, 10 - Delivery Order No.2023/TTI-CPO/LTC/DO/08 dated 6 February 2023, ordering shipment of 250 MT CPO – RSPO IP, from PT Tolan Tiga Indonesia – Perlabian POM to buyer PT Ivo Mas Tunggal. - Dispatch Slip/Weighbridge ticket No.CPO23000127W, dated 8 February 2023; from PT Tolan Tiga Indonesia – Perlabian POM; product CPO; quantity 22.89 MT; DO No.2023/TTI-CPO/LTC/DO/08; Certificate RSPO 555208; Module Sustainable Product IP; Vehicle ID No.BK9298CE; CV Sahabat; - Shipping Announcement, with transaction ID No.TR-04793516-f408 for 968.81 MT CSPO IP; from PT Tolan Tiga Indonesia – Perlabian POM (RSPO_PO1000000099) as Seller to PT Ivomas Tunggal-Lubuk Gaung Refinery (RSPO_PO1000003168) as Buyer. Shipping date 28 February 2023; Contract 2023/TC-CPO/TTI/03; Confirmation date 21 March 2023. - Contract No.2023/PL-CPO/03 between Seller: PT Tolan Tiga Indonesia (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT Multimas Nabati Asahan (address Kuala Tanjung, Dumai, Riau, Indonesia); dated 28 February 2023; for sales of 250 MT Crude Sustainable Palm Oil – RSPO IP; Certificate No.RSPO 555208. - Delivery Order No.2023/TTI-CPO/DO/05 dated 7 March 2023, ordering shipment of 250 MT CPO – RSPO IP, from PT Tolan Tiga Indonesia – Perlabian POM to buyer PT Multimas Nabati Asahan. - Dispatch Slip/Weighbridge ticket No.CPO23000197W, dated 7 March 2023; 	
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		<p>from PT Tolan Tiga Indonesia – Perlabian POM; product CPO; quantity 25.45 MT; DO No.2023/TTI-CPO/DO/05; Certificate RSPO 555208; Module Sustainable Product IP; Vehicle ID No.BK9619CE; CV Sahabat;</p> <ul style="list-style-type: none"> - Shipping Announcement, with transaction ID No.TR-d4be4932-2718 for 46.7 MT CSPO IP; from PT Tolan Tiga Indonesia – Perlabian POM (RSPO_PO1000000099) as Seller to PT Multimas Nabati Asahan (RSPO_PO1000000150) as Buyer. Shipping date 17 May 2023; Contract 2023/PL-CPO/03; Confirmation date 26 May 2023. - Contract No.2023/CPO/TTI-MM/07 and No.2023/CPO/TTI-MM/08 between Seller: PT Tolan Tiga Indonesia (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT Intibenua Perkasa Tama (address Lubuk Gaung, Dumai, Riau); dated 3 July 2023 and 20 July 2023; for sales of 250 MT and 250 MT Crude Sustainable Palm Oil – RSPO SG; Certificate No. RSPO 555208. - Delivery Order No.2023/TTI-CPO/LTC/DO/IBP/14 dated 6 July 2023, ordering shipment of 250 MT CPO – RSPO SG, from PT Tolan Tiga Indonesia – Perlabian POM to buyer PT Intibenua Perkasa Tama, Lubuk Gaung. - Delivery Order No.2023/TTI-CPO/LTC/DO/IBP/16 dated 25 July 2023, ordering shipment of 250 MT CPO – RSPO SG, from PT Tolan Tiga Indonesia – Perlabian POM to buyer PT Intibenua Perkasa Tama, Lubuk Gaung. - Dispatch Slip/Weighbridge ticket No.CPO23000665W, dated 26 July 2023; from PT Tolan Tiga Indonesia – Perlabian POM; product CPO; quantity 25.33 MT; DO No.2023/TTI-CPO/LTC/DO/IBP/14 and No.2023/TTI-CPO/LTC/DO/IBP/16; Certificate RSPO 555208; Module Sustainable Product IP; Vehicle ID No.BK8556EN; CV Sahabat; - Shipping Announcement, with transaction ID No.TR-05b12284-f9f9 for 7.41 MT CSPO SG; from PT Tolan Tiga Indonesia – Perlabian POM (RSPO_PO1000000099) as Seller to PT Intibenua Perkasa Tama, Lubuk 	
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		<p>Gaung (RSPO_PO1000001472) as Buyer. Shipping date 3 August 2023; Contract 2023/CPO/TTI-MM/07; Confirmation date 11 August 2023.</p> <ul style="list-style-type: none"> - Shipping Announcement, with transaction ID No.TR-825ed4ec-0742 for 249.64 MT CSPO SG; from PT Tolan Tiga Indonesia – Perlabian POM (RSPO_PO1000000099) as Seller to PT Intibenua Perkasa Tama, Lubuk Gaung (RSPO_PO1000001472) as Buyer. Shipping date 8 August 2023; Contract 2023/CPO/TTI-MM/08; Confirmation date 11 August 2023. - Contract No.2023/CPO/TTI-MM/09 between Seller: PT Tolan Tiga Indonesia (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT Intibenua Perkasa Tama (address Lubuk Gaung, Dumai, Riau, Indonesia); dated 25 July 2023; for sales of 250 MT Crude Sustainable Palm Oil – RSPO SG; Certificate No. RSPO 555208. - Delivery Order No.2023/TTI-CPO/LTC/DO/IBP/18 dated 1 August 2023, ordering shipment of 250 MT CPO – RSPO IP, from PT Tolan Tiga Indonesia – Perlabian POM to buyer PT Intibenua Perkasa Tama, Lubuk Gaung. - Dispatch Slip No.CPO23000765W, dated 8 August 2023; from PT Tolan Tiga Indonesia – Perlabian POM; product CPO; quantity 25.43 MT; DO No.2023/TTI-CPO/LTC/DO/IBP/18; Certificate RSPO 555208; Module Sustainable Product IP; Vehicle ID No.BK9619BE; CV Sahabat; - Shipping Announcement, with transaction ID No.TR-5f9f40e3-c845 for 451.86 MT CSPO Segregated; from PT Tolan Tiga Indonesia – Perlabian POM (RSPO_PO1000000099) as Seller to PT Intibenua Perkasa Tama-Lubuk Gaung (RSPO_PO1000001472) as Buyer. Shipping date 31 August 2023; Contract 2023/CPO/TTI-MM/08; Confirmation date 7 September 2023. - Contract No.2024/PL-CPO/01 between Seller: PT Tolan Tiga Indonesia (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT Multimas Nabati Asahan (address Kuala Tanjung, Indonesia); dated 22 	
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		<p>January 2024; for sales of 170 MT Crude Sustainable Palm Oil – RSPO IP; Certificate No. RSPO 555208.</p> <ul style="list-style-type: none"> - Delivery Order No.2023/TTI-CPO/DO/06 dated 26 January 2024, ordering shipment of 170 MT CPO – RSPO IP, from PT Tolan Tiga Indonesia – Perlabian POM to buyer PT Multimas Nabati Asahan. - Dispatch Slip No.CPO24000110W, dated 30 January 2024; from PT Tolan Tiga Indonesia – Perlabian POM; product CPO; quantity 30.79 MT; DO No.2024/TTI-CPO/DO/06; Certificate RSPO 555208; Module Sustainable Product IP; Vehicle ID No.BK8405VA; CV Jasa Sahabat Abadi; - Shipping Announcement, with transaction ID No.TR-771ae785-2534 for 97.53 MT CSPO Identity Preserved; from PT Tolan Tiga Indonesia – Perlabian POM (RSPO_PO1000000099) as Seller to PT Multimas Nabati Asahan (RSPO_PO1000000150) as Buyer. Shipping date 31 January 2024; Contract 2024/PL-CPO/01; Confirmation date 21 February 2024. - Contract No.2023/LTC-CPO/TTI/02 between Seller: PT Tolan Tiga Indonesia (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT Ivo Mas Tunggal (address Jl. Kelapa RT17, Kelurahan Lubuk Gaung, Kecamatan Sungai Sembilan, Dumai, Riau, Indonesia); dated 10 January 2023; for sales of 250 MT Crude Sustainable Palm Oil – RSPO IP; Certificate No. RSPO 555208. - Delivery Order No.2023/TTI-CPO/LTC/DO/03 dated 24 January 2023, ordering shipment of 250 MT CPO – RSPO IP, from PT Tolan Tiga Indonesia – Perlabian POM to buyer PT Ivo Mas Tunggal. - Dispatch Slip No.CPO23000071W, dated 25 January 2023; from PT Tolan Tiga Indonesia – Perlabian POM; product CPO; quantity 25.42 MT; DO No.2023/TTI-CPO/LTC/DO/03; Certificate RSPO 555208; Module Sustainable Product IP; Vehicle ID No.BK8360ME; CV Sahabat; 	
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		<ul style="list-style-type: none"> - Shipping Announcement, with transaction ID No.TR-ad6456ec-cb88 for 149.65 MT CSPO Segregated; from PT Tolan Tiga Indonesia – Perlabian POM (RSPO_PO1000000099) as Seller to PT Ivomas Tunggal-Lubuk Gaung Refinery (RSPO_PO1000003168) as Buyer. Shipping date 28 February 2023; Contract 2023/LTC-CPO/TTI/02; Confirmation date 21 March 2023. - Contract No.2023/CPO/TTI-MM/09 between Seller: PT Tolan Tiga Indonesia (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT Intibenua Perkasa Tama (address Lubuk Gaung, Dumai, Riau, Indonesia); dated 25 July 2023; for sales of 500 MT Crude Sustainable Palm Oil – RSPO SG; Certificate No. RSPO 555208. - Delivery Order No.2023/TTI-CPO/LTC/DO/IBP/18 dated 1 August 2023, ordering shipment of 250 MT CPO – RSPO SG, from PT Tolan Tiga Indonesia – Perlabian POM to buyer PT Intibenua Perkasa Tama. - Dispatch Slip No.CPO23000765W, dated 8 August 2023; from PT Tolan Tiga Indonesia – Perlabian POM; product CPO; quantity 25.43 MT; DO No.2023/TTI-CPO/LTC/DO/IBP/18; Certificate RSPO 555208; Module Sustainable Product IP; Vehicle ID No.BK9619CD; CV Sahabat; - Shipping Announcement, with transaction ID No.TR-d2710248-9b1f for 27.2 MT CSPO Segregated; from PT Tolan Tiga Indonesia – Perlabian POM (RSPO_PO1000000099) as Seller to PT Intibenua Perkasa Tama-Lubuk Gaung (RSPO_PO1000001472) as Buyer. Shipping date 30 September 2023; Contract 2023/LTC-CPO/TTI-MM/09; Confirmation date 18 October 2023. <p>PK.</p> <ul style="list-style-type: none"> - Contract No.2023/LTC-PK/PL/13 between Seller: PT Tolan Tiga Indonesia (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT Sinar Mas Agro Resources and Technology Tbk (address Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat); 	
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		<p>dated 28 November 2023; for sales of 450 MT Crude Sustainable Palm Kernel – RSPO IP; Certificate No. RSPO 555208.</p> <ul style="list-style-type: none"> - Delivery Order No.2023/LTC-PK/PL/DO/16 dated 4 December 2023, ordering shipment of 450 MT PK – RSPO IP, from PT Tolan Tiga Indonesia – Loko PKS Perlarian to buyer PT SMART Tbk. - Dispatch Slip No.PK23000347W, dated 08/12/2023; from PT Tolan Tiga Indonesia – Perlarian POM; product Palm Kernel; quantity 32.52 MT; DO No.2023/LTC-PK/PL/DO/16; Certificate RSPO 555208; Module Sustainable Product IP; Vehicle ID No. BK9548EP; PT Sumatera Lintas Asia; - Shipping Announcement, with transaction ID No. TR-c61b0c9d-b4b7 for 450 MT CSPK IP; from PT Tolan Tiga Indonesia – Perlarian POM (RSPO_PO1000000099) as Seller to PT SMART Tbk, Belawan Refinery (RSPO_PO1000006555) as Buyer. Shipping date 31/12/2023; Contract 2023/LTC-PK/PL/13; Confirmation date 19 January 2024. - Contract No.2023/LTC-PK/PL/01 between Seller: PT Tolan Tiga Indonesia (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT Ivo Mas Tunggal (address Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat); dated 5 January 2023; for sales of 750 MT Crude Sustainable Palm Kernel – RSPO IP; Loko Perlarian. - Delivery Order No.2023/LTC-PK/PL/DO/01 dated 19 January 2023, ordering shipment of 750 MT PK – RSPO IP, from PT Tolan Tiga Indonesia – Loko PKS Perlarian to buyer PT Ivo Mas Tunggal. - Dispatch Slip No.PK23000031W, dated 11/02/2023; from PT Tolan Tiga Indonesia – Perlarian POM; product Palm Kernel; quantity 28.22 MT; DO No.2023/LTC-PK/PL/DO/01; Certificate RSPO 555208; Module Sustainable Product IP; Vehicle ID No.BK9581EL; PT Sumatera Lintas Asia; - Shipping Announcement, with transaction ID No.TR-51c904c9-0191 for 311.25 MT CSPK IP; from PT Tolan Tiga Indonesia – Perlarian POM 	
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		<p>(RSPO_PO1000000099) as Seller to PT Ivo Mas Tunggal, Lubuk Gaung Refinery (RSPO_PO1000006558) as Buyer. Shipping date 28/02/2023; Contract No.2023/LTC-PK/PL/01; Confirmation date 21 March 2023.</p> <ul style="list-style-type: none"> - Contract No.2023/LTC-PK/PL/02 between Seller: PT Tolan Tiga Indonesia (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT Ivo Mas Tunggal (address Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat); dated 25 January 2022; for sales of 700 MT Crude Sustainable Palm Kernel – RSPO IP; Certificate No. RSPO 555208. - Delivery Order No.2023/LTC-PK/PL/DO/02 dated 6 February 2023, ordering shipment of 700 MT PK – RSPO IP, from PT Tolan Tiga Indonesia – Loko PKS Perlabian to buyer PT Ivo Mas Tunggal. - Dispatch Slip No.PK23000039W, dated 10/12/2023; from PT Tolan Tiga Indonesia – Perlabian POM; product Palm Kernel; quantity 28.63 MT; DO No.2023/LTC-PK/PL/DO/02; Certificate RSPO 555208; Module Sustainable Product IP; Vehicle ID No.BK8109WO; PT Sumatera Lintas Asia; - Shipping Announcement, with transaction ID No.TR-86d5aeea-e836 for 513.58 MT CSPK IP; from PT Tolan Tiga Indonesia – Perlabian POM (RSPO_PO1000000099) as Seller to PT Ivo Mas Tunggal, Lubuk Gaung Refinery (RSPO_PO1000006558) as Buyer. Shipping date 28/02/2023; Contract 2023/LTC-PK/PL/02; Confirmation date 21 March 2023. - Contract No.2023/LTC-PK/PL/09 between Seller: PT Tolan Tiga Indonesia (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT Ivo Mas Tunggal (address Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat); dated 29 August 2023; for sales of 800 MT Crude Sustainable Palm Kernel – RSPO IP; Certificate No. RSPO 555208. 	
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		<ul style="list-style-type: none"> - Delivery Order No.2023/LTC-PK/PL/DO/09 dated 4 September 2023, ordering shipment of 800 MT PK – RSPO IP, from PT Tolan Tiga Indonesia – Loko PKS Perlabian to buyer PT Ivo Mas Tunggal. - Dispatch Slip No.PK23000264W, dated 30/09/2023; from PT Tolan Tiga Indonesia – Perlabian POM; product Palm Kernel; quantity 27.57 MT; DO No.2023/LTC-PK/PL/DO/09; Certificate RSPO 555208; Module Sustainable Product IP; Vehicle ID No. BK9444PYY; PT Sumber Kencana Inhu; - Shipping Announcement, with transaction ID No.TR-d08a7a03-15cc for 1,031.99 MT CSPK IP; from PT Tolan Tiga Indonesia – Perlabian POM (RSPO_PO1000000099) as Seller to PT Ivo Mas Tunggal, Lubuk Gaung Refinery (RSPO_PO1000006558) as Buyer. Shipping date 30/09/2023; Contract 2023/LTC-PK/PL/09; Confirmation date 18 October 2023. - Contract No.2023/LTC-PK/PL/11 between Seller: PT Tolan Tiga Indonesia (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT Ivo Mas Tunggal (address Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat); dated 27 October 2023; for sales of 800 MT Crude Sustainable Palm Kernel – RSPO IP; Certificate No. RSPO 555208. - Delivery Order No.2023/LTC-PK/PL/DO/14 dated 3 November 2023, ordering shipment of 800 MT PK – RSPO IP, from PT Tolan Tiga Indonesia – Loko PKS Perlabian to buyer PT Ivo Mas Tunggal. - Dispatch Slip No.PK23000339W, dated 01/12/2023; from PT Tolan Tiga Indonesia – Perlabian POM; product Palm Kernel; quantity 29.18 MT; DO No.2023/LTC-PK/PL/DO/14; Certificate RSPO 555208; Module Sustainable Product IP; Vehicle ID No.BK9519PYY; PT Sumber Kencana Inhu; - Shipping Announcement, with transaction ID No.TR-ea036685-62d5 for 207.21 MT CSPK IP; from PT Tolan Tiga Indonesia – Perlabian POM (RSPO_PO1000000099) as Seller to PT Ivo Mas Tunggal, Lubuk Gaung 	
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		<p>Refinery (RSPO_PO1000006558) as Buyer. Shipping date 31/12/2023; Contract 2023/LTC-PK/PL/11; Confirmation date 19 January 2024.</p> <p>Detail Information available:</p> <ul style="list-style-type: none"> • The name and address of the buyer: PT Ivo Mas Tunggal, address Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat; • The name and address of the seller: PT Tolan Tiga Indonesia, address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan 20112; • The loading or shipment / delivery date: 1 December 2023 based on Dispatch Slip; • The date on which the documents were issued: Contract on 27 October 2023; DO on 3 November 2023; Dispatch Slip on 1 December 2023; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): CSPK RSPO IP notation on all mill records; • The quantity of the products delivered: from sampled dispatch slip: 29.18 MT of PK; • Any related transport documentation: vehicle ID No.BK9519PYY by PT Sumber Kencana Inhu; • Supply chain certificate number of the seller: RSPO 555208. • A unique identification number: Contract No.2023/LTC-PK/PL/11 (verified on all record) 	
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</p>	<p>PT Tolan Tiga Indonesia-Perlabian POM does not outsources its milling activity to any independent third party. However, the certificate holder only outsources the transport activity. Transport for RSPO certified sustainable CPO was managed by PT Tolan Tiga Indonesia, whilst transport of RSPO certified PK was managed by the buyer. Transport of certified CPO performed by several</p>	Complied

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	<p>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> <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance. 	<p>contractor. During transport, legal ownership of CSPO were still under PT Tolan Tiga Indonesia. This evident by sales contract that between PT Tolan Tiga Indonesia and the buyer.</p> <p>Contract with transporter and statement of compliance:</p> <ul style="list-style-type: none"> a. Addendum to contract No.2021/03 dated 6 April 2021 upon "Perjanjian Pengangkutan PT Tolan Tiga Indonesia dengan Pengangkutan Sahabat No.04/Angkutan/CPO/PL/05" signed on 2 December 2014. CV Angkutan Sahabat issued a statement letter signed by Mr. Gunawan Ruslan, dated 1 January 2023. The statement "CV Angkutan Sahabat is willing to comply with RSPO Supply Chain requirement; Angkutan Sahabat is willing to be audited by certification body if needed". b. Addendum to contract No.2021/02 dated 6 April 2021 upon "Perjanjian Pengangkutan PT Tolan Tiga Indonesia dengan CV Jasa Sahabat Abadi No.2019/Angkutan/CPO/PL-SMRT/02" signed on 17 January 2019. CV Jasa Sahabat Abadi issued a statement letter signed by Mr. Christiantosanajaya Ong, dated 27 February 2024. The statement "CV Jasa Sahabat Abadi is willing to comply with RSPO Supply Chain requirement; CV Jasa Sahabat Abadi is willing to be audited by certification body if needed". c. "Perjanjian Pengangkutan PT Tolan Tiga Indonesia dengan PT Bersama Karya Transport No.2023/Angkutan/CPO/PL-MNA/01" dated 15 May 2023. CV Sejahtera Abadi issued a statement letter signed by Mr. Wilyanto Tentunata, dated 1 January 2023. The statement "PT Bersama Karya Transport is willing to comply with RSPO Supply Chain requirement; PT Bersama Karya Transport is willing to be audited by certification body if needed". d. Addendum to contract No.2021/04 dated 6 April 2021 upon "Perjanjian Pengangkutan PT Tolan Tiga Indonesia dengan CV Felindo No.2015/Angkutan/CPO/PL-SMRT/04" signed on 17 January 2019. CV Felindo issued a statement letter and signed 1 January 2023. The statement "CV Felindo is willing to comply with RSPO Supply Chain requirement; CV Felindo is willing to be audited by certification body if needed". 	
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		PT Tolan Tiga Indonesia – Perlarian POM has demonstrated SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. Section 5.4 Evaluation by Certification Body stipulates the Contractor Control: POM ensures that related contractors in the product supply chain have followed applicable procedures and audited contractors by internal/external if necessary.																
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>Perlarian POM prepare a list, recording contact person names, contact details and addresses of all contractors used for transport of CSPO. From last assessment, CV Sejahtera Abadi was replaced by PT Bersama Karya Transport.</div> <table><tr><th>Contractor</th><th>Contact person</th><th>Address</th></tr><tr><td>CV Angkutan Sahabat</td><td>Gunawan Ruslan</td><td>Jl. Asia Raya Blok CC No.14, Medan, Sumatera Utara, Indonesia</td></tr><tr><td>CV Jasa Sahabat Abadi</td><td>Cristiantosanaja ya Ong</td><td>Jl. Besar Kisaran – Medan, KM.5.8, Sidomulyo, Pulo Bandring, Asahan, Sumatera Utara, Indonesia</td></tr><tr><td>CV Felindo</td><td>Sutrisno Sukijung</td><td>Jl. Gunung Krakatau Ujung No.62, Medan, Sumatera Utara, Indonesia</td></tr><tr><td>PT Bersama Karya Transport</td><td>Willyanto Tentunata</td><td>Jl.B. Katamso Dalam No.64N/25, Medan, Sumatera Utara, Indonesia</td></tr></table>	Contractor	Contact person	Address	CV Angkutan Sahabat	Gunawan Ruslan	Jl. Asia Raya Blok CC No.14, Medan, Sumatera Utara, Indonesia	CV Jasa Sahabat Abadi	Cristiantosanaja ya Ong	Jl. Besar Kisaran – Medan, KM.5.8, Sidomulyo, Pulo Bandring, Asahan, Sumatera Utara, Indonesia	CV Felindo	Sutrisno Sukijung	Jl. Gunung Krakatau Ujung No.62, Medan, Sumatera Utara, Indonesia	PT Bersama Karya Transport	Willyanto Tentunata	Jl.B. Katamso Dalam No.64N/25, Medan, Sumatera Utara, Indonesia	Complied
Contractor	Contact person	Address																
CV Angkutan Sahabat	Gunawan Ruslan	Jl. Asia Raya Blok CC No.14, Medan, Sumatera Utara, Indonesia																
CV Jasa Sahabat Abadi	Cristiantosanaja ya Ong	Jl. Besar Kisaran – Medan, KM.5.8, Sidomulyo, Pulo Bandring, Asahan, Sumatera Utara, Indonesia																
CV Felindo	Sutrisno Sukijung	Jl. Gunung Krakatau Ujung No.62, Medan, Sumatera Utara, Indonesia																
PT Bersama Karya Transport	Willyanto Tentunata	Jl.B. Katamso Dalam No.64N/25, Medan, Sumatera Utara, Indonesia																
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.	Perlarian POM inform the audit team changes in the list of CPO transporter through the RSPO P&C Pre-Audit Information checklist.	Complied															
3.8.12	Record keeping	Perlarian Palm Oil Mill has implemented RSPO Supply Chain Certification Standard based on procedure SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. The procedure	Complied															

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	<ul style="list-style-type: none"> 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. 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. 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. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> 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. 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. 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>explains all aspects of supply chain and traceability scope in PT Tolan Tiga Indonesia: FFB harvesting, harvest recording and delivery to Palm Oil Mill; FFB receiving and processing in Palm Oil Mill, CPO and PK production and reporting; CPO and PK dispatch from Palm Oil Mill and receiving in storage tank for delivery; Shipping instruction and preparation; CPO and PK stock balancing post-shipping.</p> <p>Perlabian POM maintains accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. Daily Production Figure for 31 August 2023: FFB received month todate is 18,930.13 MT; year todate is 110,197.82 MT. CPO produced month todate is 4,202.96 MT; year todate is 24,290.00 MT. PK produced month todate is 1,113.35 MT; year todate is 6,368.08 MT. OER month todate is 22.24%; year todate is 22.08%. KER month todate is 5.89%; year todate is 5.79%.</p> <p>CPO dispatched month todate is 5,170.29 MT; year todate is 23,723.20 MT. PK dispatched month todate is 1,180.18 MT; year todate is 6,241.34 MT.</p> <p>The SOP Supply Chain and Traceability of Palm Products No.MKT-03- 06/04-03-2019/Rev.0 dated 18 March 2019; Section 5.2 Production Process stipulates storage and control of recording related to product sales, transportation until product delivery is stored with minimum period of 5 years. Review to the document verified that supply chain's document back to 2023 are available.</p> <p>Daily Production Figure for 31 January 2024: FFB received month todate is 14,100.77 MT; year todate is 14,100.77 MT. CPO produced month todate is 3,003.61 MT; year todate is 3,003.61 MT. PK produced month todate is 823.05 MT; year todate is 823.05 MT. OER month todate is 21.59%; year todate is 21.59%. KER month todate is 5.92%; year todate is 5.92%. CPO dispatched month todate is 3,224.52 MT; year todate is 3,224.52 MT. PK dispatched month todate is 934.51 MT; year todate is 934.51 MT.</p>	
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		<p>Monthly production report is available containing records of FFB received by Perlavian POM from Perlavian Estate and Tolan Estate. All FFB received by Perlavian POM are certified. The record contains CPO and PK production, dispatch and stocks. Extraction rate of CPO and PK are recorded as well.</p> <p>The SOP Supply Chain and Traceability of Palm Products No.MKT-03- 06/04-03-2019/Rev.0 dated 18 March 2019; Section 5.2 Production Process stipulates storage and control of recording related to product sales, transportation until product delivery is stored with minimum period of 5 years.</p> <p>Perlavian POM is able to record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real time basis.</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>Extraction rate is applied to provide reliable estimation of CPO and PK produced. For year 2024, the estimated extraction rate from FFB into CPO is 22.50%, whilst from FFB to PK is 5.80%. Based on Daily Production Figure dated 31 January 2024 for period 1-31 January 2024, actual OER is 21.59% and KER is 5.92%.</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 Oil Extraction Rates (OER) and Kernel Extraction Rates (KER) are monitored on daily basis through sounding result and documented in Daily Production Figure. Based on Daily Production Figure dated 31 August 2023 for period January to August 2023, actual OER is 22.24% and KER is 5.89%.</p> <p>Based on Daily Production Figure dated 31 January 2024 for period 1-31 January 2024, actual OER is 21.59% and KER is 5.92%.</p>	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-</p>	<p>Perlavian POM does not received non-certified FFB. Therefore, no non-certified FFB being entered the processing, no non-certified CPO and PK being produced, no non-certified product being dispatched. Storage tank for CPO dedicated only for certified palm oil. Silo for PK used to store certified product. However, PT Tolan Tiga Indonesia does record losses from CSPO transport as conventional sales (transport claim).</p>	Complied

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	certified oil palm products, including during transport and storage to strive for 100% separation.	Perlabian POM have 4 storage tanks, consist of PLST01 (capacity 700 MT), PLST02 (capacity 500 MT), PLST03 (capacity 3,000 MT) and PLST04 (capacity 3,000 MT). Perlabian POM uses PLST01; PLST02 and PLST03 as the storage tank, whilst PLST04 is used for certified CPO from PT Umbul Mas Wisesa (sister company). Based on site visit to storage tank station, all CPO received in Perlabian POM has a designated piping system to pump the CPO from UMW POM to the tanks and from the tanks to dispatch station. Verified there are no contamination.	
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 Tolan Tiga Indonesia – Perlabian POM is a palm oil mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product (FFB, CSPO and CSPK), therefore the site has been registered in RSPO IT Platform with ID number RSPO_PO1000000099.</p> <p>As a Palm Oil Mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product, Perlabian POM has made Shipping Announcement for certified CPO and PK sold. For example:</p> <ul style="list-style-type: none"> Shipping Announcement, with transaction ID No.TR-ad6456ec-cb88 for 149.65 MT CSPO Segregated; from PT Tolan Tiga Indonesia – Perlabian POM (RSPO_PO1000000099) as Seller to PT Ivomas Tunggal-Lubuk Gaung Refinery (RSPO_PO1000003168) as Buyer. Shipping date 28 February 2023; Contract 2023/LTC-CPO/TTI/02; Confirmation date 21 March 2023. Shipping Announcement, with transaction ID No.TR-d08a7a03-15cc for 1,031.99 MT CSPK IP; from PT Tolan Tiga Indonesia – Perlabian POM (RSPO_PO1000000099) as Seller to PT Ivo Mas Tunggal, Lubuk Gaung Refinery (RSPO_PO1000006558) as Buyer. Shipping date 30/09/2023; Contract 2023/LTC-PK/PL/09; Confirmation date 18 October 2023. <p>During this assessment period, Perlabian POM conducted “Remove” in PalmTrace for several amount of certified product that sold under other scheme and for volume loss during transport. There were 31 remove transactions since last assessment with total removed volume of 9,975.08 MT, that consist of</p>	Complied

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		<p>9,969.88 MT sold as ISCC and 5.20 MT removed because of transport lost. Remove transaction sampled:</p> <ul style="list-style-type: none"> Transaction ID: ST-TR-f78cff5f-8405; dated 10 November 2023; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 499.45 MT. Transaction ID: ST-TR-833e18a5-142b; dated 10 November 2023; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 499.13 MT. Transaction ID: ST-TR-095364d6-5288; dated 14 December 2023; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 1.09 MT. Transaction ID: ST-TR-74ab15c2-12dc; dated 19 January 2024; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 0.49 MT. 	
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>The procedure for claims is stated in SOP Supply Chain and Traceability of Palm Products (MKT-03-06/04-03-2019/Rev.0) dated 18 March 2019. The mill only makes claims on RSPO Certified product in compliance with RSPO Rules on Market Communications and Claims.</p> <p>Statement of RSPO certified and Identity Preserved are only stated in sales documents of RSPO certified product.</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 Tolan Tiga Indonesia is a subsidiary of RSPO registered member, SIPEF Group. SIPEF Group, is highlighting its commitment to the principles of RSPO – therefore making an "non-product related" claim. The corporate communication of SIPEF Group can be seen in the corporate website: www.sipef.com</p>	Complied
4.2	<p>In corporate communications, a member is allowed to:</p> <ol style="list-style-type: none"> display its RSPO membership status display the RSPO web address (www.rspo.org) state that the member supports the work of RSPO 	<p>Corporate communication in SIPEF Group website:</p> <ul style="list-style-type: none"> Display its RSPO membership status: No, SIPEF did not display its RSPO membership status. 	Complied

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	<p>D. state the member's history with regard to RSPO</p> <p>E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership</p>	<ul style="list-style-type: none"> • Display the RSPO web address: Not in direct manner. SIPEF made a link to RSPO website. • State the member supports the work of the RSPO: Not in direct manner. In the website, SIPEF wrote "We believe in a landscape approach to new oil palm developments, guided by the methodology endorsed by the RSPO". • State the member's history with regards to the RSPO: No. SIPEF did not state their history with regards to the RSPO. • Use of RSPO Trademark to promote its membership of the RSPO: No, SIPEF did not use RSPO trademark in its corporate communication such in website. 	
4.3	Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	No, SIPEF did not display RSPO corporate logo in any of documentation.	Complied
4.4	In corporate communications, RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products.	No, SIPEF did not shows any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products. The statement is clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in the SIPEF's own 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 (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified." 	No, SIPEF Group did not display made statements that highlight their RSPO certification status and product-related claims in their corporate communication tools.	Complied

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	<ul style="list-style-type: none"> • “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 Tolan Tiga Indonesia is a subsidiary of RSPO registered member, SIPEF Group with Membership No. 1-0021-05-000-00. Therefore, this indicator 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	No, SIPEF Group did not display product-specific communications both on-pack or off-pack to any public statement about an individual product that contains RSPO sustainable palm oil.	Complied

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	be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.		
5.1.2	Product-specific communications are voluntary.	No, SIPEF Group did not display product-specific communications both on-pack or off-pack to any public statement about an individual product that contains RSPO sustainable palm oil.	Complied
5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself.	No, SIPEF Group did not display product-specific communications such as RSPO label.	Complied
5.1.4	Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication.	No, SIPEF Group did not use any 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. 	<p>SIPEF Group is entering RSPO P&C certification.</p> <p>Not applicable.</p>	Not Applicable

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5.1.6	Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain	SIPEF Group is entering RSPO P&C certification. Not applicable.	Not Applicable
5.2 Off pack claims			
5.2.1	Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made.	No, SIPEF Group does not made off-pack claims in their shipping documents, websites, emails, annual report.	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.	Yes, SIPEF Group stating the supply chain model and certificate number in their sales documents such as contract, delivery order, weighbridge ticket.	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:	PT Tolan Tiga Indonesia is not a distributor or wholesaler.	Complied

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	<ul style="list-style-type: none"> • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products, it is essential that customers are aware that the products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation. • If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. 		
5.3 On pack claims			
5.3.1	Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.	No, SIPEF Group does not made on-pack claims in their product. Furthermore PT Tolan Tiga Indonesia entering RSPO P&C certification.	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* 	No, SIPEF Group does not made on-pack claims in their product. Furthermore PT Tolan Tiga Indonesia entering RSPO P&C certification.	Complied

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	<ul style="list-style-type: none"> Contains RSPO certified palm oil (IP/SG)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>		
	<p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> RSPO MIXED* Contributes to the production of RSPO certified palm oil* Contains RSPO certified palm oil (MB)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	No, SIPEF Group does not made on-pack claims in their product. Furthermore PT Tolan Tiga Indonesia entering RSPO P&C certification.	Complied
	<p>C) For Partially Certified Products:</p> <ul style="list-style-type: none"> RSPO 50% MIXED* Contains at least 50% RSPO certified palm oil* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	No, SIPEF Group does not made on-pack claims in their product. Furthermore PT Tolan Tiga Indonesia entering RSPO P&C certification.	Complied
	<p>D) For Products covered with Book and Claim (B&C):</p> <ul style="list-style-type: none"> RSPO CREDITS* Supports the production of RSPO certified palm oil* Contains palm oil covered by the purchase of RSPO Credits* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	No, SIPEF Group does not made on-pack claims in their product. Furthermore PT Tolan Tiga Indonesia entering RSPO P&C certification.	Complied
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	No, SIPEF Group does not made on-pack claims in their product. Furthermore PT Tolan Tiga Indonesia entering RSPO P&C certification.	Complied
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	No, SIPEF Group does not made on-pack claims in their product. Furthermore PT Tolan Tiga Indonesia entering RSPO P&C certification.	Complied
5.3.5	Use of the RSPO Label is restricted to claims about RSPO certified sustainable palm oil contained in products and is not authorised for use in relation to any other ingredient.	No, SIPEF Group does not made on-pack claims and/or RSPO label in their product. Furthermore PT Tolan Tiga Indonesia entering RSPO P&C certification.	Complied
5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	No, SIPEF Group does not made on-pack claims in their product. Furthermore PT Tolan Tiga Indonesia entering RSPO P&C certification.	Complied

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MODULE A – IDENTITY PRESERVED			
	95% of the palm oil content must be RSPO IP certified.	100% of CSPO and CSPK produced from RSPO P&C certified supply base.	Complied
	If 100% of RSPO IP certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.	100% of CSPO and CSPK produced from RSPO P&C certified supply base.	Complied
Messaging			
	<p>Messaging ALLOWED for storytelling in product-specific communications may include any of the following elements:</p> <ul style="list-style-type: none"> • The palm oil products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure that it contains RSPO certified palm oil. For more information: www.rspo.org • RSPO certified sustainable palm oil products were kept apart from other palm oil products throughout the supply chain. www.rspo.org • Certified sustainable palm oil products can be traced back to RSPO certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO certified sustainable palm oil has been produced according to stringent environmental and social criteria. www.rspo.org 	No, SIPEF Group does not made off-pack claims in their shipping documents, websites, emails, annual report.	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"> • RSPO Trademark that includes the tag "CERTIFIED"; or 	No, SIPEF Group does not made off-pack claims in their shipping documents, websites, emails, annual report.	Complied

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	<ul style="list-style-type: none"> RSPO Trademark that includes the tag "This product contains certified sustainable palm oil". 		
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	<p>(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 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>A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented in Human Rights policy (Policy No. QMM-40-01-P02) dated 27 March 2019. The policy stated company recognises that human rights are universal and apply to all, without any form of distinction. Company supports the implementation of the International Bill of Human Rights, and of the ILO Declaration on Fundamental Principles and Rights at Work, as they are transcribed into the laws and regulation of Republic of Indonesia. Charges of violation of human rights where substantiated will result in disciplinary action up to and including dismissal and may also lead to legal action. This policy has been disseminated to all workforce regularly, the last one was on 10 & 12 January 2024.</p> <p>Communication to all level workforce, operations and local communities implemented through morning muster (estate/mill workers), put on notice board of village office and through communication by phone.</p> <p>According to interviews with a sample of visited village head and sample contracted workers (including contractors), understanding of human rights policy was good.</p>	Complied
4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.	The company does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations. The	Complied

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	- Minor compliance -	company location and conditions in the surrounding community are classified as conducive and safe. This information was verified during stakeholder consultation with affected communities, workers, and other relevant stakeholders.	
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>Documented system and complaints or grievance mechanism is available at unit of certification. Information on complaint/grievance procedures does not have any revision from last assessment.</p> <p>PT Tolan Tiga Indonesia as subsidiary of SIPEF, also implementing grievance mechanism following the corporate policy and its accessible on the website: https://www.sipecf.com/sipecf-indonesia/sustainability/grievances-sipecf-indonesia/</p> <p>Based on case tracker on RSPO website https://rspo.my.site.com/Complaint/s/casetracker, there are no complaints or grievance delivered to PT Tolan Tiga Indonesia.</p> <p>However, there's a grievance from LBHI (Lembaga Bantuan Hukum Indonesia) Masmada Labusel on 31 August 2023 regarding worker welfare issues. The legal aid organization asked for clarification regarding the resolution of industrial relations disputes on behalf of Ismail regarding allegations of leaking company secrets to other parties and request to showed contract worker agreement in the name of Juli Fitriani (Ismail's wife). Based on interview with head of worker union, A previous bipartite meeting had been held regarding employee issues, the union said that the leaking of company secrets in question was a conspiracy to commit FFB theft at the company. The worker on behalf of Ismail informed the thieves of the location of the FFB, this was proven by evidence in the form of a screenshot of the WhatsApp application. The company has calculated the compensation provided in this regard and the compensation value is in accordance with the provisions of the Collective Labor Agreement (CLA).</p>	Complied

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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>All relevant procedures related conflict resolution mechanism are in place, such as: Internal Grievance mechanism (HRD-04-01/01-04-2019/Rev.1) dated 5 April 2019; External Grievance mechanism (HRD-04-02/19-02-2019/Rev.0) dated 19 February 2019; Whistleblowing policy refers to company policy No. QMM-40-01-P16 (Whistleblowing Policy) dated 14 January 2019. For illiterate parties, the mechanism said can be carried out verbally. Employees and other stakeholders who express a concern or grievance according to Group procedures will not be penalized or victimized in any way by the Group or its employees. Non-compliance with this provision by Group employees will result in disciplinary action, up to dismissal, and might also result in legal action.</p> <p>Based on interview with relevant stakeholder such as contractor (CV Felindo), Government Agency, and Worker Union representative, Air Merah and Perlavian Village, clearly informed that conflict resolution mechanism/procedure are understood.</p>	Complied
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Based on case tracker on RSPO website https://rspo.my.site.com/Complaint/s/casetracker, there are no complaints or grievance delivered to PT Tolan Tiga Indonesia.</p> <p>However, there's a grievance from LBHI (Lembaga Bantuan Hukum Indonesia) Masmada Labusel on 31 August 2023 regarding worker welfare issues. The legal aid organization asked for clarification regarding the resolution of industrial relations disputes on behalf of Ismail regarding allegations of leaking company secrets to other parties and request to showed contract worker agreement in the name of Juli Fitriani (Ismail's wife). Based on interview with head of worker union, A previous bipartite meeting had been held regarding employee issues, the union said that the leaking of company secrets in question was a conspiracy to commit FFB theft at the company. The worker on behalf of Ismail informed the thieves of the location of the FFB, this was proven by evidence in the form of a screenshot of the WhatsApp application. The company has calculated the compensation provided in this regard (Ismail and his wife) and the compensation</p>	Complied

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		<p>value is in accordance with the provisions of the Collective Labor Agreement (CLA).</p> <p>In addition, the company also follows up the request from Perlavian Village related to bridge (cattle grid) repairing on 11 January 2024. Currently, estate manager has done. cost calculation in coordination with RMO Civil Staff. These calculations have been confirmed by the Engineering Department on 29 February 2024.</p>	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>Documented system and complaints or grievance mechanism is available at unit of certification. Information on complaint/grievance procedures does not have any revision from last assessment.</p> <p>PT Tolan Tiga Indonesia as subsidiary of SIPEF, also implementing grievance mechanism following the corporate policy and its accessible on the website: https://www.sipef.com/sipef-indonesia/sustainability/grievances-sipef-indonesia/</p> <p>Based on the policy review, qualified, neutral third parties can be invited to support the resolution of grievances, if agreed by all parties to the grievance. Aggrieved stakeholders are also free to decide that they prefer to use the legal system to pursue the resolution of their grievances.</p>	Complied
Criteria 4.3: The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local community are demonstrated.</p> <p>- Minor compliance -</p>	<p>Each unit of mill or estate has set the program to improve the quality of life and beneficial environment, both for the companies or local and general communities. Those programs developed based on the result of consultation with local communities through annual direct communication and questioner.</p> <p>The company showed DOQ-12 Questioner Interview with the Community for social aspects for the 2023 period within PT Tolan Tiga Indonesia. Interviews were conducted in May and June 2023 with correspondents from surrounding</p>	Complied

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		<p>communities Perlarian POM, Perlarian Estate Tolan Estate. The results of the questionnaire support the preparation of the CSR program in 2024.</p> <p>Those programs written in document namely "Community Development and Corporate Social Responsibility Program", i.e</p> <ol style="list-style-type: none">1. Education; such as donation for public school, apprentice program.2. Health; such as giving opportunity for local communities to use company's medical clinic.3. Infrastructure; such as road/bridge maintenance, road hardening and public infrastructure repair.4. Agriculture; such as giving access for communities to cutting grass for their cattle.5. Micro and Small Enterprises6. Sports; Maintenance of sports facilities, provision of facilities by the surrounding village sports facilities and donation for local sports event.7. Art8. Religious; Religious assistance, breaking the fast and Ramadan gifts.9. Socio Economic <p>For example, the Community Development and Corporate Social Responsibility programs for Perlarian POM, Perlarian Estate Tolan Estate in 2024. Several program categories include assistance for schools, places of worship and sports facilities, road maintenance in surrounding villages.</p> <p>Apart from that, the company also carries out business partnerships with local communities in the form of cooperation in developing scheme smallholders.</p>	
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		<ul style="list-style-type: none"> • Agreement Partnership with Koperasi Produsen Air Merah Masyarakat Sejahtera – Air Mas Village on 01 December 2020. • Agreement Partnership with Koperasi Produsen Petani Perlabian Sejahtera (KPPPS) – Perlabian Village on 01 December 2020. • Agreement Partnership with Koperasi Produsen Petani Tanjung Selamat Sejahtera (KPPTS) – Tanjung Selamat Village on 01 December 2020. <p>All realizations of CSR program implementation are also included in the <i>Laporan Perkembangan Usaha Perkebunan</i> (LPUP) which is sent to the Plantation Agency of Labuhanbatu Selatan Regency every six months. For example semester 2 of 2023 has been reporting on 11 February 2024.</p>	
Criteria 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>In general, there is no change in land rights owned by the company. The company has documents in the form of HGU (Hak Guna Usaha) as the basis for ownership of operational areas. Here's the detail of legal document:</p> <ul style="list-style-type: none"> - HGU Certificate No. 2 covering an area of 6,042.44 Ha. Valid until 31 December 2023. - HGU Certificate No. 2 covering an area of 2,463.62 Ha. Valid until 30 June 2024. <p>Currently the Company has submitted a renewal of land rights to the Land Agency (BPN) of Labuhanbatu Selatan Regency on December 15 2021 via letter No. G.031/TTI/2021 concerning Application for Measurement of the Area for which the Cultivation Rights (HGU) will be renewed covering an area of 8,521.24 ha, located in Labuhanbatu Selatan Regency, Sumatra Utara Province. The letter was received by the Head of the Labuhanbatu Selatan Regency Land Agency.</p> <p>Until the audit was carried out, BPN as the agency that issued the HGU certificate had not carried out re-measurements in the Company's operational area. The company has met with Land Agency of Labuhanbatu Selatan at the end of 2023,</p>	OFI

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		<p>based on that meeting, current measurement for new land use title still on queue.</p> <p>Regarding issue that Masmada Labusel inform to BSI related to HGU PT Tolan Tiga, auditors carries out in-depth verification regarding the HGU map owned by the Company. From the results of matching the map contained in the HGU certificate in 1997 with actual conditions in the field (via coordinates), it is known that there were no violations related to land rights owned by the Company. From the results of interviews with Masmada Labusel, they claimed that it was impossible for HGU to pass along provincial roads. However, from the facts known from the results of the review of the 1997 HGU map (Situation Picture Map 128/12/IV/1997, 14 March 1997), the location of the land rights in question (outside the provincial road) is included in the HGU certificate. This is also confirmed by the results of field observations of boundary markers number XXIX and XLII located at the Tolan Estate location, where these stakes are the boundaries set by BPN for HGU certificate no. 2 of 1997 covering an area of 6,062.71 ha.</p>	
4.4.2	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <ul style="list-style-type: none"> - Minor compliance - <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p> <p>4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;</p>	<p>From the results of document verification and public consultations with related agencies, it is known that PT Tolan Tiga was previously a foreign-owned oil palm plantation company that had been operating since 1921, which was then nationalized to become a state-owned company in 1961.</p> <p>Supporting documents related to this matter have also been submitted previously, namely:</p> <ul style="list-style-type: none"> - "Agreement between Government of Indonesia and Societe Internationale de Plantations Et de Finance S.A-SIPEF (Belgium)" dated 29 April 1968 for concession of 3,000 Ha and 7,031.27 Ha. - The landuse decree from Head of Land Use Inspection in Sumatera Utara Province, dated 18 April 1970. - The land survey result "Risalah Pemeriksaan Tanah dari Panitia B No.40/PPT/B/69" dated 17 December 1968 and "Risalah Pemeriksaan Tanah dari Panitia B No.48/PPT/B/71" dated 7 December 1971. 	Complied

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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.	Land rights before 1960 were obtained not through a community land compensation process, but rather by continuing the plantation business that had existed since the pre-independence era. Information on the origins of the company's land acquisition was also obtained from interviews with representatives of Perlarian Village and Air Merah Village who stated that the plantation had been operating since the colonial period.	
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	In the HGU documents owned as land rights, the company has a map with a scale of 1: 20,000 which contains the boundaries of the location of the company's land ownership as the basis for the operational area issued by the Land Office. Based on public consultation with previous land owner and village representatives from Air Merah and Perlarian Village, it is recognized that they know the legal boundaries owned by PT Tolan Tiga Indonesia.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements. - Minor compliance -	All information related to legal document available in appropriate form and Indonesian Language. This information is in line with Environment Agency and Plantation Agency public consultation results.	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 -	As explained on indicators 4.4.2, land rights before 1960 were obtained not through a community land compensation process, but rather by continuing the plantation business that had existed since the pre-independence era. Information on the origins of the company's land acquisition was also obtained from interviews with representatives of Perlarian Village and Air Merah Village who stated that the plantation had been operating since the colonial period. No expansion of scope area company during the assessment.	Complied
4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	Until the ASA 2_4 was carried out, there is currently no compensation process or recent change in land ownership. Regarding the implementation of the FPIC process, according to the explanation in indicator 4.4.2, all land compensation were obtained not through a community land compensation process, but rather	Complied

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		by continuing the plantation business that had existed since the pre-independence era.	
Criteria 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	<p>There is no land expansion activity during this audit. The company has not currently carried out new planting activities beyond 2018. Based on field observations at Perlavian Estate and Tolan Estate, it is known that the company has only carried out replanting activities for areas that were previously included in the scope of certification.</p> <p>As explanation on Indicator 4.4.1, the company has land ownership legality documents in the form of the following documents:</p> <ul style="list-style-type: none"> - HGU Certificate No. 2 covering an area of 6,042.44 Ha. Valid until 31 December 2023. - HGU Certificate No. 2 covering an area of 2,463.62 Ha. Valid until 30 June 2024. - Bussinees permit based on <i>Keputusan Menteri Negara Investasi/Kepala Badan Koordinasi Penanaman Modal</i> (No.: 394/T/Kehutanana.Perkebunan/1998) on 21 August 1998. The permit covers 8,479.06 ha areal. - <i>Nomor Pokok Wajib Pajak</i> (NPWP): 01.001.801.8-116.001 	Complied
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and 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>Based on document verification of environmental, land use title and public consultation with relevant stakeholder, there's no new planting after 2018.</p> <p>Similar information was also obtained from interviews with representatives of Perlavian and Air Merah Village who stated that there had been no land compensation process. The village representative stated that the compensation process done before 1960.</p>	Complied

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	- Critical (Major) compliance -		
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>As explained in indicator 4.5.2, based on document verification of environmental, land use title and public consultation with relevant stakeholder, there's no new planting after 2018.</p> <p>Similar information was also obtained from interviews with representatives of Perlarian and Air Merah Village who stated that there had been no land compensation process. The village representative stated that the compensation process done before 1960.</p>	Complied
4.5.4	<p>To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of land allocations process.</p> <p>- Minor compliance -</p>	<p>As a result of interviews with representatives of Air Merah and Perlarian Village, local communities do not experience any restrictions regarding access to water and food in the company's operational areas, except for conservation areas where there is a prohibition on destroying or hunting protected animals.</p>	Complied
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>As explained on 3.4.1 and 3.4.2, companies can show evidence of social impact assessment documentation with FPIC approach that has been carried out by involving various key parties, such as representatives of village head, government agencies and also the community around the company.</p>	Complied
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>As explained in indicators 4.5.2, based on the results of interviews with community representatives of Perlarian and Air Merah Village who stated that there had been no land compensation process. The village representative stated that the compensation process done before 1960.</p>	Complied

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4.5.7	After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes. - Minor compliance -	Based on document verification of environmental, land use title and public consultation with relevant stakeholder, there's no new planting after 2018.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	Based on document verification of environmental, land use title and public consultation with relevant stakeholder, there's no new planting after 2018.	Complied
Criteria 4.6: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	The company has procedure of Land & Planting Compensation Inside Izin Lokasi of The Company (LCA-01-01/24-01-2020/Rev.1, dated 30 January 2020) related to identifying legal, customary or user rights, and for identifying people entitled to compensation. The purpose of this SOP is as a reference for companies in implementing land compensation and planting (GRTT) correctly and in accordance with applicable laws and regulations and in compliance with FPIC principles. Based on public consultation with previous landowner and village representatives from Perlarian and Air Merah Village known that they know about the procedure through the socialization given and they agree with the procedure.	Complied
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	Policies related to calculating the amount of compensation for the process of transferring land ownership are also contained in the Land & Planting Compensation Inside the Location Permit of the Company (LCA-01-01/30-08-2022/Rev.4, dated 3 October 2022). The procedures discussed relate to identifying land ownership, coordination flow mechanisms and also determining the calculation of land compensation value. Regarding price approval, a request	Complied

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		<p>will be made by the relevant estate manager and approved by the VPL (Vice President Legal).</p> <p>Based on public consultation with village representatives from Air Merah and Perlarian Village known that they know about the procedure through the socialization given and they agree with the procedure and compensation process was done directed to the land owner and landowners are given the freedom to release their land without coercion.</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>As explained in indicator 4.5.2, based on document verification of environmental, land use title and public consultation with relevant stakeholder, there's no new planting after 2018.</p> <p>Similar information was also obtained from interviews with representatives of Perlarian and Air Merah Village who stated that there had been no land compensation process. The village representative stated that the compensation process done before 1960.</p> <p>However, in establishing partnership agreements with cooperatives as explained in indicator 5.1.1, there are female farmer representatives represented in the cooperative membership, for example in the names of Leli Rosa Sembiring (AIRMAS) and Sri Mahyuni (KPPTS). This proves that the company is fair in determining land ownership as a member of a cooperative partnering with the company, especially gender equality.</p>	Complied
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them.</p> <p>- Minor compliance -</p>	<p>Until the latest assessment was carried out there was no area expansion or new planting, so there's no ongoing process related to negotiating agreement for land compensation.</p>	Complied
Criteria 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p>	<p>Related to mutually agreed procedure for identifying people has been informed in Land & Planting Compensation Inside Location Permit of The Company (LCA-01-01/30-08-2022/Rev.4, dated 3 October 2022). In this procedure, the GRTT</p>	Complied

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	- Critical (Major) compliance -	<p>process can only be carried out on land owned by third parties which is within a location permit belonging to a company group and which has the status of other use areas (not forest areas). GRTT is also only carried out on landowners, namely parties who have legal rights to the land and control/work on the land in question based on legal documents (SKT, sale and purchase deed, SHM) issued by government agencies.</p> <p>To ensure the correctness of the landowner, each estate manager is asked to clarify with the local community/neighbours adjacent to the GRTT planned land, village officials and/or other trusted sources.</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>	As explained in indicators 4.6.2, Policies related to calculating the amount of compensation for the process of transferring land ownership are also contained in the Land & Planting Compensation Inside the Location Permit of the Company (LCA-01-01/30-08-2022/Rev.4, dated 3 October 2022). The procedures discussed relate to identifying land ownership, coordination flow mechanisms and determining the calculation of land compensation value. Regarding price approval, a request will be made by the relevant estate manager and approved by the VPL (Vice President Legal).	Complied
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>	From the results of document verification and public consultations with related agencies, it is known that PT Tolan Tiga was previously a foreign-owned oil palm plantation company that had been operating since 1921, which was then nationalized to become a state-owned company in 1961. land rights before 1960 were obtained not through a community land compensation process, but rather by continuing the plantation business that had existed since the pre-independence era. Information on the origins of the company's land acquisition was also obtained from interviews with representatives of Perlarian Village and Air Merah Village who stated that the plantation had been operating since the colonial period.	Complied
Criteria 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.			

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4.8.1	<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>Based on field observations, document review and public consultation with relevant stakeholders (Perlabian and Air Merah Villages), there are no issues related to land conflicts.</p> <p>However, there's issue from Masmada Labusel related to HGU of PT Tolan Tiga. Auditors carries out in-depth verification regarding the HGU map owned by the Company. From the results of matching the map contained in the HGU certificate in 1997 with actual conditions in the field (via coordinates), it is known that there were no violations related to land rights owned by the Company. From the results of interviews with Masmada Labusel, they claimed that it was impossible for HGU to pass along provincial roads. However, from the facts known from the results of the review of the 1997 HGU map (Situation Picture Map 128/12/IV/1997, 14 March 1997), the location of the land rights in question (outside the provincial road) is included in the HGU certificate. This is also confirmed by the results of field observations of boundary markers number XXIX and XLII located at the Tolan Estate location, where these stakes are the boundaries set by BPN for HGU certificate no. 2 of 1997 covering an area of 6,062.71 ha.</p> <p>The plaintiffs on behalf of KTB (United Farmers Group) also to this day feel that the Company has not completed compensation for their land in the 1960s. Due to this, the company invited the plaintiff to take legal action. The legal process itself had previously been resolved based on Civil Decision document Number 56/Pdt. G/2013/PN-Rap by the Rantauprapat District Court on September 16 2014 by Martin Ginitng, S.H., M.H. as Chief Judge of the Panel. In the document decided:</p> <ul style="list-style-type: none"> - Declare that the Plaintiff's (United Farmers Group) claim is unacceptable (Niet Onvankijke ver klaard). - Reject the plaintiff's compensation claim in its entirety. - Neither the plaintiff/his attorney nor the defendant/his attorney/co-defendant I and co-defendant II filed a legal appeal against the decision of the Rantau Prapat District Court dated 16 September 2014 Number. 	Complied
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		56/Pdt.G/2013/PN-RAP in accordance with deed number No. 56/Pdt.G/2013/PN-RAP dated 7 November 2014 so that this decision has permanent legal force. All estate has been fully operated by company (no occupation area by other parties).	
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	Based on field observation, there's not present land conflict in operational area. Regarding to HGU issue, there's a Law decision based on Decision document Number 56/Pdt. G/2013/PN-Rap by the Rantau Prapat District Court on September 16 2014 by Martin Ginitng, S,H., M.H. as Chief Judge of the Panel. In the document decided: - Declare that the Plaintiff's (United Farmers Group) claim is unacceptable (Niet Onvankijke ver klaard). - Reject the plaintiff's compensation claim in its entirety. - Neither the plaintiff/his attorney nor the defendant/his attorney/co-defendant I and co-defendant II filed a legal appeal against the decision of the Rantau Prapat District Court dated 16 September 2014 Number. 56/Pdt.G/2013/PN-RAP in accordance with deed number No. 56/Pdt.G/2013/PN-RAP dated 7 November 2014 so that this decision has permanent legal force. All estate has been fully operated by company (no occupation area by other parties).	Complied
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4). - Minor compliance -	Based on explanation on relevant stakeholders (Air Merah & Perlabian Villages, Plantation Agency and Environment Agency), There are no issues related land acquisition using intimidation. Regarding to KTB (Kelompok Tani Bersatu) issue, it has been describe on indicator 4.8.1. The company leaves it to the parties to file a lawsuit in court if they feel that someone is not satisfied.	Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with	Based on field observation and company map operational area, there's not present land conflict in operational area. Regarding to HGU issue, there's a Law	Complied

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	involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	<p>decision based on Decision document Number 56/Pdt. G/2013/PN-Rap by the Rantau Prapat District Court on September 16 2014 by Martin Ginitng, S.H., M.H. as Chief Judge of the Panel. In the document decided:</p> <ul style="list-style-type: none"> - Declare that the Plaintiff's (United Farmers Group) claim is unacceptable (Niet Onvankijke ver klaard). - Reject the plaintiff's compensation claim in its entirety. - Neither the plaintiff/his attorney nor the defendant/his attorney/co-defendant I and co-defendant II filed a legal appeal against the decision of the Rantau Prapat District Court dated 16 September 2014 Number. 56/Pdt.G/2013/PN-RAP in accordance with deed number No. 56/Pdt.G/2013/PN-RAP dated 7 November 2014 so that this decision has permanent legal force. <p>The company leaves it to the parties to file a lawsuit in court if they feel that someone is not satisfied.</p>	
Principle 5: Support smallholder inclusion Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.			
Criteria 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices for FFB are publicly available and accessible by smallholders. - Minor compliance -	<p>Currently, the company does not accept FFB from other sources. All FFB based on own estate (Perlabian and Tolan Estate). However, the company has agreement letter with smallholder as an obligation from government related to partnership 20% on regulation. Here's the record of agreement:</p> <ul style="list-style-type: none"> - Agreement Partnership with Koperasi Produsen Petani Tanjung Selamat Sejahtera (KPPTS) on 1 December 2020. - Agreement Partnership with Koperasi Produsen Petani Perlabian Sejahtera (KPPPS) on 1 December 2020. - Agreement Partnership with Koperasi Air Merah Masyarakat Sejahtera (AIRMAS) on 1 December 2020. 	Complied

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		<p>On that agreement, it was explained that the smallholder was willing to sell all the fresh fruit bunches from the Partnership Cooperation to PT Tolan Tiga. However, currently Palm Oil Mill only purchases FFB from the cooperative, but processing is carried out by other factories in collaboration with PT Tolan Tiga Indonesia. For example, here's the record of FFB transaction:</p> <ul style="list-style-type: none"> - No. 342/INV/KPPPS/XII/2023 dated 8 December 2023 for Koperasi Produsen Petani Perlabian Sejahtera with amount 5,762 kg (Rp 2,058/kg). - No. 169/INV/KPAMS/XII/2023 dated 7 December 2023 for Koperasi Produsen Airmerah Masyarakat Sejahtera with amount 2,425 kg (Rp 2,059/kg). 	
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>As explained in indicators 5.1.1, the company does not accept FFB from other sources. All FFB based on own estate (Perlabian and Tolan Estate). However, on that agreement with smallholder cooperation (inform on indicator 5.1.1), it was explained that the smallholder was willing to sell all the fresh fruit bunches from the Partnership Cooperation to PT Tolan Tiga Indonesia. Currently Palm Oil Mill only purchases FFB from the cooperative, but processing is carried out by other factories in collaboration with certificate holder. Regarding this situation, there's no complaint from cooperation representative.</p>	Complied
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>Based on consultation result with representative of Smallholder Cooperation, it is known that Currently Palm Oil Mill only purchases FFB from the cooperative, but processing is carried out by other factories in collaboration with certificate holder. The pricing mechanism is approved by both parties, there's no force for cooperation to sold the FFB, if the price is low, they can choose any POM that buy more pricey.</p>	Complied
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,</p>	<p>in establishing partnership agreements with cooperatives as explained in indicator 5.1.1, there are female farmer representatives represented in the cooperative membership, for example in the names of Leli Rosa Sembiring (AIRMAS) and Sri Mahyuni (KPPTS). This proves that the company is fair in</p>	Complied

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	loans/credits, and re-payments through FFB price reductions for replanting and/or, other support mechanisms where applicable. - Critical (Major) compliance -	determining land ownership as a member of a cooperative partnering with the company, especially gender equality.	
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	<p>The company has agreement letter with smallholder as an obligation from government related to partnership 20% on regulation. Here's the record of agreement:</p> <ul style="list-style-type: none"> - Agreement Partnership with Koperasi Produsen Petani Tanjung Selamat Sejahtera (KPPTS) on 1 December 2020. - Agreement Partnership with Koperasi Produsen Petani Perlabian Sejahtera (KPPPS) on 1 December 2020. - Agreement Partnership with Koperasi Air Merah Masyarakat Sejahtera (AIRMAS) on 1 December 2020. <p>The agreement informed right and obligation for all parties, here's the detail:</p> <ul style="list-style-type: none"> - The cooperative is obliged to sell all partnership plantation products to the Company during the validity period of the agreement. - The parties agree that the purchase price of partnership plantation products from partnership farmers is determined by the core. - Prices will be notified by the core to the Cooperative once a week. - The agreement is valid for 25 years. And the agreement can be extended for the next 25 years if more than 50% of members agree to the extension. - Cooperative management and cooperative supervisors are willing to fully implement and comply with the terms and conditions to obtain RSPO/ISPO/ISCC/ISO certification. <p>Based on consultation result with representative of Cooperation, it is known that all agreement has been transparent & fairly accepted by both parties.</p>	Complied

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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>The company showed record of FFB purchasing for smallholder partnership which already signed by both parties, including head of cooperation. Here's the detail:</p> <ul style="list-style-type: none"> - No. 342/INV/KPPPS/XII/2023 dated 8 December 2023 for Koperasi Produsen Petani Perlabian Sejahtera with amount 5,762 kg (Rp 2,058/kg). - No. 169/INV/KPAMS/XII/2023 dated 7 December 2023 for Koperasi Produsen Airmerah Masyarakat Sejahtera with amount 2,425 kg (Rp 2,059/kg). <p>From the results of the interview, it was also conveyed that every payment as well as in FFB invoice payment.</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>The company showed latest calibration record for their 2 weighing equipment on the POM by <i>Dinas Koperasi dan Usaha Kecil dan Menengah serta Perdagangan Bidang Metologi Legal</i> of Labuhanbatu Selatan Regency, here's the detail:</p> <ul style="list-style-type: none"> - Calibration record No. 217/510/2418/DISKOP/2023 on 18 December 2023; Merk Every Weigh Tronix; Type E1205; Serial No. 111350583 valid thru 18 December 2024. - Calibration record No. 217/510/2419/DISKOP/2023 on 18 December 2023; Merk Every Weigh Tronix; Type E1205; Serial No. 143850136 valid thru 18 December 2024. 	Complied
5.1.8	<p>The unit of certification supports Independent smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholder on who runs the Internal Controlling System (ICS), who holds the certificate, and who owns and sells certified materials.</p> <p>- Minor compliance -</p>	<p>Based on smallholder partnership agreement especially on clause 15 related to environment and quality certification, it explained that Cooperative management and Cooperative supervisors are willing to fully implement and comply with the terms and conditions in order to obtain RSPO/ISPO/ISCC/ISO certification. This information in line with explanation from company management that all cooperation will be RSPO certified on 2025 (on progress).</p>	Complied

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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>Documented system and complaints or grievance mechanism is available at unit of certification. Information on complaint/grievance procedures does not have any revision from last assessment.</p> <p>PT Tolan Tiga Indonesia as subsidiary of SIPEF, also implementing grievance mechanism following the corporate policy and its accessible on the website: https://www.sipef.com/sipef-indonesia/sustainability/grievances-sipef-indonesia/</p> <p>Based on case tracker on RSPO website https://rspo.my.site.com/Complaint/s/casetracker, there are no complaints or grievance delivered to PT Tolan Tiga Indonesia.</p> <p>Based on review of grievance logbook period 2023, there's no complaint/grievance/appeal from smallholder.</p>	Complied
Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	<p>The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p>	<p>In establishing partnership agreements with cooperatives as explained in indicator 5.1.1, there are female farmer representatives represented in the cooperative membership, for example in the names of Leli Rosa Sembiring (AIRMAS) and Sri Mahyuni (KPPTS). This proves that the company is fair in determining land ownership as a member of a cooperative partnering with the company, especially gender equality.</p>	Complied
5.2.2	<p>The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).</p> <p>- Minor compliance -</p>	<p>Based on smallholder partnership agreement especially on clause 15 related to environment and quality certification, it explained that Cooperative management and Cooperative supervisors are willing to fully implement and comply with the terms and conditions to obtain RSPO/ISPO/ISCC/ISO certification. Beside that, the clause 3 also explained that all smallholder must have legal document for land own state.</p> <p>This information in line with explanation from company management that all cooperation will be RSPO certified on 2025 (on progress).</p>	Complied

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5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Based on smallholder partnership agreement especially on clause 15 related to environment and quality certification, it explained that Cooperative management and Cooperative supervisors are willing to fully implement and comply with the terms and conditions to obtain RSPO/ISPO/ISCC/ISO certification. Beside that, the clause 3 also explained that all smallholder must have legal document for land own state. The legal document can be in form of SHM (<i>sertifikat hak milik</i>), SKT (<i>Surat Keterangan Tanah</i>) or other document which legalized by government. This information in line with explanation from company management that all cooperation will be RSPO certified on 2025 (on progress).	Complied
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	The certificate holder has done training activity for their smallholder, especially related to best management practice (including pesticide handling). For example, the training has been conducted on 19 December 2023 attended by smallholder members. Based on consultation result with representative of Smallholder Cooperation, it is known that company conducted socialization related to best management practice for all their cooperation. This socialization including harvesting activities, OHS aspect and pesticide handling.	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme. - Minor compliance -	The company can show evidence that it reported its partnership program to smallholder cooperation in Community Development Report on 24 June 2023.	Complied
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	(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,	Company has a policy Equal employment opportunity policy dated 22 August 2022 Which stated PT Tolan Tiga Indonesia is committed to creating a work environment that is non-discriminatory and complies with applicable laws. This policy also described that discrimination based on ethnic origin, caste,	Complied

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	<p>sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age are prohibited</p> <p>This policy has also been disseminated regularly, for example during morning briefing activities with foremen and assistants or other special activities such as those carried out on 6 February 2024 for PLE, TLE, and Perlarian POM Training. Interviews with employees during field visits as well as interviews with labor union representatives revealed that there had never been any discrimination received by employees.</p> <p>Evidence of policy implementation including equal opportunities for example receive performance appraisals, promotions, equal pay coverage for the same type of work as well as providing employee welfare facilities.</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>Based on a document review, interviews with worker representatives, and interviews with labor union representatives, it is known that there has never been an incident of discrimination within the company. This is demonstrated, among other things, by:</p> <ul style="list-style-type: none"> - Transparency in job vacancies and the selection process, including no recruitment fees. - Equal pay based on the same scope of work which refers to the wage structure and scale. - Training and self-development opportunity. - Equivalent welfare facilities for employees according to position, such as electricity subsidized housing and the provision of cooperatives. 	Complied
6.1.3	<p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>Companies can show evidence of recruitment, selection, training, promotion based on qualification capabilities and job availability. This is demonstrated, among other things, by:</p> <p>Recruitment</p>	Complied

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		<p>Recruitment of PKWT workers for Nursery in the name of Dimas who have been equipped with supporting documents such as job application forms, administration of work equipment such as ID Card, to the relevant <i>PKWT</i> Agreement dated 01 February 2024. The results of interviews with workers revealed that the entire process was carried out transparently and there were no recruitment fees charged to prospective workers.</p> <p>Employee Promotion</p> <ul style="list-style-type: none"> - Letter No. 35/PLE/II/2024 dated 24 January 2024 from EM PLE regarding the request for the appointment of FL employees as PKWT for 49 people because the 2024 budget is still available and new workers are needed. - Promotion letter from the TLE manager to become division 4 harvesting foreman since January 2024 for Pirmanto, who was previously a harvester. Promotions are based on performance assessments from direct supervisor and then proposed to the Manager. <p>Training and Socialization</p> <ul style="list-style-type: none"> - Training on pesticide use and storage for TLE and PLE spraying teams will be held in February 2024 and semester 1 of 2023 to ensure that pesticide applicator employees have good competence in managing and using pesticides. - Gender committee outreach for workers and housing residents with issues discussed in relation to company policies. 	
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>Pregnancy tests carried out by companies are not part of discrimination but rather part of a positive effort to ensure that no pregnant or breastfeeding women work with toxic chemicals. If there are pregnant or breastfeeding women who have the potential to be exposed, they will be transferred to other jobs such as manual upkeep or housekeeping. This was also confirmed based on the results of interviews with representatives of the company gender committee</p>	Complied

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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>The company has SOP Gender Committee (HRD-04-12/22-02-2022/Rev.1, 04 March 2022) as the guideline for implementing gender management issues for all workers working in company.</p> <p>The duties of the Gender Committee (GCoCG) are:</p> <ul style="list-style-type: none"> • Provide recommendations to the BOD regarding decision making related to gender issues in the company. • Review and evaluate the management of gender issues in the company. • Hold meetings at least once a year and make a report on the management of gender issues in the company to the BOD. • Receive and respond to incidents related to gender issues in the company, including fulfilling the rights of female workers in terms of employment opportunities and reproductive rights, as well as sexual harassment in the workplace or company environment. • Provide training on the rights of women workers. <p>The Gender Committee Contact Group (GCoCG) is a group formed in the Operating Unit whose role and function are to liaise with the local worker community in managing gender issues at the Operating Unit level. GCoCG appoints one woman from the management as liaison personnel, who will be involved directly with victims in handling complaints or cases of violations of gender issues in each Operating Unit. In cases involving violations of gender issues, GCo and GCoCG are obliged to maintain the confidentiality of the reporter and/or victim.</p> <p>Gender committee has been established by the organization. Each estate and mill have appointed representative for gender committee. The committee consider matters such as; dissemination on women's rights, child care facilities to be provided by the growers and millers, women to be allowed to breastfeed</p>	Complied
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		<p>up to 2 years before resuming chemical spraying/manuring or usage tasks, and women to be given specific break times to enable effective breastfeeding. Organization has also setting several signboards about this policy in the bulletin board in every office/mill estate.</p> <p>GCoCG Perlabian POM issued on 19 February 2024, with structure i.e:</p> <ul style="list-style-type: none"> • Chairman : Sariman Sihombing • Secretary: Defi Syahfrizal • Member: Ade Rani Agustina, H. Tamba, Subandi, Fajar Purba, Jonrikus Situmeang • Empowerment Women Section: Debi Fadil <p>Minutes of Meeting the GCoCG Perlabian POM on 29 February 2024 with discussion of no reporting on gender issues.</p> <p>GCoCG Tolan Estate approved on 20 January 2024, with structure i.e:</p> <ul style="list-style-type: none"> • Chairman: Mhd. Said Abdullah Hsb • Secretary: Fadly Fazlurrahman • Member: D.S. Siahaan, Suratman P, Supriyanto, Buyung, Heni Rubeka, Saiful Baheri, Siswanto, M. Arif Syahputra, Abd. Haris Sagal, Siti Aminah, Isnain Cahyono <p>Minutes of Meeting the GCoCG Tolan Estate on 22 January 2024, with an agenda to discuss no gender issues for the January 2024 period, implementation of policy refreshment, structure, and function of the gender committee.</p> <p>Gender Committee Program year of 2024</p> <ul style="list-style-type: none"> • Gender committee meeting. • Socialization of the gender committee structure. 	
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		<ul style="list-style-type: none"> • Efforts to improve the quality of female workers. • Efforts to increase environmental sustainability'. 					
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>Based on the results of document review and interviews with worker representatives, it is known that the company has implemented the same wages for each scope of work. Even if there are differences, this is more due to the wage scale structure which takes into account length of service and employee class.</p> <p>example of wage documentation shown i.e :</p> <ul style="list-style-type: none"> • Employee ID 05101 (SKU-H) 7 years of service. The salary slip for the period January 2024 shows the worker's basic salary is IDR 3,200,000. • Employee ID 05108 5 years work period (SKU-H). The salary slip for the period January 2024 shows the worker's basic salary is IDR 3,200,000. <p>Wages are in accordance with the company determination, namely for a work period of 3 years and 1 month up to 6 years..</p>	Complied				
Criteria 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).							
6.2.1	<p>(C) Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the Circular Letter of the Governor of North Sumatra Number 500.15.14.1/15696 of 2023 dated 30 November 2023 concerning Determination of Minimum Wages for Provinces and Regencies throughout North Sumatra in 2024. Based on this Circular it is known that the minimum wage for South Labuhan Batu Regency in 2024 is Idr 3,197,168</p> <p>The company presented memo No. 51/MEM-TTI/II/2024 dated 05 February 2024 regarding employee wages for 2024 in accordance with the Tolan Tiga Workers Union agreement with the following details :</p> <table> <tr> <th>Type</th><th>Wage 2023</th><th>Wage 2024</th><th>Working time</th></tr> </table>	Type	Wage 2023	Wage 2024	Working time	Complied
Type	Wage 2023	Wage 2024	Working time				

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		Daily worker	IDR 3,198,000	IDR 3,215,000	0 – 3 years				
			IDR 3,200,000	IDR 3,217,000	3 years and 1 month up to 6 years				
			IDR 3,202,000	IDR 3,219,000	6 years and 1 month and above				
		Monthly worker	IDR 3,346,000	IDR 3,363,000					
Monthly Employee Wage Structure									
For example, the salary range is shown as follows:									
<ul style="list-style-type: none">• Grade P: Level 1 IDR 3,363,000 to Level 6 IDR 3,418,000• Grade EL: Level 1 IDR 3,888,000 to level 6 IDR 4,138,000									
An example of verified wage documentation is shown as :									
<table><tr><td>Perlabian Oil Mill ID: 05108 (SKU-H) Basic salary: IDR 3,200,000 Rice allowance: IDR 531,336 <i>BPJS Ketenagakerjaan</i>: IDR 153,794 <i>BPJS Kesehatan</i>: IDR 128,000 <i>BPJS Pensiun</i>: IDR 67,750 Premi: IDR 53,129 Overtime: IDR 3,260,249 Allowance: IDR 25,000 Tax allowance: IDR 27,817 Gross income: IDR 7,447,075</td><td>Loan: IDR 300.000 Rice allowance: IDR 531.336 <i>BPJS Ketenagakerjaan</i>: IDR 153,794 <i>BPJS Ketenagakerjaan</i> (employee): IDR 67,750 <i>BPJS Kesehatan</i> (company): IDR 128,000 <i>BPJS Kesehatan</i> (employee): IDR 32.000 <i>BPJS Pensiun</i> (company): IDR 67,750 <i>BPJS pensiun</i> (employee): IDR 33,875 Worker Cooperative: IDR 1,053,624 Labour Union: IDR 10,000 Other: IDR 5,000 <i>PPh pasal 21</i>: IDR 54,405 Total deduction: IDR 2,437,534</td></tr><tr><td colspan="2">Nett income : IDR 5,009,541</td></tr></table>						Perlabian Oil Mill ID: 05108 (SKU-H) Basic salary: IDR 3,200,000 Rice allowance: IDR 531,336 <i>BPJS Ketenagakerjaan</i> : IDR 153,794 <i>BPJS Kesehatan</i> : IDR 128,000 <i>BPJS Pensiun</i> : IDR 67,750 Premi: IDR 53,129 Overtime: IDR 3,260,249 Allowance: IDR 25,000 Tax allowance: IDR 27,817 Gross income: IDR 7,447,075	Loan: IDR 300.000 Rice allowance: IDR 531.336 <i>BPJS Ketenagakerjaan</i> : IDR 153,794 <i>BPJS Ketenagakerjaan</i> (employee): IDR 67,750 <i>BPJS Kesehatan</i> (company): IDR 128,000 <i>BPJS Kesehatan</i> (employee): IDR 32.000 <i>BPJS Pensiun</i> (company): IDR 67,750 <i>BPJS pensiun</i> (employee): IDR 33,875 Worker Cooperative: IDR 1,053,624 Labour Union: IDR 10,000 Other: IDR 5,000 <i>PPh pasal 21</i> : IDR 54,405 Total deduction: IDR 2,437,534	Nett income : IDR 5,009,541	
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Nett income : IDR 5,009,541									

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		<p>Tolan Estate ID: 0914 (<i>PKWT</i>) – Loose Fruit Picker Salary: IDR 3,329,500 <i>BPJS TK</i>: IDR 151,160 <i>BPJS TK</i> (company): IDR 133,180 <i>BPJS Pensiun</i> (perusahaan): IDR 66,590 Premi: IDR 1,153,420 Gross Income: IDR 4,883,850</p> <p>Loan: IDR 300,000 <i>BPJS TK</i>: IDR 151,160 <i>BPJS TK</i> (company): IDR 66,590 <i>BPJS Kesehatan</i> (employee): IDR 33,295 <i>BPJS Pensiun</i> (company): IDR 66,590 <i>BPJS Pensiun</i> (employee): IDR 33,295 Total deduction: IDR 784,110</p> <p>Nett income: IDR 4,049,740</p>		
		Interview with worker representative known that information related Payroll transparency can be accessed easily. The determination of new wages is carried out every January, but increases are usually only applied in February so that wage shortfalls due to new wage adjustments will be made in that month.		
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>Based on document review and interview with worker representative known that there is 3 type of worker in PT Tolan Tiga Indonesia i.e Permanent (Daily and Monthly), contract worker (<i>PKWT</i>), and Free Labour (FL) which in the form of outsourcing.</p> <p>Contract Worker Agreement (<i>PKWT</i>)</p> <ul style="list-style-type: none"> - Specific Time Work Agreement dated 1 September 2021 between the employer and Dermawan Syahputra for replanting work is valid until 03 December 2021. The work agreement has been extended several times until the updated work agreement is 02 January 2024 to 31 January 2024 with upkeep field work. By extending the <i>PKWT</i> period, the company can show proof of compensation payments when the <i>PKWT</i> ends, for example calculating compensation on December 30 2023 for the 12 month work period. Proof of compensation payment is shown via Bank Mandiri transfer to the worker's account. 		Complied

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		<ul style="list-style-type: none"> - Specific Time Work Agreement dated 01 February 2024 between the employer and Dimas Dwi Pratama Sitorus for work in nursery is valid until 01 February 2024. This work agreement is the first SPK. <p>Submission of Part of the Work to Third Parties (outsourcing)</p> <p>Based on the results of document reviews, interviews and field visits, it is known that PT Tolan Tiga Indonesia handed over part of the work to the Tolan Tiga Employee Services Cooperative. In this regard, several supporting documents have been presented as follows:</p> <ul style="list-style-type: none"> - Employment Agreement Letter No.01/TTI/KJK/I/2024 between PT Tolan Tiga Indonesia and the Tolan Tiga Employee Services Cooperative regarding Cooperation in providing plant maintenance/cleaning, Mature, Immature, Preparation, Nursery and building cleaning work with the validity period of the agreement 1 year and can be extended according to agreement - Proof of reporting on types of supporting work Number: 560/204/Naker/I/2024 from the Head of the Labuhan Batu Selatan Regency Employment Service dated January 29 2024 - Attachment to PT Tolan Tiga Indonesia Employee Services Cooperative business permit NIB 0220306151759 date of issue of first project business permit 15 January 2020 with KBLI 47219 (Retail trade in other agricultural products) and KBLI 46209 (Wholesale trade in agricultural products and other live animals) - NIB 0220306151759 issued by the OSS Institute with KBLI (01611) Land Processing Services, KBLI 016012 (Fertilization services, planting seeds and pest and weed control), KBLI 01613 (Harvesting Services), KBLI 46209 (Wholesale of agricultural and animal products other living), KBLI 47219 (Retail trade in other agricultural products), and KBLI 49431 (Motorized transportation for general goods) 	
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		The handover of part of the work is in accordance with what is stated in Minister of Manpower Regulation 11 of 2019 concerning the Second Amendment to Regulation of the Minister of Manpower and Transmigration Number 19 of 2012 concerning Conditions for Handing Over Part of the Work to Another Company	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Company has been shown evidence that comply with labour requirement shown by :</p> <p>Regular working hour</p> <p>As stated in Collective Labour agreement and interview with worker representative working hour is 7 hours in a day for 6 days. No issue regarding regular working hour both from worker or labour union. During working hours you are also given a break of 1 hour</p> <p>Overtime</p> <p>The company has a PKB (Collective Labour Agreement) for the 2022-2024 period which, among other things, regulates overtime working hours where there is a statement that the maximum overtime working hours are 4 hours per day or 18 hours a week excluding overtime on national holidays or other holidays. The overtime documentation taken is the Overtime Order and the daily overtime.</p> <p>Implementation of entitlement holiday</p> <p>The company has a Collective Labor Agreement for the period 2022 – 2024, which in Article IV regarding working hours states:</p> <ul style="list-style-type: none"> • Weekly rest day: In general, the weekly rest day is Sunday unless another day is determined by management considering the interests of the company and the wishes of workers and agreements • Official holidays: Days set by the government • Work on weekly rest days and official holidays: Workers are not employed unless it is unavoidable and if circumstances arise that require work 	OFI

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		<p>immediately (for example in the event of a disaster) taking into account the applicable laws and regulations.</p> <p>Submission of Part of the Work to Third Parties (outsourcing)</p> <p>Based on the results of document reviews, interviews, and field visits, it is known that PT Tolan Tiga Indonesia handed over part of the work to the Tolan Tiga Employee Services Cooperative. In this regard, several supporting documents have been presented as follows:</p> <ul style="list-style-type: none">- Employment Agreement Letter No.01/TTI/KJK/I/2024 between PT Tolan Tiga Indonesia and the Tolan Tiga Employee Services Cooperative regarding Cooperation in providing plant maintenance/cleaning, Mature, Immature, Preparation, Nursery and building cleaning work with the validity period of the agreement 1 year and can be extended according to agreement.- Proof of reporting on types of supporting work Number: 560/204/Naker/I/2024 from the Head of the Labuhan Batu Selatan Regency Employment Service dated 29 January 2024.- Attachment to PT Tolan Tiga Indonesia Employee Services Cooperative business permit NIB 0220306151759 date of issue of first project business permit 15 January 2020 with KBLI 47219 (Retail trade in other agricultural products) and KBLI 46209 (Wholesale trade in agricultural products and other live animals).- NIB 0220306151759 issued by the OSS Institute with KBLI (01611) Land Processing Services, KBLI 016012 (Fertilization services, planting seeds and pest and weed control), KBLI 01613 (Harvesting Services), KBLI 46209 (Wholesale of agricultural and animal products other living), KBLI 47219 (Retail trade in other agricultural products), and KBLI 49431 (Motorized transportation for general goods).	
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		<p>The handover of part of the work is in accordance with what is stated in Minister of Manpower Regulation 11 of 2019 concerning the Second Amendment to Regulation of the Minister of Manpower and Transmigration Number 19 of 2012 concerning Conditions for Handing Over Part of the Work to Another Company.</p> <p><i>Opportunity for Improvement:</i></p> <p>The company has demonstrated evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements, however, without considering the right to adequate rest time for every workers, it can be but not necessary to lead a non-conformity if not addressed.</p>	
6.2.4	<p>(C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the results of the field visit, it is known that the welfare facilities and infrastructure provided by the company to employees include the following:</p> <ul style="list-style-type: none"> • Employee housing • Clean water supply • Electricity subsidies • Daycare • Waste management • Sports facilities such as badminton courts and volleyball courts. <p>The results of interviews with employee representatives from Perlaian POM, Perlavian Estate and Tolan Estate revealed that the facilities and infrastructure provided were in good condition. Even if there is damage, it can be followed up immediately through reporting.</p>	Complied
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p>	<p>Several efforts have been made by the company to increase the ease of workers accessing adequate, sufficient, and affordable food, such as:</p>	Complied

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	- Minor compliance -	<ul style="list-style-type: none"> • The existence of employee cooperatives • Shop in employee housing • Providing rice allowance <p>Interviews with employee representatives and labour union representatives, information was obtained that there was never any difficulty in fulfilling the need for adequate food due to the existence of resources in the plantation area. Access to the market was also felt to be quite easy.</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>Until now, the DLW benchmark for Indonesia has not been set, so the company calculates the prevailing wage with minimum wage components, 1 month salary bonus/year, 1 kg meat money/year, bonus, rice and electricity with a prevailing wage value of IDR 5,262,722.</p>	Complied
<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 the results of document review such as employee lists, payroll payments, pay slips and interviews with employee representatives, it is known that all core work such as harvesting and processing is carried out by permanent employees.</p>	Complied

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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>Unit of certification has a policy related to freedom of association set in Policy No. QMM-40-01-P13-22-08-2022/Rev.2 Freedom of Association Policy, approved by President Director dated 22 August 2022. The policy stated that:</p> <ul style="list-style-type: none"> • PT Tolan Tiga Indonesia recognises the role of lawful and independent workers and employees representative organizations in creating a constructive working environment. • PT Tolan Tiga Indonesia supports the implementation of the laws and regulations of the Republic of Indonesia relevant to Freedom of Association for workers and employees. • This policy applies to PT Tolan Tiga Indonesia and to all companies under the management of PT Tolan Tiga Indonesia. <p>This policy has been disseminated to all workforce regularly, the last one was on 10 & 12 January 2024.</p> <p>Serikat Pekerja Tolan Tiga Mandiri (SPTTM) The composition of Serikat Pekerja Tolan Tiga Mandiri (SPTTM) PT Tolan Tiga Indonesia for period 2020-2025 includes:</p> <p><i>Pengurus Induk</i></p> <ul style="list-style-type: none"> • Chairman: Edi Sofian Nasution • Vice Chairman: Sapri Syam • Secretary: Ismail <p><i>Pimpinan Unit Kerja (PUK) Perlabian Mill</i></p> <ul style="list-style-type: none"> • Chairman: M Neldrayani Nasution • Vice Chairman: Edi Sandro • Secretary: Ahmad Sabran <p><i>Pimpinan Unit Kerja (PUK) Perlabian Estate</i></p>	Complied
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		<ul style="list-style-type: none"> Chairman: Suyanto Vice Chairman: Suriadi Secretary: Assrian Syahputra Tarigan <p><i>Pimpinan Unit Kerja (PUK) Tolan Estate</i></p> <ul style="list-style-type: none"> Chairman: Dudu Sanorba Siahaan Vice Chairman: Abdul Haris Sagala Secretary: Juliadi <p><i>Tanda Bukti Pencatatan Nomor 11/STTM-PT.TTI/PL-VIII/2021 dated 26 August 2021 issued by Manpower Agency of Labuhanbatu Selatan Regency.</i></p> <p><i>Lembaga Kerjasama Bipartit (LKS Bipartit) Perlabian POM</i> <i>Surat Keputusan Kepala Dinas Ketenagakerjaan Kabupaten Labuhanbatu Selatan Nomor: KEP.560/03/NAKER/I/2024 dated 20 January 2024 issued by Manpower Agency of Labuhanbatu Selatan Regency. The membership composition of the LKS Bipartit includes:</i></p> <ul style="list-style-type: none"> Chairman: Sariman Sihombing (Company Representative) Vice Chairman: M. Neldrayani (Worker Representative) Secretary: Horas M. Butar Butar (Company Representative) Member: Ahmad Syabran (Worker Representative), Defi Syafrizal (Company Representative), Debi Fadli (Worker Representative) <p>The LKS Bipartite of Report with Letter Number 20/KRE-EXT/II/2024 dated 01 February 2024 was reported to the Manpower Agency of Labuhanbatu Selatan Regency.</p> <p><i>Lembaga Kerjasama Bipartit (LKS Bipartit) Perlabian Estate</i> <i>Surat Keputusan Kepala Dinas Ketenagakerjaan Kabupaten Labuhanbatu Selatan Nomor: KEP.560/05/NAKER/I/2024 dated 20 February 2024 issued by Manpower Agency of Labuhanbatu Selatan Regency. The membership composition of the LKS Bipartit includes:</i></p> <ul style="list-style-type: none"> Chairman: Burlen J. Sihombing (Company Representative) 	
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		<ul style="list-style-type: none"> • Vice Chairman: Suyanto (Worker Representative) • Secretary: Elfradial Nasution (Company Representative) • Member: Edi Sofiyan (Worker Representative), Budi Sentosa Dongoran (Company Representative), Rio Evaldo Nasution (Company Representative), Assrian Syahputra Tarigan (Worker Representative), Suryadi (Worker Representative). <p>The LKS Bipartite of Report with Letter Number G/01/PLE/2023 dated 05 January 2024 was reported to the Manpower Agency of Labuhanbatu Selatan Regency.</p> <p><i>Lembaga Kerjasama Bipartit (LKS Bipartit) Tolan Estate</i> <i>Surat Keputusan Kepala Dinas Ketenagakerjaan Kabupaten Labuhanbatu Selatan Nomor: KEP.560/15/Naker/VI/2023</i> dated 05 June 2023 issued by Manpower Agency of Labuhanbatu Selatan Regency. The membership composition of the <i>LKS Bipartit</i> includes:</p> <ul style="list-style-type: none"> • Chairman: M. Said Abdullan Hasibuan (Company Representative) • Vice Chairman: DS. Siahaan (Worker Representative) • Secretary: Tamrin Budi Prasetyo (Company Representative) • Member: Juliadi (Worker Representative), Fadly Fazlurrahman (Company Representative), Abd Haris Sagala (Worker Representative), Mhd. Arif Syahputra (Company Representative), Nanda Seprizal (Worker Representative). <p>The LKS Bipartite of Report with Letter Number 004/D/TLE-Disnaker/2024 dated 23 February 2024 was reported to the Manpower Agency of Labuhanbatu Selatan Regency.</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>Minutes of meetings between the company with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request. Sample during this assessment as below:</p> <ul style="list-style-type: none"> • Minutes of Meeting the LKS Bipartit Perlabian POM with Serikat Pekerja Tolan Tiga Mandiri on 17 November 2023 and 19 December 2023 with a meeting agenda to discuss employee requests regarding the provision of water 	Complied

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		<p>suitable for consumption, filling roads in housing, repairing ditches, routine cleaning programs for ditches in housing to prevent flooding, holding morning roll call combined every Monday, checking workers' vehicles when they leave the factory.</p> <ul style="list-style-type: none"> • Minutes of Meeting the LKS Bipartit Perlabian Estate with Serikat Pekerja Tolan Tiga Mandiri on 16 December 2023 with the agenda for a meeting to negotiate wages and increase production after the premium increase. • Minutes of Meeting the LKS Bipartit Tolan Estate with Serikat Pekerja Tolan Tiga Mandiri on 07 February 2024 with a meeting agenda to discuss the follow-up to the results of the previous meeting, the problem of decreasing FFB production for the period January – February 2024 due to changes in blocks being amalgamated so that adjustments still need to be made in the field, national OHS day ceremony activities, applications increase in transport premiums from SPTTM. <p>Based on the interviews with trade union representatives and their members who work in each unit, it's known that the trade union held meetings whenever it's needed. The meetings accommodated in bipartite and internal meeting and there has been no labor issue that brought to Manpower Agency.</p>	
6.3.3	<p>Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Based on interview, it is known that the management does not interfere with the formation or operation of registered labour union. There is no coercion and intervention related to membership and the course of the organization.</p> <p>Based on result of interview with labor union representatives, it has also known that there is not any intervention by company to the election of workers representative in Bipartite.</p>	Complied
Criteria 6.4: Children are not employed or exploited.			

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6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. - Minor compliance -	Company has a Child Labor Policy dated 22 August 2023 which stated PT Tolan Tiga Indonesia is committed to not employing child who will damage the future. It has been socialized to employee and contractor for example in February 2024. Based on document review from employee list update February 2024 known that there is no worker with age under 18. Interview with worker representative, supervisor, and worker union representative known that its policy has been implemented in the company. Person interviewed said that child labour is prohibited.	Complied
6.4.2	(C) Documented evidence on the fulfilment of worker's minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available. - Critical (Major) compliance -	Evidence of Child Labour Policy dated 22 August 2022 has been implemented shown with: - The job requirements state that the minimum age applicants is 18 years - Results of employee document verification for the February 2024 update revealed that there were no employees who started working for the first time with the company under the age of 18 years old. - Based on a sampling of work agreement letters, it is known that there were no workers under the age of 18 when they first started working at the company. - Interview with worker representative they known about child labour policy. - Interview with Labour Agency of Labuhanbatu Selatan district there is no issue related Child Labour in the company.	Complied
6.4.3	(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work. - Critical (Major) compliance -	There is no young person which work with the company. Minimum age for worker are 18 years old.	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -	No child labour policy has been disseminated to all internal and external stakeholder for example: - 6 February 2024 to all resident in Perlavian Estate Housing Complex	Complied

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		<p>- 23 February 2024 to all worker in Perlavian Estate, Tolan Estate, and Perlavian POM (Include for the contractor)</p> <p>Interview result with related stakeholder for example village representative and agencies representative known all of company policy has been disseminated at least once a year. Field observation result to the company activities for example upkeep, manuring, pesticide application, mill processing, and others there is no child labour found. Workers and supervisor also have good knowledge related prohibition of child labour as described in the policy.</p>	
Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p>(C) A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>The company established Sexual Harassment Policy No.QMM-40-01-P10/27-03-2019 signed by President Director on 27 March 2019. The policy stated the company is committed to ensuring harmonious and productive work environment for its workers. This commitment recognizes that the workplace should be free of sexual harassment. Sexual harassment is unwanted, unwelcome, and offensive behavior and will not be tolerated under any circumstances. The company supports a strict implementation of the laws and regulations of Republic of Indonesia punishing sexual harassment. All report of sexual harassment will be dealt with a sympathetic and confidential manner to help achieve fair hearings of the reports. No person/whistleblower is to be victimized for reporting sexual harassment. Besides that, policy also stated:</p> <ul style="list-style-type: none"> • Sexual harassment can take many forms and may include physical contact, verbal comments, propositional jokes, display of offensive material or other behavior. • All reports of sexual harassment will be handled properly and confidentially to obtain true and fair statements. Workers/people/whistleblowers should not become victims for reporting sexual harassment. • Sexual harassment applies equally to both male and female workers. 	Complied

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		<p>The company shows minutes of socialization of company policies to workers on 10 & 12 January 2024. Based on interview with sample of female workers, it is clearly that they have understood the company's policies on prevention of sexual harassment.</p> <p>The Gender Committee Contact Group (GCoCG) has been established by the organization. Each estate and mill have appointed representative for gender committee. The committee consider matters such as; dissemination on women's rights, child care facilities to be provided by the growers and millers, women to be allowed to breastfeed up to 2 years before resuming chemical spraying/manuring or usage tasks, and women to be given specific break times to enable effective breastfeeding. Organization has also set several signboards about this policy in the bulletin board in every office/mill estate. An interview with GCoCG in Estate and Mill revealed that there were no reported cases of sexual harassment in the last one-year period.</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>The company established has a Protection of Reproductive Rights Policy No.QMM-40-01-P11/27-03-2019 signed by President Director on 27 March 2019. The policy stated, the company consider the main components of reproductive health to be:</p> <ul style="list-style-type: none"> • Counseling on sexuality, pregnancy, contraceptives, infertility, infection and the related diseases, education on sex and gender. • Prevention and curing of infections on reproduction tracts, including of HIV/AIDS and such other maternity issues. • Prenatal care, delivery by health professionals, and postnatal care, medical care for infants and children. • Encouraging and supporting men to take their share of responsibility on sexual and reproductive behaviour, during pregnancy, on mother-and-child healthcare, on pregnancy planning, on HIV/AIDS and on domestic violence. <p>This policy has been disseminated to all workforce regularly, the last one was on 10 & 12 January 2024.</p>	Complied

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		Based on interview with sample of female workers and nurse, it is clearly that company are respectful on protection of reproductive rights. In example, female workers who has children are given to breastfeeding time for 30-45 minutes every day and not assign in high-risk area (spraying, manuring and or handling chemical substance) for 2 years. Besides that, menstrual leave and maternity leave has been granted in accordance with existing regulations.	
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 the need of expectant mother and new mother. The company has fulfilled their need by providing:</p> <ul style="list-style-type: none"> • Clinic including company's doctor and paramedic, for getting regular check-up, consultation and giving birth. • Monthly '<i>Posyandu</i>' as an event to check their maternity (fetuses) and babies under 5 years old, to give consultations and vitamins. • Maternity leave: 3 months including before and after giving birth in accordance with legal regulation. • Company's ambulance for emergency respond, to get to nearest hospital. • Daycare/crèche. • Breastfeeding time <p>Consultation conducted via questionnaire "Formulir Interview dengan Ibu Baru Bersalin/Menyusui". The questionnaire consist of: status of work; presence of children need breastfeeding; exclusive breastfeeding; breastfeeding frequency; breastfeeding timeframe; permission from company for breastfeeding time; breastfeeding frequency during working hour; breastfeeding time adequate; provision of specific place for breastfeeding; pay deduction for time used during breastfeeding time; Provision of access to information related to breastfeeding consultation, baby health and vaccination.</p> <p>For example, Interview Form with New Maternity/Breastfeeding Mother PT Tolan Tiga Indonesia – Tolan Estate on behalf of SSA (Clerk Division), date of return to work 10 July 2023, date of interview 12 July 2023. Interview results:</p>	Complied

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		<ul style="list-style-type: none"> The company provides time for mothers to breastfeed more than twice during working hours. The company provides a place for workers who want to give breast milk to their babies. The company has provided facilities for consultations for babies and breastfeeding mothers. The company provides access to health education for babies and breastfeeding mothers. The company provides access to take babies to get immunizations and/or attend <i>posyandu</i>. <p>Based on interview with sample of female workers and nurse, it is clearly that company are respectful on protection of reproductive rights. In example, female workers who has children are given to breastfeeding time for 30-45 minutes every day and not assign in high-risk area (spraying, manuring and or handling chemical substance) for 2 years. Besides that, menstrual leave and maternity leave has been granted in accordance with existing regulations.</p>	
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>The company has established procedures related to grievance such as :</p> <ul style="list-style-type: none"> Resolution of Internal Complaint refers to the Internal Grievance mechanism (HRD-04-01/01-04-2019/Rev.1) dated 5 April 2019. Resolving external complaints refers to the External Grievance mechanism (HRD-04-02/19-02-2019/Rev.0) dated 19 February 2019. Whistleblowing policy refers to company policy No. QMM-40-01-P16 (Whistleblowing Policy) dated 14 January 2019. Whistleblowing Policy PT Tolan Tiga Indonesia (QMM-40-01-P16/14-01-2019/Rev.1) which was ratified by the President Director on 14 January 2019. The policy states that the company encourages its employees who have concerns about alleged violations to come forward and express these concerns without fear of punishment or unfair treatment. PT Tolan Tiga Indonesia guarantees the confidentiality of reports and information provided, the confidentiality of the 	Complied

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		<p>reporter or sender of the report even if the report cannot be disclosed or there is an error in reporting. The company encourages its employees who have concern about suspected misconduct to come forward and express these concerns without fear of punishment or unfair treatment. PT Tolan Tiga Indonesia guarantees the confidentiality of the report and the information it contains, as well as the anonymity of the Whistleblower or sender, even if the report is subsequently proven to be incorrect or unfounded.</p> <p>This procedure has been disseminated regularly to all workforce and the last one was on 10 & 12 January 2024.</p> <p>Until this audit, based on the document verification. there are no internal or external complaints related to reporting sexual harassment and violations of reproductive rights. This was supported by recognition from workers who have been interviewed who say that so far there have been no complaints against the company.</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 - Critical (Major) compliance - 	<p>All workers who work in PT Tolan Tiga Indonesia area are voluntary and based on an agreement between both parties. The company also has a commitment to fostering basic working relationships as can be seen in several documentation as follows :</p> <ul style="list-style-type: none"> - There are established procedures and policies relating to employment - There is worker agreement which has been agreed by both parties - There is a Collective Labour Agreement period 2022 - 2024 <p>Example for work agreement:</p> <ul style="list-style-type: none"> - Spesific Time Work Agreement dated 01 September 2021 between the employer and Dermawan Syahputra for replanting work is valid until 03 December 2021. The work agreement has been extended several times until 	Complied

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		<p>the updated work agreement is 02 January 2024 to 31 January 2024 with upkeep field work.</p> <ul style="list-style-type: none"> - Specific Time Work Agreement dated 01 February 2024 between the employer and Dimas Dwi Pratama Sitorus for work in nursery is valid until 01 February 2024. This work agreement is the first <i>SPK</i>. - Employment Agreement Letter No.01/TTI/KJK/I/2024 between PT Tolan Tiga Indonesia and the Tolan Tiga Employee Services Cooperative regarding Cooperation in providing plant maintenance/cleaning, Mature, Immature, Preparation, Nursery and building cleaning work with the validity period of the agreement 1 year and can be extended according to agreement <p>Interview result from worker representative and worker union known that the company has a good commitment to human resource management. There is no issue related forced labour, involuntary overtime, debt bondage, withholding of wage, and others.</p>	
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>Based on the results of document reviews, interviews and field visits, it is known that there are no migrant workers at PT Tolan Tiga Indonesia, however, it is still found that there is use of PKWT workers. Regarding this matter, SOP HRD-01-03/12-12-2022/Rev.3 concerning Recruitment for PKWT/FL (Non-Staff) was approved by PD on 03 Feb 2023. The procedures include explaining:</p> <ul style="list-style-type: none"> • Analysis of the needs of budget/non-budget <i>PKWT</i> employees • Proposal for <i>PKWT</i> needs • Send memo to RMO • Approval letter • Work agreement • FL and <i>PKWT</i> are not for primary work such as harvesting and processing • The <i>PKWT</i> made refers to PP 35 of 2021 • FL and <i>PKWT</i> must be included in the <i>BPJS Kesehatan</i> and <i>Ketenagakerjaan</i> program and receive wages according to the <i>UMR/UMP/UMK</i> 	Complied

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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>The responsible in health and safety has been established in accordance with the legal requirements, that is OHS Committee (<i>Panitia Pembina Keselamatan dan Kesehatan Kerja/P2K3</i>) that has been approved by Manpower Agency, and the Secretary is a legal OHS Expert. Record of OHS Committee registration such as:</p> <ul style="list-style-type: none"> • Surat Keputusan Kepala Dinas Tenaga Kerja Provinsi Sumatera Utara No.566-013-7/DTK/SU/I/2023 dated 05 January 2024 concerning <i>Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) di PT Tolan Tiga Indonesia – Perlabian POM.</i> • <i>Surat Keputusan Kepala Dinas Ketenagakerjaan Kabupaten Labuhanbatu Selatan Nomor: KEP.03/P2K3/Naker/II/2024</i> dated 20 February 2024 concerning <i>Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) di PT Tolan Tiga Indonesia – Perlabian Estate.</i> • <i>Surat Keputusan Kepala Dinas Ketenagakerjaan Kabupaten Labuhanbatu Selatan Nomor: KEP.14/P2K3/naker/X/2023</i> dated 10 October 2023 concerning tentang <i>Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) di PT Tolan Tiga Indonesia – Tolan Estate.</i> <p>Records of OHS Expert on behalf of Atmadia Pratama (<i>Keputusan Menteri Ketenagakerjaan RI</i> concerning Appointment OHS Expert, issued on 12 December 2022 valid until three years.</p> <p>The safety committee (P2K3) regular meeting has been performed each month, discussed regarding OHS plan program achievement and corrective actions to achieve target and improve the program such as Personal Protective Equipment (PPE), hazard from animal, safety notes, accidents etc. The actions were monitored for realization and reported to management and local authority. Concerns of all parties about health, safety and welfare were discussed at the meeting such as: review of accident, PPE Checklist update, result of internal audit, incident investigation, etc. Samples of document that has been reviewed</p>

Complied

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		<p>during audit such as meeting on 20 January 2024 (Perlabian POM), on 04 December 2023 (Perlabian Estate), and on 13 January 2024 (Tolan Estate).</p> <p>Quarter Report of P2K3 to Manpower Office of Sumatera Utara Province (DPTP PK WIL IV). Samples of document that has been reviewed during audit such as:</p> <ul style="list-style-type: none"> • Letter No. 11/PLM-II/2024 dated 19 February 2024 regarding reporting of the P2K3 Report Perlabian POM for the four quarter of 2023. • Letter No. G/09/PLE/2024 dated 19 February 2024 regarding reporting of the P2K3 Report Perlabian Estate for the four quarter of 2023. • Letter No. G/25/PLE/2023 dated 17 October 2023 regarding reporting of the P2K3 Report Perlabian Estate for the thirs quarter of 2023. • Letter No. 001/I/TLE-Disnaker/2024 dated 29 January 2024 regarding reporting of the P2K3 Report Tolan Estate for the four quarter of 2023. <p>Based on the explanation above, it can be concluded that the company has a person in charge of OHS which has been approved by the relevant agency, the availability of documents for periodic meetings between the person in charge and all the interests of all parties related to OHS have been discussed at the meeting.</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>The company has prepared the document of accident and emergency procedures available in:</p> <ul style="list-style-type: none"> • <i>Pertolongan Pertama pada Kecelakaan</i> - First Aid (SOP Code OHS-01-04/04-02-2019/Rev.0). • <i>Prosedur Pelaporan Insiden</i> – Incident Report (SOP Code OHS-01-08/06-07-2022/Rev.1) • Land Fire Prevention and Control (SOP Code OHS-01-12/13-04-2022/Rev.2) • Emergency Response (SOP Code OHS-03-01/28-02-2020/Rev.0) <p>All SOP and work instruction available in Bahasa Indonesia and communicated in Bahasa Indonesia to worker.</p>	Complied

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		<p>Each operational units (Estate and Mill) have a First Aider Officer that has been trained, such as workplace first aid license on behalf of Suprianto (license Number 566/539-7/P3K/DTK/2020) valid until 02 March 2025.</p> <p>Based on field visits, it is known that there are built first aid kits available, for example at the Estate and Mill Office, Chemical Warehouse, Workshop and Hazardous Waste Storage. And during field operational activities, the foreman is equipped with a first aid kit. Checking the completeness of first aid equipment is carried out every month by paramedics.</p> <p>The company shows Training Report "<i>Refresh Training Pengendalian Kebakaran Hutan dan Lahan</i> (Theory & Practical) in collaboration with Manggala Agni Daerah Operational Labuhan Batu which was held on 26 and 27 July 2023, with 47 participants taking part in the training from Perlabian POM, Perlabian Estate and Tolan Estate. The training materials include the basics of forest and land fires, prevention and control techniques, techniques for extinguishing forest and land fires, introduction to and use of equipment. And for practical training in the form of prevention practices (GPS, Hot-spot applications), hose reels, team formation extinguishing technique practice, extinguishing technique practice, and extinguishing simulations.</p> <p>Records of work accidents year of 2023, such as:</p> <ul style="list-style-type: none"> • Perlabian POM, there was 2 work accidents reports, lost time accidents were 30 man-days • Perlabian Estate, there was 6 work accidents reported, lost time accidents were 26 man-days • Tolan Estate, there was 5 work accidents reported, lost time accidents were 4 man-days <p>All the incidents have been followed with investigation report. Sample seen: <i>Formulir Pelaporan Kecelakaan Kerja</i>, nomor: 01-PLE-06-AC/SHS dated 24 October 2023.</p>	
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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>The company has an OHS Procedure regarding Personal Protective Equipment (SOP Code OHS-01-10/23-07-2019/Rev.1) which explains starting from the type of PPE according to the job, workers are required to look after the PPE provided, workers carry out cleaning, inspection, maintenance and storage of PPE, as well as safety officers/OHS Expert monitoring the condition of PPE periodically, PPE that has reached its useful life or is damaged must be repaired or replaced.</p> <p>The following types of PPE are needed according to the type of work referring to the procedure above, for example:</p> <ul style="list-style-type: none"> • Welding, the type of PPE required includes welding gloves and apron, welding mask, welding goggles. • Working with chemicals/spraying/pest and disease/fertilization, the types of PPE needed include gloves, eye protection, rubber boots, rubber gloves, chemical masks. • Harvesting/cutting fruit, the type of PPE required includes eye protection (for palm trees with a height of more than 6 meters), rubber boots. • Activities exposed to noise, the required PPE is ear protection for noise areas of more than 85 dBA. • activities at the Biogas Plant, the PPE required includes respirator masks, chemical gloves, eye protection, safety shoes. <p><i>Perjanjian Kerja Bersama</i> (Collective Labor Agreement) between the company and trade union Article XV;</p> <ul style="list-style-type: none"> • point 3a states that safety shoes are given once a year to factory, workshop, warehouse, sample boy and loading ramp sorting workers as needed. • Point 3h states that boot shoes are given twice a year to the first foreman, upkeep foreman, harvester, composting, carpenter, harvest foreman, loose fruit picker, grassmower and spraying, manuring, waterpump, pest & disease. 	Complied
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		<p>It has been shown evidences of regular PPE provision especially for high risk workplace such as chemical storage, pesticide application, manuring, mill and harvesting such as :</p> <ul style="list-style-type: none"> • Handover of PPE (hand gloves, safety goggle, mask, apron) to spraying operator of Tolan Estate on 18 February 2024. • Handover of PPE (hand gloves, safety goggle, mask) to manuring workers of Tolan Estate on 10 January 2024. • Handover of PPE (safety boot) to spraying operator Tolan Estate on 27 October 2023. <p>If there is damaged PPE, the worker can request a replacement by reporting it to his superior and handing over the damaged PPE.</p> <p>The 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.</p> <p>Based on field observation, sanitation facilities and PPE storage for pesticide/fertilizer applicator provided in the Estate Offices. Therefore, the PPE and working tools are washed and stored in the special place and prohibited to be placed in worker's houses.</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>The company established the company's clinic, as well as its licensed company's doctor and paramedics. All workers including contractor's workers can use this facility. The company has complied legal compliance toward the clinic facilities and paramedic, sample as follows:</p> <ul style="list-style-type: none"> • Certificate of Hiperkes No. 17.553/PM-VII/14 issued in June 2014 on behalf of Wildan Marpaung. • Certificate of Hiperkes No. 13.781/PM-VII/12 issued on August 2012 on behalf of Heni Rubeka Br. Hutagalung • Certificate of Hiperkes No. 11.562/PM-VII/10 issued in November 2010 on behalf of M. Hairul Lubis 	Complied

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		<ul style="list-style-type: none"> • Certificate of Hiperkes No. 11.565/PM-VII/10 issued in 15 July 2003 on behalf of Siti Anora. • Certificate of Hiperkes No. 13.392/DH-VII/03 issued in 15 July 2003 on behalf Dr. Gunawanta. <p>For further medical care are covered in government employment and health insurance programs (<i>BPJS Ketenagakerjaan</i> & <i>BPJS Kesehatan</i>). This insurance has been paid monthly based on document review according to the applicable rule.</p> <p>The auditor has verified the payment of <i>BPJS Ketenagakerjaan</i> & <i>BPJS Kesehatan</i> for period December 2023, January and February 2024. It can be concluded that the payments have been conducted routinely (monthly) in accordance with total worker including family member for national health insurance.</p> <p>National Employment Insurance (<i>BPJS Ketenagakerjaan</i>):</p> <ul style="list-style-type: none"> • Record of payment for December 2023 with amount paid on 28 December 2023. • Record of payment for January 2024 with amount paid on 30 January 2024. • Record of payment for February 2024 with amount paid on 27 February 2024. <p>National Health Insurance (<i>BPJS Kesehatan</i>) has been paid for December 2023, January and February 2024 cover all employees and their families.</p> <p>Based on document review and interview with workers in Mill and Estate, there is no issue related medical care. If the clinic cannot handle the medical care, the patient will be brought to the partner hospital in the city using company's Ambulance.</p>	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	The company has shown the record of injuries using lost time accident (LTA) metrics as in " <i>Rekapitulasi Kejadian Kecelakaan Kerja</i> " year 2023.	Complied

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		<p>Lost Time Accidents metrics were using to record the accidents and injuries during year 2023. The Lost Time accidents and injuries were determined according to Decree of the Minister of Manpower and Transmigration No. 609 year 2012.</p> <p>Safety performance for both mill and estates was calculated using frequency rate (FR) and severity rate (SR).</p> <p>The calculation for FR and SR as below:</p> <ul style="list-style-type: none"> FR= total lost time accident x 1.000.000/total man hour SR=total lost time hours x 1.000.000/total man hour <p>The calculation for frequency rate and severity rate was generated from lost time accident (LTA) data, employee working hour's data and lost time day (LTD) data and Lost Time Hour data. The timesheet calculation for each month was shown during audit.</p> <p>The calculation for frequency rate and severity rate was generated from lost time accident (LTA) data, employee working hour's data and lost time hours/lost time day (LTH/LTD) data.</p> <p>Data verified – year 2023</p> <ul style="list-style-type: none"> Perlabian POM, there was 2 work accidents reports, lost time accidents were 30 man-days Perlabian Estate, there was 6 work accidents reported, lost time accidents were 26 man-days Tolan Estate, there was 5 work accidents reported, lost time accidents were 4 man-days <p>All the accidents were completed with report document and investigation. The recommendation of investigation has been followed up. The record has been verified during the audit. Those cases already reported and claim to accident insurance services (<i>BPJS Ketenagakerjaan</i>).</p>	
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Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.

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Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>Integrated pest management program for the period 2023 and 2024:</p> <ul style="list-style-type: none"> • Creation/Addition of new gupon (barn-owl box) • Gupon repair • Monitoring gupon occupation • Planting beneficial plant • Identify natural enemies of leaf-eating caterpillars • Identify beneficial weeds growing around the plantation • Pest and disease census • Ganoderma census • Release of <i>Sycanus</i> Sp • Release of <i>Eucationa</i> Sp <p>Pest and Disease Census & Control</p> <p>Carried out regularly for both mature and immature area. From the results of the detection and census for the 2023 period, it is known that potential pests whose infestation levels are above the control threshold are Oryctes and Rats. If there is an infestation level that is above the control threshold, control is carried out with pesticides as shown by the use of Coumatetralyl for rat and carbosulfan for Oryctes control. The application of Coumatetralyl is 1 gram per palm while for Marshall it is 5 grams/palm.</p>	Complied
7.1.2	<p>Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>The reference for Invasive species as per the Indonesian National Interpretation is Regulation of the Minister of Environment and Forestry of The Republic Indonesia Number P.94/MENLHK/SETJEN/KUM.1/12/2016 concerning Invasive Types. Based on the list there is no Invasive species used by the company.</p>	Complied

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7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	Based on interview with worker representative and worker union representative known that there is no fire use for pest control. Field observation result to sampling block shown that pest control is using combination between chemical, biological, and physical control.	Complied
Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	<p>The company has an Integrated Pest Management Procedure (OPM-07-04/17-07-2019/Rev.3) and a Procedure for Using and Storing Agrochemicals (OPM-09-03/15-07-2019/Rev.5). The SOP includes an explanation of the procedures for using pesticides as well as justification for when the application is carried out. Pesticide application is carried out when the level of pest infestation is above the control threshold after a pest and disease census has been carried out. Integrated Pest Management includes an Early Warning System, a combination of biological, physical and mechanical control.</p> <p>An explanation of selective products to target pests and diseases is also explained, such as the use of insecticides for pests and herbicides for weeds and fungicides to control fungi.</p> <p>The company also shows examples of the use of registered pesticides, for example as follows:</p> <ul style="list-style-type: none"> • Marathon 500 SL with active ingredient Dimehypo target control bagworm registered ID RI.01010120103769 valid until 11/06/2025 • Metsulindo 20 WP with active ingredients Methyl Metsulfuron target control ferns and broadleaf <p>Verification results on the site simpl1.pertanian.go.id show that all pesticides used have been registered and have valid registration permits.</p>	Complied
7.2.2	(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. - Critical (Major) compliance -	The company has a Recapitulation of Pesticide Use for 2023 which has information regarding the name of the pesticide, active ingredient, Ld 50, WHO class and the number of uses and area of application, which is shown using pesticides at Tolan Tiga Estate as follows:	Complied

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		<ul style="list-style-type: none"> • Pesticide with the active ingredient carbosulfan, WHO class III, total application 435.94 kg, application dose 5 grams / plant, with application amount per hectare 680 grams. • Pesticides with the active ingredient glyphosate, WHO class III. The total usage is 1,397 liters and the application area is 2,170.27 Ha with the active ingredient usage/ha being 0.31 liters <p>The results of interviews with worker representatives and management representatives revealed that pesticide use is always recorded to ensure monitoring of annual pesticide use. There is an increase in pesticide use compared to 2022 because in 2023 there will be an additional Immature area which requires more intense treatment to protect against pest and disease attacks.</p>	
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>The company has a plan to reduce pesticides by implementing integrated pest management, including the following:</p> <ul style="list-style-type: none"> • Creation / Adding new gupon (Barn Owl Box) • Gupon (Barn Owl Box) repair • Monitoring gupon occupation • Planting beneficial plants • Identify natural enemies of leaf-eating caterpillars • Identify beneficial weeds that grow around the plantation • Pest and disease census • Ganoderma census • Release of Sycaus Sp • Release of Eucationa Sp <p>This plan has been implemented routinely and continuously, for example the detection and census of plant pest organisms every month. Insecticide application is based on census and installation of barn-owl boxes and planting of beneficial plants.</p>	Complied

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		As a result of the field visit, it was discovered that the barn-owl boxes installed had been occupied, apart from that there were beneficial plants planted on the main road and collection road with the types <i>Turnera subulatta</i> and <i>Antigonon leptopus</i> .	
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines. - Minor compliance -	Based on document review and interviews with plant and disease officers, it is known that there is no prophylactic use of pesticides in either the Immature or Mature areas. Pesticide use is based on census results that are above the control threshold. Especially for weeds, pesticide application is based on rotation and identification of the diversity of weed types while still paying attention to the application dose and specific targets.	Complied
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to: - Minor compliance - 7.2.5a Judgment of the threat and verify why this is a major threat.	There is no use of class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat in the unit of certification. In terms of active ingredients, there is indeed the use of coumatetralyl with the trademark "Tikumin" for controlling rats. However, as the information on the packaging states, the pesticide formulation is 0.0375 grams with a blue label so it is included in WHO Class II.	Complied
	7.2.5b Why there is no other alternative which can be used.	According to IPM procedures, the unit of certification mostly use biological approach in order to monitoring pest attack. For example, estate using <i>Tyto alba</i> (barn-owl) to control rat infestation than using rodenticide or using <i>Sycanus dichotomus</i> as a caterpillar predator.	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	There is no use of pesticide in the unit of certification that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat.	

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	7.2.5d Process to limit the negative impacts of the application.	There is no use of pesticide in the unit of certification that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat.	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	There is no use of pesticide in the unit of certification that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and 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>The company has Procedure for Using and Storing Agrochemicals (OPM-09-03/15-07-2019/Rev.5). To ensure pesticide application is only carried out by competent officer, the company has formed a special spraying team to handle all divisions with a gang system. Based on interviews with workers, it can also be concluded that workers understand the technicalities of chemical applications as well as the hazards and risks associated with chemicals. In addition, workers were found to have fully used the free PPE provided by the company, in accordance with the identification and understanding of mechanisms to replace PPE if there is damage.</p> <p>Field visits to rinse houses and warehouses found that there were already product labels and MSDS in Indonesian for each chemical and chemical placement had been arranged based on trade name and type of chemical. In addition, the rinse house also has PPE and sanitation facilities for chemical applicators such as bathrooms, washing areas and clothesline.</p>	Complied
7.2.7	<p>(C) Storage of all pesticides in accordance with recognized best practices.</p> <p>- Critical (Major) compliance -</p>	<p>The company has an SOP for Using and Storing Agrochemicals (OPM-09-03/15-07-2019/Rev.5 dated 15 July 2019 which in the agrochemical storage section states:</p> <ul style="list-style-type: none"> • The warehouse door must be tightly closed and locked when there is no activity. • Put a mark on the storage room, including: Toxic and Hazardous Materials, Irritants, Explosive Materials. • The agrochemical label and MSDS for each type of active ingredient must be: available, complete, easy to access, easy to read. 	Complied

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		<ul style="list-style-type: none"> Agrochemicals are arranged by type. <p>The results of a field visit to the pesticide storage warehouse revealed that the procedures had been implemented well. Pesticides have been grouped according to class, equipped with MSDS, symbol of hazardous material, and emergency response facilities.</p>	
7.2.8	<p>All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.</p> <p>- Minor compliance -</p>	<p>All pesticide containers are classified as Hazardous Waste, regulated according to the Standard Operating Procedure (SOP) for Hazardous and Toxic Waste Materials (No. ENC 01-10/04-03-2019/Rev 1 dated 18 March 2019). The hazardous wastes are stored in permitted temporary hazardous waste storage facilities at Perlabin Estate (for Perlabin Estate and POM) and at Tolan Estate. They are subsequently transported by licensed transporter trucks and companies to the final disposal site.</p> <p>Upon field observation of the temporary hazardous storages at Perlabin Estate and Tolan Estate, it is confirmed that the waste/chemical containers have been segregated in accordance with their characteristics, as specified in the relevant regulations and/or instructions on the packaging. The input and output of waste (disposed of by authorized companies) have been meticulously documented in the waste logbook.</p> <p>It was observed sample of disposal manifest of pesticide container No. KLHK-1716227468 dated 29 January 2024, amount of 0.0985 Ton pesticide containers by PT Amindy Barokah Sumut.</p> <p>The waste management reports have been documented quarterly and reported to Environment and Forestry, Government of Labuhanbatu Selatan Regency, and Government of Sumatera Utara Province. The recent report has been submitted electronically on 20 January 2024.</p> <p>1. Report on the Hazardous Waste Management of PT Tolan Tiga Indonesia, 4th Quarter of 2024 has been submitted to the Ministry of Environment and Forestry (ID TTE SIMPEL: 1705721477-3163), for period 01/10/2023 – 31/12/2023.</p>	Complied

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		<p>2. Report on the Hazardous Waste Management of PT Tolan Tiga Indonesia, 4th Quarter of 2024 has been submitted to the Government of Labuhanbatu Selatan Regency (ID TTE SIMPEL: 1705721504-3163), for period 01/10/2023 – 31/12/2023.</p> <p>3. Report on the Hazardous Waste Management of PT Tolan Tiga Indonesia, 4th Quarter of 2024 has been submitted to the Government of Sumatera Utara Province (ID TTE SIMPEL: 1705721492-3163), for period 01/10/2023 – 31/12/2023.</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>Until this assessment was carried out, there had been no aerial application of pesticides. This was also confirmed from the results of interviews with management representatives, IPM foremen as well as the results of field visits to warehouse areas where there were no facilities and infrastructure for controlling pests by air.</p> <p>There is a plan for using drone in pesticide application and is still in the stage of management discussion.</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>The company has conducted the special annual medical surveillance for pesticides operators. This medical check up cooperates with Laboratorium Klinik Kesehatan Spesialis Anugerah Ibu – Medan. Records of MCU in 2023 as follow:</p> <ul style="list-style-type: none"> Tolan Estate Estate: special health examination for high-risk employees on 31 July 2023 which was attended by 16 pesticide operators. The results of the health examination stated that all employees examined were in good condition. Perlabian Estate: special health examination for high-risk employees on 01 August 2023 which was attended by 23 pesticide operators. The results of the health examination stated that all employees examined were in good condition. 	Complied
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>Based on document "<i>Daftar Pemeriksaan Haid</i>", "<i>Catatan Kehamilan</i>" and "<i>Catatan Menyusui</i>", period of January and February 2024, obtain information</p>	Complied

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	- Critical (Major) compliance -	<p>there are no spraying and or manuring workers that working in pregnant or breastfeeding condition.</p> <p>Based on interview with workers on handling pesticides, there was no works with pesticides is undertaken by person under the of 18, pregnant or breastfeeding women or other people that have medical restrictions.</p> <p>This information later verified during interview with workers and paramedic, where all of them are female workers. They stated that female workers who has children are given to breastfeeding time for 30-45 minutes every day and not assign in high-risk area (spraying, manuring and or handling chemical substance) for 2 years. Besides that, menstrual leave and maternity leave has been granted in accordance with existing regulations.</p>	
<p>Note For 7.2.11</p> <p>Referring to Act No. 13 of 2003 concerning Manpower, Act No. 35 of 2014 concerning Child Protection, and taking into account the risks of hazards on palm oil plantations and mills on the development and physical, mental and social health of children, the national interpretation mandates that the unit of certifications does not employ people under the age of 18 for pesticide spraying. For this reason, the provisions of young workers under 18 years in indicator 7.2.11 are irrelevant.</p>			
<p>Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.</p> <p>- Minor compliance -</p>	<p>The Unit of Certification has established and put into action a waste management plan that encompasses reduction, recycling, reusing, and disposal methods tailored to the toxicity and hazardous characteristics of the waste. According to the waste management plan document dated 2 January 2024, various treatment methods for waste are outlined, including:</p> <ol style="list-style-type: none"> 1. Solid and sharp waste from clinic: Every day it is collected in special containers for each solid and sharp waste; Waste containers are equipped with the Bio Hazard (Infectious) symbol; Storage containers are impermeable to fleas and vermin; The storage period for waste in the clinic is no later than 14 days or if the container bag is 2/3 full; Waste is handed over to the hazardous waste collection/transporter/management company; refer to clinical waste management procedures (Clinic Waste Management Med-01-02). 	Complied

		<p>2. Liquid domestic waste: Construction of septic tanks in every staff/employee house and office; Domestic Waste management has been carried out using Wastewater Treatment facilities.</p> <p>3. Solid domestic waste: Every house is provided with a rubbish bin; at least twice a week, inorganic waste from housing is collected and transported to the Landfill which is located in estate location far from housing; Organic waste is thrown into the interrow between oil palm plants.</p> <p>4. Hazardous waste: Stored in a temporary hazardous waste storage that has license from the relevant government agency; temporary hazardous waste storage is equipped with second containment, oil trap, spill kit to prevent spills; Completed with hazardous waste symbols and labels; Recorded online in "SIRAJA LIMBAH" application; Handed over to hazardous waste transport and collection companies that have license from the Ministry of Environment and Forestry.</p> <p>5. Ex agrochemical container: Re-used as a spraying solution container, after triple-rinse the inside with clean water, removing the original label and giving it a toxic symbol.</p> <p>6. Solid waste and effluent from palm oil mill; e.g. EFB, POME, bunch ash, and solid. EFB collected in one place, then delivered to Estate for organic fertilizer; Palm oil mill liquid waste (POME) is processed in the biogas plant to produce CH₄ gas which is then sent to the boiler to assist the combustion process; CH₄ also be flared so that it turns into CO₂; Waste from the biogas plant is channelled to the estate (Land Application) as organic fertilizer; Boiler ash is collected somewhere far from residential areas; Every waste released or processed is recorded in a logbook.</p> <p>All pesticide and agrochemical containers that produced from Estate and Mill are disposed and stored at licensed temporary hazardous storage (TPS LB3) which located at Perlavian Estate and Tolan Estate.</p>	
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		<ul style="list-style-type: none"> • Permit of hazardous and toxic waste temporary storage (TPS LB3) Perlarian Estate as referred No.503/0003/DPMPTSP-LS/V/2020, dated 8 May 2020, valid for 5 years. Source of waste covering Perlarian POM and Perlarian Estate. • Permit of hazardous and toxic waste temporary storage (TPS LB3) Tolan Estate as referred No.503/0004/DPMPTSP-LS/V/2020, dated 8 May 2020, valid for 5 years. Source of waste covering Tolan Estate. <p>It was observed sample of disposal manifest of pesticide container No. KLHK-1716227468 dated 29 January 2024, amount of 0.0985 Ton pesticide containers by PT Amindy Barokah Sumut.</p> <p>The waste management reports have been documented quarterly and reported to Environment and Forestry, Government of Labuhanbatu Selatan Regency, and Government of Sumatera Utara Province. The recent report has been submitted electronically on 20 January 2024.</p> <ol style="list-style-type: none"> 1. Report on the Hazardous Waste Management of PT Tolan Tiga Indonesia – Tolan Estate, 4th Quarter of 2023 has been submitted to the Ministry of Environment and Forestry (ID TTE SIMPEL: 1705721477-3163, for period 01/10/2023 – 31/12/2023. 2. Report on the Hazardous Waste Management of PT Tolan Tiga Indonesia – Tolan Estate, 4th Quarter of 2023 has been submitted to the Government of Labuhanbatu Selatan Regency (ID TTE SIMPEL: 1705721504-3163, for period 01/10/2023 – 31/12/2023. 3. Report on the Hazardous Waste Management of PT Tolan Tiga Indonesia – Tolan Estate, 4th Quarter of 2023 has been submitted to the Government of Sumatera Utara Province (ID TTE SIMPEL: 1705721492-3163, for period 01/10/2023 – 31/12/2023. <p>During the ASA 2_4 visit to the temporary hazardous and toxic waste storage, it was observed that the conditions were in compliance with the permits and the requirements outlined in the Decree of the Head of Bapedal No.Kep-</p>	
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		<p>01/Bapedal/09/1995. Additionally, each housing compound unit has been equipped with permitted wastewater treatment installations to guarantee the appropriate disposal of wastewater. This constitutes a crucial measure in preserving a healthy living environment and mitigating the risk of potential contamination in the surrounding area.</p> <p>Furthermore, the unit of certification has allocated a dedicated site for the disposal of degradable waste. This area is equipped with an appropriate dumping system to guarantee the safe and efficient disposal of waste. This dedication to responsible waste management plays a pivotal role in safeguarding the environment and reducing the adverse effects of human activities. Moreover, it contributes to the promotion of sustainable development and the responsible utilization of resources.</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>Efforts have been made by the unit of certification to ensure the responsible handling of domestic waste originating from workers' compounds. Inorganic waste, notably plastic waste, is directed to designated landfills. By channelling waste to these designated landfills, the unit aims to prevent the buildup of waste in the surrounding environment, thus averting potential contamination and environmental deterioration. Field observation during ASA 2_4 conducted to landfill at Block J13 for inorganic waste from Division 1 and 2 Perlavian Estate and landfill at Blok B19 Division 2 Tolan Estate. Observed that landfill equipped with fence, and signboard explaining the opening date and types of waste that are prohibited from being disposed into the landfill.</p> <p>Organic waste from the workers' compounds is buried at the backyard of their compound, which is an acceptable method of disposal for this type of waste. This method also helps to minimize the amount of waste that needs to be disposed to the landfill.</p> <p>Based on interview with workers and their families, known that they have aware segregation and a proper disposal of waste material. Verified that there is no inorganic waste disposed to the organic waste pit, and no hazardous waste disposed to the landfill.</p>	Complied

		Moreover, the unit of certification has adhered to regulations pertaining to the installation of domestic wastewater management systems. This entails the implementation of appropriate systems to handle the domestic wastewater produced by workers in the compounds. Following a field visit to the housing compounds at Perlarian POM, Division 4 Perlarian Estate and Division 2 Tolan Estate, it was confirmed that the domestic wastewater management systems had been installed in accordance with the pertinent permits. Wastewater segregation by type has been implemented in unit of certification, that black water channelled to septic tanks and grey water channelled to Wastewater Treatment facilities.	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	Based on field visit during this ASA 2_4, to the housing compounds at Perlarian POM, Division 4 Perlarian Estate and Division 2 Tolan Estate, there is no use of open fire for waste disposal. Inorganic waste, particularly plastic waste, is disposed of to the landfill, and organic waste from the workers' compounds is buried at the backyard of their compound or at interrow of the oil palm. Workers interviewed are aware that open fire for waste disposal are prohibited.	Complied
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	Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented. - Minor compliance -	The company has procedure to managed soil fertility which can be seen in : 1. OPM-06-01 dated 02 October 2017 (Anorganic Fertilizer) 2. OPM-06-02 dated 02 October 2017 (Organic Fertilizer) 3. OPM-06-03 dated 02 October 2017 (Leaf Sampling Unit and Palm Marking) 4. OPM-06-04 dated 02 October 2017 (Leaf Sampling Unit and Rachis Sampling Unit) Based on the results of interviews with employee representatives, it is known that fertilization is carried out routinely with reference to the recommendations given.	Complied

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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>Soil Analysis:</p> <ul style="list-style-type: none"> TLE: Carried out by Verdant Bioscience PT Timbang Deli Indonesia with assessment results report number: 495071920 dated 02 September 2020. Analysis results dated 07 September 2021 with test parameters including pH, OM, total N, Al+H, K, Mg, Ca included soil texture PLE: Carried out by Verdant Bioscience PT Timbang Deli Indonesia with assessment results report number: 494071820 dated 07 October 2020. Analysis results dated 14 June 2021 with test parameters including pH, OM, total N, Al+H, K, Mg, Ca included soil texture <p>Leaf Analysis:</p> <ul style="list-style-type: none"> TLE: Carried out by Verdant Bioscience PT Timbang Deli Indonesia with Assessment Results Report number: 03103A1923 dated 22 February 2023. Analysis Results March 2023 with test parameters N, P, K, Mg, Ca, B, Cu. Za PLE: Conducted by Verdant Bioscience PT Timbang Deli Indonesia with Assessment Results Report number: 10603A1822 dated 19 January. Analysis Results March 2022 with test parameters N, P, K, Mg, Ca, B, Cu. Za 	Complied
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>The company applies POME and compost as natural nutrients for plants. Records of use include in July a total of 1,115 m3 for POME and a total application of compost of 20,776.05 Kg for compost in the period January - December 2023. The results of the field visit revealed that both POME and compost had indeed been applied to the plant area. POME application is available at Perlabian Estate</p>	Complied
7.4.4	<p>Records of fertilizer inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Company has record fertilizer used which applied based on recommendation for example can be seen in Manuring recapitulation for year 2023 and informed the use of fertilizer and that period.</p> <p>Record of fertilizer input in 2023:</p> <p>- Dolomite : 395.941 Kg</p>	Complied

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		<ul style="list-style-type: none"> - MOP : 1,172,880 Kg - Rock Phosphate : 916,349 Kg - Urea : 1,250,856 Kg - Zinc Sulphate : 16,770 Kg - Zincop 25 : 574 Kg - Copper Sulphate : 33,438 Kg 	
Criteria 7.5: Practices minimise and control erosion and degradation of soils.			
7.5.1	<p>(C) Maps that identify marginal and fragile soils, including steep sloped land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Tolan Estate</p> <p>Company have a Semi Detail Soil Map with scale 1 : 30,000 year 2009 by JH Agriculture Service. Based on identification known that soil type found are Endoaquept 2 % (73 ha), Typic Kandiuult : 98% (3,553 Ha). Beside that there is an slope class map Tolani Estate scale 1 : 62,500 year 2022 with information < 1° (223.97 Ha); 1° – 3° (1,260.78 Ha); 3° - 6° (1,629.08 Ha); 6° - 9° (455.12 Ha); 9° - 25° (103.09 Ha).</p> <p>Perlabian Estate</p> <p>Company have a Semi Detail Soil Map with scale 1 : 30,000 year 2009 by JH Agriculture Service. Based on identification known that soil type found are Typic Endoaquept: 12% (555 Ha); Typic Kandiuult: 88% (4,069 Ha). Beside that there is an slope class map Tolani Estate scale 1 : 60,500 year 2022 with information 0° - 2° (2,358 Ha); 2° - 6° (2,266 Ha).</p> <p>Marginal and Fragile Soil</p> <p>There are no marginal and fragile soil was identified in the company area.</p>	Complied
7.5.2	<p>The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>Based on Slope class map own by the company, known there is no steep terrain area in PT Tolani Tiga Indonesia. Identified slope class is between 0° until 25°</p>	Complied

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7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations. - Minor compliance -	There is no new palm oil planting in PT Tolan Tiga Indonesia. Existing activities are in the form of replanting and as explained in indicator 7.5.2 there are no areas identified as steep terrain.	Complied
Criteria 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(C) Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations. - Critical (Major) compliance -	<p>Tolan Estate</p> <p>Company have a Semi Detail Soil Map with scale 1 : 30,000 year 2009 by JH Agriculture Service. Based on identification known that soil type found are Endoaquept 2 % (73 ha), Typic Kandudult : 98% (3,553 Ha). Beside that there is an slope class map Tolani Estate scale 1 : 62,500 year 2022 with information < 1° (223.97 Ha); 1° – 3° (1,260.78 Ha); 3° - 6° (1,629.08 Ha); 6° - 9° (455.12 Ha); 9° - 25° (103.09 Ha).</p> <p>Perlabian Estate</p> <p>Company have a Semi Detail Soil Map with scale 1 : 30,000 year 2009 by JH Agriculture Service. Based on identification known that soil type found are Typic Endoaquept: 12% (555 Ha); Typic Kandudult: 88% (4,069 Ha). Beside that there is an slope class map Tolani Estate scale 1 : 60,500 year 2022 with information 0° - 2° (2,358 Ha); 2° - 6° (2,266 Ha).</p> <p>Marginal and Fragile Soil</p> <p>There are no marginal and fragile soil was identified in the company area.</p> <p>The company has been operating since Netherland Indie period in 1921 and for ensuring land suitability for oil palm cultivation has carried out soil sampling units and leaf sampling units which conduct by Verdant Bioscience PT Timbang Deli Indonesia. Result of leaf and soil sampling will be used as a reference for making fertilizer recommendations.</p>	Complied

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7.6.2	Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan. - Minor compliance -	There is no marginal and fragile soil identified in the company area as described in Semi Detail Soil Map.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	The company has a semi detail and topographic map which inform that condition of soil and slope class. There is no new planting in all operational area but replanting activities. Basically, when replanting is carried out it does not change the condition of roads and other infrastructure.	Complied
Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas. - Critical (Major) compliance -	PT Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921. As unit of certification, the company have no plan for new development after 15 November 2018. Based on Semi Detail Soil Survey Report by JH Agriculture Services, October 2009, soil type in Perlabian Estate consist of <i>Typic Endoaquept</i> 555 Ha (12%); <i>Typic Kandiudult</i> 4,069 Ha (88%). Soil type in Tolan Estate consist of <i>Typic Endoaquept</i> 73 Ha (2%); <i>Typic Kandiudult</i> 3,553 Ha (98%). There is no peatland within the Unit of Certification.	Complied
7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018). - Minor compliance -	PT Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921. As unit of certification, the company have no plan for new development after 15 November 2018. Based on Semi Detail Soil Survey Report by JH Agriculture Services, October 2009, soil type in Perlabian Estate consist of <i>Typic Endoaquept</i> 555 Ha (12%); <i>Typic Kandiudult</i> 4,069 Ha (88%). Soil type in Tolan Estate consist of <i>Typic Endoaquept</i> 73 Ha (2%); <i>Typic Kandiudult</i> 3,553 Ha (98%). There is no peatland within the Unit of Certification.	Not Applicable

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PROCEDURAL NOTE: Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).			
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	PT Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921. As unit of certification, the company have no plan for new development after 15 November 2018. Based on Semi Detail Soil Survey Report by JH Agriculture Services, October 2009, soil type in Perlabian Estate consist of <i>Typic Endoaquept</i> 555 Ha (12%); <i>Typic Kandiudult</i> 4,069 Ha (88%). Soil type in Tolan Estate consist of <i>Typic Endoaquept</i> 73 Ha (2%); <i>Typic Kandiudult</i> 3,553 Ha (98%). There is no peatland within the Unit of Certification.	Not Applicable
7.7.4	(C) Availability of implementation evidence of the water and land cover management program. - Critical (Major) compliance -	PT Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921. As unit of certification, the company have no plan for new development after 15 November 2018. Based on Semi Detail Soil Survey Report by JH Agriculture Services, October 2009, soil type in Perlabian Estate consist of <i>Typic Endoaquept</i> 555 Ha (12%); <i>Typic Kandiudult</i> 4,069 Ha (88%). Soil type in Tolan Estate consist of <i>Typic Endoaquept</i> 73 Ha (2%); <i>Typic Kandiudult</i> 3,553 Ha (98%). There is no peatland within the Unit of Certification.	Not Applicable
7.7.5	(C) Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the 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	PT Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921. As unit of certification, the company have no plan for new development after 15 November 2018. Based on Semi Detail Soil Survey Report by JH Agriculture Services, October 2009, soil type in Perlabian Estate consist of <i>Typic Endoaquept</i> 555 Ha (12%); <i>Typic Kandiudult</i> 4,069 Ha (88%). Soil type in Tolan Estate consist of <i>Typic Endoaquept</i> 73 Ha (2%); <i>Typic Kandiudult</i> 3,553 Ha (98%).	Not Applicable



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	for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation. - Critical (Major) compliance -	There is no peatland within the Unit of Certification.																					
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.																							
7.7.6	(C) All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019). - Critical (Major) compliance -	<p>PT Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921. As unit of certification, the company have no plan for new development after 15 November 2018.</p> <p>Based on Semi Detail Soil Survey Report by JH Agriculture Services, October 2009, soil type in Perlabian Estate consist of <i>Typic Endoaquept</i> 555 Ha (12%); <i>Typic Kandiudult</i> 4,069 Ha (88%). Soil type in Tolan Estate consist of <i>Typic Endoaquept</i> 73 Ha (2%); <i>Typic Kandiudult</i> 3,553 Ha (98%).</p> <p>There is no peatland within the Unit of Certification.</p> <p>Topography of PT Tolan Tiga Indonesia:</p> <table border="1"> <thead> <tr> <th>Terrain Classes</th><th>Perlabian Estate (Ha)</th><th>Tolan Estate (Ha)</th><th>Total (Ha)</th></tr> </thead> <tbody> <tr> <td>Low lying flat; 0 – 2°</td><td>555</td><td>73</td><td>628</td></tr> <tr> <td>Raised flat; 0 – 2°</td><td>1,803</td><td>73</td><td>1,876</td></tr> <tr> <td>Raised flat to gently undulating; 0 – 6°</td><td>2,266</td><td>2,357</td><td>4,623</td></tr> <tr> <td>Gently undulating to rolling;</td><td>0</td><td>326</td><td>326</td></tr> </tbody> </table>	Terrain Classes	Perlabian Estate (Ha)	Tolan Estate (Ha)	Total (Ha)	Low lying flat; 0 – 2°	555	73	628	Raised flat; 0 – 2°	1,803	73	1,876	Raised flat to gently undulating; 0 – 6°	2,266	2,357	4,623	Gently undulating to rolling;	0	326	326	Not Applicable
Terrain Classes	Perlabian Estate (Ha)	Tolan Estate (Ha)	Total (Ha)																				
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		2 – 12°					
		Rolling to hilly; 6 – 20°	0	797	797		
		Total	4,624	3,626	8,250		
7.7.7	<p>(C) All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non- corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines.</p> <p>- Critical (Major) compliance -</p>	<p>PT Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921. As unit of certification, the company have no plan for new development after 15 November 2018.</p> <p>Based on Semi Detail Soil Survey Report by JH Agriculture Services, October 2009, soil type in Perlabian Estate consist of <i>Typic Endoaquept</i> 555 Ha (12%); <i>Typic Kandiuult</i> 4,069 Ha (88%). Soil type in Tolan Estate consist of <i>Typic Endoaquept</i> 73 Ha (2%); <i>Typic Kandiuult</i> 3,553 Ha (98%).</p> <p>There is no peatland within the Unit of Certification.</p>					Not Applicable

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

No	Category of River	Cross Section	Outside the Settlement		Inside at the Settlement		Articles
			Criteria	Minimum Riparian Zone	Criteria	Minimum Riparian Zone	
1	Levee		–	5 m	–	3 m	Article 6
2	Rivers with no dike (from river bank)		Big River River Basin > 500 km2	100 m	Depth : > 20 m	30 m	Articles 7 & 8
					Depth : 3 m to 20 m	15 m	Articles 7 & 8
			Small River River Basin < 500 km2	50 m	Depth : 0 m to 3 m	10 m	Articles 7 & 8
3	Lake / Reservoir		–	50 m	–	50 m	Article 10
4	Water Springs		–	200 m	–	200 m	Article 10
5	Rivers affected by tides (from river bank)		–	100 m	–	100 m	Article 10

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7.8.1	<p>A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters:</p> <ul style="list-style-type: none"> - Minor compliance - <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>The unit of certification has prepared water management plan, and it is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The water management plan consists of reporting of surface and deep-water usage; quality analysis; facilities maintenance; distribution; and maintenance of drainage.</p> <p>Sample document of Perlabian Estate. Water Management Plan dated 4 January 2024, consist of:</p> <ol style="list-style-type: none"> 1. Water Sources. Water source for worker housing is from groundwater which is pumped using submersible pump. There are 7 wells used in Perlabian Estate. 2. Monitoring of water quality to ensure no pollution. Water quality measurement conducted in 6-month intervals. Wells are equipped with flowmeter to monitor water usage. 3. Facilities Maintenance. Water tank cleaning (in 6-month intervals), maintaining of submersible pump and all installation. 4. Water usage and distribution. Schedule distribution to worker housing (morning and afternoon), water usage for Nursery. 5. Water drainage. Maintaining water drainage periodically, consist of cleanliness and upkeep. <p>Perlabian POM have water management plan with aims to water usage efficiently. The plan dated 8 January 2024, consists of:</p> <ol style="list-style-type: none"> a. Water management at Mill define Water sources, Calculation of water needs (domestic and processes). Domestic water categorized as water use for daily use by employees and staff at housing compound. b. Water saving efforts. This activity consists of water usage campaign to employees, monitoring and maintenance water piping. c. Maintenance at water intake point, includes maintenance of pump house, pipes, and ensuring water intake is free from wastes. 	Complied
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		<p>d. Operational schedule for mill processing.</p> <p>e. Daily works procedure.</p> <p>f. Efforts to maintain water quality by taking measurement of water quality with laboratory, to ensure no water pollution.</p> <p>g. Water quality inspection schedule.</p> <p>h. Problems and corrective actions.</p> <p>From the water management plant and implementation, verified that the Company committed to not limit access to clean water or does not pollute the water used by the community.</p>	
	7.8.1b Workers have adequate access to clean water.	<p>The certification unit is situated adjacent to public settlements and near the main road. Consequently, employees opt to purchase bottled water for drinking purposes, deeming it more convenient, despite the company providing accessible clean water.</p> <p>During interviews conducted with workers and supervisors at Division 1 of Perlarian Estate, it was revealed that the Certification Unit provides clean water distributed to all worker housing. However, workers prefer to use refillable water bottles for drinking water consumption.</p> <p>The company does not impose restrictions on the use of clean water by workers, especially for bathing, washing, and toileting. However, it manages the water flow in phases to ensure that all housing blocks receive access to clean water.</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>The watercourses within the unit of certification's managed area consist of natural tributaries. Maintenance efforts in the riparian areas are undertaken by the unit of certification, which includes providing boundary markers to limit spraying activity, and the promotion of woody plant enrichment within the riparian zones.</p> <p>Based on field observation at riparian of Alangan River, sighted those 50 meters each riparian sides have been enriched by planting fruit trees (<i>Mangifera indica</i>,</p>	Complied

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		<p><i>Durio zibethinus</i>, <i>Nephelium lappaceum</i>, etc), and woody trees (<i>Samanea saman</i>, <i>Swietenia mahagoni</i>, <i>Terminalia catappa</i>, etc).</p> <p>Furthermore, the unit of certification conducts regular monitoring every six months of surface water quality across all tributaries. This initiative aims to ensure that the water quality adheres to the thresholds outlined in the applicable national regulations.</p> <p>Perlabian Estate 2023, sample taken at Bakaran Batu River on 11 October 2023:</p> <table><tr><th>pH</th><th>TDS (mg/L)</th><th>TSS (mg/L)</th><th>BOD₅ (mg/L)</th><th>COD (mg/L)</th><th>DO (mg/L)</th><th>Certificate</th></tr><tr><td colspan="7">Threshold</td></tr><tr><td>6-9</td><td>1.000</td><td>50</td><td>3</td><td>25</td><td>Min.4</td><td></td></tr><tr><td>7.00</td><td>216</td><td>12</td><td>2.41</td><td>10.11</td><td>5.80</td><td>D.10.3264/LHU/2023</td></tr></table> <p>Tolan Estate 2023, sample taken at Sungai Sri Pinang on 10 September 2023:</p> <table><tr><th>pH</th><th>TDS (mg/L)</th><th>TSS (mg/L)</th><th>BOD₅ (mg/L)</th><th>COD (mg/L)</th><th>DO (mg/L)</th><th>Certificate</th></tr><tr><td colspan="7">Threshold</td></tr><tr><td>6-9</td><td>1.000</td><td>50</td><td>3</td><td>25</td><td>Min.4</td><td></td></tr><tr><td>7.40</td><td>178</td><td>10</td><td>2.15</td><td>6.40</td><td>6.38</td><td>D.09.2953-1/LHU/2023</td></tr></table>	pH	TDS (mg/L)	TSS (mg/L)	BOD ₅ (mg/L)	COD (mg/L)	DO (mg/L)	Certificate	Threshold							6-9	1.000	50	3	25	Min.4		7.00	216	12	2.41	10.11	5.80	D.10.3264/LHU/2023	pH	TDS (mg/L)	TSS (mg/L)	BOD ₅ (mg/L)	COD (mg/L)	DO (mg/L)	Certificate	Threshold							6-9	1.000	50	3	25	Min.4		7.40	178	10	2.15	6.40	6.38	D.09.2953-1/LHU/2023	
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7.8.3	<p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>Palm oil mill effluent (POME) is processed in the biogas plant to produce CH₄ gas which is then sent to the boiler to assist the combustion process; CH₄ also be flared so that it turns into CO₂; Waste from the biogas plant is channelled to the estate (Land Application) as organic fertilizer; Every waste released or processed is recorded in a logbook.</p> <p>The quality of mill effluent discharged from the biogas plant is monitored in accordance with applicable regulations. Perlabian POM has monitored the mill effluent, ensuring compliance with national regulations as detailed in the document sample titled "Laporan Hasil Uji Kualitas Air Limbah PT Tolan Tiga Indonesia" for year 2023. Measurement of mill effluent quality conducted by</p>	Complied																																																								

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		<div>national accredited environmental testing and laboratory (PT Itec Solution Indonesia).</div> <table><tr><th>Month</th><th>Discharge (m3)</th><th>pH</th><th>BOD5 (Max 5000)</th><th>COD</th><th>Oil & Fat</th></tr><tr><td>January</td><td>12,617</td><td>7.70</td><td>3,011.83</td><td>6,597.34</td><td>15.40</td></tr><tr><td>February</td><td>9,095</td><td>6.80</td><td>2,781.35</td><td>5,067.89</td><td>19.82</td></tr><tr><td>March</td><td>11,358</td><td>6.40</td><td>1,943.11</td><td>4,217.35</td><td>14.81</td></tr><tr><td>April</td><td>8,107</td><td>7.66</td><td>1,850.16</td><td>4,127.40</td><td>15.10</td></tr><tr><td>May</td><td>9,926</td><td>7.20</td><td>1,419.83</td><td>3,926.15</td><td>14.70</td></tr><tr><td>June</td><td>10,631</td><td>7.40</td><td>1,493.11</td><td>3,687.08</td><td>13.92</td></tr><tr><td>July</td><td>10,417</td><td>7.10</td><td>1,264.15</td><td>3,189.72</td><td>16.40</td></tr><tr><td>August</td><td>13,400</td><td>7.80</td><td>1,385.19</td><td>3,647.15</td><td>19.60</td></tr><tr><td>September</td><td>14,530</td><td>7.30</td><td>1,289.73</td><td>3,528.16</td><td>24.10</td></tr><tr><td>October</td><td>18,811</td><td>7.70</td><td>1,369.83</td><td>3,792.17</td><td>29.40</td></tr><tr><td>November</td><td>12,489</td><td>7.30</td><td>1,350.19</td><td>3,761.28</td><td>20.64</td></tr><tr><td>December</td><td>14,464</td><td>7.00</td><td>1,196.84</td><td>3,463.11</td><td>21.44</td></tr></table> <div>From the table above, verified that the quality of mill effluent discharged, especially BOD has been complied with national regulation threshold.</div>	Month	Discharge (m3)	pH	BOD5 (Max 5000)	COD	Oil & Fat	January	12,617	7.70	3,011.83	6,597.34	15.40	February	9,095	6.80	2,781.35	5,067.89	19.82	March	11,358	6.40	1,943.11	4,217.35	14.81	April	8,107	7.66	1,850.16	4,127.40	15.10	May	9,926	7.20	1,419.83	3,926.15	14.70	June	10,631	7.40	1,493.11	3,687.08	13.92	July	10,417	7.10	1,264.15	3,189.72	16.40	August	13,400	7.80	1,385.19	3,647.15	19.60	September	14,530	7.30	1,289.73	3,528.16	24.10	October	18,811	7.70	1,369.83	3,792.17	29.40	November	12,489	7.30	1,350.19	3,761.28	20.64	December	14,464	7.00	1,196.84	3,463.11	21.44	
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7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	<div>PT Tolan Tiga Indonesia - Perlarian POM demonstrate and provide the record of mill water use per tonne of Fresh Fruit Bunches (FFB) in 2023 as per document "Water Usage 2023". Budget for water usage in Perlarian POM is 1.25 m³/MT FFB</div> <table><tr><th>Month</th><th>Water Usage (m³)</th><th>FFB Processed (MT)</th><th>Ratio (m³/MT FFB)</th></tr><tr><td>January</td><td>17,657</td><td>11,448</td><td>1.54</td></tr><tr><td>February</td><td>14,093</td><td>9,772</td><td>1.44</td></tr><tr><td>March</td><td>15,539</td><td>11,422</td><td>1.36</td></tr><tr><td>April</td><td>12,499</td><td>9,163</td><td>1.36</td></tr><tr><td>May</td><td>18,995</td><td>16,054</td><td>1.18</td></tr><tr><td>June</td><td>18,192</td><td>14,885</td><td>1.22</td></tr><tr><td>July</td><td>23,992</td><td>18,368</td><td>1.31</td></tr><tr><td>August</td><td>20,322</td><td>18,901</td><td>1.08</td></tr></table>	Month	Water Usage (m³)	FFB Processed (MT)	Ratio (m³/MT FFB)	January	17,657	11,448	1.54	February	14,093	9,772	1.44	March	15,539	11,422	1.36	April	12,499	9,163	1.36	May	18,995	16,054	1.18	June	18,192	14,885	1.22	July	23,992	18,368	1.31	August	20,322	18,901	1.08	Complied																																										
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September	20,814	17,822	1.17																				
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Criteria 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised																							
7.9.1	Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented. - Minor compliance -	<p>The unit of certification has shown its dedication to minimizing pollution and emissions through the development of a comprehensive strategy. This strategy encompasses the planning and execution of monitoring initiatives to assess pollution and emission levels within the palm oil mill and plantation. The company has implemented efforts to increase the efficiency of fossil fuel and optimize renewable energy such as using fibre, shell and POME as biogas. Palm oil mill effluent (POME) is processed in the biogas plant to produce CH₄ gas which is then sent to the boiler to assist the combustion process.</p> <p>The unit of certification regularly submits monitoring results to the relevant government agency, showcasing transparency and a commitment to regulatory compliance.</p> <p>Record of renewable energy usage in Perlarian POM 2023:</p> <table><tr><th>Month</th><th>FFB Processed (MT)</th><th>Fibres (MT)</th><th>Shell (MT)</th><th>Equivalent to HSD Oil (Kcal)</th></tr></table>	Month	FFB Processed (MT)	Fibres (MT)	Shell (MT)	Equivalent to HSD Oil (Kcal)	Complied															
Month	FFB Processed (MT)	Fibres (MT)	Shell (MT)	Equivalent to HSD Oil (Kcal)																			

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January	11,448	1,493.95	655.96	539.65
February	9,772	1,249.78	549.16	451.58
March	11,422	1,482.62	703.61	552.60
April	9,163	1,154.51	565.34	435.95
May	16,054	2,054.87	1,019.41	780.21
June	14,885	1,905.22	945.16	723.38
July	18,368	2,430.13	949.64	839.82
August	18,901	2,500.55	977.16	864.15
September	17,822	2,357.84	921.39	814.83
October	17,956	2,375.60	928.33	820.97
November	16,408	2,170.73	848.27	750.17
December	14,206	1,879.44	734.44	649.51
Total	176,404	23,055.30	9,797.94	8,222.87

Record of Biogas Production in Perlarian POM 2023:

Month	POME from Mill (m ³)	Biogas Production (m ³)	Ratio (Biogas/POME)
January	7,158	347,130	48.50
February	6,625	294,018	44.38
March	8,807	374,780	42.55
April	9,795	440,814	45.00
May	8,642	426,861	49.39
June	10,453	531,398	50.84
July	11,330	479,865	43.96
August	12,013	534,861	44.00
September	10,659	543,615	49.56
October	12,273	567,048	46.18
November	11,511	615,953	51.88
December	9,813	470,293	48.39

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

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7.10.1	<p>(C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p> <p>- Critical (Major) compliance -</p>	<p>The unit of certification has established a comprehensive procedure for calculating and mitigating greenhouse gas emissions resulting from its operations (ENC 01-12/04-03-2019/Rev.1 dated 18 March 2019). This procedure encompasses guidelines for registering emission sources arising from the company's operations, monitoring and reducing the use of materials emitting greenhouse gases, and calculating greenhouse gas emissions from the company's operational activities.</p> <p>Additionally, the procedure encompasses an inventory of emission sources from the estate operation, which involves the utilization of inorganic fertilizers such as Urea (N), Dolomite (CaO), MOP (K₂O), and Rock Phosphate (P₂O₅). Other emission sources from the estate operation comprise pesticide usage, HSD fuel consumption, planted area, mature oil palm trees, FFB production, estate proximity to POM, distance from POM to the bulking tank, OER %, KER %, and the availability of methane capture facilities.</p> <p>The unit of certification has adopted a proactive stance in identifying and managing sources of pollution. The Environmental Aspect & Impact List comprehensively documents recognized polluting activities, encompassing emissions of gases, smoke, particulates, and soot, as well as control, treatment, and discharge of effluents. Through this meticulous process, significant pollutants and emissions have been pinpointed.</p> <p>In addition to the identification of pollution sources, the unit of certification has devised a comprehensive plan aimed at pollution reduction. This plan is integrated into the aspects/impacts register, ensuring diligent tracking and monitoring over time.</p> <p>Managing emissions from the steam boiler involves adhering to guidelines to minimize soot pollution and particulates. It entails ensuring proper fiber and shell feed, minimizing shell usage to prevent black smoke, adjusting air damper settings for ignition to avoid excess air, regularly dumping the grate to reduce unburned fuel, performing soot blowing every 4 hours to clean heat exchanger pipes, maintaining proper operation of the dust collector, monitoring boiler</p>	Complied
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		<p>exhaust emission with a smoke density meter, conducting emission checks every 6 months through an independent laboratory, and diligently recording any issues.</p> <p>The management of emissions from the engine generator includes guidelines to minimize emissions. It involves ensuring the generator operates at the permitted load (80% of design capacity), replacing air filter elements every 1,250 hours, replacing fuel filters every 500 hours, replacing oil filters every 250 hours, and changing engine lubricant every 250 hours on a regular basis. Additionally, in the event of black smoke, checking the engine load and injection pump is recommended. Engine emission monitoring is conducted every 6 months by an independent laboratory.</p> <p>To further bolster efforts in pollution reduction, the unit of certification has conducted thorough assessments of polluting activities, covering gaseous emissions, particulate emissions, and effluent management. These assessments are meticulously documented in the "<i>Pengelolaan Lingkungan Hidup (RKL) dan Pemantauan Lingkungan Hidup (RPL)</i>" – Environment Management and Monitoring document.</p> <p>Unit of certification has monitored GHG emission through the RSPO PalmGHG calculator and reported publicly. Based on summary of the calculator, Total emission of Perlabian POM is 5,314.52 tCO₂e; or 0.03 tCO₂e/t FFB.</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>PT Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921. As unit of certification, the company have no plan for new development. To monitor GHG emission, Unit of Certification calculates and submit GHG value periodically through RSPO PalmGHG Calculator.</p>	Complied

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7.10.3	<p>(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>The Unit of Certification has formulated a strategy aimed at reducing and mitigating pollution and emissions within the plantation. This strategy involves the planned and systematic monitoring of pollution and emission quality, including ambient air quality assessments for boilers and power generators, water quality testing for surface and groundwater, evaluation of effluent water quality, and monitoring of noise levels. The findings from these monitoring activities are integrated into the Environmental Management and Monitoring Plan (RKL/RPL) and are regularly reported to the government. At Perlarian POM and supply bases, all emissions are meticulously monitored to ensure compliance with environmental standards.</p> <p>Measurement of other significant pollutant monitoring are carried out every six months by a KAN accredited laboratory. Records of test results are maintained and reported in the Management Performance Report. PT Tolan Tiga Indonesia has consistently reported the implementation of Environmental Management and Monitoring periodically at 6 month intervals and reported it to the Environmental Office of Labuhanbatu Selatan Regency, Sumatra Utara Province and via the electronic reporting application Electronic Reporting Information System (SIMPEL) to the Ministry of Environment and Forestry. Proof of reporting can be verified, namely:</p> <ol style="list-style-type: none"> 1. Environmental Management Performance Report for 2nd Semester of 2023 has been reported to the Ministry of Environment and Forestry via SIMPEL based on SIMPEL TTE ID: 1709003852-2171 dated 20 February 2024. 2. Environmental Management Performance Report for 2nd Semester of 2023 was reported to the Sumatra Utara Province Environmental Service on 23 February 2024. 3. Environmental Management Performance Report for 2nd Semester of 2023 was reported to the Labuhanbatu Selatan Regency Environmental Service on 23 February 2024. 	Complied
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		<p>The Test Results Report has identified other significant pollutant in: Employee Housing (ambient air and noise), Loading Ramp (ambient air and noise), Boiler (noise), Engine Room (noise), Boiler (2 boiler units) and Genset (2 generator unit) air emission measurements.</p> <p>Ambient air test results (based on Government Regulation No. 41 of 1999 concerning National Ambient Air Quality Standards) and environmental quality for odor levels in accordance with State Minister of Environment Decree No. 50 of 1996.</p> <p>Environmental Test Results Documents for significant pollutant measurement are available for the Semester II 2023 period, e.g.:</p> <ol style="list-style-type: none"> 1. Laboratory Analysis Results No.D.10.3319-1/LHU/2023, dated 27 October 2023 for Genset Chimney Emission, sample matrix no. 1, carried out by PT Itec Solution Indonesia, with the following test results: CO: 168 mg/Nm³; NO₂: 555.36 mg/Nm³; SO₂: 2.53 mg/Nm³; Total particulates: 43.85 mg/Nm³. 2. Laboratory Analysis Results No.D.10.3319-1/LHU/2023, dated 27 October 2023 for Genset Chimney Emission sample matrix no. 2, carried out by PT Itec Solution Indonesia, with the following test results: CO: 152.47 mg/Nm³; NO₂: 555.28 mg/Nm³; SO₂: 2.53 mg/Nm³; Total particulates: 35.25 mg/Nm³. <p>All test results are complied to the quality standards stipulated in Minister of Environment Regulation No. 13 of 2009, Appendix Ia.</p> <ol style="list-style-type: none"> 3. Laboratory Analysis Results, No.D.10.3319-1/LHU/2023, dated 27 October 2023 for the Ambient Air Quality sample matrix with the following test results: <ol style="list-style-type: none"> a. Employee compound: CO: 1,420 µg/Nm³; NO₂: 14.37 µg/Nm³; SO₂: 29.46 µg/Nm³; HC: 8.80 µg/Nm³; PM_{2.5}: 5.67 µg/Nm³; Noise (SNI 7231-2009): 46.2 dB. b. Boiler: CO: 1.8450 mg/m³; NO₂: 0.0490 mg/m³; SO₂: 0.1010 mg/m³; HC: 0.005 mg/m³; Pb: 0.0167 mg/m³; Noise (SNI 7231-2009): 68.1 dB. 	
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		All test results are complied to the quality standards stipulated in PP No. 22 of 2021 Appendix 7 concerning Environmental Administration and Management.	
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 Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era back in 1921. As unit of certification, the company have no plan for new development. The current activities exist is replanting which using mechanical method for felling and chipping, tractor ploughing, cover crops planting and oil palm planting.</p> <p>Land preparation for Replanting conducted by contractor CV Tua Gabe, based on "Surat Perjanjian Kerja" No.06/RMO-PLE/TG/IX/2023 dated 1 September 2023, regarding contract for replanting OP 2024. Type of work covers Ripping, Ploughing, Felling, Chipping, Spreading, Holing, Closing hole. There is no burning stated in the contract.</p> <p>Based on "Monitoring Pekerjaan Replanting 2023 Kebun Perlabian" type of work in replanting activity are Ripping, Ploughing, Felling, Chipping, Spreading, Holing, closing hole, verified that there is no land preparation for replanting conducted by burning.</p> <p>Based on Map of Replanting Perlabian Estate 2024, replanting covers area 178.40 Ha at Division 4, Block 95D01A, 95D02A, 95D03A, 95E01, 95E02, 95E03, and 95E04. In Tolan Estate, replanting 2024 covers 96.22 Ha at Division 2 Block 94D11, 94D12, 94D13, 98D14 and 98D15. Based on field observation to blocks of replanting, there is no evidence that land preparation was conducted burning.</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>Unit of Certification has list of "Sarana dan Prasarana Pengendalian Kebakaran Lahan Perkebunan" where the list fire equipment as referred to Ministry of Agriculture Regulation No. 05/PERMENTAN/KB.410/ 1/2018.</p> <p>Based on field visit to "Gudang Bakortiba" (fire prevention facility) at Perlabian Estate and Tolan Estate, Fire prevention equipment is available in place, such as</p>	Complied

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		<p>water pump, solo sprayer, boots, helmet, fire jacket, etc. Fire extinguisher also available each building, such as office, warehouse, workshop, clinic, etc.</p> <p>Fire control facilities and infrastructure consist of:</p> <ol style="list-style-type: none"> Individual equipment: helmet, head lamp, safety glasses, mask, leather gloves, equipment belt, water bottle, whistle, backpack, fire boots, fire extinguisher. Team equipment: overnight tents and sleeping mats, first aid kit, workshop equipment, lighting equipment, protective blankets, fire monitoring facilities (drones, towers, CCTV). Hand tools: dual purpose axe, <i>gepyok</i>, sharp rake, hoe rake, shovel, back pump, torch, chainsaw. <p>Available Fire Monitoring Report that has been submitted to relevant government agency of Labuhanbatu Selatan Regency based on letter No.01/PLE-Disbun/I/2024, dated 22 January 2024. The report contains the results of land fires monitoring, where during the period January to December 2023 there were no fire incidents; fire control organization; land fire control training and simulation; fire control facilities and infrastructure.</p>	
7.11.3	<p>The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>Unit of certification engages stakeholders in adjacent locations for fire prevention and control measures. Available dissemination records of fire prevention and domestic waste management, e.g on 5 February 2023 to Perlabian Village and Gunung Selamat Village, attended by 10 participants; to Desa Pekan Tolan, on 6 February 2024 attended by 14 participants.</p>	Complied
<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>			

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

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

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

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

7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests.</p> <p>Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).</p> <p>- Critical (Major) compliance -</p>	<p>PT Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921. As unit of certification, the company have no plan for new development after November 2005 or 15 November 2018.</p> <p>HCV Assessment has been conducted previously in 2009 by "Yayasan Kelapa Sawit Berkelanjutan Indonesia (YASBI)". HCV Assessment is using reference of Indonesian Toolkit 2008 and the HCV assessment team are registered by RSPO-approved assessor.</p> <p>In 2022, an integrated HCV-HCS assessment conducted by independent consultant PT Meganesia Tirta Foresta where the team led by assessor licensing scheme (ALS15005AS). The assessment objective is to identify and re-mapping of HCV-HCS recent condition and developing Integrated Conservation and Land Use Plan. Scope of the assessment is management unit of PT Tolan Tiga Indonesia where consist of Perlabian Estate and Tolan Estate covers 8,582.6 Ha, and wider landscape which configure Area of Interest (AOI) 38,769.8 Ha.</p> <p>Plantation development of PT Tolan Tiga Indonesia carried out since Dutch Era, therefore RSPO LUCA was not applicable for this unit of certification. However, as a group, SIPEF has been submit the disclosure of liability to RSPO Secretariat since 2014. Where, there is no liability occurs in PT Tolan Tiga Indonesia.</p>	Complied
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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>PT Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921. As unit of certification, the company have no plan for new development after November 2005 or 15 November 2018.</p> <p>HCV Assessment has been conducted previously in 2009 by “Yayasan Kelapa Sawit Berkelanjutan Indonesia (YASBI)”. HCV Assessment is using reference of Indonesian Toolkit 2008 and the HCV assessment team are registered by RSPO-approved assessor.</p> <p>In 2022, an integrated HCV-HCS assessment conducted by independent consultant PT Meganesia Tirta Foresta where the team led by assessor licensing scheme (ALS15005AS). The assessment objective is to identify and re-mapping of HCV-HCS recent condition and developing Integrated Conservation and Land Use Plan. Scope of the assessment is management unit of PT Tolan Tiga Indonesia where consist of Perlabian Estate and Tolan Estate covers 8,582.6 Ha, and wider landscape which configure Area of Interest (AOI) 38,769.8 Ha.</p> <p>This assessment conducted in several stages, i.e.:</p> <ol style="list-style-type: none">1. Collecting information and desk study (14-16 Feb 2022 and 1-4 Mar 2022).2. Scoping study (7-12 Mar 2022)3. Field assessment (22-29 Mar 2022). <p>Outcome from this integrated assessment is to determine the HCV managed area in unit of certification. The conservation area identified in the AOI (Area of Interest) is 201.2 Ha consisting of HCV 1, HCV 4, HCV 6 and HCS Forest. The conservation area identified in the management unit is 72.3 Ha, consisting of HCV 1, HCV 4, HCV 6 and HCS Forest. Meanwhile, the size of the conservation area identified in the landscape area (outside the management unit) is 128.9 Ha consisting of HCV 1 and HCV 4.</p> <table><tr><th>Environmental and Social Conservation Values</th><th>Area (Ha)</th></tr><tr><td>HCV 1</td><td>70.17</td></tr><tr><td>HCV 2</td><td>-</td></tr></table>	Environmental and Social Conservation Values	Area (Ha)	HCV 1	70.17	HCV 2	-	Complied
Environmental and Social Conservation Values	Area (Ha)								
HCV 1	70.17								
HCV 2	-								

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HCV 3	-
HCV 4	70.17
HCV 5	-
HCV 6	2.17
HCS Forest	5.07
Peatland	-

Recapitulation of conservation area:

Index	Remark	Conservation Type	Area (Ha)
ID01	Public cemetery of Perkebunan Perlarian Village	HCV 6	0.22
ID02	Public cemetery of Perkebunan Perlarian Village	HCV 6	0.68
ID03	Bakaran Batu River	HCV 1 & 4	5.93
ID04	Perlarian River	HCV 1 & 4	18.01
ID05	Reservoir	HCV 1 & 4	8.94
ID06	Old cemetery of Perkebunan Perlarian Village	HCV 6	0.38
ID07	Sei Tolan River	HCV 1 & 4	11.22
ID08	Public cemetery Tolan 1-2 Village	HCV 6	0.13
ID09	Alangan River	HCV 1 & 4	3.68
ID10	Old cemetery Tolan Estate	HCV 6	0.05
ID11	Public cemetery Tolan 1-2 Village	HCV 6	0.42
ID12	Sisumut Tributary	HCV 1 & 4	3.68
ID13	Ex Airstrip Forest	HCV 1, 4 & HCS	1.37
ID14	Setumpuk Forest	HCV 1, 4 & HCS	3.70
ID15	Sisumut River	HCV 1 & 4	5.43
ID16	Kwangheng Lake	HCV 1 & 4	0.42
ID17	Public cemetery Tolan Estate	HCV 6	0.29
ID18	Sosopan Tributary	HCV 1 & 4	2.38

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		<table><tr><td>ID19</td><td>Sosopan River</td><td>HCV 1 & 4</td><td>5.41</td></tr><tr><td colspan="3">Total</td><td>72.34</td></tr></table> <p>Area of PT Tolan Tiga Indonesia covers 8,582.6 Ha; Area of Interest covers 38,769.8 Ha</p> <p>The Integrated HCV-HCS Assessment Report status is accepted by HCV resources network (HCVRN) and final status is satisfactory on 13 March 2023.</p>	ID19	Sosopan River	HCV 1 & 4	5.41	Total			72.34	
ID19	Sosopan River	HCV 1 & 4	5.41								
Total			72.34								
	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.	As unit of certification, PT Tolan Tiga Indonesia have no plan for new development after November 2005 or 15 November 2018. However, in 2022, an integrated HCV-HCS assessment conducted by independent consultant PT Meganesia Tirta Foresta where the team led by assessor licensing scheme (ALS15005AS). The assessment objective is to identify and re-mapping of HCV-HCS recent condition and developing Integrated Conservation and Land Use Plan.									
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>As unit of certification, PT Tolan Tiga Indonesia have no plan for new development after November 2005 or 15 November 2018.</p> <p>Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.</p>	Not Applicable								
<p>PROCEDURAL NOTE for 7.12.3:</p> <p>Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.</p>											
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</p>	<p>In 2022, an integrated HCV-HCS assessment conducted by independent consultant PT Meganesia Tirta Foresta where the team led by assessor licensing scheme (ALS15005AS). The assessment objective is to identify and re-mapping of HCV-HCS recent condition and developing Integrated Conservation and Land Use Plan. Scope of the assessment is management unit of PT Tolan Tiga</p>	Complied								

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	<p>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>Indonesia where consist of Perlarian Estate and Tolan Estate covers 8,582.6 Ha, and wider landscape which configure Area of Interest (AOI) 38,769.8 Ha.</p> <p>This assessment conducted in several stages, i.e.:</p> <ol style="list-style-type: none"> 1. Collecting information and desk study (14-16 Feb 2022 and 1-4 Mar 2022). 2. Scoping study (7-12 Mar 2022) 3. Field assessment (22-29 Mar 2022). 4. Analysis and report compilation (4-20 Apr 2022) 5. Closing consultation (25 Apr 2022) 6. Report finishing (13-20 June 2022) 7. Final report (4 Jul 2022). <p>Outcome from this integrated assessment is to determine the HCV managed area in unit of certification. The conservation area identified in the AOI (Area of Interest) is 201.2 Ha consisting of HCV 1, HCV 4, HCV 6 and HCS Forest. The conservation area identified in the management unit is 72.3 Ha, consisting of HCV 1, HCV 4, HCV 6 and HCS Forest. Meanwhile, the size of the conservation area identified in the landscape area (outside the management unit) is 128.9 Ha consisting of HCV 1 and HCV 4.</p> <p>The Integrated HCV-HCS Assessment Report status is accepted by HCV resources network (HCVRN) and the final status is Satisfactory on 13 March 2023.</p> <p>Threats of HCV attribute refer to the assessment result are potential of RTE's species hunting activities; Degradation of surface water quality due to water pollution; Land conversion or illegal land use within buffer zone from encroacher.</p> <p>An integrated management and monitoring plans as output from this HCV-HCS assessment has been determined for year 2024 which taken into consideration:</p> <ol style="list-style-type: none"> a. Aspects of species protection include managing wildlife-human conflicts, creating corridors between fragmented habitats, and habitat enrichment. 	
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		<p>b. Strengthening communication links with surrounding companies to develop management plans and action plans for protecting conservation areas.</p> <p>c. Involving the local community, because the interests and benefits of the existence of a conservation area are the interests and benefits of all parties.</p> <p>Based on field visits at HCV of Alangan River Riparian close to Block 21M13, it can be verified that HCV Management Plan activities have been implemented, including enriching plant species such as <i>Swietenia mahagoni</i>, <i>Swietenia macrophylla</i>, <i>Mangifera indica</i>, <i>Durio zibethinus</i>, <i>Nephelium lappaceum</i>, <i>Samanea saman</i>, <i>Terminalia catappa</i>, etc. At the time of the ASA 2_4 audit, the plant height had reached approximately 2 m. The boundaries of the HCV area are well maintained, replanting activity that had been done in 2021 does not crossing the riparian borders.</p> <p>Based on interviews with employees and local residents, they are aware of the prohibition on hunting of wild animals. Employees and their families as well as the surrounding community never carry out hunting activities in the company area or around the company.</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>In 2022, an integrated HCV-HCS assessment conducted by independent consultant PT Meganesia Tirta Foresta where the team led by assessor licensing scheme (ALS15005AS). The assessment objective is to identify and re-mapping of HCV-HCS recent condition and developing Integrated Conservation and Land Use Plan. Scope of the assessment is management unit of PT Tolan Tiga Indonesia where consist of Perlabian Estate and Tolan Estate covers 8,582.6 Ha, and wider landscape which configure Area of Interest (AOI) 38,769.8 Ha.</p> <p>This assessment conducted in several stages, i.e.:</p> <ol style="list-style-type: none"> 1. Collecting information and desk study (14-16 Feb 2022 and 1-4 Mar 2022). 2. Scoping study (7-12 Mar 2022) 3. Field assessment (22-29 Mar 2022). 4. Analysis and report compilation (4-20 Apr 2022) 5. Closing consultation (25 Apr 2022) 	Complied

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		<p>6. Report finishing (13-20 June 2022)</p> <p>7. Final report (4 Jul 2022).</p> <p>Outcome from this integrated assessment is to determine the HCV managed area in unit of certification. The conservation area identified in the AOI (Area of Interest) is 201.2 Ha consisting of HCV 1, HCV 4, HCV 6 and HCS Forest. The conservation area identified in the management unit is 72.3 Ha, consisting of HCV 1, HCV 4, HCV 6 and HCS Forest. Meanwhile, the size of the conservation area identified in the landscape area (outside the management unit) is 128.9 Ha consisting of HCV 1 and HCV 4.</p> <p>The Integrated HCV-HCS Assessment Report status is accepted by HCV resources network (HCVRN) and the final status is Satisfactory on 13 March 2023.</p> <p>Based on HCV-HCS assessment report 2023, there is no peatland area was existed in unit of certification area. Also, there is no indigenous/ customary/local communities rights within the managed area are identified.</p> <p>Based on field visits at HCV of Alangan River Riparian close to Block 21M13, it can be verified that HCV Management Plan activities have been implemented, including enriching plant species such as <i>Swietenia mahagoni</i>, <i>Swietenia macrophylla</i>, <i>Mangifera indica</i>, <i>Durio zibethinus</i>, <i>Nephelium lappaceum</i>, <i>Samanea saman</i>, <i>Terminalia catappa</i>, etc. At the time of the ASA 2_4 audit, the plant height had reached approximately 2 m. The boundaries of the HCV area are well maintained, replanting activity that had been done in 2021 does not crossing the riparian borders.</p> <p>Based on interviews with employees and local residents, they are aware of the prohibition on hunting of wild animals. Employees and their families as well as the surrounding community never carry out hunting activities in the company area or around the company.</p>	
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7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>The HCV program implemented by the certification unit prioritizes monitoring for any threatening activities near conservation areas, watercourses/riparian zones, and wildlife.</p> <p>Based on HCV-HCS assessment report 2023, there are 5 species categorized as RTE (based on IUCN: CR EN and VU), such as: Common Long-tailed Macaque (<i>Macaca fascicularis</i>); Southern pig-tailed macaque (<i>Macaca nemestrina</i>); Sumatran silvery lutung/lutung sumatera (<i>Trachypithecus cristatus</i>); Javan Myna/Jalak Kerbau (<i>Acridotheres javanicus</i>); Southern Asian Box Turtle (<i>Cuora amboinensis</i>).</p> <p>Company issued a circular letter on company imposing disciplinary measures 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 RTE species. "Surat Edaran Larangan Memasuki Wilayah Nilai Konservasi Tinggi No.08/PLE/2020" dated 28 January 2020 – stating for those violate will be sanction in accordance with applicable country regulation.</p> <p>Based on field visits to the HCV area of Perlarian Estate, that is riparian area of Alangan River, bordering with Block 21M13, it can be verified that the HCV Management Plan activities have been implemented, including enriching plant species such as <i>Mangifera indica</i>, <i>Durio zibethinus</i>, <i>Nephelium lappaceum</i>, <i>Samanea saman</i>, <i>Swietenia mahagoni</i>, <i>Terminalia catappa</i>, etc. During ASA 2_4 audit, the plant height had reached approximately 2 m. The boundaries of the HCV area are well maintained, replanting 2021 was not crossing the riparian borders.</p> <p>Field observation also conducted to HCV area of Tolan Estate, consist of riparian of Sosopan River at Block C/D36, Kwangheng Lake at Block C30, Hutan Setumpuk at Block E19 and Ex Airstip Forest at Block E16. During ASA 2_4, verified that condition of the trees are dense and well maintained, including the boundaries of the Conservation area are clear and maintained.</p> <p>Based on interviews with employees and local communities, they are aware of the prohibition on hunting of wild animals. Employees and their families as well</p>	Complied
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		as the surrounding community never carry out hunting activities in the company area or around the company.	
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>Based on field visits at HCV of Alangan River Riparian close to Block 21M13, it can be verified that HCV Management Plan activities have been implemented, including enriching plant species such as <i>Swietenia mahagoni</i>, <i>Swietenia macrophylla</i>, <i>Mangifera indica</i>, <i>Durio zibethinus</i>, <i>Nephelium lappaceum</i>, <i>Samanea saman</i>, <i>Terminalia catappa</i>, etc. At the time of the ASA 2_4 audit, the plant height had reached approximately 2 m. The boundaries of the HCV area are well maintained, replanting activity that had been done in 2021 does not crossing the riparian borders.</p> <p>Based on interviews with employees and local residents, they are aware of the prohibition on hunting of wild animals. Employees and their families as well as the surrounding community never carry out hunting activities in the company area or around the company.</p> <p>Monitoring RTE's species conducted at determined HCV area in monthly basis using form "Checklist Pemantauan Area NKT". In example:</p> <p>Perlabian Estate:</p> <p>30 January 2024: identified birds, long-tailed macaque, snake. During field visit to HCV area Riparian of Sungai Alangan observed that numbers of Kingfisher are sighted.</p> <p>Tolan Estate:</p> <p>31 January 2024: identified birds, long-tailed macaque and monitor lizard. During field visit to HCV area Sosopan River, Kwangheng Lake, "Hutan Setumpuk" and Ex Airstrip Forest, observed that long-tailed macaque and numbers of birds are sighted.</p> <p>Supervision and monitoring of HCV areas is carried out by conservation cadres who have received training and are employees of PT Tolan Tiga Indonesia. The form of supervision and monitoring carried out in HCV areas is routine patrols and data collection from the field in the form of identification of plant and wildlife</p>	Complied

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		<p>species (based on Minister of Environment and Forestry Regulation No. 92 of 2018 concerning protected types of plant and wildlife), monitoring the condition of HCV signboards, conditions of HCV boundary marks and elimination of threats to damage to HCV Areas, such as controlling <i>Mucuna bracteata</i>, destroying wild boar snares/traps.</p> <p>The HCV including RTE species monitoring for period 2023 has been submitted to Balai Konserasi Sumber Daya Alam/BKSDA Sumatera Utara Province on 16 January 2024.</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>As unit of certification, PT Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era back in 1921.</p> <p>In 2022, an integrated HCV-HCS assessment conducted by independent consultant PT Meganesia Tirta Foresta where the team led by assessor licensing scheme (ALS15005AS). The assessment objective is to identify and re-mapping of HCV-HCS recent condition and developing Integrated Conservation and Land Use Plan.</p> <p>The Integrated HCV-HCS Assessment Report status is accepted by HCV resources network (HCVRN) and the final status is Satisfactory on 13 March 2023.</p> <p>The company have no plan for new development after November 2005 or 15 November 2018. Disclosure of liability have been submitted in 2014, including Land Use Change Analysis (LUCA). According to LUCA result, Remediation and Compensation Procedures is not applicable for this unit of certification.</p>	Not Applicable

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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2023** for **Perlabian POM** and supply base was calculated using the PalmGHG Calculator version 4. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2023** for **Perlabian POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct	Extraction	%
CPO	0.61	OER	22.03
PK	0.61	KER	5.87

Production	t/yr	Land Use	Ha
FFB Process	176,403.77	OP Planted Area	6,959.97
CPO Produced	38,865.48	OP Planted on peat	0.00
PKO Produced	10,360.61	Conservation (forested)	5.07
		Conservation (non-forested)	67.27
		Total	7,032.31

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	58,842.78	0.33	0.00	0.00	0.00	0.00	58,842.78	0.33
CO ₂ Emission from fertilizer	8,737.19	0.05	0.00	0.00	0.00	0.00	8,737.19	0.05
NO ₂ Emission from Peat	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NO ₂ Emission from fertilizer	8,297.94	0.05	0.00	0.00	0.00	0.00	8,297.94	0.05
Fuel Consumption	1,047.07	0.01	0.00	0.00	0.00	0.00	1,047.07	0.01
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-52,311.80	-0.30	0.00	0.00	0.00	0.00	-52,311.80	-0.30
Conservation Sequestration	-46.49	-0.00	0.00	0.00	0.00	0.00	-46.49	-0.00
Total	24,566.68	0.14	0.00	0.00	0.00	0.00	24,566.68	0.14

**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	5,004.89	0.03
Fuel Consumption	182.15	0.00
Grid Electricity Utilization	127.48	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	5,314.52	0.03

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

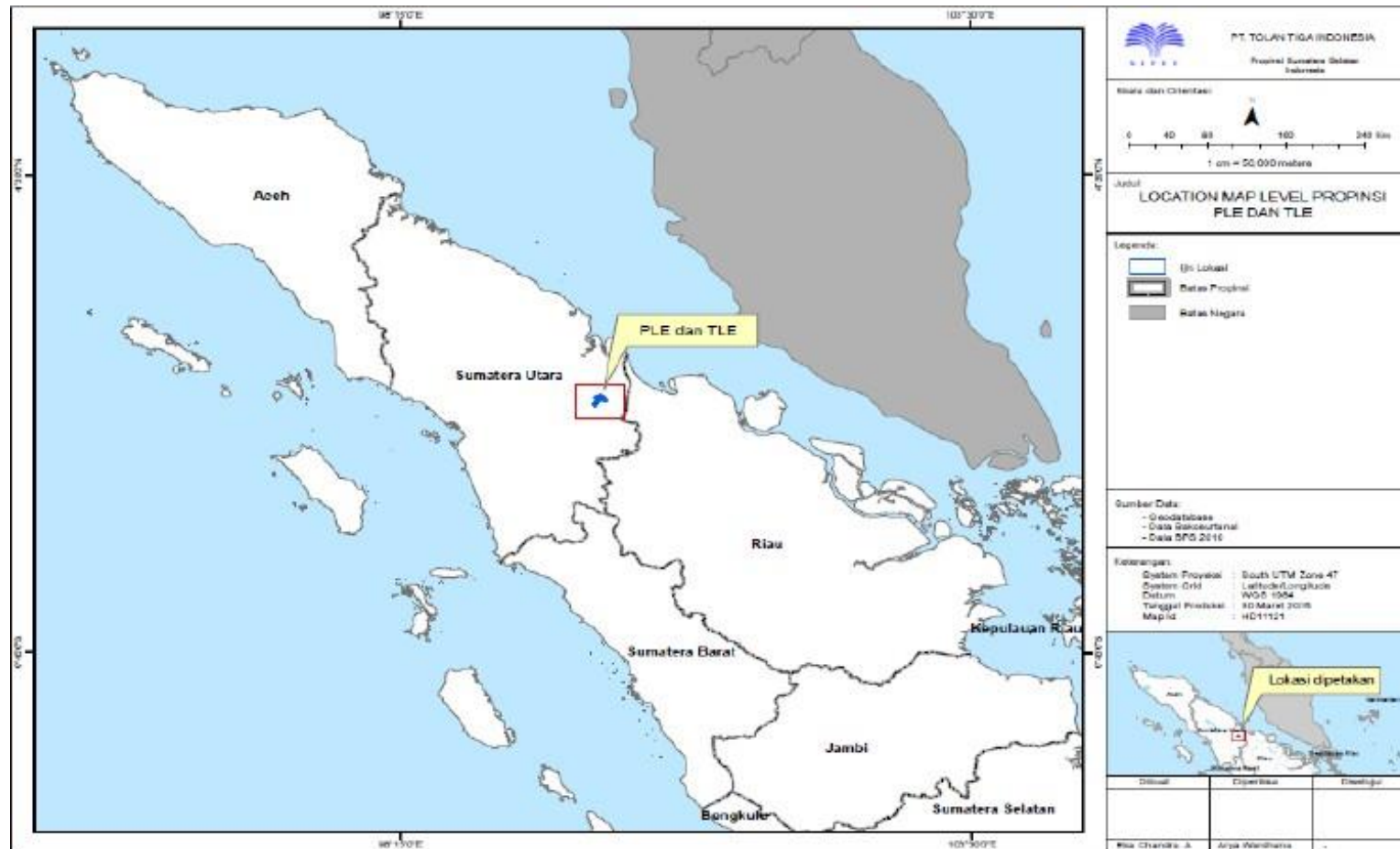
*This mill has no kernel crusher operation.

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

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

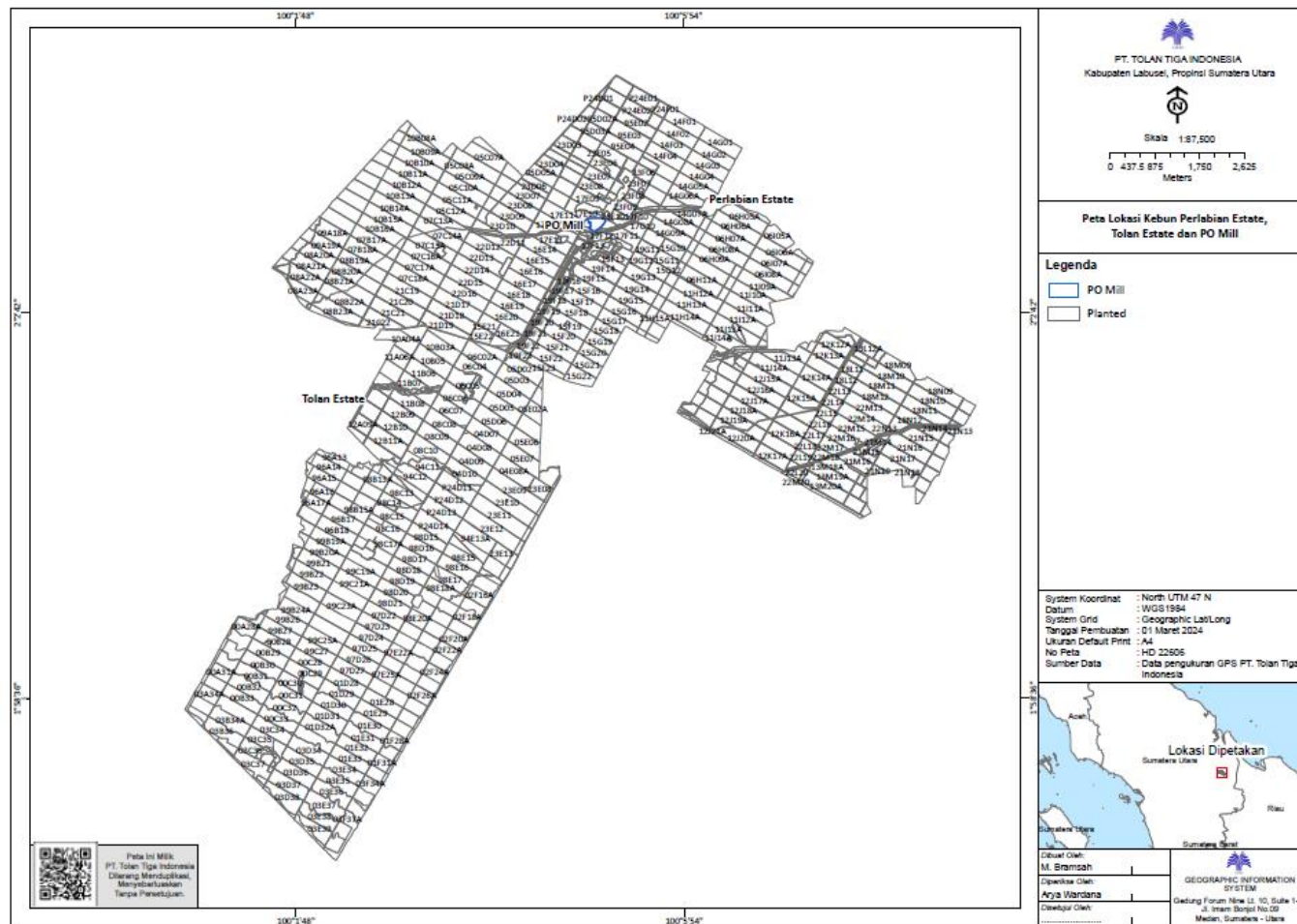
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Appendix C: Location Map of Certification Unit and Supply bases



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Appendix D: Estate Field Map



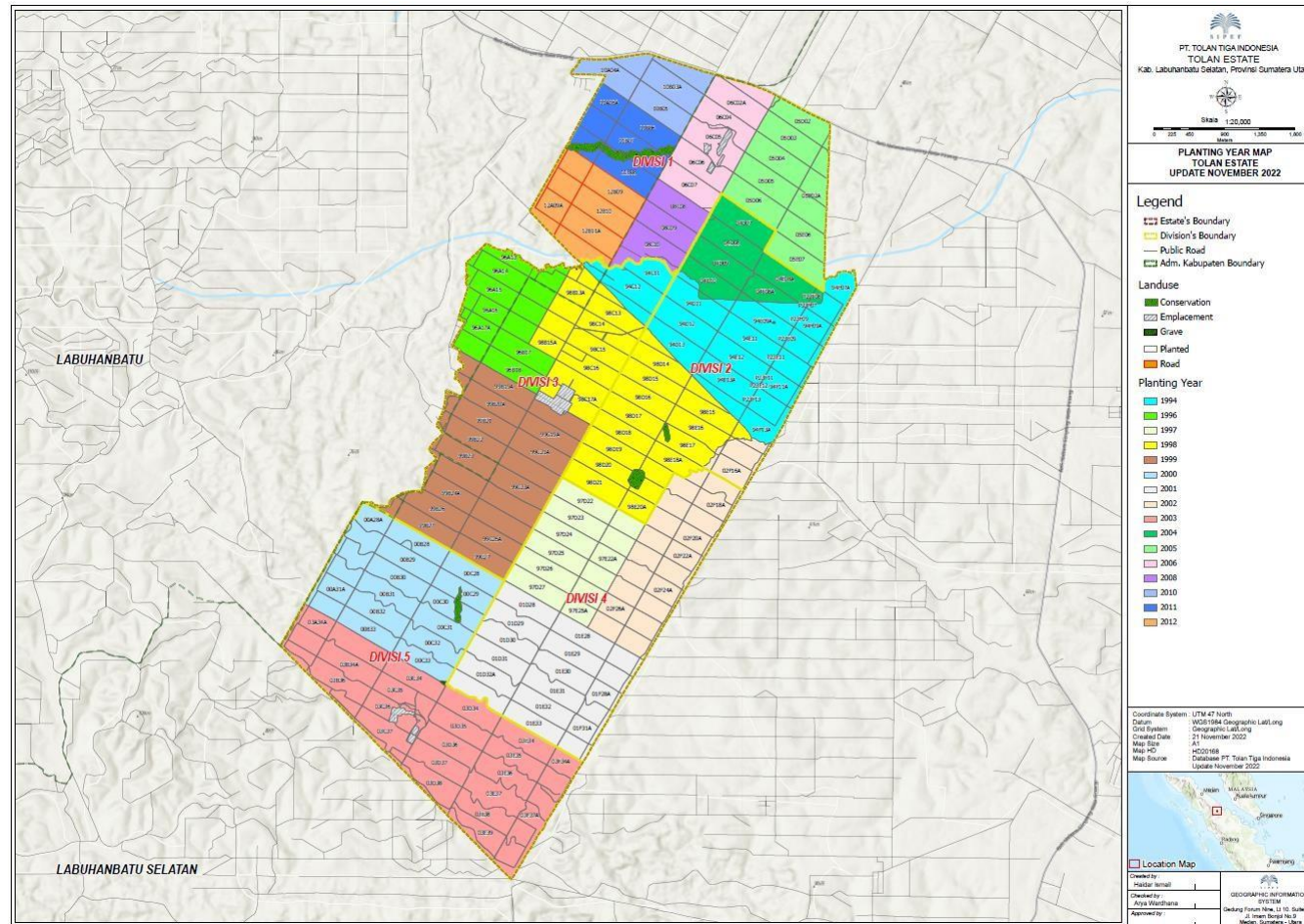
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Perlabian Estate



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Tolan Estate



Appendix E: List of Smallholder Registered and/or sampled

Not Applicable

Risk Factor Applied	Choose an item.	Choose an item.	Choose an item.
Justification of Risk Factor Applied			
Number of samples			
Remarks			

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
Total									
Note: * are smallholders sampled in this audit.									

Appendix F: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
BPJS TK	Social Insurance
BPJS Kesehatan	Health Insurance
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
FL	Free Labour (Casual Worker)
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IDR	Indonesian Rupiah
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
PKWT	Specified Time Work Agreement
PLE	Perlabian Estate
PLPOM	Perlabian Palm Oil Mill
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

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SOP	Standard Operating Procedure
TLE	Tolan Estate
TTI	Tolan Tiga Indonesia
UMP/UMK	Minimum Wage