

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

Annual Surveillance Assessment (2_1)

<p>Client Company name (Parent Company): SIPEF Group</p>
<p>Client company Address: Kasteel Calesberg – Calesbergdreef 5 B-2900 Schoten – Belgium</p>
<p>Certification Unit: PT. Tolan Tiga Indonesia – Perlabian Palm Oil Mill</p> <p>Location of Certification Unit: Perkebunan Perlabian Village, Kampung Rakyat District, Labuhanbatu Selatan Regency, Sumatera Utara Province - 21463 Indonesia</p>
<p>Date of Final Report: 11/5/2021</p>

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Section 1: Scope of the Certification 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 Indonesia – Perlabian POM		
Location / Address	Site address: Perkebunan Perlabian Village, Kampung Rakyat District, Labuhanbatu Selatan Regency, Sumatera Utara Province – 21463, Indonesia		
Website	www.tolantiga.co.id		
Management Representative	Mr. Sander Van Den Ende	E-mail	svdenende@sipef.com
Telephone	+6261 - 41060020	Facsimile	+6261 - 4520908

2. Certification Information			
Certificate Number	RSPO 555208	Date of First Certification	17/05/2010
		Certificate Start Date	17/05/2020
		Certificate Expiry Date	16/05/2025
Scope of Certification	Palm Oil and Palm Kernel Production. (Production of CPO and PK at Perlabian POM with 2 estates as supply base, namely Perlabian Estate and Tolan Estate; with Marketing Activities through SIPEF N.V. Mill capacity of Perlabian POM is 60 MT FFB/hour)		
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 requirements of Principles and Criteria For Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 th April 2020.		
Assessment Cycle	<input type="checkbox"/> Initial Assessment <input type="checkbox"/> Recertification Assessment (Choose an item.) <input checked="" type="checkbox"/> Annual Surveillance Assessment (RA 2 ; ASA 1) <input type="checkbox"/> Scope Extension		
Applicable Standards	<input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil <input type="checkbox"/> Group Certification 2016 <input type="checkbox"/> RSPO Independent Smallholders Standard 2019		

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Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved <input type="checkbox"/> Mass Balance
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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-ID218-20200125	ISCC	Intertek	3/12/2021
ISPO 611404	ISPO	PT. BSI Group Indonesia	18/07/2021
10219730	ISO 9001:2015	PT. Lloyd's Register Indonesia	2 July 2021

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	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' 7.60" N	100° 2' 30.85" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Perlabian Estate	4,216.69	85.12	505.21	4,807.02	87.71
Tolan Estate	3,614.15	55.99	1.9	3,672.04	98.42
Total	7,830.84	141.11	507.11	8,479.06	92.36

6. Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Perlabian Estate	378.74	1,832.8	1,409.14	41.80	554.21	4,039.84	176.85
Tolan Estate	0	219.92	1,614.03	1,439.26	340.94	3,614.15	0
Total (ha)	378.74	2,052.72	3,023.17	1,481.06	895.15	7,653.99	176.85

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7. Certified Tonnage of FFB (Own Certified Scope)				
Estate	Tonnage / year			
	Estimated (May 2020 – April 2021)	Actual (Mar 2020 – February 2021)		Forecast (May 2021 – April 2022)
		Previous license period (Mar 2020 – Apr 2020)	Current license period (May 2020 – Feb 2021)	
Perlabian Estate	106,841.55	13,319.86	81,022.45	117,991
Tolan Estate	99,223.19	13,371.65	70,681.85	114,827
Total	206,064.74	178,395.81		232,818

8. Certified Tonnage of FFB (from other certified unit(s))				
Estate	Tonnage / year			
	Estimated (May 2020 – April 2021)	Actual (Mar 2020 – February 2021)		Forecast (May 2021 – April 2022)
	N/A	Previous license period (Mar 2020 – Apr 2020)	Current license period (May 2020 – Feb 2021)	N/A
Nil				
Total				

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Independent FFB Supplier	Tonnage / year			
	Estimated (May 2020 – April 2021)	Actual (Mar 2020 – February 2021)		Forecast (May 2021 – April 2022)
		Previous license period (Mar 2020 – Apr 2020)	Current license period (May 2020 – Feb 2021)	
Nil				
Total				

10. Certified Tonnage				
Mill Capacity: 60 MT/hr	Estimated (May 2020 – April 2021)	Actual (Mar 2020 – February 2021)		Forecast (May 2021 – April 2022)
	FFB	FFB		FFB
		Previous license period (Mar 2020 – Apr 2020)	Current license period (May 2020 – Feb 2021)	
	206,064.74	26,691.51	151,704.30	232,818

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	CPO (OER: 21.7%)	CPO (OER: 22.02%)		CPO (OER: 24%)
		178,395.81		
	44,922.11	5,945.48	33,336.62	55,876
		39,282.10		
	PK (KER: 5.49%)	PK (KER: 5.82%)		PK (KER: 5.5%)
	11,333.56	1,597.79	8,781.38	12,805
		10,379.17		

11. Actual Sold Volume (CPO)					
Current License period					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	-	33,857.04	-	-	33,857.04
Previous License period					
CPO (MT)	-	4,979.14	-	-	4,979.14
Total	0	38,836.18	0	0	38,836.18

12. Actual Sold Volume (PK)					
Current License period					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
PK (MT)	9,001.68	-	-	-	9,001.68
Previous License period					
PK (MT)	1,360.07	-	-	-	1,360.07
Total	10,361.75				10,361.75

13. Independent Smallholders Certification Claims		
	Credit	Physical Volume (MT)
IS-CSPO	Nil	Nil
IS-CSPKO	Nil	Nil
IS-CSPKE	Nil	Nil

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
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BSI is a leading global provider of management systems assessment and certification, with more than 84,000 certified locations and clients in over 180 countries. BSI Standards 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 9-11 March 2021. 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. RSPO Principles & Criteria 2018 for the Production of Sustainable Palm Oil (The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20th April 2020) was used to guide the assessment of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (and smallholders) of its supply base.

- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (0.8\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula $(0.8\sqrt{y}) \times (z)$; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each

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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 3.5.

All the previous nonconformities are remains closed. The assessment findings for the initial assessment/annual surveillance assessment are detailed in Section 3.4.

This report is structured to provide a summary of assessment finding as attached in the Appendix A. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

For Initial and Re-certification assessment, the report was externally reviewed by RSPO approved Certification Reviewer prior to certification decision by BSI.

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re-Certification)	Year 2 (ASA 2_1)	Year 3 (ASA 2_2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_4)
Perlabian POM	√	√	√	√	√
Perlabian Estate	√	√	√	√	√
Tolan Estate	√	√	√	√	√

Tentative Date of Next Visit: March 7, 2022 – March 9, 2022

Total No. of Mandays: 12

2.2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Pratama Agung Sedayu (PS)	Team Leader	Graduated from University of Jenderal Soedirman in 2008, majoring in Social Economic of Agriculture. He involved in RSPO certification since 2009 as a team member subsequently as a Lead Auditor, covering assessment against RSPO P&C in Indonesia, Malaysia, Thailand, Papua New Guinea, and Liberia. He completed the ISO 9001, ISO 14001, OHSAS 18001 Lead Auditor Course, HCV Identification and Management; ISPO Lead Auditor endorsed Course and RSPO P&C and RSPO SCCS Lead Auditor endorsed Courses. During this assessment, he assessed on the aspects of legal, supply chain for CPO Mills, environment management system, HCV, smallholder audits and stakeholder consultation. He is using Bahasa Indonesia. During this assessment, he assessed on the aspects of social, worker welfare, contractor/supplier compliance.

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Eko Purwanto (EP)	Team Member	Holds a Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Institute of Agriculture (IPB) in 2001. He has working experience at Oil Palm Plantation in East Kalimantan since 2003 to 2012, the last position was Estate Manager. He has implementing good agricultural practice including integrated pest management and limited pesticides uses. He has completed lead auditor training courses for RSPO P&C (2013), RSPO SCC (2012), ISPO (2012), LAC ISO 9001 (2012), ISO 14001 (2013) and ISO 45001 (2019). Refreshment training have been completed for RSPO P&C in May 2018, RSPO SCC in March 2018. He has been involved in quality (ISO 9001) management system audits for very broad industrial and involved in RSPO and ISPO audit for several plantations and mills since October 2012. During this assessment, he assessed on the aspects of best management practice in palm oil mill and estate, supply chain for palm oil mill.
Yudwi Wisnu Rahmanto (YW)	Team Member	Bachelor of Forestry with Silviculture background. He worked at professional independent Certification Body as an Auditor for last 8 years and has involved in auditing activities with various certification schemes. Selected training which have been followed, such as RSPO Endorsed Lead Auditor Training Course, RSPO NEXT, ISPO Auditor/Lead Auditor Course, Quality Management System (QMS) ISO 9001:2008 Auditor/Lead Auditor Course, GIS-Basic Mapping and Spatial Analysis, Timber Legality Assurance System (SVLK), Verification Organization Training C.A.F.E Practices (Starbucks), UTZ Programme and others internal training programs. He has involved in auditing activities, such as Sustainable Forest Management by FSC FM/COC Scheme, Sustainable Palm Oil by RSPO and ISPO Scheme, Coffee And Farmer Equity (C.A.F.E Practices) Starbucks, Organic Standard (EU, NOP, JAS) for Coffee Farmers and Organic Exchange for Textile. During this assessment, he assessed on the aspects of OHS, GHG, HCV identification and management.
Nanang Mualib (NM)	Team Member	He holds a Bachelor degree in Forestry Technology from Bogor Agriculture University, 1999. He has 4 years experience worked in the Forest plantation company in Indonesia, and has experiences involves in the several RSPO certification audits as team member. He has passed 5 days ISO 9001 auditor training on 2009. He has been approved as an HCV Assessor under RSPO Scheme. He has been involved in many assessment related to the Forestry and Sustainable oil palm certification in Indonesia. He has experienced involves in RSPO certification assessments more than 15 different oil palm organizations (including mills and estates) in Indonesia. He has passed the RSPO Lead Auditor Training in 2017. During this assessment, he assessed on the aspect of legal and land ownership.

Accompanying Persons:

Name	Role
Nicholas Cheong (NC)	Qualifying Reviewer (Remote)

2.3 Assessment Plan

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

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Date	Time	Subjects	PS	EP	NM	YW	NC
Monday, 08/03/2021	08.20 – 10.20	Flight Jakarta – Medan	√	√	√	√	
	10.30 – 17.30	Travelling Medan – Perlabian POM	√	√	√	√	
Tuesday, 09/03/2021	08.00 – 08.30	Opening Meeting	√	√	√	√	√
		- Presentation by client (Overview of PT. Tolan Tiga Indonesia – Perlabian POM and its supply bases); - Presentation by BSI team (Objective, scope, audit plan, etc.)					
	08.30 – 12.00	Field visit to Perlabian POM to verify: - 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. - Stakeholder consultation with gender committee, worker union. - Visit to Perlabian POM housing: house condition, water supplies, sanitation, access to affordable food, welfare amenities	√				√
		Field visit to Perlabian POM to verify: - Best Management Practice for Mill Processing and Supply Chain Element for Palm Oil Mill – site visit to check on FFB receiving, FFB process, CPO and PK dispatch, document and record keeping.		√			
		- Stakeholder consultation to relevant agencies of Labuhanbatu Selatan Regency; - Stakeholder consultation with local community/villagers;			√		
		Field visit to Perlabian POM to verify: - Implementation of OHS (loading ramp, 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, Biogas Plant)				√	
	12.00 – 14.00	Break	√	√	√	√	√
	14.00 – 16.30	Continue Morning Agenda - Review support to smallholder inclusion/support independent smallholder. - Review and interview with contractors for Perlabian POM;	√				√
		Continue Morning Agenda - Review information related to RSPO SCCS for Perlabian POM;		√			
		Continue Morning Agenda - Review information related to legal, consultation and communication for Perlabian POM;			√		
Continue Morning Agenda - Review information related to OHS and EMS for Perlabian POM;					√		
16.30 – 17.00	Wash up meeting Audit team	√	√	√	√	√	
Wednesday 10/03/2021	08.00 – 12.00	Field visit to Tolan Estate to verify: - Visit to Tolan Estate housing complex: house condition, water supplies, sanitation, access to affordable food, welfare amenities, clinic, school, landfill, social amenities. - Interview with workers in housing;	√				√

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Date	Time	Subjects	PS	EP	NM	YW	NC
		Field visit to Tolan Estate to verify: - Visit to plantation activity and interview workers: harvesting, spraying, fertilizer application, EFB application - Visit to plantation IPM implementation: barn owl boxes, beneficial plant nursery.		√			
		Field visit to Tolan Estate to verify: - Visit to Tolan Estate HGU boundary poles; - Visit to Tolan Estate, bordering with surrounding villages;			√		
		Field visit to Tolan Estate to verify: - Chemical warehouse, mixing bay, fertilizer store, workshop, fire fighting equipment. - Visit to HCV area, riparian zone, and area with slope				√	
	12.00 – 14.00	Break	√	√	√	√	√
	14.00 – 16.30	Continue Morning Agenda - Review information related to Policy and commitment, smallholder welfare, FFB suppliers, social requirements, contract agreement, human rights, workers' welfare, stakeholder consultation, GHG mitigation;	√				√
		Continue Morning Agenda - Review information related to Economic management plan, Estate best management practices, IPM;		√			
		Continue Morning Agenda - Review information related to Stakeholder Consultation and Communication, Legal Requirements, Land & Legal issue, Conflict resolution;			√		
		Continue Morning Agenda - Review information related to OHS Management System, EIA and Environmental MS, Training, HCV, Natural and biodiversity conservation, waste management;				√	
	16.30 – 17.00	Wash up meeting Audit team	√	√	√	√	√
	Thursday 11/03/2021	08.00 – 12.00	Field visit to Perlabian Estate to verify: - Visit to Tolan Estate housing complex: house condition, water supplies, sanitation, access to affordable food, welfare amenities, clinic, school, landfill, social amenities. - Interview with workers in housing;	√			
		Field visit to Perlabian Estate to verify: - Visit to plantation activity and interview workers: harvesting, transport, spraying, fertilizer application, EFB application - Visit to plantation IPM implementation: barn owl boxes, beneficial plant nursery.		√			
		Field visit to Perlabian Estate to verify: - Visit to Perlabian Estate HGU boundary poles; - Visit to Perlabian Estate, bordering with surrounding villages;			√		
		Field visit to Perlabian Estate to verify: - Chemical warehouse, mixing bay, fertilizer store, workshop, fire fighting equipment. - Visit to HCV area, riparian zone, and area with slope				√	
	12.00 – 14.00	Break	√	√	√	√	√

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Date	Time	Subjects	PS	EP	NM	YW	NC
	14.00 – 16.30	Continue Morning Agenda - Review information related to Policy and commitment, smallholder welfare, FFB suppliers, social requirements, contract agreement, human rights, workers' welfare, stakeholder consultation, GHG mitigation;	√				√
		Continue Morning Agenda - Review information related to Economic management plan, Estate best management practices, IPM;		√			
		Continue Morning Agenda - Review information related to Stakeholder Consultation and Communication, Legal Requirements, Land & Legal issue, Conflict resolution;			√		
		Continue Morning Agenda - Review information related to OHS Management System, EIA and Environmental MS, Training, HCV, Natural and biodiversity conservation, waste management;				√	
	16.30 – 17.00	Report Preparation	√	√	√	√	√
	17.00 – 17.30	Closing Meeting	√	√	√	√	√

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- SIPEF Group Multiple Management Units / Time Bound Plan
- RSPO Principle and Criteria (P&C) 2018 for the Production of Sustainable Palm Oil
- RSPO Group Certification Standard 2016
- Indonesia National Interpretation 2020 for RSPO P&C 2018
- Independent Smallholder Standard 2019

3.2 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company?	PT. Tolan Tiga Indonesia – Perlabian POM is a subsidiary of SIPEF Group. SIPEF Group has disclose all of its companies, mills and estates. The timebound plan including un-certified units/companies.	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	No. Not all the estates and mills certified within five years after obtaining RSPO membership. New estates and mills are under progress to be RSPO certified after RSPO NPP carried out in 2014.	Yes
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	The latest acquisition noted for PT. Asri Rimba Wirabhakti in Bengkulu Province, announced end of 2018. Certification plan have been prepared, awaiting for RSPO LUC, RSPO RACP and RSPO NPP.	Yes
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Yes, there is changes from the last audit to include PT. Asri Rimba into timebound plan. Waiting for HCV ALS review, LUC review for preparation into RSPO NPP. This is consistent with ACOP reporting 2019. Stated SIPEF group plan to achieve 100% RSPO certification for all estate and smallholder by 2029. The timebound plan is consistent with ACOP reporting.	Yes
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No isolated lapse. SIPEF is able to demonstrate adequate evidence related to changes in implementation of the plan.	Yes
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	The delay of not able to certify all the estate within the 5 years period from the day of RSPO membership due to pending HGU issuance for uncertified management unit. This is accepted by the assessment team.	Yes

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Un-Certified Units or Holdings		
<p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	<p>Assessment team checked to confirm any land conflict/liabilities on RaCP tracker and found note "The compensation plans for PT. Umbul Mas Wisesa and PT. Toton Usaha Mandiri (SIPEF) have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015".</p>	<p>Yes</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>All new planting after 1 January 2010 have undergone and complies with RSPO New Planting Procedure.</p>	<p>Yes</p>
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.</p> <p><i>Note:</i> <i>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker. The progress on the Liabilities shall be verified and reported.</i> <i>Please refer to BSI-RSPO Secretariat approval.</i></p>	<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 Muara Rupit, dated 17 May 2017. 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. The summary presented in the RSPO Case Tracker:</p> <p>On 25 July 2017 - Secretariat to write to the company and inform them on the complaint. On 24 August 2017 (CP Meeting) - Secretariat to wait for reply from the company. On 28 August 2017 - Secretariat received response from the company. On 5 September 2017 - Complainant failed to provide the document. On 11 September 2017 - Secretariat has sent an email to SIPEF. On 26 September 2017 (CP Meeting) - Secretariat to draft the decision letter. On 18 June 2018 – Complaint Panel to deliver a decision. On 25 July 2018 – Complaint Panel to deliver a decision. On 23 August 2018 – Draft decision letter to be reformatted. On 19 September 2018 – Decision Letter – Complaints Panel. On 26 September 2018 – The decision letter finalised and to be delivered to Parties.</p>	<p>Yes</p>

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	<p>On 24 October 2018 – Complaint Panel Decision letter has been sent to parties. Deadline for submission of appeals is on 20 December 2018.</p> <p>On 20 December 2018 – The complaint is officially closed.</p> <p>The case tracker available on link https://askrspo.force.com/Complaint/s/case/5090000028Es1JAAS/detail</p> <p>Based on RaCP tracker in RSPO website there are 3 MU’s which have potential liability, 2 of them are PT. Umbul Mas Wisesa and PT. Toton Usaha Mandiri (SIPEF) have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015. Whilst the other one, PT. Dendymarker Indah Lestari have submitted CN to the RSPO Secretariat and waiting for approval.</p>	
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.</p>	<p>The assessment team has conducted a search to RSPO Complaint Panel and RSPO Dispute Settlement Facility to confirm that there is a lodged complaint related to casual worker payment and welfare, that was recorded as complaint under RSPO Case Tracker; raised by complainant requesting confidentiality, 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 https://askrspo.force.com/Complaint/s/case/5000o000039fi8kAAA/detail</p> <p>Date complaints submitted 22 January 2021. Date complaints accepted 5 March 2021. The complainant brought forward the issue of:</p> <ul style="list-style-type: none"> -The daily casual workers are paid below the minimum wage set out by the Musi Rawas District Government; -The daily casual workers are not protected and no remedy available for work accidents; -The daily casual workers are not equipped with personal protection equipment [PPE] and are not equipped with working tools; -The daily casual workers did not receive festive allowance in accordance with the regulation; 	<p>Yes</p>

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	<p>-The daily casual workers, who are hired through the third party, do not get a pay slip. The amount written in the payment receipt is without formal stamp and without the name of the party who rendered the payment.</p> <p>SIPEF correspond with RSPO Grievance Manager – Indonesia to follow up the complaint on 16 March 2021, 19 March 2021 with highlight that the complainant has decided to resolve the complaint through mediation by RSPO Dispute Settlement Forum/DSF.</p> <p>On 1 April 2021, SIPEF sent formal response to the complaint, addressed to RSPO Grievance Manager. There is no update in RSPO Case Tracker website as of 14 April 2021.</p>	
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>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.</p>	<p>Yes</p>
<p>Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.</p>	<p>The internal audit against the uncertified management units requirement has been conducted for all uncertified units:</p> <ul style="list-style-type: none"> • PT. Agro Rawas Ulu was conducted on 20-21 March 2019 – including assessment against criterion 2.1; 2.2; 2.3; 6.3; 6.4; 7.3; 7.5; 7.6; • PT. Agro Kati Lama was conducted on 4- 6 March 2019 assessing criterion 2.1; 2.2; 2.3; 6.3; 6.4; 7.3; 7.5; 7.6; • PT. Agro Muara Rupit was conducted on 18-20 March 2019 – including assessment against criterion 2.1; 2.2; 2.3; 6.3; 6.4; 7.3; 7.5; 7.6; <p>Each company provide correction and corrective action on the base to ensure all RSPO P&C requirements are implemented.</p>	<p>Yes</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Yes. Stakeholder comments are noted. The assessment team has conducted a search in internet to confirm that there is a comment that was recorded as complaint under RSPO Dispute Settlement Facility – however, it was stated as confidential. Therefore audit team</p>	<p>Yes</p>

	cannot contact the stakeholder with negative comment for un-certified management unit.	
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3.3 Progress of scheme smallholders and/or outgrowers

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

3.4 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 no Critical; no Minor nonconformities and **one Opportunity For Improvement** raised. The PT. Tolan Tiga Indonesia – Perlabian POM Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	Nil	Clause & Category (Critical / Minor)	
Date Issued		Due Date	
Closed (Yes / No)		Date of nonconformity Closure	
Statement of Nonconformity:			
Requirement Reference:			
Objective Evidence:			
Corrections:			
Root Cause Analysis:			
Corrective Actions:			
Assessment Conclusion:			

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Opportunity for Improvements	
OFI #	Description
OFI 1	RSPO P&C 7.12.7 Tolan Estate has conduct and record monitoring upon RTE species and other wild animal in the HCV identified area. Consideration for broader monitoring RTE species and other wild animal in other area such as plantation boundaries.

Positive Findings	
PF #	Description
PF 1	Nil

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	Nil	Clause & Category (Critical / Minor)	
Closed (Yes / No)		Date of nonconformity Closure	
Statement of Nonconformity:			
Requirement Reference:			
Objective Evidence:			
Corrective Actions:			
Assessment Conclusion:			

Opportunity for Improvement	
OFI#	Description
OFI 1	Point of consideration: consistency of monitoring of all license are well implemented by respective Department Follow up: Certificate holders improving and maintaining all license to be valid and accurate, even though pandemic situation in 2020. Audit team made stakeholder interview with relevant government authorities and verified as per Criterion 2.1, 3.8 and 7.2. Follow up sufficient.

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
032936M0	Major	RSPO P&C 2.1.1	15 March 2014	Closed on 14 May 2014
1032936M16	Major	RSPO P&C 5.3.2	15 March 2014	Closed on 14 May 2014
1032936M27	Major	RSPO P&C 5.6.2	15 March 2014	Closed on 14 May 2014
1032936N1	Minor	RSPO P&C 2.1.4	15 March 2014	Closed on 1 April 2015
1032936N11	Minor	RSPO P&C 4.7.3	15 March 2014	Closed on 1 April 2015
1032936N25	Minor	RSPO P&C 4.7.4	15 March 2014	Closed on 1 April 2015
1032936N26	Minor	RSPO P&C 4.7.5	15 March 2014	Closed on 1 April 2015
1032936N28	Minor	RSPO P&C 5.3.3	15 March 2014	Closed on 1 April 2015
1149548M1	Major	RSPO P&C 1.1.2	1 April 2015	Closed on 5 May 2015
1174416N1	Minor	RSPO P&C 2.1.3	1 April 2015	Closed on 16 March 2016
1149548N1	Minor	RSPO P&C 6.1.4	1 April 2015	Closed on 16 March 2016
1304318N1	Minor	RSPO P&C 4.7.6	16 March 2016	Closed on 23 February 2017
1754048-201903-M1	Major	RSPO Supply Chain Certification Standard (June 2017) General Chain of Custody Requirement- Clause 5.7.2	30 March 2019	Closed on 3 May 2019

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

List of Stakeholders contacted	
Internal Stakeholders <ul style="list-style-type: none"> - Koperasi Karyawan (Employee’s Cooperative) - Gender Committee 	Union/Contractors <ul style="list-style-type: none"> - Serikat Pekerja Tolan Tiga Mandiri (SPTTM), - Contractor PT. Persada Dinamika Jaya (Mill Maintenance) and CV Ira Puspita (Replanting)

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<ul style="list-style-type: none"> - Plantation and Mill workers: Boundary Poles Monitoring Officer, Harvesters, Sprayers, Children Day care Attendant, Contract Workers - Housewives in Estate Housing 	<ul style="list-style-type: none"> - Ketua Koperasi KPPPS Desa Perlabian (Cooperative for smallholder partnership program Perlabian Village) - Ketua Koperasi KPAMS Desa Air Merah (Cooperative for smallholder partnership program Air Merah Village)
<p>Government Departments</p> <ul style="list-style-type: none"> - Dinas Perkebunan dan Peternakan Kabupaten Labuhanbatu Selatan (Plantation and Husbandry Service Labuhanbatu Selatan Regency) - Dinas Lingkungan Hidup Kabupaten Labuhanbatu Selatan (Environmental Service Labuhanbatu Selatan Regency) - Dinas Ketenagakerjaan Kabupaten Labuhanbatu Selatan (Manpower Service Labuhanbatu Selatan Regency) - Tanjung Selamat Village - Persiapan Lohsari Village - Gunung Selamat Village 	<p>NGO</p> <ul style="list-style-type: none"> - LSM Pilar Kesejahteraan Rakyat Nasional (PKRN)

Stakeholders comment	
<p>1</p>	<p>Feedbacks: Dinas Perkebunan dan Peternakan Kabupaten Labuhanbatu Selatan (Plantation and Husbandry Service Labuhanbatu Selatan Regency)</p> <ol style="list-style-type: none"> PT. Tolan Tiga Indonesia has established and managed the oil palm plantation since Dutch Colonial Era. PT. Tolan Tiga Indonesia was conversion from "Hak Barat (Hak Erfpacht)" therefore no Izin Lokasi. Based on review, the company concession was not fall into Forest Area. There is no issue between land title/HGU of PT. Tolan Tiga Indonesia with the Provincial Spatial planning – located as agricultural/plantation area. Social activity from PT. Tolan Tiga Indonesia to surrounding community is good. Company is having smallholder partnership program with community through "Program Perkebunan Sawit Rakyat (PSR)" for replanting of community plantation. Company made agreement with cooperative surrounding the concession and well-coordinated with Government Services such as Plantation Services and Environmental Services. So far there is no report of land conflict related to PT. Tolan Tiga Indonesia reported to Plantation Service. There is once land claim from Kelompok Tani Bersatu, with court decree in 2014 stating the claim was dismissed. PT. Tolan Tiga Indonesia actively and consistently sent the report such as mill production report, plantation business report, fire and fire prevention report, environmental management and monitoring report. <p>Management Responses:</p> <ul style="list-style-type: none"> - PT. Tolan Tiga Indonesia management appreciates comments from Plantation Services, as positive inputs. - The land complaint from Kelompok Tani Bersatu has been issued with court decision. - Company regularly reports the production data, plantation business report, fire and fire prevention report, environmental management and monitoring report to Plantation Service. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Audit team accepts the comments from Plantation Services as positive comments. - Audit team accepts response and explanation from PT. Tolan Tiga Indonesia. - Audit team report chronology related to land complaint under indicator 4.2.3 and 4.2.4. <p>Feedbacks:</p>

<p>2</p>	<p>Dinas Lingkungan Hidup Kabupaten Labuhanbatu Selatan (Environmental Service Labuhanbatu Selatan Regency)</p> <p>a. PT. Tolan Tiga Indonesia has established and managed the oil palm plantation since Dutch Colonial Era. PT. Tolan Tiga Indonesia was conversion from "Hak Barat (Hak Erfpacht)" therefore no Izin Lokasi. Based on review, the company concession was not fall into Forest Area. There is no issue between land title/HGU of PT. Tolan Tiga Indonesia with the Provincial Spatial planning.</p> <p>b. There is no peat area in concession of PT. Tolan Tiga Indonesia.</p> <p>c. PT. Tolan Tiga Indonesia have issued with environment permit, Temporary Hazardous Waste Storage, etc.;</p> <p>d. PT. Tolan Tiga Indonesia have regularly report the environment management performance. The laboratory test result shows all environmental parameter meets regulations.</p> <p>e. Company is having smallholder partnership program with community through "Program Perkebunan Sawit Rakyat (PSR)" for replanting of community plantation. Company made agreement with cooperative surrounding the concession and well-coordinated with Government Services.</p> <p>f. So far there is no report of environmental pollution or land conflict related to PT. Tolan Tiga Indonesia reported to Environmental Service.</p> <p>g. Social activity from PT. Tolan Tiga Indonesia to surrounding community is good.</p> <p>Management Responses:</p> <ul style="list-style-type: none"> - PT. Tolan Tiga Indonesia management appreciates comments from Environmental Services, majority as positive inputs. - There is no peat soil in area of PT. Tolan Tiga Indonesia. - PT. Tolan Tiga Indonesia committed to meet all environmental parameter. Company received award "Blue" status for environmental performance PROPER period 2019-2020. - Company regularly reports the environmental management performance to Environmental Service. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Audit team accepts the comments from Environmental Services as positive comments. - Audit team accepts response and explanation from PT. Tolan Tiga Indonesia. - Audit team report chronology related to environmental performance under indicator 3.4.1, 7.3.1, 7.4.3.
<p>3</p>	<p>Feedbacks:</p> <p>Dinas Ketenagakerjaan Kabupaten Labuhanbatu Selatan (Manpower Service Labuhanbatu Selatan Regency)</p> <p>a. PT. Tolan Tiga Indonesia supports the presence of worker union. So far the relationship between company and worker union is good. PT. Tolan Tiga Indonesia has Collective Bargaining Agreement (CBA), and currently under extension period for one year. Worker union is actively involved in the establishment of collective bargaining agreement, including inquired for approval to agree upon CBA extension application.</p> <p>b. In PT. Tolan Tiga Indonesia has established Bipartite Organization for mediation of industrial relation case – and has been registered; Routine report submitted and received by Manpower Service.</p> <p>c. In PT. Tolan Tiga Indonesia has established Safety Committee (P2K3) for occupational health and safety management and monitoring in company level. Health and safety committee report submitted to provincial level but for accident report, Manpower Service at regency level received the copy report.</p> <p>d. The COVID-19 pandemic situation does not affecting in form of company laying off employees.</p> <p>e. The company follows the regulation related to minimum wage. Company follows "UMK Kabupaten Labuhanbatu Selatan" for year 2021.</p> <p>f. PT. Tolan Tiga Indonesia provides all the rights for workers, including coverage BPJS Ketenagakerjaan and BPJS Kesehatan for all employees – comply with regulation. PT. Tolan Tiga Indonesia provision the personal protective equipment, first aid kit, fire extinguisher to ensure occupational health and safety implementation.</p> <p>g. Based on report review: There is no discrimination issue by company. There is no child worker or underage worker employed by company. There is no complaint related to employee rights violation.</p>

	<p>h. The daily worker was managed by cooperative and communicated to Manpower Service. The daily worker has been covered with BPJS Ketenagakerjaan and BPJS Kesehatan – comply with regulation. However Manpower Service asked PT. Tolan Tiga Indonesia to register the work agreement between company and cooperative to the Manpower Service.</p> <p>i. Manpower Service asked to ensure the payment for daily worker under cooperative meets the regulation for minimum wage.</p> <p>Management Responses:</p> <ul style="list-style-type: none"> - PT. Tolan Tiga Indonesia has policy for freedom of association and company acknowledge roles from worker union to represent employees in creating conducive work place. - PT. Tolan Tiga Indonesia has Collective Bargaining Agreement (CBA), and currently under extension period for one year, and informed to Manpower Service through letter No. 30/PLE/2020 dated 3 September 2020. - Salary payment year 2021 meets the regulation as per “Keputusan Gubernur Sumatera Utara No. 188.44/578/KPTS/2020 Tentang Penetapan Upah Minimum Kabupaten Labuhanbatu Selatan Tahun 2021”. The regulation stipulates minimum wage of Rp. 2,930,970 per month; while PT. Tolan Tiga Indonesia determined the lowest wage at Rp. 3,157,500. - Company responded the applicable pay rate for daily worker meets the minimum wage year 2021. - Company responded the daily worker covered with BPJS Kesehatan and BPJS Ketenagakerjaan; company ensure female worker covered under spouse’s registration. - Company regularly reports the manpower data, industrial data, health and safety management performance to Manpower Service. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Audit team accepts response and explanation from PT. Tolan Tiga Indonesia. - Audit team report worker welfare under indicator 2.2.2, 6.2.6, 6.2.7, 6.3.1, 6.4.1, 6.6.2.
<p>4</p>	<p>Feedbacks: Serikat Pekerja Tolan Tiga Mandiri (SPTTM) – Worker Union</p> <p>a. PT. Tolan Tiga Indonesia supports the presence of worker union. So far the relationship between company and worker union is good. PT. Tolan Tiga Indonesia has Collective Bargaining Agreement (CBA), and currently under extension period for one year. Worker union is actively involved in the establishment of collective bargaining agreement, including inquired for approval to agree upon CBA extension application.</p> <p>b. In PT. Tolan Tiga Indonesia has established Bipartite Organization for mediation of industrial relation case – and has been registered.</p> <p>c. Worker union committee election every 5 years. The latest election in November 2020 for period 2020-2025.</p> <p>d. Worker union meeting with management usually on monthly basis. However due to COVID-19 the meeting only held when it is urgent.</p> <p>e. The basic wage meets the minimum wage regulation for Labuhanbatu Selatan rate with additional Rp.7,500 for each grade.</p> <p>f. All worker has been covered with BPJS Ketenagakerjaan and BPJS Kesehatan. There is no discrimination issue by company. There is no child worker or underage worker employed by company. There is no complaint related to employee rights violation.</p> <p>g. To fulfill monthly grocery, employee can access “Koperasi Karyawan”. No issue related to quality and quantity of rice provided by company through “Koperasi Karyawan”.</p> <p>Management Responses:</p> <ul style="list-style-type: none"> - Salary payment year 2021 meets the regulation as per “Keputusan Gubernur Sumatera Utara No. 188.44/578/KPTS/2020 Tentang Penetapan Upah Minimum Kabupaten Labuhanbatu Selatan Tahun 2021”. The regulation stipulates minimum wage of Rp. 2,930,970 per month; while PT. Tolan Tiga Indonesia determined the lowest wage at Rp. 3,157,500. - PT. Tolan Tiga Indonesia management confirms the statement from worker union, as positive input. <p>Audit Team Findings:</p>

	<ul style="list-style-type: none"> - Audit team accepts the comments from worker union as positive comments. - Audit team accepts response and explanation from PT. Tolan Tiga Indonesia. - Worker union input and management response reported under indicator 2.2.2, 6.2.6, 6.2.7, 6.3.1, 6.4.1, 6.6.2.
<p>5</p>	<p>Feedbacks: Contractors CV Ira Puspita and PT. Persada Dinamika</p> <ol style="list-style-type: none"> a. PT. Tolan Tiga Indonesia has strict requirement related to child worker/underage worker, trafficked worker, pays minimum wage to workers, and implementation of health and safety management system, registration to social insurance BPJS Ketenagakerjaan and BPJS Kesehatan. b. All the requirements stipulated in contract clauses. Contract is prepared for each scope of work, updated as per term, signed and kept a copy. c. Payment for contractor is good, as per terms in contract. d. Requirement to become partner: legality (Establishment act, tax number, business permit, etc.) e. Contractors confirms that PT. Tolan Tiga Indonesia communicating the policies. Contractors understands the mechanism for conveying complaint. f. Contractor provides personal protective equipment for own worker. This is including paying social insurance BPJS Ketenagakerjaan and BPJS Kesehatan fee, and ensure income tax paid. <p>Management Responses:</p> <ul style="list-style-type: none"> - Company provide opportunity for local contractor to carry out some works in the company. - All contractors performing work for company shall: have legal entity, shall abide to rules and regulation in conformance to scope of work, contractor selection through tender process, does not employ child worker/underage worker, does not employ trafficked worker, pays minimum wage to workers, implement health and safety management system, register all workers to BPJS Ketenagakerjaan and BPJS Kesehatan. - Before performing work, company provides policy socialization to contractor and its worker. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Audit team accepts the comments from contractors as positive comments. - Audit team accepts response and explanation from PT. Tolan Tiga Indonesia related to contractor/supplier monitoring. Stakeholder comments reported under indicator 2.2.2.
<p>6</p>	<p>Feedbacks: Ketua Koperasi KPPPS – Desa Perlabian (Cooperative for smallholder partnership program Perlabian Village) and Ketua Koperasi KPAMS – Desa Air Merah (Cooperative for smallholder partnership program Air Merah Village)</p> <ol style="list-style-type: none"> a. KPPPS-Desa Perlabian (Cooperative for smallholder partnership program Perlabian Village) has cooperative has 236 members with area of 832.98 Ha. b. KPAMS-Desa Air Merah (Cooperative for smallholder partnership program Air Merah Village) cooperative had 70 members with area of 377 Ha. c. The “Program Perkebunan Sawit Rakyat (PSR)” Program defined member joined the program shall completed all administrative requirement including recommendation from Plantation Services, currently awaiting decision from BPDPKS. The PSR program will carried out with full managed scheme by PT. Tolan Tiga Indonesia and cooperatives. d. The current partnership program in form of seedling provision, fertilizer credit, heavy equipment for road maintenance, plantation tools, solid and boiler ash from POM. The management of oil palm plantation carried out by smallholder member individually. PT. Tolan Tiga Indonesia communicating clearly and provides guidance. e. The FFB sales from smallholder member under cooperative will awaiting for certification process. <p>Management Responses:</p> <ul style="list-style-type: none"> - Company is in partnership agreement with cooperative with smallholder member. - Cooperative will sell the FFB from partnering smallholder to company. This non-certified FFB will be sell again to third-party mill. This is because PT. Tolan Tiga Indonesia implementing supply chain module Identity Preserved.

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	<ul style="list-style-type: none"> - Smallholder member under “Petani Sawit Rakyat/PSR” program is waiting fund from BPDPKS to be utilized for replanting. Company does not provide oil palm seedling. To meet quality standard, company will provides guidance. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Audit team accepts the comments from village cooperative as positive comments. - Audit team accepts response and explanation from PT. Tolan Tiga Indonesia related to program to assist and support smallholder. Reported under indicator 4.3.1, 4.6.3, 5.1.4.
<p>7</p>	<p>Feedbacks: LSM Pilar Kesejahteraan Rakyat Nasional (PKRN) a. The NGO “LSM Pilar Kesejahteraan Rakyat Nasional” sent letter Surat LSM Pilar Kesejahteraan Rakyat Nasional No. 110/DPD-LSM-PKRN/LR/VII/2020 perihal Klarifikasi Pemakaian Pengaman Jaring Truk Angkut TBS”, dated 17 July 2020. The letter stated based on NGO investigation on 17 June 2020, the NGO found some truck did not use safety net when transporting FFB.</p> <p>Management Responses: PT. Tolan Tiga Indonesia, Medan replied the letter through email on 14 August 2020, stating:</p> <ul style="list-style-type: none"> - PT. Tolan Tiga Indonesia will continue to check the safety and security aspect of all FFB transport truck; - Regional Management Office issued memorandum to all Operating Unit and contractor of FFB transport related to the use of FFB net; - Regional management will monitor closely and give sanction for every deviation or failure to meet the company requirement. <p>Audit Team Findings: Audit team accepts response and explanation from PT. Tolan Tiga Indonesia related to complaint handling. Reported under indicator 4.2.3.</p>
<p>8</p>	<p>Feedbacks: Village Head and Community from - Tanjung Selamat Village, Persiapan Lohsari Village, Gunung Selamat Village</p> <ol style="list-style-type: none"> a. The communication between company and local communities are good. b. Community understand the boundary of HGU in form of boundary poles coloured blue. c. Community has not received report about land conflict between community and PT. Tolan Tiga Indonesia. d. Communities and company has an agreement to develop community plantation in December 2020 for “Program Petani Sawit Rakyat” to prepare for replanting. Waiting for decision for BPDPKS. Currently company prepared oil palm seedling for this program. e. PT. Tolan Tiga Indonesia is informing if any job vacancy to the village government. f. Company social activity in form of: heavy equipment for road maintenance/repair, COVID-19 prevention, solid, EFB and boiler ash for farmer, Ramadhan package and Christmas package, etc. g. A number of national festivities or religious festivities was cancelled during COVID-19 (March 2020 – to date). h. Request from Persiapan Losari Village that main road crossing PT. Tolan Tiga Indonesia be excised from HGU so the main road can be maintained/asphalt by Regency Government. <p>Management Responses:</p> <ul style="list-style-type: none"> - Management will keep good relationship with communities. - Management will continue check the boundary poles, ensure all in good condition. - Management has not received report about land conflict or environmental pollution. - Company is in partnership agreement with cooperative with smallholder member. Cooperative will sell the FFB from partnering smallholder to company. Smallholder member under “Petani Sawit Rakyat/PSR” program is waiting fund from BPDPKS to be utilized for replanting. Company does not provide oil palm seedling. To meet quality standard, company will provides guidance. - Company committed to follow government advice to mitigate COVID-19 spread including prevent crowd-gathering. - Company has provided explanation the road is fall under company land title/HGU and cannot be excised out. Company always allow community to use the road.

	<p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Audit team accepts the comments from communities as positive comments. - Audit team accepts response and explanation from PT. Tolan Tiga Indonesia related to community development. Stakeholder comment and company response reported under indicator 4.3.1.
<p>9</p>	<p>Feedbacks: Gender Committee PT. Tolan Tiga Indonesia</p> <ol style="list-style-type: none"> a. Gender committee has been established. b. No sexual harassment case and/or violence case noted and/or recorded up to date. c. Company has implementing the female worker’s right such as regular medical checkup for female sprayers, menstrual leave right, maternal leave and breast-feeding leave, gender equality in payment. d. Company has conveyed the mechanism for complaint and grievance settlement for any sexual harassment case. e. Company asked female worker to consultation related to breastfeeding policy. <p>Management Responses:</p> <ul style="list-style-type: none"> - Management will keep good relationship with all internal stakeholders. - Management will continue good practices to protect reproductive rights. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Audit team accepts the comments from gender committee as positive comments. - Audit team accepts response and explanation from PT. Tolan Tiga Indonesia.
<p>10</p>	<p>Feedbacks: Harvesters, Sprayers, Contract workers</p> <ol style="list-style-type: none"> a. Company has implemented minimum wage in 2020, as in “Upah Minimum Sektoral Kabupaten” for salary payment standard. Company has asked worker union for meeting on minimum wage 2021; b. Company has registering all worker under “BPJS Ketenagakerjaan” and “BPJS Kesehatan” for insurance; c. Company has provided facility for the worker, housing with clean water and electricity, medical clinic, school bus, religious house, sport facility. d. Company provides the facility for the worker including clean water. Clean water tested by laboratory. e. There has been no case of industrial relation dispute between employees and company; f. Company has communicated the OHS plan; provided medical check up on annual basis; provided PPE for harvester and sprayers; provided working tool as appropriate; provided onsite first aid kit with mandors; g. Company has communicated the complaint and grievance settlement mechanism. h. Company has communicated the policy on protection of flora and fauna, as well as high conservation value area. i. “Perjanjian Kerja Waktu Tertentu” stipulates: Clause 1: PKWT for Ebert as upkeep mill; PKWT period 1 September 2020 – 1 September 2021 (1 year). Clause 4: Salary paid per month, equal to UMP/UMSP/UMK/UMSK applicable to the company. Employee entitled for the salary including rice 15kg/month. Clause 5: Company provides medical treatment for employee as per regulation. Clause 7: Company will register employee to BPJS Ketenagakerjaan. <p>Management Responses:</p> <ul style="list-style-type: none"> - Management will keep good relationship with all internal stakeholders. - Management committed to fulfil all worker rights as regulation. <p>Audit Team Findings: Audit team accepts comments from workers and response & explanation from PT. Tolan Tiga Indonesia.</p>
<p>11</p>	<p>Feedbacks: Housewives in Housing Compound</p> <ol style="list-style-type: none"> a. Company has provided facility for the worker, housing with clean water and electricity, medical clinic, school bus, religious house, sport facility. b. Company provides the facility for the worker including clean water – can be used for cooking, washing and other household activity. c. Housewives received rice as form of in-kind benefit with good quality and quantity. Housewives can access food, grocery from local market, location near the plantation.

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	<p>Management Responses:</p> <ul style="list-style-type: none"> - Management will keep good relationship with all internal stakeholders. - Management committed to fulfil all worker rights as regulation.
	<p>Audit Team Findings:</p> <p>Audit team accepts comments from housewives and response & explanation from PT. Tolan Tiga Indonesia.</p>


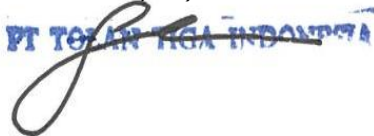
List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Nil					
<p>Note: PT. Tolan Tiga Indonesia – Perlabian POM has been operated since the Dutch Colonial Era and there was no new land expansion after 2005. There is no previous land owner/user existed.</p>					

3.6 Impartiality and conflict of interest

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

Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that PT. Tolan Tiga Indonesia – Perlabian POM has complied with the RSPO Principles and Criteria 2018 for Sustainable Palm Oil (The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20th April 2020) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of PT. Tolan Tiga Indonesia – Perlabian POM is continued.

Report prepared by	Acceptance of Assessment Conclusion
Name: Pratama Agung Sedayu	Name: Sander Van Den Ende
Company Name: On behalf BSI Services Malaysia Sdn Bhd	Company Name: PT. Tolan Tiga Indonesia – Perlabian POM
Title: Lead Auditor	Title: Regional Director – Environment & Conservation 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: 14 April 2021	Date: 14 April 2021

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
<p>Principle 1: Behave ethically and transparently</p>			
<p>Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p>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.</p>			
<p>1.1.1</p>	<p>(C) Management documents that are specified in the RSPO P&C are made publicly available.</p>	<p>PT. Tolan Tiga Indonesia consistently renew the list of documents made publicly available. Perlabian POM updated the list of documents made publicly available on 24 February 2021, comprise of 16 documents. Perlabian Estate updated the list of documents made publicly available on 3 February 2021, comprise of 21 documents. Tolan Estate updated the list of documents made publicly available on 8 February 2021, comprise of 19 documents.</p> <p>In general, based on document verification to estates and palm oil mill, type of document made publicly available:</p> <p>a. Copy of land title/HGU, in form of:</p> <ul style="list-style-type: none"> - Decree as per "Surat Keputusan Menteri Negara Agraria/Kepala Badan Pertanahan No.SK 80/HGU/BPN/97, dengan luas 6,042.44 Ha, yang berlokasi di Desa Kebun Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu, Provinsi Sumatera Utara. Masa berlaku sampai dengan 31 Desember 2023", dated 16 July 1997. Based on the decree, HGU certificate issued by "Kantor Pertanahan Kabupaten Labuhanbatu No. 02 tertanggal 17 September 1997 dengan luas 6,042.44 Ha sesuai dengan Surat Ukur No. 2868/1997" dated 17 September 1997". - Decree as per "Surat Keputusan Menteri Negara Agraria/Kepala Badan Pertanahan No.SK 86/HGU/BPN/97, tanggal 23 Juli 1997, 	<p>Complied</p>

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		<p>dengan luas 2,436.62 Ha, yang berlokasi di Desa Tolan Pekan, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu, Provinsi Sumatera Utara” dated 23 July 1997. Based on the decree, HGU certificate issued “Sertifikat HGU oleh Kantor Pertanahan Kabupaten Labuhanbatu No. 02 tertanggal 17 September 1997 dengan luas 2,436.62 Ha sesuai dengan Surat Ukur No. 2869/1997” dated 17 September 1997.</p> <ul style="list-style-type: none"> b. OHS Committee Program as in “Program Panitia Pembina Kesehatan dan Keselamatan Kerja, Lingkungan Hidup dan Sosial (P2K3LHS)” for each estate and mill. c. Environmental permit, Environmental Aspect-Impact Assessment and its report as in “Dokumen Lingkungan (AMDAL), dokumen Laporan pelaksanaan RKL-RPL”; d. HCV identification report, HCV management and monitoring document, HCV report as in “Dokumen Identifikasi HCV, Rencana Pengelolaan dan Pemantauan HCV, Laporan HCV”. e. Complaint document from stakeholders and company response upon these complaints as in “Dokumen keluhan yang diterima dari stakeholder dan tanggapan perusahaan atas keluhan tersebut”. f. Procedure for handling information request and responding to information request. g. 24 sets of procedures and working instructions i.e: “Prosedur Legal and Corporate Affair Department Manual, Environment and Conservation Department Manual, Estate Department Manual, Palm Oil Mill Operational Manual, Internal Audit Department Manual, Occupational Health and Safety Operational Manual, Laboratory independent Operational Manual, Purchasing Department Manual, Engineering Department Manual”, etc.. 	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	Based on document verification, the document listed above in 1.1.1 is available in Bahasa Indonesai and some document made bi-lingual, Bahasa Indonesia and English:	Complied

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		<ul style="list-style-type: none"> - Company policies available in English and Bahasa Indonesia; - Prosedur-Prosedur operasional perusahaan available in English and Bahasa Indonesia; - The document of Land Title/Izin HGU, Environmental Permit/AMDAL, HCV Identification/Identifikasi HCV, Social Impact Assessment available in Bahasa Indonesia; - The document of OHS Committee Management Plan available in Bahasa Indonesia; - The document of GHG identification and GHG Mitigation Plan available in Bahasa Indonesia; - Public summary of the certification assessment report oleh CB available in English; - Internal Audit RSPO P&C Report available in Bahasa Indonesia; - The document of Stakeholder Complaint, Grievance and respond upon complaint and grievance from stakeholder available in Bahasa Indonesia; - The document of Continuous Improvement available in Bahasa Indonesia; 	
1.1.3	(C) Records of requests for information and responses are maintained.	<p>Records of requests for information and responses are maintained by each estate and mill, under logbook title "Rekaman Permintaan Informasi & Tanggapan":</p> <p>In year 2020, Perlabian POM recorded 16 information requests from stakeholders. Most of them in type of donation request. Sample taken: A letter from Air Merah Village Head dated 14 January 2020 related to request for solid transport, responded on same date. Up to February 2021, there are 4 information requests.</p> <p>In year 2020, Perlabian Estate recorded 2 information requests from stakeholders. Most of them in type of donation request. Sample taken: A letter from Vocational School SMK PGRI 17 Lohsari, dated 13 January 22021 related to request permission for student to do practical on-the-</p>	Complied

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		<p>job training. Responded on same date. Up to February 2021, there is no information request.</p> <p>In year 2020, Tolan Estate recorded 15 information requests from stakeholders. Most of them in type of donation request or meeting invitation. Sample taken: A letter from Manpower Service No. 560/153/Naker/III/2020 dated 16 March 2020 related to "Undangan Sosialisasi Syarat-Syarat Penyerahan Sebagian Pelaksanaan Pekerjaan kepada Perusahaan Lain" and responded by sending representative to attend the meeting on 19 – 20 March 2020.</p> <p>Another letter from DPRD Labusel No. 005/235/DPRD-LBS/2020 related to "Undangan Rapat Dengar pendapat DPRD Labusel dengan PT. Tolan Tiga Indonesia dan Kelompok Tani Bersatu Desa Meranti" sent on 6 October 2020 and responded by company by representative to attend the meeting on 8 October 2020. Up to February 2021, there is no information request.</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>Records of consultation and communication also documented in the same logbook "Rekaman Permintaan Informasi & Tanggapan":</p> <p>In year 2020, Perlabian POM recorded 16 information requests from stakeholders. Most of them in type of donation request. Sample taken: A letter from Air Merah Village Head dated 14 January 2020 related to request for solid transport, responded on same date. Up to February 2021, there are 4 information requests: Letter by Perlabian Village Head No. 411.2/246/Kesra/2021 dated 16 February 2021 related to "Permohonan Solid", responded by mill manager by sending the solid to Perlabian village on 17 February 2021.</p> <p>In year 2020, Perlabian Estate recorded 2 information requests from stakeholders. Most of them in type of donation request. Sample taken: A letter from Vocational School SMK PGRI 17 Lohsari, dated 13 January 2021 related to request permission for student to do practical on-the-</p>	Complied

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		<p>job training. Responded on same date. Up to February 2021, there is no information request.</p> <p>In year 2020, Tolan Estate recorded 15 information requests from stakeholders. Most of them in type of donation request or meeting invitation. Sample taken: A letter from Manpower Service No. 560/153/Naker/III/2020 dated 16 March 2020 related to “Undangan Sosialisasi Syarat-Syarat Penyerahan Sebagian Pelaksanaan Pekerjaan kepada Perusahaan Lain” and responded by sending representative to attend the meeting on 19 – 20 March 2020.</p> <p>Another letter from DPRD Labusel No. 005/235/DPRD-LBS/2020 related to “Undangan Rapat Dengar pendapat DPRD Labusel dengan PT. Tolan Tiga Indonesia dan Kelompok Tani Bersatu Desa Meranti” sent on 6 October 2020 and responded by company by representative to attend the meeting on 8 October 2020. Up to February 2021, there is no information request.</p>	
1.1.5	<p>An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.</p>	<p>Stakeholder list available and updated, for example:</p> <p>Perlabian POM stakeholder list updated 25 February 2021 comprise of 31 stakeholders covering Government (6 stakeholders), MUSPIKA (3 stakeholders), Village heads (8 stakeholders), NGO and press (2 stakeholders), Worker union (5 stakeholders), contractors (5 stakeholders) dan Suppliers (2 stakeholders).</p> <p>Perlabian Estate stakeholder list updated 3 February 2021 comprise of 32 stakeholders covering Government (7 stakeholders), MUSPIKA (4 stakeholders), Village heads (8 stakeholders), NGO and press (2 stakeholders), Worker union (5 stakeholders), contractors (6 stakeholders).</p> <p>Tolan Estate stakeholder list updated 10 February 2021 comprise of 23 stakeholders covering Government (5 stakeholders), MUSPIKA (3 stakeholders), Village heads (8 stakeholders), NGO (1 stakeholder), Worker union (1 stakeholder), Hospital (1 Stakeholder) and Contractors (4 stakeholders).</p>	Complied

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		The stakeholder list explains the name of stakeholders, representative, address and contact number.	
Criteria 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	<p>PT. Tolan Tiga Indonesia has Code of Conduct No.QMM-40-01-P19/21-08-2018/Rev.0 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 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, etc. - 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, etc. - 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. 	Complied

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		<ul style="list-style-type: none"> - Each individual will secure, protect, maintain and use company property the best possible way, according to the provisions, use company property only in the interests of the company. - The company will not tolerate insider trading practices and will take legal action against insider trading in accordance to applicable regulations. - Each individual has an obligation to put the interests of the company first and avoid conflicts of interest in various forms by the company. It is not permissible to have business ties, personally or involving families, that can cause business conflicts with the company. - Company employees may not become an administrator of a political party or a political candidate unless there is written permission from the company. - Giving or receiving a sign of gratitude for interests in a business relationship, in the form of gifts of any kind or souvenirs, must not be done in a situation considered as an act that does not meet principle of decency and fairness. Donation can only be made for charitable purpose and other social objectives, tailored to financial capacity of the company as well as laws and regulations. The company and each individuals do not give, offer or receive, directly or indirectly, anything of value or in the form of promises, that can be categorized as bribe to or from customer or government officials to influence decision. - Every individuals is obliged to report any breach of the Code of conduct made by other individuals with sufficient evidence, through the communication channels provided by the Company. - The provision of sanction for breaches of the Code of conduct by individuals in the company is determined in accordance with the provisions of the company and/or prevailing laws and regulations. <p>Perlabian POM: Socialization of this policy in Perlabian POM carried out on 3 March 2020; attended by 25 workers from laboratory, office, weighbridge, driver,</p>	
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		<p>payroll, sortation, biogas plant, warehouse keeper; 18 workers from Workshop such as helper, mechanic, welder, civil works; 37 workers from Processing B such as mandors, boiler operators, clarification operators, water treatment operators, sterilizer operators, hoisting crane operators, screw press operators, loading ramp operators, kernel plant operators, un-stripped bunch operator, mandors, and dayworkers.</p> <p>Perlabian POM carried out recruitment through Memorandum Mill Manager "Rekrutmen Karyawan Baru No.004/PLM/ENG/08-20" dated 11 August 2020. The recruitment for 2 position: boiler operator, godown helper. Application and recruitment document sighted: application letter, education certificate, copy of ID card, health certificate, etc.</p> <p>Perlabian Estate: Socialization of this policy has conducted regularly. For example, sighted the record of company's policy on "Kebijakan Anti Korupsi, Kebijakan Integritas Supplier, Kebijakan Pelaporan Pelanggaran/Whistleblowing, Kebijakan Keamanan IT, Kebijakan Kode Etik"; socialization on 10 September 2020. The socialization attended by 17 workers from Division I (harvesters, harvesting mandors, tally clerk); 16 workers from Division II (harvesters, harvesting mandors); 11 workers from Division III (sprayers and mandors);</p> <p>Tolan Estate: Socialization of this policy has conducted regularly. For example, sighted the record of company's policy on "Kebijakan Anti Korupsi, Kebijakan Integritas Supplier, Kebijakan Pelaporan Pelanggaran/Whistleblowing, Kebijakan Keamanan IT, Kebijakan Kode Etik"; socialization on 10 September 2020. The socialization attended by 43 workers from Division I (harvesters, P&D census, waterman, baby sitter, harvesting mandors) and 34 contract workers/PKWT (loose fruit collectors, gardener); 34 workers from Division II (harvesters, spraying team, harvesting mandors); 83 workers from Division III (harvesters, harvesting</p>	
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		<p>mandors, tally clerk, manuring); 39 workers from Division IV (harvesters, harvesting mandors); 41 workers from Division V (harvesters, waterman, baby sitter, harvesting mandors); 48 workers from Division Transport (tractor driver, dump truck driver, quality controller, helper dump truck, carpenter, electrician, school bus driver); During interview with 3 harvesters, 2 sprayers and 2 fertilizer applicators in Tolan Estate, they understand the code of ethical conduct policy as to avoid corruption, to avoid fraud during operation.</p> <p>To prove the implementation of the code of ethics, the team of auditors has interviewed board of labour union and village heads around the company's operational areas. Based on the results of interviews obtained information that the employee recruitment process has been openly informed. The results of the recruitment procedure can be accessed by prospective employees and there is no charge for the whole process. This also applies to the recruitment of SIPEF estate security services conducted by PT Safeguarding Solution Indonesia (SSI).</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>Certificate holder has had annual internal audit program to monitor and to ensure operational activity align with the company's procedures. Furthermore, the internal audit also ensuring all business activity are comply with SIPEF ethics policy.</p> <p>Internal Audit in Perlabian POM against RSPO, ISPO, ISCC standard dated 18-20 June 2020. The internal audit issued 4 Major findings and 10 Minor findings; but no findings related to code of ethical conduct. Based on interview with PKWT worker in Perlabian POM, he admitted there was no imposition of worker recruitment costs, there was no imposition of recruitment and transportation costs that are deducted from the worker's wages (he was local).</p> <p>Internal Audit in Perlabian Estate against RSPO, ISPO, ISCC standard dated 10-13 June 2020. The internal audit issued findings, but no findings related to code of ethical conduct.</p>	Complied

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		Contractor issued statement letter: CV Tua Gabe issued statement letter dated 3 January 2021 that: CV Tua Gabe will abide to regulation and laws in Republic of Indonesia; will not practice forced labor or employ trafficked labour; will not employ worker under 18 years old; available to be audited by CB; will follows the RSPO, SCCS, ISCC principle and criterion.	
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.	Certificate Holder has monitored the change in laws and regulation. The changes and update in laws and regulation documented under "Pemantauan Penambahan atau Perubahan Undang-Undang/Peraturan tahun 2020". Based on document verification, there are 19 type laws and regulation changed – relevant and applicable to the company operations: a) Governor of Sumatera Utara Province Decree related to the minimum wage as per "Keputusan Gubernur Sumatera Utara No. 188.44/50/Kpts/2020 tentang Upah Minimum Sektoral Kabuapten Labuhan Batu Selatan tahun 2020" – new regulation. b) Minister of Environment and Forestry Regulation related to Hazardous Waste Transport as per "Peraturan Menteri Lingkungan Hidup dan Kehutanan RI No. P.4/MenLHK/Setjen/KKUM.1/1/2020 tentang pengangkutan limbah bahan berbahaya dan beracun yang menggantikan Keputusan Kepala Bapedal No. 2 tahun 1995 tentang Dokumen Limbah Bahan Berbahaya dan Beracun" – new regulation. c) Circular from Minister of Manpower related to protection of worker during COVID-19 pandemic, as per "Surat Edaran Menteri Ketenagakerjaan No. M/3/HK.04/III/2020 tentang Perlindungan Pekerja/buruh dan Kelangsungan Usaha dalam Rangka Pencegahan dan Penanganan COVID-19" – new regulation.	Complied

		<p>d) Minister of Manpower Regulation related to Lift and Carry Vessel as per "Peraturan Menteri Ketenagakerjaan No. 8 tahun 2020 tentang Keselamatan dan Kesehatan Kerja Pesawat Angkat dan Pesawat Angkut sebagai Pengganti Peraturan Menteri Ketenagakerjaan No. 5 tahun 1985 tentang Pesawat Angkat dan Angkut.</p> <p>The documented laws and regulation provide information type of laws/regulation as new or replacing obsolete laws, the impact to company's system, Source of laws/regulation document, Area of concerns, Remarks, and other things.</p> <p>Company has evaluated each new laws and regulation:</p> <p>a. In 2020, company evaluated 3 regulations and the impact on company operations and manpower/industrial relation: "Peraturan Menteri Ketenagakerjaan No. 8 tahun 2020 tentang Keselamatan dan Kesehatan Kerja Pesawat Angkat dan Pesawat Angkut" – related to operation of lift and carry vessel in use under PT. Tolan Tiga; "Peraturan Menteri Ketenagakerjaan No. 14 Tahun 2020 tentang Pedoman Pemberian Bantuan Pemerintah Berupa Subsidi Gaji/upah bagi Pekerja/buruh dalam Penanganan Dampak COVID-19" – related to provision of subsidy for worker salary to reduce impact from COVID-19.</p> <p>b. In 2020, company evaluated 4 regulations and the impact on environmental management: "Peraturan Menteri Lingkungan Hidup dan Kehutanan RI No. P.4/MenLHK/Setjen/KKUM.1/1/2020 tentang Pengangkutan Limbah Bahan Berbahaya dan Beracun" for transport of hazardous waste in estate and POM; "Peraturan Menteri Lingkungan Hidup dan Kehutanan RI No. P.12/MenLHK/Setjen/PLB.3/05/2020 tentang Penyimpanan limbah Bahan Berbahaya dan Beracun" – related to storage of hazardous waste in the mill and estate.</p> <p>c. In 2020, company evaluated 2 regulations and the impact on Plantation/Agricultural Regulation compliance, "Peraturan Menteri</p>	
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		<p>Pertanian No. 38 tahun 2020 tentang Penyelenggaraan Sertifikasi Perkebunan Kelapa Sawit Berkelanjutan Indonesia/ISPO” – related to ISPO certification.</p> <p>From stakeholder consultation with relevant government services (Dinas Perkebunan, Dinas Lingkungan Hidup dan Dinas Tenaga Kerja Kabupaten Labuhanbatu Selatan) and village heads, as well as worker union, the company fulfil all legal, laws, and regulations requirement: legal ownership of the land, legal entity, tax and retribution, regulation related to manpower, regulation related to environmental management.</p> <p>Based on visit and document verification, PT. Tolan Tiga Indonesia demonstrate effort to comply with laws and regulation, such as: “Izin Usaha Perkebunan”, Land Title – “Hak Guna Usaha/HGU”, maintenance og HGU boundary poles, evidence of worker payment meets minimum wage regulations, overtime payment as per regulation, annual leave provision for workers, all level of worker registered with social insurance, environmental permit is valid, hazardous waste storage permit is valid, reports related to environmental performance submitted to regulatory bodies.</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.</p>	<p>Certificate holder has procedure to ensure laws and regulation compliance, under “SOP Legal and Corporate Affair Department Manual No. LCA-01-08/24-01-2020/Rev.0” dated 17 March 2020. The SOP regulated Update Information and News and Regulations whenever new regulation issued, take into consideration legal opinion from Vice President Legal – if necessary.</p> <p>Certificate holder has documented 266 laws and regulations relevant to oil palm plantation operation in year 2020, this including international convention, national laws, provincial and local laws.</p> <p>Based on document verification, there are 19 type laws and regulation changed – relevant and applicable to the company operations:</p>	Complied

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		<ul style="list-style-type: none"> - Governor of Sumatera Utara Province Decree related to the minimum wage as per "Keputusan Gubernur Sumatera Utara No. 188.44/50/Kpts/2020 tentang Upah Minimum Sektor Labuhan Batu Selatan tahun 2020" – new regulation. - Minister of Environment and Forestry Regulation related to Hazardous Waste Transport as per "Peraturan Menteri Lingkungan Hidup dan Kehutanan RI No. P.4/MenLHK/Setjen/KKUM.1/1/2020 tentang pengangkutan limbah bahan berbahaya dan beracun yang menggantikan Keputusan Kepala Bapedal No. 2 tahun 1995 tentang Dokumen Limbah Bahan Berbahaya dan Beracun" – new regulation. - Circular from Minister of Manpower related to protection of worker during COVID-19 pandemic, as per "Surat Edaran Menteri Ketenagakerjaan No. M/3/HK.04/III/2020 tentang Perlindungan Pekerja/buruh dan Kelangsungan Usaha dalam Rangka Pencegahan dan Penanganan COVID-19" – new regulation. - Minister of Manpower Regulation related to Lift and Carry Vessel as per "Peraturan Menteri Ketenagakerjaan No. 8 tahun 2020 tentang Keselamatan dan Kesehatan Kerja Pesawat Angkat dan Pesawat Angkut sebagai Pengganti Peraturan Menteri Ketenagakerjaan No. 5 tahun 1985 tentang Pesawat Angkat dan Angkut. <p>The documented laws and regulation provide information type of laws/regulation as new or replacing obsolete laws, the impact to company's system, Source of laws/regulation document, Area of concerns, Remarks, and other things.</p> <p>Company has evaluated each new laws and regulation:</p> <ul style="list-style-type: none"> - In 2020, company evaluated 3 regulations and the impact on company operations and manpower/industrial relation: "Peraturan Menteri Ketenagakerjaan No. 8 tahun 2020 tentang Keselamatan dan Kesehatan Kerja Pesawat Angkat dan Pesawat Angkut" – related to operation of lift and carry vessel in use under PT. Tolan Tiga; "Peraturan Menteri Ketenagakerjaan No. 14 Tahun 2020 tentang 	
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		<p>Pedoman Pemberian Bantuan Pemerintah Berupa Subsidi Gaji/upah bagi Pekerja/buruh dalam Penanganan Dampak COVID-19” – related to provision of subsidy for worker salary to reduce impact from COVID-19.</p> <ul style="list-style-type: none"> - In 2020, company evaluated 4 regulations and the impact on environmental management: “Peraturan Menteri Lingkungan Hidup dan Kehutanan RI No. P.4/MenLHK/Setjen/KKUM.1/1/2020 tentang Pengangkutan Limbah Bahan Berbahaya dan Beracun” for transport of hazardous waste in estate and POM; “Peraturan Menteri Lingkungan Hidup dan Kehutanan RI No. P.12/MenLHK/Setjen/PLB.3/05/2020 tentang Penyimpanan limbah Bahan Berbahaya dan Beracun” – related to storage of hazardous waste in the mill and estate. - In 2020, company evaluated 2 regulations and the impact on Plantation/Agricultural Regulation compliance, “Peraturan Menteri Pertanian No. 38 tahun 2020 tentang Penyelenggaraan Sertifikasi Perkebunan Kelapa Sawit Berkelanjutan Indonesia/ISPO” – related to ISPO certification. 	
2.1.3	<p>Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.</p>	<p>PT. Tolan Tiga Indonesia established SOP “Prosedur Pemeliharaan Patok HGU - Maintain HGU Pillars No.LCA-01-04/01-02-2020/Rev0” signed by management on 18 February 2020.</p> <p>Based on document verification, interview and field visit, company has identified boundary poles as listed under “Buku Ukur HGU” and consistently maintain the boundary poles. Dedicated officer monitors the boundary poles on monthly basis and reporting in form “Cek Patok HGU”. The form explains condition of each boundary poles and indicated any need for repair/replacement.:</p> <ul style="list-style-type: none"> a. 23 November 2020 in Perlavian Estate, Division 1 (F1) monitoring 12 HGU boundary poles (Poles No.16 – 27). Monitoring result shows all pole in good and maintained condition. b. 28 December 2020 in Perlavian Estate, Division 1 (F1) monitoring 12 HGU boundary poles (Poles No.16 – 27). Monitoring result shows all 	Complied

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		<p>pole in good and maintained condition.</p> <p>c. 21 February 2021 in Perlabian Estate, Division 2 (F2) monitoring 13 HGU boundary poles (No. XII – XV, XXI and XXVIII - XXXV). Monitoring result shows all pole in good and maintained condition.</p> <p>d. 19-24 September 2020 in Tolan Estate, Division 3 (F3) monitoring 27 HGU boundary poles (Poles No.6 – 32). Monitoring result shows all pole in good and maintained condition.</p> <p>e. 9 February 2021 in Tolan Estate, Division 5 (F5) monitoring 5 HGU boundary poles (Poles No.01-05). Monitoring result shows all pole in good and maintained condition, however a number of poles need repaint.</p>	
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.	<p>PT. Tolan Tiga Indonesia established list of contractor up-to-date. List of contractor provides service in Perlabian POM recorded under "Stakeholder Perlabian Palm Oil Mill", dated 25 February 2021". There are 5 contractors: PT. Atmindo (recondition sterilizer door No.5), PT. Persada Dinamika Jaya (Replacement CBC), PT. Tenggeraja Jaya Teknik (Replacement wet kernel elevator), CV. Boiler Care (Repair economizer boiler 26T), PT. Southern Chemical & Engineering (supply, install testing & commissioning RO).</p> <p>List of contractor provides service in Perlabian Estate recorded under "Stakeholder Perlabian Estate", dated 5 March 2021". There are 6 contractors: CV Tua Gabe (EFB transport and fibre), UD Juir (transport and application of fibre), UD Putra Labuhanbatu Jaya (FFB transport), Solusi Security Indonesia (security), Koperasi Serba Usaha OMI (food stock), Koperasi Jasa Karyawan (manpower supplier).</p> <p>List of contractor provides service in Tolan Estate recorded under "Daftar Pemangku Kepentingan /List of Stakeholders Tolan Estate, 10 Februari 2020". There are 4 contractors: Tua Gabe (FFB transport), Koperasi</p>	Complied

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		<p>Serba Usaha OMI (food stock), CV Prima (house construction), Koperasi Jasa Karyawan (manpower supplier). List of contractor provides service in Tolan Estate recorded under "Daftar Pemangku Kepentingan /List of Stakeholders Tolan Estate, 8 Februari 2021". There are 3 contractors: Putra Labuhan Batu Jaya (FFB transport), Koperasi Serba Usaha OMI (food stock), Koperasi Jasa Karyawan (manpower supplier).</p>	
<p>2.2.2</p>	<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>PT. Tolan Tiga Indonesia made all contract contain specific clause on meeting relevant legal requirements. In Perlabian POM, the contract: "Surat Perjanjian Kerja No.02/PLM-HO/ENG/2021 antara PT. Tolan Tiga Indonesia dengan PT. Persada Dinamika Jaya untuk pekerjaan Replacement Cake Breaker Conveyor No.1 (ribbon, liner c/w bearing) Perlabian POM" signed on 2 February 2021. The contract, section 6 stipulates contractor shall fully responsible to health and safety including machine security, riot, fire, lost, etc. Does not employ worker under 18 years old. Contractor shall guarantee all worker has earn salary comply with minimum wage. Contractor and its worker shall equip with PPE in compliance with Occupational Safety regulation in Indonesia.</p> <p>In Perlabian Estate, the contract: "Surat Perjanjian Kerja No.02/RMO-PLM/TG/I/2021 antara PT. Tolan Tiga Indonesia dengan CV Tua Gabe tentang Angkut Fibre" signed on 3 January 2021. The contract, section 5 stipulates contractor shall responsible to any accident in the working area PT. Tolan Tiga Indonesia, referring to "Undang-undang Kecelakaan Kerja No.33 tahun 1974"; Contractor pays income tax as tax regulation in Indonesia; Contractor shall abide to Company Policy: prohibit child worker, does not employ worker under 18 years old, prohibit forced labor, do not use trafficked workers; Contractor shall pay the worker using applicable minimum wage; Contractor shall support the implementation of sexual harassment prohibition; Contractor shall abide to all relevant regulation and comply to principle and criteria from certification standard. Timeframe agreed on Section 4: start 3 January 2021 – 30 June 2021.</p>	<p>Complied</p>

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		<p>In 2020, Tolan Estate use the service from CV Tua Gabe for FFB transport. The contract: "Surat Perjanjian Kerja No.01/RMO-TLE/TG/I/2020 antara PT. Tolan Tiga Indonesia dengan CV Tua Gabe tentang Angkut FFB" signed on 2 January 2020. The contract, section 5 stipulates contractor shall responsible to any accident in the working area PT. Tolan Tiga Indonesia, referring to "Undang-undang Kecelakaan Kerja No.33 tahun 1974"; Contractor pays income tax as tax regulation in Indonesia; Contractor shall abide to Company Policy: prohibit child worker, does not employ worker under 18 years old, prohibit forced labor, do not use trafficked workers; Contractor shall pays the worker using applicable minimum wage; Contractor shall support the implementation of sexual harassment prohibition; Contractor shall abide to all relevant regulation and comply to principle and criteria from certification standard.</p> <p>Evidence: Certificate holder demonstrate CV Tua Gabe paid their driver. Sampled: Indratno (BK8814YN-Dump Truck), for period February 2021 payslip: Commission: Rp.9,889.375. Deduction: Material: Rp.375,000 + Operational cost February 2021: Rp. 4,700,00; Total income Rp. 4,814,375. Sukono (BK8922YF-Dump Truck), for period February 2021 payslip: Commission: Rp. 8,230,000. Deduction: Material: Rp. 658,440 + Operational cost February 2021: Rp. 4,000,00; Total income Rp. 3,572,000.</p>	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.	<p>PT. Tolan Tiga Indonesia does not purchase FFB from contractor and/or smallholder. However, on each contract or agreement, the certificate holder stipulates clauses disallowing child worker, forced labour and trafficked labour.</p> <p>In Tolan Estate, the sampled contract: "Surat Perjanjian Kerja No.01/RMO-TLE/TG/I/2020 antara PT. Tolan Tiga Indonesia dengan CV Tua Gabe tentang Angkut FFB" signed on 2 January 2020. The contract, section 5 stipulates Contractor shall abide to Company Policy: prohibit</p>	Complied

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		<p>child worker, does not employ worker under 18 years old, prohibit forced labor, do not use trafficked workers.</p> <p>In Perlabian POM the contract: "Surat Perjanjian Kerja No.02/PLM-HO/ENG/2021 antara PT. Tolan Tiga Indonesia dengan PT. Persada Dinamika Jaya untuk pekerjaan Replacement Cake Breaker Conveyor No.1 (ribbon, liner c/w bearing) Perlabian POM" signed on 2 February 2021. The contract, section 8 stipulates contractor shall not employ worker under 18 years old; shall not practice forced labour and not employ trafficked labour.</p>	
<p>Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>			
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>Based on document verification, field visit and interview with weighbridge operator in Perlabian POM, shows in the past 12 months, Perlabian POM only received and processed FFB from company-owned estate. Perlabian POM did not received and process FFB from other party including scheme smallholder or independent smallholders.</p> <p>The implementation of traceability and supply chain integrity of company-owned FFB processed in Perlabian POM reviewed and verified in Criterion 3.8.</p>	Complied
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>Based on document verification, field visit and interview with weighbridge operator in Perlabian POM, shows in the past 12 months, Perlabian POM only received and processed FFB from company-owned estate. Perlabian POM did not received and process FFB from other party including scheme smallholder or independent smallholders.</p>	Complied
<p>Principle 3: Optimise productivity, efficiency, positive impact and resilience Implement plans, procedures and systems for continuous improvement.</p>			
<p>Criteria 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</p>			

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<p>3.1.1</p>	<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>Perlabian POM: PT. Tolan Tiga Indonesia prepared Production Plan 2021-2031</p> <table border="1"> <thead> <tr> <th>Year</th> <th>FFB own estate (MT)</th> <th>FFB smallholder* (MT)</th> <th>CPO (MT)</th> <th>PK (MT)</th> </tr> </thead> <tbody> <tr><td>2021</td><td>196,962</td><td>17,210</td><td>43,923</td><td>11,030</td></tr> <tr><td>2022</td><td>186,613</td><td>17,210</td><td>41,913</td><td>10,264</td></tr> <tr><td>2023</td><td>179,872</td><td>17,210</td><td>40,723</td><td>9,893</td></tr> <tr><td>2024</td><td>179,198</td><td>17,210</td><td>40,875</td><td>9,856</td></tr> <tr><td>2025</td><td>180,155</td><td>17,210</td><td>41,400</td><td>9,909</td></tr> <tr><td>2026</td><td>181,423</td><td>17,210</td><td>41,727</td><td>9,978</td></tr> <tr><td>2027</td><td>186,367</td><td>17,210</td><td>42,864</td><td>10,250</td></tr> <tr><td>2028</td><td>186,983</td><td>17,210</td><td>43,006</td><td>10,284</td></tr> <tr><td>2029</td><td>183,113</td><td>17,210</td><td>42,117</td><td>10,071</td></tr> <tr><td>2030</td><td>174,955</td><td>17,210</td><td>40,240</td><td>9,623</td></tr> <tr><td>2031</td><td>168,350</td><td>17,210</td><td>38,721</td><td>9,259</td></tr> </tbody> </table> <p>*) FFB from smallholder received and sold to external mill – until become certified supply base.</p> <p>Tolan Estate: PT. Tolan Tiga Indonesia prepared Business Plan 2020- 2030</p> <table border="1"> <thead> <tr> <th>Year</th> <th>FFB production (MT)</th> <th>Field work cost (Rp/kg)</th> <th>Harvesting cost (Rp/kg)</th> <th>General charges (Rp/kg)</th> </tr> </thead> <tbody> <tr><td>2020</td><td>99,223</td><td>176</td><td>140</td><td>146</td></tr> <tr><td>2021</td><td>99,375</td><td>176</td><td>140</td><td>146</td></tr> <tr><td>2022</td><td>95,636</td><td>176</td><td>140</td><td>146</td></tr> <tr><td>2023</td><td>90,489</td><td>176</td><td>140</td><td>146</td></tr> <tr><td>2024</td><td>84,827</td><td>176</td><td>140</td><td>146</td></tr> <tr><td>2025</td><td>79,100</td><td>176</td><td>140</td><td>146</td></tr> <tr><td>2026</td><td>73,427</td><td>176</td><td>140</td><td>146</td></tr> <tr><td>2027</td><td>66,163</td><td>176</td><td>140</td><td>146</td></tr> </tbody> </table>	Year	FFB own estate (MT)	FFB smallholder* (MT)	CPO (MT)	PK (MT)	2021	196,962	17,210	43,923	11,030	2022	186,613	17,210	41,913	10,264	2023	179,872	17,210	40,723	9,893	2024	179,198	17,210	40,875	9,856	2025	180,155	17,210	41,400	9,909	2026	181,423	17,210	41,727	9,978	2027	186,367	17,210	42,864	10,250	2028	186,983	17,210	43,006	10,284	2029	183,113	17,210	42,117	10,071	2030	174,955	17,210	40,240	9,623	2031	168,350	17,210	38,721	9,259	Year	FFB production (MT)	Field work cost (Rp/kg)	Harvesting cost (Rp/kg)	General charges (Rp/kg)	2020	99,223	176	140	146	2021	99,375	176	140	146	2022	95,636	176	140	146	2023	90,489	176	140	146	2024	84,827	176	140	146	2025	79,100	176	140	146	2026	73,427	176	140	146	2027	66,163	176	140	146	<p>Complied</p>
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<p>3.1.2</p>	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p>	<p>Tolan Estate: Replanting Program 2020 – 2030</p> <table border="1"> <thead> <tr> <th>Replanting year</th> <th>Planting Year</th> <th>Total Hectarage (Ha)</th> </tr> </thead> <tbody> <tr> <td>2020</td> <td>-</td> <td>-</td> </tr> <tr> <td>2021</td> <td>-</td> <td>-</td> </tr> <tr> <td>2022</td> <td>-</td> <td>-</td> </tr> <tr> <td>2023</td> <td>1994</td> <td>173.33</td> </tr> <tr> <td>2024</td> <td>1994</td> <td>167.61</td> </tr> <tr> <td>2025</td> <td>1996</td> <td>161.96</td> </tr> <tr> <td>2026</td> <td>1997</td> <td>178.91</td> </tr> <tr> <td>2027</td> <td>1998</td> <td>426.04</td> </tr> <tr> <td>2028</td> <td>1999</td> <td>369.95</td> </tr> <tr> <td>2029</td> <td>2000</td> <td>302.40</td> </tr> <tr> <td>2030</td> <td>2001</td> <td>296.04</td> </tr> <tr> <td></td> <td></td> <td>2,076.74</td> </tr> </tbody> </table>	Replanting year	Planting Year	Total Hectarage (Ha)	2020	-	-	2021	-	-	2022	-	-	2023	1994	173.33	2024	1994	167.61	2025	1996	161.96	2026	1997	178.91	2027	1998	426.04	2028	1999	369.95	2029	2000	302.40	2030	2001	296.04			2,076.74	<p>Complied</p>											
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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>PT. Tolan Tiga Indonesia demonstrated</p> <p>a. "Management Review Report Implementasi Persyaratan P&C RSPO dan ISPO Tolan Estate" dated 17 September 2020. The management review consists of:</p> <ul style="list-style-type: none"> - Internal Audit result dated 15-27 June 2020; - Customer feedback: no significant complaint related to FFB sent for Perlabian POM; - Process performance and product conformity: upkeep and harvesting follows Oil Palm Agriculture Manual; FFB quality follows SOP Engineering Department; - Correction and Prevention: All internal audit findings have been closed. - Follow up from previous Management Review: Has been followed up, as part of internal audit. - Changes affecting Management System: No company policy changes; No changes in procedure and work instruction. - Recommendation for Improvement: Update data/record related to sustainability system fulfilment. <p>Internal audit was carried out on 15-17 June 2020. 3 Major findings and 12 Minor findings issued. Status closed as of September 2020.</p>	Complied																		

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		<p>b. "Management Review Report Implementasi Persyaratan P&C RSPO, ISCC, ISPO Perlabian POM" dated 10 September 2020. The management review consists of:</p> <ul style="list-style-type: none"> - Internal Audit result dated 18-20 June 2020; - Customer feedback: no significant complaint related to FFB sent for Perlabian POM; - Process performance and product conformity: upkeep and harvesting follows Oil Palm Agriculture Manual; FFB quality follows SOP Engineering Department; - Correction and Prevention: All internal audit findings have been closed. - Follow up from previous Management Review: Has been followed up, as part of internal audit. - Changes affecting Management System: No company policy changes; No changes in procedure and work instruction. - Recommendation for Improvement: Ensure GHG value for FFB delivery documents and CPO as per GHG calculation. <p>Internal audit was carried out on 18-20 June 2020. 4 Major findings and 10 Minor findings issued. Status closed as of September 2020.</p> <p>c. Management Review Report (corporate level), dated 4 March 2021.</p> <ul style="list-style-type: none"> - Last Management Review Action Plan: KPI for stock management – ongoing; ENC feedback for Agricultural procedure – completed; - Assessment Result: Internal Observation 229; External Observation 27; Non-conformity Internal 20; Non-conformity External 2; The status for correction was approved by President Director; - Improvement ticket and result: 69 tickets approved by President Director; 48 tickets approved by Head of Department; 42 tickets approved by Manager. - Feedback from Interested parties: The major impact on relationships, communications, and engagement within the business and with all of our external stakeholders for 2020 was the evolving COVID-19 	
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		<p>pandemic across the world; Engineering Department; Contractors related to payment delay; Statutory reporting all met in 2020; Union: minor difficulties related to worker bonus expectation due to low commodity price in 2019; NGO: reports made concerning labour management practices, environmental management, investigation with documented and public response have made to all allegations; HGU renewal: impending for North Sumatera Estates; Plasma requirements: new and renewal HGU applications must be supported by a 20% plasma component.</p> <ul style="list-style-type: none"> - Product Quality Achievement: North Sumatera crop performance was 9% below budget: drought, gradual recovery from nutritional factor. Replanting: 320.04 Ha replanting implemented in Perlavian Estate. Fertilizer application: 100% applied in North Sumatra. Fruit ripeness: Perlavian Estate and Tolan Estate 96.52%. - Effectiveness of Action: Drought mitigation: make saving; Flood stopping: documented drain maintenance; Soil quality mitigation: fertilizer recommendation made annually to maintain optimal soil nutrient; Planting material quality mitigation: Planting material from reputable, certified source. Pest & Disease mitigation: Following SOP for census, recording, reporting and timely treatment. - Process performance: continue write what we do, and do what we write. - Adequacy of resources: rapid company growth, new acquisition, changing government regulation placed pressure on human resources. Transfer, promotions, training and external recruitment being carried out. - Opportunity for Improvement: Training on harvesting; Improved reporting in LintraMax; Following certification to continue to look for improved marketing opportunities; NPP for Musi Raws; SOP, training, resources, patrol and monitoring to mitigate fire damage. Loose fruit recovery. Management of labour to ensure full compliance. 	
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		<p>- Performance of External Supplier: President Director, Engineering Department, IT, Environment and Conservation, Marketing, Internal Audit, Quality Department, Medical, Human Resources, Smallholder Department, External Suppliers.</p>	
<p>Criteria 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p>			
<p>3.2.1</p>	<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>Perlabian POM: Continuous Improvement Plan prepared in Capital Expenditure Control 2020 (Non Planting), consist of: Replacement Sterilizer Door No.2 front and rear door; Overhead water tower tank capacity 10 c/w structure; Reverse Osmosis water treatment plant 45 m3/hour including new building; Replacement of mill effluent pipe HDPE dia. 6" length 2,750 meters. Verified implemented continuous improvement plan "Berita Acara Serah Terima Lapangan (BAST-L) No.14/PLM-HO/ENG/2020" dated 21 May 2020 for replacement of mill effluent pipe with HDPE diameter 6" (PN 16) – signed both parties. "Berita Acara Serah Terima Pertama No.06/PLM-HO/ENG/2020" dated 14 December 2020 for scope work recondition sterilizer door No.2 front and rear doors – signed both parties. Continuous Improvement Plan prepared in Capital Expenditure Requisition 2021 (Non Planting), approved on 3 December 2020; consist of sterilizer station improvement (replace sterilizer foor No.5, replacement pneumatic pump); pressing station improvement (gear motor Brevini); nut & kernel recovery system improvement (ribbon, liner c/w bearing, replacement bucket, chains c/w sprocket & roll for wet kernel elevator); clarification station improvement (electromotor vibro screen, dried oil pump); boiler station improvement (repair economizer pipe for boiler 26 tons); water treatment plant improvement (overhead</p>	<p>Complied</p>

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		water tower tank capacity 10T c/w structure); power station improvement (multi stage steam turbine 1500 kW);	
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.	PT. Tolan Tiga Indonesia - Perlabian POM and its supply base has joined training on RSPO metrics template. The Certificate holder will use the RSPO metrics template as per grace period, starting 1 July 2021.	Not Applicable
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.	<p>Estate: The procedures documented in "Oil Palm Agricultural Manual" (latest revision in March 2020), 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:</p> <ol style="list-style-type: none"> 1. OPM-01-00; dated 02/10/2017; Biology of Oil Palm. 2. OPM-02-00; dated 02/10/2017; General Information: Oil Palm Nursery. 3. OPM-02-01; dated 02/10/2017; Land Preparation of Oil Palm Nursery – Persiapan Lahan Pembibitan Kelapa Sawit 4. OPM-02-02; dated 02/10/2017; Oil Palm Pre Nursery – Pre Nursery Kelapa Sawit. 5. OPM-02-03; dated 02/10/2017; Oil Palm Main Nursery – Main Nursery Kelapa Sawit. 6. OPM-03-01; dated 02/10/2017; Survey and Mapping – Survey dan Pemetaan. 7. OPM-03-02; dated 02/10/2017; Land Clearing – Pembersihan Lahan. 8. OPM-03-03; dated 02/10/2018; Land Preparation – Persiapan Lahan. 	Complied

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		<ol style="list-style-type: none"> 9. OPM-03-04; dated 02/10/2017; Legume Cover Crop <i>Mucuna bracteata</i> – <i>Mucuna bracteata</i> Kacangan Penutup Tanah 10. OPM-03-05; dated 02/10/2017; Field Planting – Penanaman ke Lapangan. 11. OPM-04-01; dated 02/10/2017; Palm Supplying – Penyisipan Tanaman. 12. OPM-04-02; dated 02/10/2017; Thinning Out and Removing Plant – Penjarangan dan pembongkaran Tanaman. 13. OPM-05-01; dated 02/10/2018; Ablation and Sanitation – Ablasi dan Sanitasi. 14. OPM-05-02; dated 17/07/2019; Harvesting – Panen. 15. OPM-05-03; dated 17/07/2019; FFB and LF Delivery – Pengiriman TBS dan Berondolan. 16. OPM-05-04; dated 18/07/2019; Frond Pruning – Pemangkasan Pelepah 17. OPM-05-05; dated 19/03/2020; Black Bunch Count – Sensus Buah 18. OPM-05-06; dated 02/10/2017; <i>Elaeobius camerunicus</i> Management – Pengelolaan <i>Elaeobius camerunicus</i>. 19. OPM-06-01; dated 19/03/2020; Inorganic Fertiliser – Pupuk Inorganik 20. OPM-06-02; dated 19/03/2020; Organic Fertiliser – Pupuk Organik 21. OPM-06-03; dated 02/10/2017; LSU: Palm Marking – LSU: Penandaan Tanaman. 22. OPM-06-04; dated 02/10/2017; Leaf Sampling Unit (LSU) and Rachis Sampling Unit (RSU) – Pengambilan Sampel. 23. OPM-07-01; dated 20/03/2020; Detection and Census – Deteksi dan Sensus. 24. OPM-07-02; dated 02/10/2017; Pest Control – Pengendalian Hama. 25. OPM-07-03; dated 02/10/2017; Disease Control – Pengendalian Penyakit. 26. OPM-07-04; dated 17/07/2019; Integrated Pest Management – Pengendalian Hama Terpadu. 	
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		<p>27. OPM-08-01; dated 20/03/2020; Weed Control – Pengendalian Gulma.</p> <p>28. OPM-09-01; dated 19/02/2019; Water management in Coastal Soil – Pengelolaan Air di Tanah Pesisir.</p> <p>29. OPM-09-02; dated 02/10/2017; Management of Riparian Area – Pengelolaan Riparian Area.</p> <p>30. OPM-09-03; dated 15/07/2019; The Use, Store and Discrad Pesticide – Penggunaan, Penyimpanan dan pemusnahan pestisida.</p> <p>31. OPM-10-01; dated 01/02/2018; Field Quality Control</p> <p>Interviews with the employees (harvester, spraying applicator, fertilizer applicator and EFB applicator) indicates satisfactory level of understanding and implementation in relation to their respective job function.</p> <p>Palm Oil Mill: Perlabian Palm Oil Mill has a set of procedure for processing of oil palm Fresh Frut Bunch into CPO and PK, under “Palm Oil Mill Manual” dated 25 March 2019. The procedures explains all activity from receiving FFB into dispatch of products; Such as:</p> <ol style="list-style-type: none"> 1. POM-01-02; Reception in Perlabian Palm Oil Mill. 2. POM-02-02; Sterilizer in Perlabian Palm Oil Mill. 3. POM-03-02; Threshing in Perlabian Palm Oil Mill. 4. POM-04-02; Pressing in Perlabian Palm Oil Mill. 5. POM-05-02; Clarification in Perlabian Palm Oil Mill. 6. POM-06-02; Kernel Plant in Perlabian Palm Oil Mill. 7. POM-07-02; Steam Plant in Perlabian Palm Oil Mill. 8. POM-08-02; Power Plant in Perlabian Palm Oil Mill. 9. POM-09-02; Water Treatment in Perlabian Palm Oil Mill. 10. POM-10-02; Effluent Plant in Perlabian Palm Oil Mill. 11. POM-11-02; Storage and Dispatch in Perlabian Palm Oil Mill. 12. POM-12-02; Workshop in Perlabian Palm Oil Mill. 	
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		<p>13. POM-13-02; EFB Plant in Perlavian Palm Oil Mill. 14. POM-14-02; Biogas Plant in Perlavian Palm Oil Mill.</p> <p>The procedures are supported by specific Work Instructions, e.g. as follows:</p> <ol style="list-style-type: none"> 1. POM-01-02-W01; Penimbangan Truk FFB dan Berondolan – Weighing FFB truck and loose fruit. 2. POM-02-02-W01; Loading ramp, Pengisian FFB ke dalam Rebusan – Loading ramp, FFB loading into sterilizer; 3. POM-02-02-W02; Pengoperasian Sterilizer – Operating Sterilizer; 4. POM-03-02-W01; Pengoperasian Threshing Machine – Operating Threshing Machine. 5. POM-04-02-W01; Pengoperasian Digester – Operating Digester. 6. POM-04-02-W02; Pengoperasian Screw Press – Operating screw press. 7. POM-04-02-W03; Sand Trap and Vibrating Screen. 8. POM-04-02-W04; Pengoperasian Crude Oil Tank – Operating Crude Oil Tank. 9. POM-05-02-W01; Pengoperasian Continuous Settling Tank – Operating Continuous Settling Tank. 10. POM-05-02-W02; Pengoperasian Clean Oil Tank – Operating Clean Oil Tank. 11. POM-05-02-W03; Pengoperasian Sludge Tank – Operating Sludge Tank. 12. POM-05-02-W04; Pengoperasian Oil Purifier – Operating Oil Purifier. 13. POM-05-02-W05; Pengoperasian Vacuum Drier – Operating Vacuum Drier. 14. POM-05-02-W06; Pengoperasian Sludge Centrifuge – Operating Sludge Centrifuge. 15. POM-06-02-W01; Operating Depericarper. 16. POM-06-02-W02; Pengoperasian Ripple Mill – Operating Ripple Mill. 17. POM-06-02-W03; Operating Claybath Separator. 	
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		<ol style="list-style-type: none"> 18. POM-06-02-W04; Pengoperasian Sawipack Stage 1 & Stage 2 – Operating Sawipack to separate kernel and shell from cracked mixture from ripple mill, through dry separation. 19. POM-06-02-W05; Pengoperasian Kernel Silo Drier – Operating Kernel Silo Drier to reduce moisture < 7%. 20. POM-06-02-W06; Pengoperasian Hydrocyclone – Operating Hydrocyclone to separate kernel and shell from sawipack through wet method; 21. POM-07-02-W01; Operating Cation Exchanger. 22. POM-07-02-W02; Operating Degasifier. 23. POM-07-02-W03; Operating Anion Exchanger. 24. POM-07-02-W06; Operating Thermal Deaerator. 25. POM-07-02-W07; Boiler (Mech 35 MT/hr). 26. POM-07-02-W08; Penanganan Gangguan Sumber Tidak Bergerak Steam Boiler – Handling disturbance from static Steam Boiler. 27. POM-08-02-W01; Operating Genset. 28. POM-09-02-W01; Operating Water Intake. 29. POM-11-02-W01; Pengoperasian CPO Storage Tank – Operating CPO Storage Tank. 30. POM-11-02-W02; Pengoperasian Kernel Bin Storage – Operating Kernel Bin Storage. 31. Analisa FFA CPO No.POM-WI/LAB/001 – Analysing CPO’s FFA; 32. Analisa FFA Kadar air untuk CPO dispatch No.POM-WI/LAB/002A – Analysing CPO’s moisture for CPO dispatch; 33. Analisa kadar kotoran dan kadar air untuk kernel dispatch No.POM-WI/LAB/005A – Analyzing dirt and moisture in kernel for dispatch; 34. Pengiriman CPO No.POM-WI/LAB/043 – Delivery of CPO; 35. Pengiriman Kernel No.POM-WI/LAB/044 – Delivery of Kernel. <p>A set of work instruction for mill’s workshop, including use of welding equipments, cutting metal, operating lathe machine, operating drilling</p>	
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		<p>machine, operating portable grinding machine, operating and maintenance of smoke density meter.</p> <p>A set of work instruction for biogas plant, comprise of: filling in POME into screen chamber and oil grease skimmer, operating of equalization tank, operating of plate heat exchanger and cooling tower, operating of primary clarifier and sludge pit, operating buffer tank, operating anaerobic reactor, operating degassifier, operating Lamella clarifier, operating sludge sump, operating sludge decanter and operating retention pond.</p>	
3.3.2	A mechanism to check consistent implementation of procedures is in place.	The company has established mechanism to check consistent implementation of procedures under SOP OPM-10-01; dated 6 February 2019; Field Quality Control. The objectives of the procedure are to check if the result of work are in accordance with existing procedures; to evaluate the work and keep in accordance with the standards; to use as a reference for making improvements. Inspections are carried out on items related to harvesting, weeding, manuring, pest and disease, replanting and nursery.	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available.	<p>Record of monitoring in Perlarian POM are available under documents Action Plan Perlarian POM as result Vice President Engineering visit (VPE). Description of monitoring result and action plan based on visit 10-11 Jul 2019 are as follows:</p> <ol style="list-style-type: none"> 1. The feed pipe to all of the vibrating screens is not in the centre of the screen and also the weight is not set correctly to give the proper pattern. Status: already corrected on 28 July 2019. 2. The new boiler ash conveyor for the 26t boiler should be stainless steel lined in the bottom. Status: ash scrapper for the boiler 26 tonnes has been installed stainless steel lined in the bottom on 28 October 2019. 3. The 175 amp circuit breaker in the main switch board is no longer used and can be used to supply power to the new WTP upgrade, which is initially the lamella clarifier. Status: the 175 amp circuit 	Complied

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		<p>breaker in the main switch board has been used to supply power to Lamella on 18 November 2019.</p> <p>Due to Covid-19 pandemic, there has been no visit conducted by Vice President Engineering in 2020.</p> <p>Record of operation monitoring and action taken in Perlabian Estate and Tolan Estate based on Regional Director ED Visit on 13-16 October 2019:</p> <ol style="list-style-type: none"> 1. SFM in conjunction with EM to produce short written assessment on the merits of chemical mixing system and forward to RD-NS & RD-ED for discussion. 2. EM to work with estate teams to review the "Kapasitas Rata-rata Harvester per Hari" records, identify harvesters with low productivity, confirm the reason and take necessary action to increase average productivity. 3. Ensure that OER and FFA figures are regularly passed on to field staff / mandors to increase awareness of importance of their role in maintaining product quality and extraction target. 4. Arrange for KTU to confirm reason for over expenditure in allocation from CWS. <p>Due to COVID-19 pandemic, there has been no visit conducted by Regional Director in 2020.</p> <p>Other record related operation monitoring and action taken in unit of certification is Internal Audit results.</p> <p>Perlabian POM:</p> <ul style="list-style-type: none"> - Internal Audit performed on 18-20 June 2020. Several recommendations observed as follows: <ul style="list-style-type: none"> o Re-identify training needs for the period of 2020; Added Hazardous Waste Management Training in the 2020 Training Program; Carry out the Hazardous Waste Management Training in accordance with the Program. o Communicate with the Medical Department regarding the implementation of quarterly health checks for spraying workers 	
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		<p>and agrochemical warehouse officers during the Covid-19 Pandemic.</p> <ul style="list-style-type: none"> - Management review meeting in Perlabian POM held on 10 September 2020. Agenda: review internal audit results, customer feedback, process performance and product suitability, status of corrective and preventive actions, follow-up from previous management review meetings, changes that may affect the system and recommendations for improvement. <p>Perlabian Estate:</p> <ul style="list-style-type: none"> - Internal Audit performed 10-13 June 2020. Several recommendations observed as follows: <ul style="list-style-type: none"> o Communicate with RMO-NS to extend Welder license. Status: extension of welder license is still under process by Disnaker to the Ministry of Manpower in accordance with Disnaker letter No.560/247/Naker/VI/2020 regarding Notification of SIO Issuance. o Establish the 1st Quarter 2020 P2K3 Report and send it to the relevant Office; if a P2K3 meeting is not held due to the Covid-19 Pandemic, a note should be made and attached to the P2K3 Report. Status: Quarterly reports and P2K3LHS Meeting Minutes have been sent to the Manpower Office for 1st and 2nd Quarter2020 on 13 July 2020 and 3rd Quarter on 14 October 2020. - Management review meeting in Perlabian Estate held on 15 September 2020. Agenda: review internal audit results, customer feedback, process performance and product suitability, status of corrective and preventive actions, follow-up from previous management review meetings, changes that may affect the system and recommendations for improvement. <p>Tolan Estate:</p>	
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		<ul style="list-style-type: none"> - Internal Audit performed on 15 – 17 June 2020. Several recommendations observed as follows: <ul style="list-style-type: none"> o To carry out regular monitoring in all areas designated as conservation areas; To carry out upkeep in conservation areas and evidence of upkeep is updated regularly. o Completing employee training records in accordance with the training implementation. o Identifying PPE needs for FL workers; Give / lend PPE to FL workers and make a receipt. <p>Management review meeting in Tolan Estate held on 17 September 2020. Agenda: review internal audit results, customer feedback, process performance and product suitability, status of corrective and preventive actions, follow-up from previous management review meetings, changes that may affect the system and recommendations for improvement.</p>	
<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.</p>			
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>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 July 21, 2006 regarding Approval of Revision of RKL-RPL of PT. Tolan Tiga Indonesia Plantation and Tolan Plantation. 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. 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</p>	Complied

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		<p>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 Perlabian 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) 	
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>The company has prepared report on Environmental Management and Monitoring implementation (Laporan RKL-RPL) and submit to the government regularly (per semester).</p> <p>The Management Plan incorporated in the "Rencana Pengelolaan Lingkungan", consist of:</p> <ul style="list-style-type: none"> - Physical-chemical compenent/aspect: soil fertility (monitoring once per annum); water quality (monitoring twice per annum); air quality (monitoring twice per annum); aesthetic (cleanliness). - Social-economy-cultural component/aspects: community welfare; community perception. - Health component: community health, hazardous waste management; 	Complied
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p>	<p>PT. Tolan Tiga Indonesia has consistently prepared reports on the implementation of Environmental Management and Monitoring periodically every 6 months and reported to the Environmental Office of South Labuhanbatu Regency and through the electronic reporting</p>	Complied

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		<p>application Electronic Reporting Information System (SIMPEL) to the Ministry of Environment and Forestry, namely:</p> <ol style="list-style-type: none"> 1. Report on the Implementation of UKL UPL PT. Tolan Tiga Indonesia Semester I of 2020 has been submitted to the Ministry of Environment (ID TTE SIMPEL: 1593573173-2171 dated 1 July 2020). 2. Report on the Implementation of UKL UPL PT. Tolan Tiga Indonesia Semester II of 2020 has been submitted to the Ministry of Environment (ID TTE SIMPEL: 1614587534-2171 dated 1 March 2021). 	
Criteria 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.</p>	<p>Recruitment/Selection/Hiring Company established SOP Internal Recruitment (SKU to Acting Field Assistant (FA), Mill Assistant (MA), Office Assistant (OA)) No.HRD-01-01/01-04-2019/Rev.1 effective date 5 April 2019. The objective to give equal career opportunity for every employee and ensure fulfilment of the required manpower needed. Operating Unit (OU) prepares Staff Employment Request (SER). General Manager (GM)/Regional Director (RD) approve or reject SER created by Operating Unit. President Director approve or reject recruitment based on the urgency and needs of the company. OU Manager select the best candidates from SKU based on SKU Evaluation. Training Manager conduct assessment program to select candidates. Human Resources Department Manager approve or reject candidate based on the assessment report. Candidate must go through evaluation phase for 6 months as Acting FA/MA/OA. After the evaluation phase, Manager gives evaluation report to GM/RD. GM/RD then decided whether to promote or decline candidate as staff.</p> <p>Company established SOP External Recruitment (Staff only) No.HRD-01-02/01-04-2019/Rev.1 effective date 16 April 2020. The objective to ensure the process of recruiting new staff for all position is done and managed systematically, effectively, and efficiently based on the</p>	Complied

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		<p>principle of job equality and implemented procedure. Regional Management Office (RMO) or Head of Department prepares Staff Employment Request (SER). President Director approve or reject SER based on the urgency and needs of the company. Office Assistant (OA) Recruitment carried out recruitment database except for special reason use advertising. After publishing recruitment advertisement, candidates resume are collected and select best candidates for selection process: written tes, physiological test, interview, medical checkup; choose candidate based on qualification/competence; crete interview with user schedule. Office Assistant responsible for offering contract and negotiations. President Director decide to the hiring of staff based on company needs. Newly hired staff is required to go through monitoring process for 3 months and manager is responsible for the monitoring period.</p> <p>Company established SOP Recruitment for PKWT/Free Labor(Non-Staff) No.HRD-01-03/09-03-2020/Rev.2 effective date 17 March 2020. The objective to ensure the recruitment process for labor force are according to valid procedure and approve manpower plan. Field Assistant (FA), Mill Assistant (MA), Office Assistant (OA) prepare a proposal for recruitment based on available budget, work experience, achievements. Estate Manager or Mill Manager check and approve the proposal. General Manager (GM)/Regional Director (RD) approve or reject SER created by Operating Unit. Upon approval, Office Head Assistant create work agreement signed by the employee and Estate Manager or Mill Manager.</p> <p>Promotion Company established SOP Promotion to SKU No.HRD-01-04/13-03-2020/Rev.0 effective date 12 May 2020. The objective to give confirmation and clarify in the process of promotion workers in companies. Estate Manager or Mill Manager prepare proposal for promotion and send to Regional Management Office (RMO). The process</p>	
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		<p>of submission attach: SKU evaluation form, list of duties and responsibilities, list of training attended, copy of ID card, copy of driver license. Senior Estate Manager (SEM) or Senior Technical Manager (STM) review and approve proposal. General Manager (GM)/Regional Director (RD) approve or reject proposal created by Operating Unit and forward to Head Of Department (HOD). Estate HOD or Technical HOD review and approve the proposal. Upon approval, HOD Human Resources then sign memorandum regarding promotion.</p> <p>Company established SOP Staff Appraisal No.HRD-03-03/17-06-2020/Rev.2 effective date 24 July 2020. The objective is part of performance management system to produce staff that enable company to achieve its strategic goals. Every year HOD Human Resources will notify all managers to do staff appraisal. OU Manager set each staff target for one year. Later on, the target which already set up will be KPI as base of staff appraisal evaluation. Manager will evaluate all the staff with 3 set of staff appraisal form (target achievement 60%, competence 40%, summary target + competence). HOD Human Resources doing a review of overall staff appraisal report made by Office Head Assistant Compensation before approve it. Board of Director approve or reject staff appraisal based on moderation meeting result.</p> <p>Retirement and termination refers to Collective Bargaining Agreement between company and the respective worker union. Company and worker union has collective bargaining agreement, in form of "Perjanjian Kerja Bersama". Each company has different agreement: PT. Tolan Tiga Indonesia have documented the pay and working condition in accordance to labour law (Undang-undang No.13 tahun 2003 tentang Ketenagakerjaan), as established under "Perjanjian Kerja Bersama (PKB) PT. Tolan Tiga Indonesia dengan Pengurus Serikat Pekerja Tolan Tiga Mandiri (SPTTM) periode 2018-2020". This document available in Bahasa Indonesia.</p>	
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		<ul style="list-style-type: none"> - Salary regulated under Chapter V; - Reasons for dismissal regulated under Chapter XXI; - Period of notice regulated under Chapter XXI; - Pension regulated under Chapter XVI; - Resolution upon industrial dispute on Chapter XXIII; 	
3.5.2	Employment procedures are implemented and records are maintained.	<p>PT. Tolan Tiga Indonesia demonstrated employment procedures related to recruitment, promotion, contract worker recruitment, pension are implemented accordingly. Recruitment:</p> <p>Perlabian POM carried out recruitment through Memorandum Mill Manager "Rekrutmen Karyawan Baru No.004/PLM/ENG/08-20" dated 11 August 2020. The recruitment for 2 position: boiler operator, godown helper. Application and recruitment document sighted: application letter, education certificate, copy of ID card, health certificate, etc.</p> <p>Perlabian Estate carried out recruitment from Free Labor into PKWT for Suherman, as Smallholder Service.</p> <p>Promotion:</p> <p>Letter for promotion based on Memorandum HR Department No.194/JWB-PLPOM/IX/2020 dated 3 September 2020. Approved promotion for 9 employees; sample: Parluhutan Sitompul (workshop mandor) from grade P3 to P4, Koko Ariadi (Wheel loader driver) from grade H to P1, Fironika Julianti (weighbridge operator) from grade H to P1. The promotion status indicates all tribe, all sex eligible for promotion.</p> <p>Treatment for contract worker:</p> <p>"Perjanjian Kerja Waktu Tertentu Ebert Reyvaldi Siahaan dan PT. Tolan Tiga Indonesia Perlabian Palm Oil Mill", signed on 1 September 2020. The PWKT stipulates: Clause 1: PKWT for Ebert as upkeep mill; PKWT period 1 September 2020 – 1 September 2021 (1 year). Clause 4: Salary paid per month, equal to UMP/UMSP/UMK/UMSK applicable to the company. Employee entitled for the salary including rice 15kg/month. Clause 5: Company provides medical treatment for employee as per</p>	Complied

		<p>regulation. Clause 7: Company will register employee to BPJS Ketenagakerjaan.</p> <p>Pension: Perlabian POM process and paid pension fund for employee under name M. Syaruddin and HB Siahaan, dated 11 September 2020. Perlabian Estate process and paid pension fund for employee under name Legimin (working period 29 years 2 months), Arianto (working period 29 years 2 months) dated 11 December 2020.</p>	
<p>Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p>			
<p>3.6.1</p>	<p>(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.</p>	<p>PT. Tolan Tiga Indonesia has prepared the procedure of risk assessment as per Procedure of Hazard Identification Risk Analysis and Determining Control of OHS, No.OHS-01-01/04-02-2019/Rev.0, dated 12 March 2019.</p> <p>Perlabian POM - The document of risk assessment under "Daftar Penilaian dan Pengendalian Resiko K3", last review on 18 January 2021, the document was covered all activities in mill. New activities were identified for current HIRADC is installation of Brackish Water Reverse Osmose (BWRO) in Water Treatment Plan. The new risk at WTP already synchronize within WTP Procedure in Perlabian POM (POM-09-02/29-04-2020/Rev.3).</p> <p>Based on interview with Biogas Plant operator, The operator was trained and educate through internal awareness and training related on OHS including HIRADC, particularly in Biogas Plant. This training was conducted on 21 December 2020. Result of post-test is available in place within document "Post Test Training Mill Biogas Plant PT. TTI – Perlabian Mill".</p>	<p>Complied</p>

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		<p>Tolan Estate -The document of risk assessment under "Penilaian Resiko", last review on 2 March 2020, the document was covered all activities in estate, such as: spraying, manuring, office activity, workshop, harvesting, pruning, - transport TBS.</p> <p>All of the mitigation plan of risk assessment has implemented, e.g: in warehouse of fertilizer has sets the maximum height at 2.5 meters for fertilizer bag stacking, fire extinguisher has instaled in fuel station and temporary hazardous waste, and all of the workers has provided PPE.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p>	<p>PT. Tolan Tiga Indonesia have established an Occupational Health and Safety Policy No.QMM-40-01-P04/27-03/2019/Rev.1 signed by President Director dated 27 March 2019. In point 1 mentioned the company support the implementation of all relevant laws and regulation of Republic of Indonesia and of applicable international agreement and standards relevant to occupational health and safety and at point 2.b mentioned that the company committed to provision of adequate resources for effective implementation of the occupational health and safety (OHS) program and procedure, including strict compliance reviews.</p> <p>OHS Procedure under document "Prosedur Keselamatan dan Kesehatan Kerja (K3)" No. SOP/TDI/06, rev.01 dated 1 February 2019. The document of procedure consisted of:</p> <ul style="list-style-type: none"> - Procedure of Hazard Identification Risk Analysis Determining Control for OHS – No: OHS-01-01 - Procedure of Hot Work – No. OHS-01-02 - Procedure of Potential Hazard Report – No. OHS-01-03 - Procedure of First Aid – No. OHS-01-04 - Procedure of Confined Space – No. OHS-01-06 - Procedure of Working at Heights – No. OHS-01-06 - Procedure of Gas Pressure Management – No. OHS-01-07 - Procedure of Incident Reporting – No. OHS-01-08 	Complied

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		<ul style="list-style-type: none"> - Procedure of Standard for Installation of Safety Sign – No. OHS-01-09 - Procedure of Personal Protective Equipment – No. OHS-01-10 <p>OHS Program was demonstrated under “Program P2K3 year 2021”, updated on 2 February 2021, such as:</p> <ul style="list-style-type: none"> - Meeting of OHS committee (monthly) - Report of OHS performance (3 monthly base) - Fire Drill (Bakortiba) - Fire extinguisher inspection (monthly) - Training for first aider - Training on handling pesticides - Socialization of company policies - Training of PPE for all workers - Medical Check-up test - Monitoring of environmental requirement (water quality, air emission) <p>Record of implementation the OHS plan year 2020, such:</p> <ul style="list-style-type: none"> - Monitoring of OHS equipment, e.g: 6 January 2020, 5 February 2020 for fire extinguisher in Perlavian Office (registration number: 012); reported OK - Fire drill dated 27 January 2020, location in Perlavian POM. Date verified: attendance list, photograph, scenario, evaluation of fire drill. - Training for first aider, dated 27 January 2020, trainer: paramedical, was attended by 98 workers. - Monitoring of first aider in Mill laboratory on 2 March 2020, result OK. - Monitoring of fire hydrant (monthly), dated 2 March 2020, result OK. - Refresh training/socialization on using of PPE dated 4 March 2020 for processing workers in Perlavian POM. 	
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		Since 10 March 2020, periodic monitoring in form of training and awareness was postponed due to COVID-19 pandemic.	
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 covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training.	<p>PT. Tolan Tiga Indonesia – Perlabian POM Program Training 2021.</p> <ul style="list-style-type: none"> - RSPO/ISPO/Supply Chain (new employee). Plan: Oct 2021; Actual: 6 and 22 February 2021. - First Aid Training (all employee). Plan: February 2021; Actual: 1 February 2021. - MSDS Training (Warehouse, WTP Operator). Plan: February 2021; Actual: 11 February 2021. - Emergency Response Training (all employee). Plan: February 2021; Actual: 1 February 2021. <p>Welder license of Mr. Parluhan Sitompul already expired since 2017, management of Perlabian Mill has been submitted extension proposal to relevant authority in regards refreshment since 2017 to 2020. However, due to inadequate of quota participants, therefore the training never carries out from third party OHS Safety Services Provider (PJK3). In 2020 training will conducted on 24-28 August 2020, as per email dated 15 August 2020. However, due to Covid19 pandemic occurs in 2020, all training activities which involved an external party was cancelled. According to these, Unit of Certification sending letter to Labuhanbatu Selatan Employment Agency as per letter No: 560/247/Naker/VI/2020, dated 5 June 2020. Status of this letter is forwarded to Ministry of Employment, however no response yet from its Ministry. Within the letter, Unit of Certification proposed 6 new welder, 2 new operator of Turbine steam and 2 new operators of Sterilizer.</p>	Complied
3.7.2	Records of training are maintained, where appropriate on an individual basis.	Based on interview with sample of worker at Perlabian Mill and Tolan Estate, the workers obtain the general and specific training and awareness according their job desk.	Complied

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		<p>Record of training has shown for an individual basis as per document of "Employee Training and Education Record", e.g:</p> <p>Perlabian Mill:</p> <p>Name: Mr. Sulasman (FFB grader at loading ramp).</p> <ul style="list-style-type: none"> - 16 October 2015: Training crosscheck FFB Quality. - 2 December 2015: Loading ramp, sortase/grading, OHS. - 2 May 2016: Sampling Point and FFB Grading. - 10 May 2017: FFB Quality training. - 18 April 2018: FFB Quality training. - 22 June 2019: Refreshment training on FFB grading. - 6 August 2020: Refreshment training on FFB grading. <p>Name: Mr. Heri Syahputra (Boiler operator).</p> <ul style="list-style-type: none"> - 7 November 2015: Introduction Reservoir & Clarification Process, Filtration. - 7 December 2015: Training of Boiler and OHS - 23 March 2016: RSPO P&C Training. - 19 February 2018: Operating Gas Burner. - 25 September 2018: Procedure and Work Instruction of Boiler Maintenance; Risk Assessment Boiler Station; Aspect Impact Boiler. - 2 September 2019: Work Instruction Boiler Station; Risk Assessment and Aspect Impact. - 12 September 2020: Refresh training of work instruction Boiler understanding; Aspect Impact and Risk Assessment at Boiler station. <p>Name: Mr. Very Simanjuntak (Effluent Pond operator).</p> <ul style="list-style-type: none"> - 30 January 2010: Training of Emergency Response Procedure. - 8 October 2013: training of understanding on RSPO P&C. - 7 February 2015: Training on understanding of Work Instruction on Boiler station. - 7 December 2015: Boiler station and OHS. - 23 August 2017: WI sterilizer and processing procedure; aspect impact and sterilizer; risk assessment. 	
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		- 15 September 2020: Training operational effluent plant (SOP and WI); OHS policy; environmental policy; Drugs and Alcohol policy.	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	Training Program 2021 is available including RSPO Supply Chain. Actual training for RSPO Supply Chain in 2020 conducted on 22 July 2020 and 12 December 2020. The latest refresh training of supply chain conducted on 6 February 2021. The training subjected to SOP of Supply Chain and Traceability of Palm products (MKT-03-06/04-03-2019/Rev.0). Training attended by relevant personnel including Mill Manager, Office Assistant, Field Assistant, weighbridge clerk, production clerk and security.	Complied
Criteria 3.8: Supply chain requirements for mills. Procedure note: all requirements are classified as Critical Indicators . However it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>Management decided PT. Tolan Tiga Indonesia – Perlabian POM, to implement RSPO Supply Chain Model Identity Preserved. With the implementation of Supply Chain Model Identity Preserved, the POM only received and process FFB from certified company-owned estate. FFB suppliers of Perlabian POM are Perlabian Estate and Tolan Estate.</p> <p>Perlabian POM implemented the procedure of supply chain and traceability based on SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/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.</p>	Complied
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>Management decided PT. Tolan Tiga Indonesia – Perlabian POM, to implement RSPO Supply Chain Model Identity Preserved. With the implementation of RSPO Supply Chain Model Identity Preserved, the POM only received and process FFB from certified company-owned estate. FFB suppliers of Perlabian POM are Perlabian Estate and Tolan Estate.</p> <p>Not applicable.</p>	Not Applicable

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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 starts on 17 May 2010, second certification start on 17 May 2015 and third certification on 17 May 2020. Currently the unit of certification are being audit for first Annual Surveillance Assessment after the third certification.</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_PO100000099.</p>	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ol style="list-style-type: none"> 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. 	<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-03-06/04-03-2019/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> <ol 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; 	Complied

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	<p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill.</p>	<p>e. Transportation records; f. Internal control; g. Contractor control.</p> <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, refreshment training of RSPO Supply Chain on 6 February 2021, attended by relevant personnel including Mill Manager, Office Assistant, Field Assistant, weighbridge clerk, production clerk and security.</p> <p>Available records and report that demonstrated compliance with the RSPO supply chain requirement, e.g. Daily Production Figure for 30 December 2020: FFB received month todate is 14,064.61 MT; year todate is 179,502.03 MT. CPO produced month todate is 3,205.11 MT; year todate is 39,434.84 MT. PK produced month todate is 831.82 MT; year todate is 10,390.30 MT. OER month todate is 22.27%; year todate is 22.00%. KER month todate is 5.78%; year todate is 5.79%. CPO dispatched month todate is 2,196.07 MT; year todate is 38,200.67 MT. PK dispatched month todate is 963.01 MT; year todate is 10,505.45 MT. 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	Internal Audit	<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.</p>	Complied

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	<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>Section 6. Frequency and Timing stipulates the internal audits are conducted at least once a year according to the standards referred to. 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>The latest internal audit carried out on 12-13 January 2021, against RSPO P&C 2018 Indonesia National Interpretation 2020. The internal auditor assessed Criteria 3.8 related to RSPO SCCS. Corrective action related to internal audit findings have been determined.</p> <p>Latest Management Review in Perlabian POM conducted on 26 February 2021. Management review has discussed:</p> <ul style="list-style-type: none"> • Results of internal audits; internal audit in Perlabian POM conducted on 12 – 13 January 2021, by ENC RMO NS Team, summary of finding and corrective action have been documented in Visit Report ENC 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 processed in Perlabian POM are coming from owned estates. • Status of preventive and corrective actions. All finding discussed in this Management Review have been closed and attached in the minutes of management review. 	
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		<ul style="list-style-type: none"> • 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. There is no company policy that effect PLPOM management system; based on Memorandum of Engineering Department No.234/HO-ENG/2020 dated 2 December 2020 stated that starting 1 January 2021 operation of weighbridge will be controlled by independent laboratory and all data entry related production to lintramax system will be handled by independent laboratory; Installation of reverse osmosis on water treatment plan to make clear water that used in processing activity. <p>Recommendations for improvement: follow up process of welder license that postponed due to Pandemic Covid-19.</p>	
3.8.7	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. 	<p>PT. Tolan Tiga Indonesia ensured that certified FFB received are RSPO certified based on the source of FFB. These FFB source are certified under PT Toaln Tiga Indonesia – Perlabian POM certificate (RSPO 555208). Based on interview with weighbridge clerk and FFB receiving station, Perlabian POM only received certified FFB from sustainable source: Perlabian Estate and Tolan Estate.</p> <p>PT. Tolan Tiga Indonesia – Perlabian POM has verified the status of the supply base certificate during Internal Audit on 12 – 13 January 2021, 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,</p>	Complied

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		<p>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, Perlabian 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, Perlabian 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 of FFB from Field "SPB" No.PLE/006064 dated 1 March 2021 from Perlabian Estate, Division F2, block 11I12A; planting year 2011, total 233 bunches. Stamp Sustainable Product-IP. Receiving slip/weighbridge ticket No.FFB21003987W; Truck BK 8630 YN; Perlabian Estate dated 1 March 2021; D/O No.006064; block ID 11I12A; planting year 2011; total bunches 233; nett weight 3,730 kg. Stamp Sustainable Product-IP. - Delivery of FFB from Field "SPB" No.TLE/099660 dated 1 March 2021 from Tolan Estate, Division F1, Block B5 (581 bunches); planting year 2010. Stamp Sustainable Product-IP. Receiving slip/weighbridge ticket No.FFB21003981W; Truck BK 8847 YN; Tolan Estate dated 1 March 2021; D/O No.099660; Block ID 10B05; planting year 2010; total bunches 581; nett weight 8,940 kg. Stamp Sustainable Product-IP. 	
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3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification 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 have to be available in the sales and goods out document. Sales and goods out documents seen are as follows:</p> <p>CSPO</p> <p>There is no sales of RSPO certified CPO since the previous assessment, all certified CPO sold as another scheme.</p> <p>PK.</p> <ul style="list-style-type: none"> - Contract No.2020/LTC-PK/PL/15 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 September 2020; for sales of 1,500 MT Crude Sustainable Palm Kernel – RSPO IP; Certificate No. RSPO 555208. - Delivery Order No.2020/LTC-PK/PL/DO/17 dated 2 October 2020, ordering shipment of 1,500 MT PK – RSPO IP, from PT. Tolan Tiga Indonesia – Loko PKS Perlabian to buyer PT. Ivo Mas Tunggal. - Dispatch Slip No.PK20000362W, dated 03/11/2020; from PT. Tolan Tiga Indonesia – Perlabian POM; product Palm Kernel; quantity 25.77 MT; DO No.2020/LTC-PK/PL/DO/17; Certificate RSPO 555208; Module Sustainable Product IP; Vehicle ID No. BK 8522 CY; CV Jaya Pertama; - Shipping Announcement, with transaction ID No. TR-e30480e4-8486 for 180.63 MT CSPK IP; from PT. Tolan Tiga Indonesia – Perlabian POM (RSPO_PO1000000099) as Seller to PT. Ivo Mas Tunggal-Lubuk Gaung (RSPO_PO1000006558) as Buyer. Shipping date 30-11-2020; Contract 2020/LTC-PK/PL/15; Confirmation date 7 December 2020. 	Complied
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		<p>- Shipping Announcement, with transaction ID No. TR-c61b0c9d-b4b7 for 1,319.37 MT CSPK IP; from PT. Tolan Tiga Indonesia – Perlabian POM (RSPO_PO1000000099) as Seller to PT. Ivo Mas Tunggal-Lubuk Gaung (RSPO_PO1000006558) as Buyer. Shipping date 31-10-2020; Contract 2020/LTC-PK/PL/15; Confirmation date 10 November 2020.</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: 3 November 2020 based on Dispatch Slip; • The date on which the documents were issued: Contract on 29 September 2020; DO on 2 October 2020; Dispatch Slip on 3 November 2020; • 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: 27.77 MT of PK; • Any related transport documentation: vehicle ID No. BK 8522 CY by CV Jaya Pertama; • Supply chain certificate number of the seller: RSPO 555208. • A unique identification number: Contract No.2020/LTC-PK/PL/15 (verified on all record). 	
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<p>3.8.9</p>	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>Perlabian POM PT. Tolan Tiga Indonesia does not outsources its milling activity to any independent third party.</p> <p>The unit of certification only outsources the transport activity. Transport for RSPO certified sustainable CPO are managed by PT. Tolan Tiga Indonesia, whilst transport of RSPO certified PK are managed by the buyer. Transport of certified CPO performed by several contractor. During transport, legal ownership of CSPO are still under PT. Tolan Tiga Indonesia. This evident by sales contract that between PT. Tolan Tiga Indonesia and the buyer.</p> <p>Contract:</p> <p>a. "Perjanjian Pengangkutan PT. Tolan Tiga Indonesia dengan Pengangkutan Sahabat No.2015/Angkutan/CPO/PL-Dumai/01" signed on 1 February 2016. CV Angkutan Sahabat issued a statement letter signed by Mr. Gunawan Ruslan, dated 11 January 2018. 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".</p> <p>b. "Perjanjian Pengangkutan PT. Tolan Tiga Indonesia dengan CV Jasa Sahabat Abadi No.2015/Angkutan/CPO/PL-Dumai/06" signed on 1 December 2016. CV Jasa Sahabat Abadi issued a statement letter signed by Mr. Darmin Tanjudjaja, dated 23 March 2018. 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".</p> <p>c. "Perjanjian Pengangkutan PT. Tolan Tiga Indonesia dengan CV Sejahtera Abadi No.2015/Angkutan/CPO/PL-DUMAI/02" dated 1 February 2016. CV Sejahtera Abadi issued a statement letter signed by Mr. Harsono Sukijung, dated 26 February 2019. The statement "CV Sejahtera Abadi is willing to comply with RSPO Supply Chain</p>	<p>Complied</p>
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		<p>requirement; CV Sejahtera Abadi is willing to be audited by certification body if needed".</p> <p>d. "Perjanjian Pengangkutan PT. Tolan Tiga Indonesia dengan Pengangkutan Felindo No.2015/Angkutan/CPO/PL-Dumai/04" signed on 1 February 2016. Pengangkutan Felindo issued a statement letter signed by Drs. Sutrisno Sukijung, dated 1 March 2019. The statement "Pengangkutan Felindo is willing to comply with RSPO Supply Chain requirement; Pengangkutan Felindo is willing to be audited by certification body if needed".</p> <p>PT. Tolan Tiga Indonesia – Perlabian 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.</p> <p>Means of control by Perlabian POM: "Buku Pemeriksaan Kendaraan CPO dan PK", sampled: PK truck No. BK 8522 CY from CV Jaya Pertama; inspected to carry RSPO certified PK from Perlabian POM to PT Ivo Mas Tunggal – Lubuk Gaung, dated 3 November 2020.</p>																
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	<p>Perlabian Pom has recorded the names and contact details of all contractors used for transport of certified CPO, as follows:</p> <table border="1" data-bbox="1131 1107 1951 1345"> <thead> <tr> <th>Contractor</th> <th>Contact Person</th> <th>Address</th> </tr> </thead> <tbody> <tr> <td>CV Angkutan Sahabat</td> <td>Mr. Gunawan Ruslan</td> <td>Jl. Petumbukan Dusun III, Jaharun B – Ggalang, Deli Serdang – Sumatera Utara.</td> </tr> <tr> <td>CV Jasa Sahabat Abadi</td> <td>Mr. Darmin Tanjudjaja</td> <td>Jl. Besar Kisaran – Medan km 5 Sidomulyo, Pulo Bandring</td> </tr> <tr> <td>CV. Sejahtera Abadi</td> <td>Mr. Harsono Sukijung</td> <td>Jl. Jati No.65 Pulo Brayen Bengkel Kec. Medan Timur, Medan 20239</td> </tr> <tr> <td>Pengangkutan Felindo</td> <td>Mr. Sutrisno Sukijung</td> <td>Jl. Gunung Krakatau Ujung No. 62, Medan</td> </tr> </tbody> </table>	Contractor	Contact Person	Address	CV Angkutan Sahabat	Mr. Gunawan Ruslan	Jl. Petumbukan Dusun III, Jaharun B – Ggalang, Deli Serdang – Sumatera Utara.	CV Jasa Sahabat Abadi	Mr. Darmin Tanjudjaja	Jl. Besar Kisaran – Medan km 5 Sidomulyo, Pulo Bandring	CV. Sejahtera Abadi	Mr. Harsono Sukijung	Jl. Jati No.65 Pulo Brayen Bengkel Kec. Medan Timur, Medan 20239	Pengangkutan Felindo	Mr. Sutrisno Sukijung	Jl. Gunung Krakatau Ujung No. 62, Medan	Complied
Contractor	Contact Person	Address																
CV Angkutan Sahabat	Mr. Gunawan Ruslan	Jl. Petumbukan Dusun III, Jaharun B – Ggalang, Deli Serdang – Sumatera Utara.																
CV Jasa Sahabat Abadi	Mr. Darmin Tanjudjaja	Jl. Besar Kisaran – Medan km 5 Sidomulyo, Pulo Bandring																
CV. Sejahtera Abadi	Mr. Harsono Sukijung	Jl. Jati No.65 Pulo Brayen Bengkel Kec. Medan Timur, Medan 20239																
Pengangkutan Felindo	Mr. Sutrisno Sukijung	Jl. Gunung Krakatau Ujung No. 62, Medan																

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3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	The unit of certification inform the audit team in case there is changes in the list of FFB, CPO and PK transporter through the RSPO P&C Pre Audit Information checklist.	Complied
3.8.12	<p>Record keeping</p> <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>The 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 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 maintain 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 30 December 2020: FFB received month todate is 14,064.61 MT; year todate is 179,502.03 MT. 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> <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>Perlabian 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>	Complied

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		<p>For period January to December 2020, FFB processed is 179,502.03 MT; CPO produced is 39,434.84 MT; PK produced is 10,390.30 MT; OER is 22.00%; KER is 5.79%; CPO dispatched is 38,200.67 MT; PK dispatched is 10,505.45 MT; processing hour is 3,304.75 hours; mill throughput is 54.32 ton/hour.</p> <p>Sample of goods out records:</p> <p>CSPO There are no sales of RSPO certified CPO since the previous assessment, all certified CPO sold as another scheme.</p> <p>PK.</p> <ul style="list-style-type: none"> - Contract No.2020/LTC-PK/PL/15 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 September 2020; for sales of 1,500 MT Crude Sustainable Palm Kernel – RSPO IP; Certificate No. RSPO 555208. - Delivery Order No.2020/LTC-PK/PL/DO/17 dated 2 October 2020, ordering shipment of 1,500 MT PK – RSPO IP, from PT. Tolan Tiga Indonesia – Loko PKS Perlabian to buyer PT. Ivo Mas Tunggal. - Dispatch Slip No.PK20000362W, dated 03/11/2020; from PT Tolan Tiga Indonesia – Perlabian POM; product Palm Kernel; quantity 25.77 MT; DO No.2020/LTC-PK/PL/DO/17; Certificate RSPO 555208; Module Sustainable Product IP; Vehicle ID No. BK 8522 CY; CV Jaya Pertama; - Shipping Announcement, with transaction ID No. TR-e30480e4-8486 for 180.63 MT CSPK IP; from PT. Tolan Tiga Indonesia – Perlabian POM (RSPO_PO1000000099) as Seller to PT Ivo Mas Tunggal-Lubuk 	
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		<p>Gaung (RSPO_PO1000006558) as Buyer. Shipping date 30-11-2020; Contract 2020/LTC-PK/PL/15; Confirmation date 07-12-2020.</p> <ul style="list-style-type: none"> - Shipping Announcement, with transaction ID No. TR-c61b0c9d-b4b7 for 1,319.37 MT CSPK IP; from PT. Tolan Tiga Indonesia – Perlabian POM (RSPO_PO1000000099) as Seller to PT. Ivo Mas Tunggal-Lubuk Gaung (RSPO_PO1000006558) as Buyer. Shipping date 31-10-2020; Contract 2020/LTC-PK/PL/15; Confirmation date 10-11-2020. 	
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 2021, the estimated extraction rate from FFB into CPO is 22.30%, whilst from FFB to PK is 5.60%. Based on Daily Production Figure 30 December 2020, actual extraction rate ratios from FFB into CPO is 22.00% (average 12 months), whilst from FFB to PK is 5.79% (average 12 months).</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 30 December 2020 for period January to December 2020, actual OER is 22.00% and KER is 5.79%. Based on Daily Production Figure dated 8 March 2021 for period January to 8 March 2021, actual OER is 22.58% 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-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Perlabian POM does not receive any non-certified FFB. Therefore, no non-certified FFB being entered the process, no non-certified CPO and PK being produced, no non-certified product being dispatched. Storage tank for CPO dedicated only for certified oil. Silo for PK used to store certified product.</p> <p>Perlabian POM have 4 storage tank, 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 and PLST03 as the storage tank, whilst PLST02 and PLST04 are used for certified CPO from PT Umbul Mas Wisesa (sister company). All CPO received in Perlabian POM has a designated piping system to pump the CPO from</p>	Complied

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		<p>UMW POM to the tanks and from the tanks to dispatch station. Verified there are no contamination.</p>	
<p>3.8.16</p>	<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.</p> <p>For example:</p> <p>b. Shipping Announcement, with transaction ID No. TR-e30480e4-8486 for 180.63 MT CSPK IP; from PT. Tolan Tiga Indonesia – Perlabian POM (RSPO_PO1000000099) as Seller to PT. Ivo Mas Tunggal -Lubuk Gaung (RSPO_PO1000006558) as Buyer. Shipping date 30-11-2020; Contract 2020/LTC-PK/PL/15; Confirmation date 07-12-2020.</p> <p>c. Shipping Announcement, with transaction ID No. TR-c61b0c9d-b4b7 for 1,319.37 MT CSPK IP; from PT. Tolan Tiga Indonesia – Perlabian POM (RSPO_PO1000000099) as Seller to PT. Ivo Mas Tunggal -Lubuk Gaung (RSPO_PO1000006558) as Buyer. Shipping date 31-10-2020; Contract 2020/LTC-PK/PL/15; Confirmation date 10-11-2020.</p> <p>During this assessment period, Perlabian POM does not sold any RSPO certified CPO. All CPO are sold as another certification scheme. Therefore, Perlabian POM performed "Remove" in the RSPO IT Platform as well as for CSPO withdrawn from transport deduction:</p>	<p>Complied</p>

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		<ul style="list-style-type: none"> Transaction ID: ST-TR-872e5bf4-e801; dated 11/08/2020; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 12.79 MT. Transaction ID: ST-TR-9ce5a088-f055; dated 11/08/2020; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 498.95 MT. Transaction ID: ST-TR-1068c17d-d821; dated 14/07/2020; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 698.66 MT. Transaction ID: ST-TR-2bafc620-6dc7; dated 16/02/2021; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 2,038.37 MT. <p>Transaction ID: ST-TR-99429222-d660; dated 20/01/2021; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 341.79 MT.</p>	
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>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. 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 membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' 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 off product communication. 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> <ul style="list-style-type: none"> Display its RSPO membership status Display the RSPO web address (www.rspo.org) 	<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. 	Not Applicable

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	<ul style="list-style-type: none"> State that the member supports the work of the RSPO State the member’s history with regard to the RSPO. Use the RSPO trademark to promote its membership of the RSPO. <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at www.rspo.org’ where the link must lead to the member’s profile page.</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	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	No, SIPEF did not display its RSPO membership status. It is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not Applicable
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	No, SIPEF did not display its RSPO membership status. It is clear that the statement are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in the SIPEF’s own products.	Not Applicable
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No, SIPEF Group did not display the RSPO Corporate Logo in the website as well as in the correspondence letter.	Not Applicable
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	PT. Tolan Tiga Indonesia – Perlabian POM stated in sales documents, e.g. Sales Contract, Delivery Order and Despatch Slip that the product they sold is RSPO Certified CPO or PK model IP.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the	PT. Tolan Tiga Indonesia – Perlabian POM stated in sales documents, e.g. Sales Contract, Delivery Order and Despatch Slip that the product they sold is RSPO Certified CPO or PK model IP.	Complied

	supply chain model and certificate number under which the claim is being made.		
5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a) If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	PT. Tolan Tiga Indonesia – Perlabian POM is not a distributor or wholesaler, the site is a Palm Oil Mill that process FFB into CPO and PK. Not Applicable.	Not Applicable
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	PT. Tolan Tiga Indonesia – Perlabian POM is a Palm Oil Mill that process FFB into CPO and PK. The site sold its product in bulk, no product label attached. Not applicable.	Not Applicable
Business to consumer communication			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as ‘product-specific’ claims. Product-specific claims are voluntary.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable

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6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable

	RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org .		
MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES (delete if not applicable)			
Certified oil palm content (IP)			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	The Certified IP volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under IP model is considered 100% content.	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	Perlabian POM use IP for RSPO supply chain certification module.	Not Applicable
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	The Certified IP volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under IP model is considered 100% content.	Complied
Labelling and trademark (IP)			
	Members are allowed to use the RSPO label in one of the following ways: <ul style="list-style-type: none"> • RSPO trademark which includes the tag 'CERTIFIED' or • RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. 	There is no product partial claims	Not Applicable

Messaging (IP)			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm 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 to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 	<p>There is no product partial claims</p>	<p>Not Applicable</p>
Principle 4: Respect community and human rights and deliver benefit			
<p>Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p>			
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>PT. Tolan Tiga Indonesia established Company Policy on Human Rights No.QMM-40-01-P02/27-03-2019 signed by President Director on 27 March 2019. The policy stated PT. Tolan Tiga Indonesia recognises that human rights are universal and apply to all, without any form of distinction. PT. Tolan Tiga Indonesia 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</p>	<p>Complied</p>

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		<p>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.</p> <p>In Perlavian POM the equal employment opportunity policy has been disseminated to 19 workers from Laboratory, Office, Godown (laboratory attendant, weighbridge operator, office helper, driver, godown, biogas plant, sortation) dated 19 February 2020. During weekly meeting, the human rights policy also disseminated to security service – PT. SSI, sampled on 2 September 2020.</p> <p>In Perlavian Estate the record of company’s dissemination on human rights policy on 17 February 2021. The socialization attended by 17 workers from Division I (harvesters, harvesting mandors, tally clerk); 16 workers from Division II (harvesters, harvesting mandors); on 15 February 2021 for 11 workers from Division III (sprayers and mandors);</p> <p>In Tolan Estate, the socialization of this policy has conducted regularly. For example, sighted the record of company’s policy on human rights socialization on 10 September 2020. The socialization attended by 43 workers from Division I (harvesters, P&D census, waterman, baby sitter, harvesting mandors) and 34 contract workers/PKWT (loose fruit collectors, gardener); 34 workers from Division II (harvesters, spraying team, harvesting mandors); 83 workers from Division III (harvesters, harvesting mandors, tally clerk, manuring); 39 workers from Division IV (harvesters, harvesting mandors); 41 workers from Division V (harvesters, waterman, baby sitter, harvesting mandors); 48 workers from Division Transport (tractor driver, dump truck driver, quality controller, helper dump truck, carpenter, electrician, school bus driver); During interview with 3 harvesters, 2 sprayers and 2 fertilizer applicators in Tolan Estate, they understand the principle for protect human rights</p>	
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		policy as to freely hold religion and to have religious activity such as during Sholat Jumat.	
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.	During the audit, through the public consultation with village head surrounding the company areas, local government, NGO's and local journalist obtained information that there was a record of land claims between the company and Kelompok Tani Bersatu (KTB). However, certificate holder did not use violence approach to handle all case related to their operational activity. There is no evidences of mercenaries and paramilitaries usage in their operations.	Complied
Criteria 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	Based on stakeholder consultation with surrounding communities in Tanjung Selamat Village, Gunung Selamat Village, Persiapan Lohsari Village, Government officials of Plantation Services in Labuhanbatu Selatan Regency audit team gather information the plantation developed since Dutch Colonial Era. There was no land compensation because the concession operating since Dutch Colonial Era. From document verification and statement from stakeholders, PT. Tolan Tiga Indonesia do not conduct new land clearing. However, the company prepared procedure for conflict resolutions: a. Mechanism for land compensation prior to new land clearing under "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev2", signed by management 28 September 2020. b. Mechanism for resolving conflict caused by illegal encroachment in HGU area "Illegal Planting and Building Owned by Third Party Inside HGU of The Company No.LCA-01-03/01-02-2020/Rev 0", signed by management 18 February 2020. c. Mechanism for conveying complaint and grievance under "Grievance Procedure No.IAD-01-08/22-01-2020/Rev.0" signed by President Director 30 January 2020.	Complied

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		<p>d. Company established "Whistle Blower Policy No.QMM-40-01-P16/14-01-2019/Rev. 1", signed by management on 14 January 2019, stating;</p> <ul style="list-style-type: none"> - 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. - Any kind of threat, retaliation, penalty or discrimination against the whistle blower or the reported party-or anyone who has participated in the investigation into the validity of the report-will not be tolerated. PT. Tolan Tiga Indonesia reserves the right to take the appropriate actions against anyone who retaliates or threatens to retaliate against whistle blowers who have submitted report accordance with this policy. - It is understood that the company may take appropriate disciplinary and/or legal measures to protect its right, assets and reputation against anyone who. In bad faith, has made false, unfounded or opportunistic report and/or has made reports for the sole purpose of defaming, slandering or causing damage to the reported party or to other parties mentioned in the report. 	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	<p>Company has policy and mechanism to resolve dispute/conflict/claim/grievance with internal and external parties. The mechanism related to dispute/conflict/claim/grievance resolution available in Bahasa Indonesia, understood by majority of community in and around company concession. Specific for company policy was printed in Bahasa Indonesia and English.</p> <p>To anticipate stakeholders, who cannot understand Bahasa Indonesia or illiterate – company has conduct direct socialization related to mechanism for dispute/conflict/claim/grievance; including information on conveying dispute/conflict/claim/grievance; until mechanism for land compensation. Sample taken:</p>	Complied

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		<p>d. Socialization to Village Government and community of Perkebunan Tolan I Village, Perkebunan Tolan II Village – on 12 December 2020.</p> <p>e. Socialization to Village Government and community of Pekan Tolan Village – on 19 December 2020, took place in the Village Office.</p>	
<p>4.2.3</p>	<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>Based on stakeholder consultation continued with document verification, in 2020, PT. Tolan Tiga Indonesia received complaint from NGO.</p> <p>a. The NGO “LSM Pilar Kesejahteraan Rakyat Nasional” sent letter Surat LSM Pilar Kesejahteraan Rakyat Nasional No. 110/DPD-LSM-PKRN/LR/VII/2020 perihal Klarifikasi Pemakaian Pengaman Jaring Truk Angkut TBS”, dated 17 July 2020. The letter stated based on NGO investigation on 17 June 2020, the Ngo found some truck did not use safety net when transporting FFB.</p> <p>b. Company demonstrated that there is SOP in place “FFB and Loose Fruit Delivery No.OPM-05-03/17-07-2019/Rev.4” signed by management 17 July 2019. The SOP stipulates “each truck transporting FFB to mill shall use net to cover all FFB on the truck”.</p> <p>c. Company also demonstrated mechanism to convey grievance/complaint under “Grievance Procedure No. IAD-01-08/22-01-2020/Rev.0” signed by President Director 30 January 2020.</p> <p>d. Internal Audit Department in Head Office PT. Tolan Tiga Indonesia, Medan replied the letter through email on 14 August 2020, stating:</p> <ul style="list-style-type: none"> - PT. Tolan Tiga Indonesia will continue to check the safety and security aspect of all FFB transport truck; - Regional Management Office issued memorandum to all Operating Unit and contractor of FFB transport related to the use of FFB net; - Regional management will monitor closely and give sanction for every deviation or failure to meet the company requirement. <p>e. To follow up, Senior Technical Manager issued internal memorandum “Dump truck from Estate or contractor truck without FFB net or lock shall be refused by mill gatekeeper and will not be attended to for FFB receiving”, dated 1 September 2020.</p>	<p>Complied</p>

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		<p>f. PT. Tolan Tiga Indonesia demonstrated the use of FFB net is according to SOP. On 4 March 2021: all FFB truck completed with FFB net, however some FFB net was teared down. Estate immediately made replacement for non-standard FFB net.</p> <p>Based on document verification and stakeholder consultation, there was land claim from "Kelompok Tani Bersatu (KTB)" against PT. Tolan Tiga Indonesia in 2014. Certificate holder documented the land claim resolution process, including facilitation/mediation by third party:</p> <ul style="list-style-type: none"> - Copy of State Court Decision for the same case in 2014, which resulted in have been sighted "Salinan Putusan Pengadilan Negeri Rantauprapat – Perkara Perdata Gugatan Reg.No.56/Pdt.G/2013/PN-RAP antara Kelompok Tani Bersaru (KTB) Penggugat lawan PT. Tolan Tiga Indonesia (SIPEF) Dkk Tergugat. Dalam Pokok Perkara: Menyatakan Gugatan Penggugat tidak dapat diterima (Niet Onvankikje ver klaard). Dalam Rekonpensi: Menolak Gugatan Rekonpensi Penggugat untuk seluruhnya" dated 16 September 2014 – repudiate plaintiff claim. Audit team noted that the plaintiff/representative and defendants/representative and co-defendant I and co-defendant II did not apply for appeal upon the state court decision "Salinan Putusan Pengadilan Negeri Rantauprapat – Perkara Perdata Gugatan Reg.No.56/Pdt.G/2013/PN-RAP" dated 16 September 2014 as per "Act No. 56/Pdt.G/2013/PN-RAP" dated 7 November 2014 – therefore the decision has permanent legal standing. - Letter from police to mediation "Surat Kepolisian Negara Republik Indonesia Daerah Sumatera Utara Resor Labuhanbatu No.B/7135/X/Bag Ops", dated 24 October 2018 related invitation for mediation. The mediation date 29 October 2018, for claim "Klaim Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, 	
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		<p>Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan” of 716.40 Ha.</p> <ul style="list-style-type: none"> - Minutes of mediation meeting “Notulen Rapat Mediasi terkait Klaim Lahan Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan”, dated 29 October 2018. Conclusion: “Polres Labuhanbatu akan mengadakan koordinasi dengan Pemerintah Kabupaten Labuhanbatu Selatan/Bupati dalam upaya penyelesaian sengketa lahan. Akan dilakukan pertemuan/mediasi lanjutan menunggu hasil koordinasi dengan pihak Pemerintah Kabupaten Labuhanbatu Selatan dan akan mengundang pihak yang bersengketa. Kepada pihak yang bersengketa agar bersama-sama menciptakan kamtibmas yang kondusif” – police will made subsequent coordination meeting with government from Labuhanbatu Selatan Regency, for all parties to maintain security and conducive situation. - On 13 July 2020, member of Kelompok Tani Bersatu occupied land in block 99B19, under administrative area of Dusun Dua, Perkebunan Perlabian Village, Kampung Rakyat District. Upon that action, PT. Tolan Tiga Indonesia sent report letter to police, “Kepolisian Resort Labuhanbatu” with receipt “Surat Tanda Terima Laporan Polisi No. STTLP/804/VII/2020/SPKT/Res-LBH”. On 15 July 2020, member of Kelompok Tani Bersatu conduct violence to company employee and damaging property, therefore PT Tolan Tiga Indonesia conduct another reporting to the police with receipt “Surat Tanda Terima Laporan Pengaduan No.STTLP/46/VII/Yan.1.10/2020/SU/Res-LBH/Kampung Rakyat”. - Plantation and Husbandry Service of Labuhanbatu Regency facilitate the mediation and initiated coordination meeting “Rapat Koordinasi Konsolidasi dan Percepatan Penyelesaian Masalah yang Terjadi di PT. Tolan Tiga Indonesia dengan Kelompok Tani Bersatu (KTB)” 	
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		<p>dated 18 July 2020. The facilitation meeting attended by all parties; Head of Services, District Head, Lands Office (Kepala Sub Bidang Penanganan Sengketa, Konflik dan Perkara Pertanahan Kantor Pertanahan Kabupaten Labuhan Batu Selatan). In that meeting, complainant, Kelompok Tani Bersatu was not present.</p> <ul style="list-style-type: none"> - The house of representative Labuhanbatu Regency invited PT. Tolan Tiga Indonesia for a hearing meeting related to the land claim from Kelompok Tani Bersatu against land under HGU PT. Tolan Tiga Indonesia. Meeting result recorded under the minutes of meeting "Notulen Rapat Dengan Pendapat DPRD Labuhan Batu Selatan" dated 8 October 2020. 	
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>Based on document verification the conflict resolution is recorded accordingly. The conflict resolution documents demonstrated company openness includes the option of access to independent legal and technical advice as well as presence of third-party mediator or facilitator. Document sighted:</p> <ol style="list-style-type: none"> a. PT. Tolan Tiga Indonesia documented the response upon complaint from NGO, LSM Pilar Kesejahteraan Rakyat Nasional dated 17 July 2020. The response via email and use continuous improvement as reported for indicator 4.2.3. b. PT. Tolan Tiga Indonesia documented the conflict resolution process for land claim by Kelompok Tani Bersatu (KTB) since 2014. The conflict resolution process facilitated by third party: <ul style="list-style-type: none"> - Copy of State Court Decision for the same case in 2014, which resulted in have been sighted "Salinan Putusan Pengadilan Negeri Rantauprapat – Perkara Perdata Gugatan Reg.No.56/PDt.G/2013/PN-RAP antara Kelompok Tani Bersatu (KTB) Penggugat lawan PT. Tolan Tiga Indonesia (SIPEF) Dkk Tergugat. Dalam Pokok Perkara: Menyatakan Gugatan Penggugat tidak dapat diterima (Niet Onvankijke ver klaard). Dalam Rekonpensi: Menolak Gugatan Rekonpensi Penggugat untuk seluruhnya" dated 16 September 2014 – repudiate plaintiff claim. Audit team noted that 	Complied

		<p>the plaintiff/representative and defendants/representative and co-defendant I and co-defendant II did not apply for appeal upon the state court decision "Salinan Putusan Pengadilan Negeri Rantauprapat – Perkara Perdata Gugatan Reg.No.56/Pdt.G/2013/PN-RAP" dated 16 September 2014 as per "Act No.56/Pdt.G/2013/PN-RAP" dated 7 November 2014 – therefore the decision has permanent legal standing.</p> <ul style="list-style-type: none"> - Letter from police to mediation "Surat Kepolisian Negara Republik Indonesia Daerah Sumatera Utara Resor Labuhanbatu No.B/7135/X/Bag Ops", dated 24 October 2018 related invitation for mediation. The mediation date 29 October 2018, for claim "Klaim Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan" of 716.40 Ha. - Minutes of mediation meeting "Notulen Rapat Mediasi terkait Klaim Lahan Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan", dated 29 October 2018. Conclusion: "Polres Labuhanbatu akan mengadakan koordinasi dengan Pemerintah Kabupaten Labuhanbatu Selatan/Bupati dalam upaya penyelesaian sengketa lahan. Akan dilakukan pertemuan/mediasi lanjutan menunggu hasil koordinasi dengan pihak Pemerintah Kabupaten Labuhanbatu Selatan dan akan mengundang pihak yang bersengketa. Kepada pihak yang bersengketa agar bersama-sama menciptakan kamtibmas yang kondusif" – police will made subsequent coordination meeting with government from Labuhanbatu Selatan Regency, for all parties to maintain security and conducive situation. 	
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		<ul style="list-style-type: none"> - On 13 July 2020, member of Kelompok Tani Bersatu occupied land in block 99B19, under administrative area of Dusun Dua, Perkebunan Perlarian Village, Kampung Rakyat District. Upon that action, PT. Tolan Tiga Indonesia sent report letter to police, "Kepolisian Resort Labuhanbatu" with receipt "Surat Tanda Terima Laporan Polisi No. STTLP/804/VII/2020/SPKT/Res-LBH". On 15 July 2020, member of Kelompok Tani Bersatu conduct violence to company employee and damaging property, therefore PT Tolan Tiga Indonesia conduct another reporting to the police with receipt "Surat Tanda Terima Laporan Pengaduan No.STTLP/46/VII/Yan.1.10/2020/SU/Res-LBH/Kampung Rakyat". - Plantation and Husbandry Service of Labuhanbatu Regency facilitate the mediation and initiated coordination meeting "Rapat Koordinasi Konsolidasi dan Percepatan Penyelesaian Masalah yang Terjadi di PT. Tolan Tiga Indonesia dengan Kelompok Tani Bersatu (KTB)" dated 18 July 2020. The facilitation meeting attended by all parties; Head of Services, District Head, Lands Office (Kepala Sub Bidang Penanganan Sengketa, Konflik dan Perkara Pertanahan Kantor Pertanahan Kabupaten Labuhan Batu Selatan). In that meeting, complainant, Kelompok Tani Bersatu was not present. - The house of representative Labuhanbatu Regency invited PT. Tolan Tiga Indonesia for a hearing meeting related to the land claim from Kelompok Tani Bersatu against land under HGU PT. Tolan Tiga Indonesia. Meeting result recorded under the minutes of meeting "Notulen Rapat Dengan Pendapat DPRD Labuhan Batu Selatan" dated 8 October 2020. 	
<p>Criteria 4.3: The unit of certification contributes to local sustainable development as agreed by local communities.</p>			
4.3.1	Contributions to community development that are based on the results of consultation with local community are demonstrated.	PT. Tolan Tiga Indonesia carried out social impact assessment as reported in "Dokumen Sosial Analisis Dampak - Maret 2010". The social impact assessment was in cooperation with Yayasan Sawit	Complied

		<p>Berkelanjutan Indonesia (YASBI). In the process of social impact assessment study, has involving multi-stakeholder through guided interview, questionnaire filling and focus group discussion (FGD).</p> <p>Every year, PT. Tolan Tiga Indonesia conduct evaluation of the Social Impact Assessment to the surrounding community and documented in "Laporan Pelaksanaan Penilaian Aspek Dampak Sosial (Social Impact Assessment)". The evaluation result used in preparing social program for subsequent year.</p> <p>Each estate and mill have prepared annual budget for CSR program:</p> <ul style="list-style-type: none"> a) Perlabian Estate: Year 2020 has prepared 8 types of Community Development for activity in form of Education, Infrastructure, Agriculture, Micro and Small Business, Sport, Art and Cultural, Religious Activities and Social Economy with amount Rp. 71,469,700. Budget for year 2021 of Rp. 70,911,250. b) Tolan Estate: Year 2020 has prepared 6 types of Community Development for activity in form of Education, Health, Infrastructure, Agriculture/Agriculture/Husbandry, Art and Cultural, Religious Activities and Social Economy with amount Rp. 74,090,075. Budget for year 2021 Rp. 74,090,075. c) Perlabian POM: Year 2020 has budgeted CSR program of Rp. 24,000,000 and implemented Rp. 23,755,400. <p>PT. Tolan Tiga Indonesia consistently documented the implementation of CSR program every year:</p> <ul style="list-style-type: none"> a) Handover goalpost for Pekan Tolan Village on 1 September 2020 of Rp. 4,065,484. b) Provision of heavy machinery use (JCB & bulldozer) for repair of school yard "Sekolah Dasar Sripinang" dated 24 November 2020 of Rp. 1,200,000. 	
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		<ul style="list-style-type: none"> c) Evidence of donation handover for preparation of "MTQ Kabupaten Labuhanbatu Selatan" in March 2020. d) Handover of donation and aid for fire victim in Air Merah Hamlet dated 13 March 2020. The donation in form of 15 cement bags @50 kg. e) Handover material for Musholla renovation in Persiapan Lohsari Village dated 13 March 2020. The donation in form of 15 cement bags @50 kg. f) Handover Ramadhan package to committee of Mushola Al Hidayah, Air Serdang Village dated 6 May 2020 in form of sugar, tea, coffee. g) Handover Ramadhan package to committee of Masjid Al Ikhlas, Sukajadi Village dated 6 May 2020, in form of sugar, tea, coffee. h) Handover bore well package with capacity 850 liters/hour for Pekan Tolan Village dated 26 June 2020, valued Rp. 15,000,000. <p>PT. Tolan Tiga Indonesia participated in mitigation of COVID-19 pandemic for surrounding villages:</p> <ul style="list-style-type: none"> a) Handover 375 pieces mask to Perlabian Village dated 11 May 2020, of Rp. 1,875,000. And handover 375 pieces mask to Air Serdang Village dated 11 May 2020, of Rp. 1,875,000. b) Handover of donation "Proporsi cost of donation to Karang Taruna Organization Labusel to Strengthen Covid-19 Pandemic Prevention" in March 2020. c) Donation to Tanjung Selamat Village and Tanjung Medan Village for handling COVID-19 pandemic impact on June 2020 of Rp. 9,830,400. <p>Berdasarkan wawancara dengan kepala desa sekitar maupun Dinas Perkebunan Kabupaten Labuhan Batu Selatan menyatakan bahwa PT Tolan Tiga Indonesia telah mendukung peningkatan kualitas kehidupan dan lingkungan yang bermanfaat, baik Perusahaan Perkebunan, komunitas setempat maupun masyarakat pada umumnya melalui</p>	
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		<p>program Community Development (CD) oleh masing-masing Unit setiap tahun.</p> <p>Based on document verification and interview with village heads and cooperative chairman, PT. Tolan Tiga Indonesia engaged surrounding community to facilitate partnership oil palm plantation for smallholder.</p> <p>a) Partnership Agreement with Air Merah Village "Perjanjian Kerjasama Kemitraan antara Koperasi Produsen Air Merah Masyarakat Sejahtera (Desa Air Merah) dengan. PT. Tolan Tiga Indonesia" signed on 1 December 2020. The targeted partnership plantation of 370 Ha. The documented agreement acknowledged by Air Merah Village Head and Camat Kampung Rakyat.</p> <p>b) Partnership Agreement with Perlabian Village as in "Perjanjian Kerjasama Kemitraan antara Koperasi Produsen Petani Perlabian Sejahtera (KPPPS), Desa Perlabian dengan PT. Tolan Tiga Indonesia" signed on 1 December 2020. The targeted partnership plantation of 850 Ha.</p> <p>c) Partnership Agreement with Tanjung Selamat Village as in "Perjanjian Kerjasama Kemitraan antara Koperasi Produsen Petani Tanjung Selamat Sejahtera (KPPTS), Desa Tanjung Selamat dengan PT. Tolan Tiga Indonesia" signed on 1 December 2020. Target plantation partner of 530 Ha.</p> <p>Based on interview with Plantation Service in Labuhanbatu Selatan Regency and village community from Air Merah village, audit team gather information PT. Tolan Tiga Indonesia intensively communicating the program to facilitate development of community oil palm plantation as partnership smallholder.</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	(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior	Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from	Complied

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	<p>and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p>	<p>government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under</p> <ol style="list-style-type: none"> 1. "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968 for concession of 3,000 Ha and 7,031.27 Ha. 2. The landuse decree from Head of Land Use Inspection in Sumatera Utara Province, dated 18 April 1970; 3. 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; <p>The current legal ownership of the land documents of PT. Tolan Tiga Indonesia was extension of HGU "Izin Perpanjangan Hak Guna Usaha (HGU)" issued by "Menteri Negara Agraria/Kepala BPN" through letter:</p> <ol style="list-style-type: none"> 1. Decree letter from Minister of Land "Surat Keputusan Menteri Negara Agraria/Kepala Badan Pertanahan No.SK 80/HGU/BPN/97, tanggal 16 Juli 1997, dengan luas 6,042.44 Ha, yang berlokasi di Desa Kebun Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu, Provinsi Sumatera Utara". The HGU for PT. Tolan Tiga Indonesia for 6,0244.44 Ha located in Kebun Perlabian Village, Kampung Rakyat District, Kabuhanbatu Regency, Sumatera Utara Province, valid up to 31 December 2023. This decree was extension upon "Izin HGU No. 1 /Kebun Perlabian" expired on 31 December 1998. Based on the decree letter, subsequently issued with HGU certificate by "Kantor Pertanahan Kabupaten Labuhanbatu" in "Sertifikat HGU No.02 tertanggal 17 September 1997 dengan luas 6,042.44 Ha sesuai dengan Surat Ukur No. 2868/1997 tertanggal 17 September 1997" – HGU certificate No.2 for concession of 6,042.44 Ha as per survey letter No.2868/1997 dated 17 September 1997. 2. Decree letter from Minister of Land "Surat Keputusan Menteri Negara Agraria/Kepala Badan Pertanahan No.SK 86/HGU/BPN/97, tanggal 23 	
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		<p>Juli 1997, dengan luas 2,436.62 Ha, yang berlokasi di Desa Tolan Pekan, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu, Provinsi Sumatera Utara". The HGU for PT. Tolan Tiga Indonesia for 2,436.62 Ha located in Kebun Perlabian Village, Kampung Rakyat District, Kabuhanbatu Regency, Sumatera Utara Province, valid up to 30 June 2024. This decree was extension upon "Izin HGU No.1 /Tolan Pekan" expired 30 June 1998. Based on the decree letter, subsequently issued with HGU certificate by "Kantor Pertanahan Kabupaten Labuhanbatu" in "Sertifikat HGU No.02 tertanggal 17 September 1997 dengan luas 2,436.62 Ha sesuai dengan Surat Ukur No. 2869/1997 tertanggal 17 September 1997". HGU certificate No.2 for concession of 2,436.62 Ha as per survey letter No.2868/1997 dated 17 September 1997.</p> <p>The total HGU for PT. Tolan Tiga Indonesia of 8,479.06 Ha, whereby divided into 2 estates i.e. Perlabian Estate and Tolan Estate. Based on social impact assessment and environmental impact assessment shows no indication of presence of indigenous people or indigenous land inside HGU area of PT. Tolan Tiga Indonesia.</p>	
<p>4.4.2</p>	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p>	<p>Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT. Tolan Tiga Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September</p>	<p>Complied</p>

		<p>2020. Based on document evaluation, the procedure explains flow process to land clearing started from planning, inventory land, land measurement involving village government and witnessed by neighboring entity, prepare the compensation administration (agreement for land compensation, landowner data, legal ownership of the land, statement letter the land free of conflict, etc.), review from Regional Management Office, approval from Head Office Medan, record of implementation land compensation.</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>Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT. Tolan Tiga Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.</p> <p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> • Company has established procedure to be use as guideline to land compensation and complaint/land claim. • Based on document verification, public consultation and field visit shows within PT. Tolan Tiga Indonesia, there was no new land clearing since November 2005. 	

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		<p>PT. Tolan Tiga Indonesia received complaint/land claim from Kelompok Tani Bersatu, Dusun Meranti. The company and the land claimant are in process for land claim resolution with facilitation and mediation. This shows certificate holder respected communities to give or withhold their consent to the operations. The document and record to demonstrate to this case reported under indicator 4.2.3.</p>	
	<p>4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities. Including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p>	<p>Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT. Tolan Tiga Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.</p> <p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> • Company has established procedure to be use as guideline to land compensation and complaint/land claim. • Based on document verification, public consultation and field visit shows within PT. Tolan Tiga Indonesia, there was no new land clearing since November 2005. <p>PT. Tolan Tiga Indonesia has conducted social impact assessment and environmental impact assessment – reported under 4.3.1 and 4.4.1. Based on document review upon both documents and stakeholder consultation – audit team gather information the HGU area of PT. Tolan</p>	

		<p>Tiga Indonesia does not have indication of presence of indigenous people or indigenous land or any other land use (rental/lease-lease back) by other party.</p>	
<p>4.4.3</p>	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p>	<p>Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT. Tolan Tiga Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.</p> <p>Based on document verification, stakeholder interview and field visit show that during audit by BSI, there is no indication of land conflict with other party including with local community. However, audit team noted there is land claim by Kelompok Tani Bersatu, Dusun Meranti in 2014-2020. PT. Tolan Tiga Indonesia documented all land claim resolution process, including third party mediation/facilitation.</p> <p>The document verification upon the land claim shows the kelompok/claimant was not informing the location of land subject to claim, so cannot identified the object. Upon the case, path chosen is</p>	<p>Complied</p>

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		through court of law (reported in chronological order under indicator 4.2.3).	
4.4.4	All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.	PT. Tolan Tiga Indonesia has conducted social impact assessment and environmental impact assessment – reported under 4.3.1 and 4.4.1. All document related to environmental impact assessment report and social impact assessment report, including its monitoring reports is publicly available document, and written in Bahasa Indonesia.	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.	Based on document verification, stakeholder interview and field visit show that during audit by BSI, there is no indication of land conflict with other party including with local community. However, audit team noted there is land claim by Kelompok Tani Bersatu, Dusun Meranti in 2014-2020. PT. Tolan Tiga Indonesia documented all land claim resolution process, including third party mediation/facilitation. Mediation and facilitation by Police, by Plantation and Husbandry Service of Labuhanbatu Regency, by House of Representative of Labuhanbatu Regency. The document verification upon the land claim shows the kelompok/claimant was not informing the location of land subject to claim, so cannot identified the object. Upon the case, path chosen is through court of law (reported in chronological order under indicator 4.2.3).	Complied
4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.	Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was “Hak Barat (Hak erfpahct)” conversion to SIPEF Group – as documented under “Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)” dated 29 April 1968. Based on document verification, stakeholder interview and field visit show that during audit by BSI, there is no indication of land conflict with other party including with local community. However, audit team noted	Complied

		there is land claim by Kelompok Tani Bersatu, Dusun Meranti in 2014-2020. PT. Tolan Tiga Indonesia documented all land claim resolution process, including third party mediation/facilitation.	
<p>Criteria 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p>	<p>Based on legal document review and stakeholder consultation, audit team gather information the area of PT. Tolan Tiga Indonesia was developed since Dutch Colonial Era, and no new land clearing for oil palm plantation since November 2005.</p> <p>Based on document verification upon Environmental Impact Evaluation year 2006 "Kajian Dampak Lingkungan (Revisi Dokumen RKL-RPL tahun 2006)" shows no identified land use by indigenous people or other land use inside HGU area of PT. Tolan Tiga Indonesia.</p> <p>In year 2009, PT. Tolan Tiga Indonesia carried out HCV Identification Assessment and in year 2010, company carried out Social Impact Assessment; based on verification of both documents shows no identified land use by indigenous people or other land use inside HGU area of PT. Tolan Tiga Indonesia.</p> <p>Based on stakeholder consultation with Plantation Services and Environmental Services – Dinas Perkebunan and Dinas Lingkungan Hidup Labuhanbatu Selatan Regency; interview with surrounding communities, audit team gather information that no identified land use by indigenous people or other land use inside HGU area of PT. Tolan Tiga Indonesia.</p>	Complied
4.5.2	<p>(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</p>	<p>Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-</i></p>	Complied

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	<p>resourced access to independent third-party advice through a documented, long-term and two-way process of consultation and negotiation.</p>	<p><i>SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT. Tolan Tiga Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.</p> <p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> • Company has established procedure to be use as guideline to land compensation and complaint/land claim. • Based on document verification, public consultation and field visit shows within PT. Tolan Tiga Indonesia, there was no new land clearing since November 2005. 	
<p>4.5.3</p>	<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>Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to <i>SIPEF</i> Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT. Tolan Tiga Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.</p> <p>As explained under indicator 4.4.1 shows:</p>	<p>Complied</p>

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		<ul style="list-style-type: none"> • Company has established procedure to be use as guideline to land compensation and complaint/land claim. • Based on document verification, public consultation and field visit shows within PT. Tolan Tiga Indonesia, there was no new land clearing since November 2005. 	
4.5.4	To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of land allocations process.	<p>Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT. Tolan Tiga Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.</p> <p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> • Company has established procedure to be use as guideline to land compensation and complaint/land claim. • Based on document verification, public consultation and field visit shows within PT. Tolan Tiga Indonesia, there was no new land clearing since November 2005. 	Complied
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.	Complied

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		<p>Based on document verification and statement from government officials, audit team gather information PT. Tolan Tiga Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.</p> <p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> • Company has established procedure to be use as guideline to land compensation and complaint/land claim. • Based on document verification, public consultation and field visit shows within PT. Tolan Tiga Indonesia, there was no new land clearing since November 2005. <p>Based on document verification upon Environmental Impact Evaluation year 2006 "Kajian Dampak Lingkungan (Revisi Dokumen RKL-RPL tahun 2006)" shows no identified land use by indigenous people or other land use inside HGU area of PT. Tolan Tiga Indonesia.</p> <p>In year 2009, PT. Tolan Tiga Indonesia carried out HCV Identification Assessment and in year 2010, company carried out Social Impact Assessment; based on verification of both documents shows no identified land use by indigenous people or other land use inside HGU area of PT. Tolan Tiga Indonesia. The HCV assessment process and social impact assessment has involved multi-stakeholder through guided interview process, questionnaire filling and focus group discussion (FGD).</p> <p>Based on stakeholder consultation with Plantation Services and Environmental Services – Dinas Perkebunan and Dinas Lingkungan</p>	
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		<p>Hidup Labuhanbatu Selatan Regency; interview with surrounding communities, audit team gather information that no identified land use by indigenous people or other land use inside HGU area of PT. Tolan Tiga Indonesia.</p>	
<p>4.5.6</p>	<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>Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT. Tolan Tiga Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.</p> <p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> • Company has established procedure to be use as guideline to land compensation and complaint/land claim. • Based on document verification, public consultation and field visit shows within PT. Tolan Tiga Indonesia, there was no new land clearing since November 2005. <p>Based on document verification upon Environmental Impact Evaluation year 2006 "Kajian Dampak Lingkungan (Revisi Dokumen RKL-RPL tahun 2006)" shows no identified land use by indigenous people or other land use inside HGU area of PT. Tolan Tiga Indonesia.</p>	<p>Complied</p>

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		<p>In year 2009, PT. Tolan Tiga Indonesia carried out HCV Identification Assessment and in year 2010, company carried out Social Impact Assessment; based on verification of both documents shows no identified land use by indigenous people or other land use inside HGU area of PT. Tolan Tiga Indonesia. The HCV assessment process and social impact assessment has involved multi-stakeholder through guided interview process, questionnaire filling and focus group discussion (FGD).</p> <p>Based on stakeholder consultation with Plantation Services and Environmental Services – Dinas Perkebunan and Dinas Lingkungan Hidup Labuhanbatu Selatan Regency; interview with surrounding communities, audit team gather information that no identified land use by indigenous people or other land use inside HGU area of PT. Tolan Tiga Indonesia.</p>	
4.5.7	<p>After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.</p>	<p>Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT. Tolan Tiga Indonesia did not conduct any new land clearing since November 2005.</p> <p>Based on document verification upon Environmental Impact Evaluation year 2006 "Kajian Dampak Lingkungan (Revisi Dokumen RKL-RPL tahun 2006)" shows no identified land use by indigenous people or other land use inside HGU area of PT. Tolan Tiga Indonesia.</p> <p>In year 2009, PT. Tolan Tiga Indonesia carried out HCV Identification Assessment and in year 2010, company carried out Social Impact Assessment; based on verification of both documents shows no</p>	Complied

		<p>identified land use by indigenous people or other land use inside HGU area of PT. Tolan Tiga Indonesia. The HCV assessment process and social impact assessment has involved multi-stakeholder through guided interview process, questionnaire filling and focus group discussion (FGD).</p> <p>Based on stakeholder consultation with Plantation Services and Environmental Services – Dinas Perkebunan and Dinas Lingkungan Hidup Labuhanbatu Selatan Regency; interview with surrounding communities, audit team gather information that no identified land use by indigenous people or other land use inside HGU area of PT. Tolan Tiga Indonesia.</p>	
4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p>	<p>Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT. Tolan Tiga Indonesia did not conduct any new land clearing since November 2005.</p> <p>Based on document verification upon Environmental Impact Evaluation year 2006 "Kajian Dampak Lingkungan (Revisi Dokumen RKL-RPL tahun 2006)" shows no identified land use by indigenous people or other land use inside HGU area of PT. Tolan Tiga Indonesia.</p> <p>In year 2009, PT. Tolan Tiga Indonesia carried out HCV Identification Assessment and in year 2010, company carried out Social Impact Assessment; based on verification of both documents shows no identified land use by indigenous people or other land use inside HGU area of PT. Tolan Tiga Indonesia. The HCV assessment process and</p>	Complied

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		<p>social impact assessment has involved multi-stakeholder through guided interview process, questionnaire filling and focus group discussion (FGD).</p> <p>Based on stakeholder consultation with Plantation Services and Environmental Services – Dinas Perkebunan and Dinas Lingkungan Hidup Labuhanbatu Selatan Regency; interview with surrounding communities, audit team gather information that no identified land use by indigenous people or other land use inside HGU area of PT. Tolan Tiga Indonesia.</p>	
<p>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.</p>			
<p>4.6.1</p>	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p>	<p>Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT. Tolan Tiga Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.</p> <p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> • Company has established procedure to be use as guideline to land compensation and complaint/land claim. 	<p>Complied</p>

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		<ul style="list-style-type: none"> Based on document verification, public consultation and field visit shows within PT. Tolan Tiga Indonesia, there was no new land clearing since November 2005. <p>Based on document evaluation, the procedure explains flow process to land clearing started from planning, inventory land, land measurement involving village government and witnessed by neighbouring entity, prepare the compensation administration (agreement for land compensation, landowner data, legal ownership of the land, statement letter the land free of conflict, etc.), review from Regional Management Office, approval from Head Office Medan, record of implementation land compensation.</p>	
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p>	<p>Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT. Tolan Tiga Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.</p> <p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> Company has established procedure to be use as guideline to land compensation and complaint/land claim. 	Complied

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		<ul style="list-style-type: none"> Based on document verification, public consultation and field visit shows within PT. Tolan Tiga Indonesia, there was no new land clearing since November 2005. <p>Based on document evaluation, the procedure explains flow process to land clearing started from planning, inventory land, land measurement involving village government and witnessed by neighbouring entity, prepare the compensation administration (agreement for land compensation, landowner data, legal ownership of the land, statement letter the land free of conflict, etc.), review from Regional Management Office, approval from Head Office Medan, record of implementation land compensation.</p>	
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement).	<p>Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgia)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials show PT. Tolan Tiga Indonesia did not made any new land clearing since November 2005.</p> <p>Based on document verification and interview with village heads and cooperative chairman, PT. Tolan Tiga Indonesia engaged surrounding community to facilitate partnership oil palm plantation for smallholder.</p> <p>d) Partnership Agreement with Air Merah Village "Perjanjian Kerjasama Kemitraan antara Koperasi Produsen Air Merah Masyarakat Sejahtera (Desa Air Merah) dengan. PT. Tolan Tiga Indonesia" signed on 1 December 2020. The targeted partnership plantation of 370 Ha. The documented agreement acknowledged by Air Merah Village Head and Camat Kampung Rakyat.</p>	Complied

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		<p>e) Partnership Agreement with Perlabian Village as in "Perjanjian Kerjasama Kemitraan antara Koperasi Produsen Petani Perlabian Sejahtera (KPPPS), Desa Perlabian dengan PT. Tolan Tiga Indonesia" signed on 1 December 2020. The targeted partnership plantation of 850 Ha.</p> <p>f) Partnership Agreement with Tanjung Selamat Village as in "Perjanjian Kerjasama Kemitraan antara Koperasi Produsen Petani Tanjung Selamat Sejahtera (KPPTS), Desa Tanjung Selamat dengan PT. Tolan Tiga Indonesia" signed on 1 December 2020. Target plantation partner of 530 Ha.</p> <p>Based on interview with Plantation Service in Labuhanbatu Selatan Regency, audit team gather information PT. Tolan Tiga Indonesia intensively communicating the program to facilitate development of community oil palm plantation as partnership smallholder.</p>	
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them.	PT. Tolan Tiga Indonesia demonstrated that any negotiated agreements, compensation, and payments are documented with participation of affected parties and made available for review. These evident elaborated as per indicator 4.2.3.	Complied
Criteria 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place.	<p>Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT. Tolan Tiga Indonesia did not conduct any new land clearing since November 2005. However, company</p>	Complied

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		<p>established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.</p> <p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> • Company has established procedure to be use as guideline to land compensation and complaint/land claim. • Based on document verification, public consultation and field visit shows within PT. Tolan Tiga Indonesia, there was no new land clearing since November 2005. <p>Based on document evaluation, the procedure explains flow process to land clearing started from planning, inventory land, land measurement involving village government and witnessed by neighbouring entity, prepare the compensation administration (agreement for land compensation, landowner data, legal ownership of the land, statement letter the land free of conflict, etc.), review from Regional Management Office, approval from Head Office Medan, record of implementation land compensation.</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>Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT. Tolan Tiga Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land</p>	Complied

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		<p>and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.</p> <p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> • Company has established procedure to be use as guideline to land compensation and complaint/land claim. • Based on document verification, public consultation and field visit shows within PT. Tolan Tiga Indonesia, there was no new land clearing since November 2005. <p>Based on document evaluation, the procedure explains flow process to land clearing started from planning, inventory land, land measurement involving village government and witnessed by neighbouring entity, prepare the compensation administration (agreement for land compensation, landowner data, legal ownership of the land, statement letter the land free of conflict, etc.), review from Regional Management Office, approval from Head Office Medan, record of implementation land compensation.</p>	
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.</p>	<p>Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT. Tolan Tiga Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September</p>	Complied

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		<p>2020. As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> • Company has established procedure to be use as guideline to land compensation and complaint/land claim. • Based on document verification, public consultation and field visit shows within PT. Tolan Tiga Indonesia, there was no new land clearing since November 2005. <p>Based on document evaluation, the procedure explains flow process to land clearing started from planning, inventory land, land measurement involving village government and witnessed by neighbouring entity, prepare the compensation administration (agreement for land compensation, landowner data, legal ownership of the land, statement letter the land free of conflict, etc.), review from Regional Management Office, approval from Head Office Medan, record of implementation land compensation.</p>	
<p>Criteria 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.</p>			
<p>4.8.1</p>	<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>Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968. Proof of legal acquisition of title reported under indicator 4.4.1.</p> <p>Based on document verification and statement from government officials, audit team gather information PT. Tolan Tiga Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-</p>	<p>Complied</p>

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		<p>01-01/23-09-2020/Rev.2" signed by management on 28 September 2020 and mechanism to convey grievance/complaint under "Grievance Procedure No. IAD-01-08/22-01-2020/Rev.0" signed by President Director 30 January 2020.</p> <p>Audit team noted land claim from Kelompok Tani Bersatu over area inside HGU of PT. Tolan Tiga Indonesia. The company follows the conflict/claim/complaint resolution process as reported under indicator 4.2.3.</p>	
4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p>	<p>Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF (Belgium)</i>" dated 29 April 1968.</p> <p>Proof of legal acquisition of title reported under indicator 4.4.1.</p> <p>Based on document verification and statement from government officials, audit team gather information PT. Tolan Tiga Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020 and mechanism to convey grievance/complaint under "Grievance Procedure No. IAD-01-08/22-01-2020/Rev.0" signed by President Director 30 January 2020.</p> <p>Audit team noted land claim from Kelompok Tani Bersatu over area inside HGU of PT. Tolan Tiga Indonesia. The company follows the conflict/claim/complaint resolution process with help from third party facilitator and mediation as reported under indicator 4.2.3.</p>	Complied

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<p>4.8.3</p>	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).</p>	<p>Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968. Proof of legal acquisition of title reported under indicator 4.4.1.</p> <p>Based on document verification and statement from government officials, audit team gather information PT. Tolan Tiga Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020 and mechanism to convey grievance/complaint under "Grievance Procedure No. IAD-01-08/22-01-2020/Rev.0" signed by President Director 30 January 2020.</p> <p>Audit team noted land claim from Kelompok Tani Bersatu over area inside HGU of PT. Tolan Tiga Indonesia. The company follows the conflict/claim/complaint resolution process with help from third party facilitator and mediation as reported under indicator 4.2.3.</p>	<p>Complied</p>
<p>4.8.4</p>	<p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p>	<p>Audit team noted land claim from Kelompok Tani Bersatu over area inside HGU of PT. Tolan Tiga Indonesia. The company follows the conflict/claim/complaint resolution process with help from third party facilitator and mediation as reported under indicator 4.2.3.</p> <p>Based on document verification and stakeholder consultation upon land claim case from Kelompok Tani Bersatu, Dusun Meranti - audit team gather information the claimant did not indicate or informed the land parcel location claimed, therefore dispute object cannot be identified.</p>	<p>Complied</p>

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		For handling this case, mediation and facilitation by Police, by Plantation Service of Labuhanbatu Regency, by House of Representative Labuhanbaru Regency as well as legal/court of law.	
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.	Based on document verification, field visit and interview with weighbridge operator in Perlabian POM, shows in the past 12 months, Perlabian POM only received and processed FFB from company-owned estate. Perlabian POM did not received and process FFB from other party including scheme smallholder or independent smallholders.	Not Applicable
5.1.2	(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	Based on document verification, field visit and interview with weighbridge operator in Perlabian POM, shows in the past 12 months, Perlabian POM only received and processed FFB from company-owned estate. Perlabian POM did not received and process FFB from other party including scheme smallholder or independent smallholders.	Not Applicable
5.1.3	(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Based on document verification, field visit and interview with weighbridge operator in Perlabian POM, shows in the past 12 months, Perlabian POM only received and processed FFB from company-owned estate. Perlabian POM did not received and process FFB from other party including scheme smallholder or independent smallholders.	Not Applicable
5.1.4	(C) Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and repayments through FFB price reductions for replanting and/or, other support mechanisms where applicable.	Based on document verification and interview with village heads and cooperative chairman, PT. Tolan Tiga Indonesia engaged surrounding community to facilitate partnership oil palm plantation for smallholder. a) Partnership Agreement with Air Merah Village "Perjanjian Kerjasama Kemitraan antara Koperasi Produsen Air Merah Masyarakat Sejahtera (Desa Air Merah) dengan. PT. Tolan Tiga Indonesia" signed on 1 December 2020. The targeted partnership plantation of 370 Ha. The documented agreement acknowledged by Air Merah Village Head and Camat Kampung Rakyat.	Complied

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		<p>b) Partnership Agreement with Perlabian Village as in "Perjanjian Kerjasama Kemitraan antara Koperasi Produsen Petani Perlabian Sejahtera (KPPPS), Desa Perlabian dengan PT. Tolan Tiga Indonesia" signed on 1 December 2020. The targeted partnership plantation of 850 Ha.</p> <p>c) Partnership Agreement with Tanjung Selamat Village as in "Perjanjian Kerjasama Kemitraan antara Koperasi Produsen Petani Tanjung Selamat Sejahtera (KPPTS), Desa Tanjung Selamat dengan PT. Tolan Tiga Indonesia" signed on 1 December 2020. Target plantation partner of 530 Ha.</p> <p>Based on interview with Plantation Service in Labuhanbatu Selatan Regency, audit team gather information PT. Tolan Tiga Indonesia intensively communicating the program to facilitate development of community oil palm plantation as partnership smallholder.</p>	
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	<p>PT. Tolan Tiga Indonesia made all contract are legal, transparent and indicated agreed timeframe. In Perlabian POM, contract: "Surat Perjanjian Kerja No.02/PLM-HO/ENG/2021 antara PT. Tolan Tiga Indonesia dengan PT. Persada Dinamika Jaya untuk pekerjaan Replacement Cake Breaker Conveyor No.1 (ribbon, liner c/w bearing) Perlabian POM" signed on 2 February 2021. Section 5 stipulates agreed timeframe 180 calendar days; Section 10 stated the contract are legally binding.</p> <p>In 2020, Tolan Estate use the service from CV Tua Gabe for FFB transport. Contract: "Surat Perjanjian Kerja No.01/RMO-TLE/TG/I/2020 antara PT. Tolan Tiga Indonesia dengan CV Tua Gabe tentang Angkut FFB" signed on 2 January 2020. Section 4 stipulates agreed timeframe from 2 January 2020 to 31 December 2020. Section 8 stated the contract are legally binding.</p>	Complied

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5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.	<p>PT. Tolan Tiga Indonesia does not received FFB from supplier. However, the company performs payment for other local business in timely manner.</p> <p>In Perlabian POM, the contract between PT. Tolan Tiga Indonesia and PT. Triroyal Timurraya base on "Surat Perjanjian No.07/PLM-HO/ENG/2020 PT. Tolan Tiga Indonesia dan PT Triroyal Timurraya untuk pekerjaan Penggantian Kisi-kisi dan Ring Threser Drum Perlabian POM" signed on 9 March 2020. Section 6 stipulates the 95% payment from contract value paid upon completion of work; retention of 5% from contract value paid upon maintenance time. Section 7 stipulates maintenance time consist of 90 days from first minutes of completion of work. Payment for 95% of 73,530,000 done in 24 June 2020. Payment for 5% retention of Rp. 3,870,000 done in 6 July 2020.</p> <p>Perlabian Estate: Contract: "Surat Perjanjian Kerja No.02/RMO-PLE/TG/I/2021 antara PT. Tolan Tiga Indonesia dengan CV Tua Gabe tentang Angkut Fibre" signed on 3 January 2021. Payment of Rp. 70,869,600 done in 12 December 2020.</p>	Complied
5.1.7	Weighing equipment is verified by an independent third party on a regular basis.	PT. Tolan Tiga Indonesia demonstrates "Surat Keterangan Hasil Pengujian UPTD Metrologi Legal Dinas Perdagangan dan Perindustrian Kabupaten Labuhanbatu No.510.3/139/DagInd-Met/KHP/10/2020" for weighbridge brand: Avery Weigh Tronix; Serial Number 111350583; Capacity 40,000 kg; verified on 20 October 2020. Due for next verification on 20 October 2021.	Complied
5.1.8	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>PT. Tolan Tiga Indonesia prepared smallholder partnership program, as documented in "Program Kerja Smallholder Perlabian Estate & Tolan Estate 2020 -2021".</p> <p>- Smallholder partnership preparation: Selection of partner smallholder; collection document showing legal ownership of land; measurement</p>	Complied

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		<p>the oil palm block belongs to smallholder – ongoing since January 2020.</p> <ul style="list-style-type: none"> - Development of cooperative and smallholder member: cooperative committee meeting once per month January – December 2021; training related management and administration February 2021; cooperative member meeting; Training related to harvest March 2021; Training related to fertilizer application June 2021; Training related to pest and disease and use of pesticide June 2021; Training on health and safety September 2021; Training on HCV and RSPO P&C September 2021; Field visit to smallholder plot every two months in 2021. - Preparation for RSPO certification in smallholder cooperative: socialization of certification planning to committee and cooperative member March 2021; ICS structure in cooperative March 2021; document preparation in cooperative April 2021; policy – SOP – smallholder member commitment establishment April 2021; preparation smallholder member oil palm block (condition and ID) July 2021; HCV assessment August 2021; Construction of hazardous waste storage October 2021; Construction of tools and material storage November 2021; Pre audit Internal RSPO December 2021. 	
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>PT. Tolan Tiga Indonesia established SOP Grievance Procedure No.IAD-01-08/22-01-2020/Rev.0 dated 30 January 2020. The grievance mechanism applicable for internal and external parties.</p> <p>Company has “Prosedur Membuat Keluhan” equipped with flowchart: stakeholder made grievance (through email or directly) -> Estate Manager respond to grievance and sign agreement -> GM Human Resource form mediation forum -> GM Human Resource discuss to seek solution (within 30 days) and then sign agreement -> Mediation/tripartite forum giving recommendation to both parties and sign agreement. This procedure has been disseminated to Kampung</p>	Complied

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		<p>Sripinang on 11 February 2021, attended by village head and community representatives 21 attendants.</p> <p>Tolan Estate manages "Buku Keluh Kesah Internal Eksternal". In year 2020 consisted of 52 requests from workers. No external complaint recorded yet. Majority related to housing renovation. Sample: On 8 June 2020, Yani Suryani – manuring team, request for housing No.0635 repair, septic tank full/clogged. Responded by Field Head Assistant on same date, ordering carpenter/civil engineering to repair". Septic tank repair completed.</p> <p>Perlabian Estate manages "Buku Keluh Kesah Internal". In year 2020 no grievance noted. No external complaint recorded yet. Perlabian Estate manages "Buku Keluh Kesah Eksternal". In year 2020 no grievance noted. No external complaint recorded yet.</p>	
Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	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.	Based on interview with Plantation Service in Labuhanbatu Selatan Regency and village community from Air Merah village, audit team gather information PT. Tolan Tiga Indonesia intensively communicating the program to facilitate development of community oil palm plantation as partnership smallholder.	Complied
5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	<p>PT. Tolan Tiga Indonesia prepared smallholder partnership program, as documented in "Program Kerja Smallholder Perlabian Estate & Tolan Estate 2020 -2021".</p> <ul style="list-style-type: none"> - Smallholder partnership preparation: Selection of partner smallholder; collection document showing legal ownership of land; measurement the oil palm block belongs to smallholder – ongoing since January 2020. - Establishment of cooperative: meeting for cooperative establishment – documentation/administrative requirement for cooperative 	Complied

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		<p>establishment – notary deed for cooperative establishment – cooperative permit setting – ongoing since July-August 2020.</p> <ul style="list-style-type: none"> - Partnership Memorandum of Understanding/MoU signing between cooperative and company: socialization of smallholder partnership MoU; MoU signing between cooperative and company witnessed by village head, regent, and plantation service; handover document to company – done in December 2020. - Preparation of partnership FFB sales to third party POM: Survey FFB price from POM around company; Cost survey for purchase and sales operation to third party company; Estimate crop of partner cooperative; cooperative location survey and FFB quality; Determination and contract to third party POM – ongoing since December 2020; - Preparation for FFB receiving from member of smallholder partnership: cooperative partnership account setting; partner cooperative opens bank account for its smallholder member; socialization FFB receiving and payment for smallholder member; receiving FFB from partner cooperative – planned for January - February 2021. - Development of cooperative and smallholder member: cooperative committee meeting once per month January – December 2021; training related management and administration February 2021; cooperative member meeting; Training related to harvest March 2021; Training related to fertilizer application June 2021; Training related to pest and disease and use of pesticide June 2021; Training on health and safety September 2021; Training on HCV and RSPO P&C September 2021; Field visit to smallholder plot every two months in 2021. - Tools provision to smallholder member: PPE provision, spraying tools August 2021; Smallholder plot road maintenance April 2021. - Preparation for RSPO certification in smallholder cooperative: socialization of certification planning to committee and cooperative member March 2021; ICS structure in cooperative March 2021; 	
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		<p>document preparation in cooperative April 2021; policy – SOP – smallholder member commitment establishment April 2021; preparation smallholder member oil palm block (condition and ID) July 2021; HCV assessment August 2021; Construction of hazardous waste storage October 2021; Construction of tools and material storage November 2021; Pre audit Internal RSPO December 2021.</p>	
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p>	<p>PT. Tolan Tiga Indonesia prepared support program to smallholders to promote legality of FFB production in form "Penjaringan, Pengumpulan Data dan Pengukuran Smallholder PT. Tolan Tiga Indonesia Tahun 2020-2021", the company assist Koperasi Produsen Petani Perlabian Sejahtera, Perlabian village, as of December 2020 registered member 236, registered land letter 666, and registered hectarage 863.67 Ha – measure area of 480.81 Ha. Assisted Koperasi Produsen Airmerah Masyarakat Sejahtera, Air Merah village, as of December 2020 registered member 73, registered land letter 189, and registered hectarage 371.04 Ha – measure area of 358.12 Ha. Assisted Koperasi Produsen Petani Tanjung Selamat, Tanjung Selamat village, as of December 2020 registered member 53, registered land letter 160, and registered hectarage 557.43 Ha – measure area of 550.79 Ha. In year 2021, the verification of land legality against measurement resulted: Koperasi Produsen Petani Perlabian Sejahtera, Perlabian village, as of March 2021 progress registered member 236, registered land letter 641, and registered hectarage 832.98 Ha – measured area of 815.98 Ha. Assisted Koperasi Produsen Airmerah Masyarakat Sejahtera, Air Merah village, as of March 2021 registered member 70, registered land letter 192, and registered hectarage 377.59 Ha – measure area of 412.14 Ha. Assisted Koperasi Produsen Petani Tanjung Selamat, Tanjung Selamat village, as of March 2021 registered member 53, registered land letter 143, and registered hectarage 553.09 Ha – measured area of 553.09 Ha. A number of cooperative member was excluded; reason: legal ownership of land overlapped, incorrect hectarage, single ownership document for multiple lands.</p>	Complied

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5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	<p>The supply base for PT. Tolan Tiga Indonesia – Perlabian POM does not include scheme smallholders. However, the company and its supply base prepare program to assist smallholder.</p> <p>PT. Tolan Tiga Indonesia prepared smallholder partnership program, as documented in "Program Kerja Smallholder Perlabian Estate & Tolan Estate 2020 -2021".</p> <ul style="list-style-type: none"> - Development of cooperative and smallholder member: Training related to pest and disease and use of pesticide June 2021; 	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	<p>Management Review Report (corporate level), dated 4 March 2021.</p> <ul style="list-style-type: none"> - Feedback from Interested parties: The major impact on relationships, communications, and engagement within the business and with all of our external stakeholders for 2020 was the evolving COVID-19 pandemic across the world; Statutory reporting all met in 2020; HGU renewal: impending for North Sumatera Estates; Plasma requirements: new and renewal HGU applications must be supported by a 20% plasma component. - Performance of External Supplier: Smallholder Department, External Suppliers. 	Complied
<p>Principle 6: respect workers' rights and conditions</p>			
<p>Protect workers' rights and ensure safe and decent working conditions.</p>			
<p>Criteria 6.1: Any form of discrimination is prohibited.</p>			
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, sexual orientation, gender identity, union membership, political affiliation or age.	<p>PT. Tolan Tiga Indonesia established Equal Employment Opportunity Policy No.QMM-40-01-P03/27-03-2019 signed by President Director on 27 March 2019. The policy stated PT. Tolan Tiga Indonesia is committed to a non-discriminatory workplace and will abide by the relevant anti-discrimination and equal employment legislation of the Republic of Indonesia. PT. Tolan Tiga Indonesia is not discriminating against anyone in the recruitment process of the company business operations. The company recruitment selection process is based on merit so all</p>	Complied

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		<p>applicants with the desired qualifications and experience will be considered for the open position. The successful applicant will be the person who best meets the specific requirements of the job. Promotions within the company are handled on the same basis.</p> <p>In Perlabian POM, the equal employment opportunity policy has been disseminated to 34 workers from Shift B dated 19 February 2020. Letter for promotion based on Memorandum HR Department No.194/JWB-PLPOM/IX/2020 dated 3 September 2020. Approved promotion for 9 employees; sample: Parluhutan Sitompul (workshop mandor) from grade P3 to P4, Koko Ariadi (Wheel loader driver) from grade H to P1, Fironika Julianti (weighbridge operator) from grade H to P1. The promotion status indicates all tribe, all sex eligible for promotion. Perlabian POM shows list of employees in the organization, whereby shows company hires people from different religion (Islam 76 employees, Christian 21 employees); origin (local 79 employees, outside area 18 employees); gender (4 female workers, 93 male workers); ages (between 20 years to 50 years).</p> <p>Perlabian Estate issued job vacancy for cooperative (3 persons), heavy machinery keeper (18 persons), smallholder service (2 persons) on 15 April 2020. The job vacancy stipulates requirements: male/female, > 20 years old; healthy; education high school, until 30 April 2020. The administrative requirements: application letter, CV, education certificate photocopy, Kartu Keluarga photocopy, ID card photocopy, photograph, health certificate. The job vacancy information distributed to Perkebunan Perlabian Village, through the village head (posted on information board).</p> <p>Socialization of this policy in Tolan Estate has conducted regularly. For example, sighted the record of company's policy "Persamaan Kesempatan Kerja" socialization on 10 September 2020. The</p>	
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		<p>socialization attended by 43 workers from Division I (harvesters, P&D census, waterman, baby sitter, harvesting mandors) and 34 contract workers/PKWT (loose fruit collectors, gardener); 34 workers from Division II (harvesters, spraying team, harvesting mandors); 83 workers from Division III (harvesters, harvesting mandors, tally clerk, manuring); 39 workers from Division IV (harvesters, harvesting mandors); 41 workers from Division V (harvesters, waterman, baby sitter, harvesting mandors); 48 workers from Division Transport (tractor driver, dump truck driver, quality controller, helper dump truck, carpenter, electrician, school bus driver);</p> <p>During interview with 3 harvesters, 2 sprayers and 2 fertilizer applicators in Tolan Estate, they understand the non-discrimination and equal opportunity policy as to free apply for job, follow Indonesia regulation, indifferent treatment of salary payment for worker on same grade.</p> <p>Tolan Estate issued job vacancy for harvester on 1 August 2020. The job vacancy stipulates requirements: male, max. 35 years old; healthy; be able to harvest tall palms, until 31 August 2020. The administrative requirements: application letter, CV, education certificate photocopy, Kartu Keluarga photocopy, ID card photocopy, photograph, health certificate. The job vacancy information distributed to Perkebunan Perlabian Village, through the village head (posted on information board).</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>Perlabian POM shows list of employees in the organization, whereby shows company hires people from different religion (Islam 76 employees, Christian 21 employees); origin (local 79 employees, outside area 18 employees); gender (4 female workers, 93 male workers); ages (between 20 years to 50 years).</p> <p>Perlabian POM carried out recruitment through Memorandum Mill Manager "Rekrutmen Karyawan Baru No.004/PLM/ENG/08-20" dated 11 August 2020. The recruitment for 2 position: boiler operator, godown helper. Application and recruitment document sighted: application letter,</p>	Complied

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		education certificate, copy of ID card, health certificate, etc. Based on interview with one of new recruited employees, the recruitment process was not involving recruitment fees.	
6.1.3	The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	<p>Perlabian POM carried out recruitment through Memorandum Mill Manager "Rekrutmen Karyawan Baru No.004/PLM/ENG/08-20" dated 11 August 2020. The recruitment for 2 position: boiler operator, godown helper. Application and recruitment document sighted: application letter, education certificate, copy of ID card, health certificate, etc. Based on interview with one of new recruited employees, the recruitment process was not involving recruitment fees.</p> <p>Letter for promotion based on Memorandum HR Department No.194/JWB-PLPOM/IX/2020 dated 3 September 2020. Approved promotion for 9 employees; sample: Parluhutan Sitompul (workshop mandor) from grade P3 to P4, Koko Ariadi (Wheel loader driver) from grade H to P1, Fironika Julianti (weighbridge operator) from grade H to P1. The promotion status indicates all tribe, all sex eligible for promotion.</p> <p>PT. Tolan Tiga Indonesia paid pension for employee under name M. Syaruddin and HB Siahaan, dated 11 September 2020.</p>	Complied
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	Based on interview with recruited female worker in Tolan Estate, the selection and recruitment does not involve pregnancy testing.	Complied
6.1.5	(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	PT. Tolan Tiga Indonesia established SOP Gender Committee No.HRD-04-12/24-10-2019, signed on 19 March 2020. The SOP stated Gender Committee task is to give recommendation to BOD on decision making related to gender issue in the company; reviewing and evaluating management of gender issues in company; conduct meeting at least once per year; provides training on understanding of rights of female workers.	Complied

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		Tolan Estate has established gender committee Contact Group, dated 5 February 2021. Chairman Rudy M Malau; Secretary: Wahyu U Putra; Member: Muammar Irwan, D S Siahaan, Heny Rubeka.	
6.1.6	There is evidence of equal pay for the same work scope.	<p>In Perlabian POM evident in salary payment of Subandi (shift mandor/male) for period 1 December 2020 – 31 December 2020 received salary of Rp. 3,305,500. In comparison, Fironika (weighbridge operator/P1/female worker) for period 1 December 2020 – 31 December 2020 received salary of Rp. 3,305,500.</p> <p>In comparison, Rusmiati (weighbridge operator/P1/female worker) for period 1 December 2020 – 31 December 2020 received salary of Rp. 3,305,500.</p> <p>In Perlabian Estate, evident in payslip of Nuriati (sprayer/female) for period 1-31 January 2021 received salary of Rp. 3,161,500. In comparison, Fredinta (sprayer/male worker) for period 1 – 31 January 2021 received salary of Rp. 3,161,500.</p>	Complied
<p>Criteria 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	(C) Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.	<p>PT. Tolan Tiga Indonesia have documented the pay and working condition in accordance to labour law (Undang-undang No.13 tahun 2003 tentang Ketenagakerjaan), as established under “Perjanjian Kerja Bersama (PKB) PT. Tolan Tiga Indonesia dengan Pengurus Serikat Pekerja Tolan Tiga Mandiri (SPTTM) periode 2018-2020”. The document has been legalized through “Keputusan Kepala Dinas Ketenagakerjaan Kabupaten Labuhanbatu Selatan No.560/329/Naker/XII/2018 tentang Pengesahan Perjanjian Kerja Bersama (PKB) PT. Tolan Tiga Indonesia dengan Pengurus Serikat Pekerja Tolan Tiga Mandiri” dated 3 December 2018. This document available in Bahasa Indonesia.</p> <ul style="list-style-type: none"> - Regular working hours of 7 hours per day regulated under Chapter IV; - Salary regulated under Chapter V; - Deductions regulated under Chapter IV; 	Complied

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		<ul style="list-style-type: none"> - Overtime regulated under Chapter X, referring to “Keputusan Menteri Tenaga Kerja dan Transmigrasi RI No.102/MEN/VI/2004 tentang Waktu Kerja dan Upah Kerja Lembur”; - Sick leave regulated under Chapter VII; - Annual leave entitlement regulated under Chapter VII; - Maternity leave regulated under Chapter VII; - Reasons for dismissal regulated under Chapter XXI; - Period of notice regulated under Chapter XXI; - Pension regulated under Chapter XVI; - Resolution upon industrial dispute on Chapter XXIII; <p>Collective Bargaining Agreement/Perjanjian Kerja Bersama (PKB) period 2018-2020 was expired on November 2020. Worker union and management agreed to extending the use of said agreement until 2 November 2021. This consensus to extending the use of 2018-2020 agreement was explained under “Notulen Rapat Perpanjangan Perjanjian Kerja Bersama (PKB) PT. Tolan Tiga Indonesia” dated 13 August 2020. The minutes then reported through PT. Tolan Tiga Indonesia letter No.30/PLE/2020; to Manpower Service Labuhanbatu Selatan Regency; dated September 2020; acknowledged by authority.</p>	
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>PT. Tolan Tiga Indonesia have documented the pay and working condition in accordance to labour law (Undang-undang No.13 tahun 2003 tentang Ketenagakerjaan), as established under “Perjanjian Kerja Bersama (PKB) PT. Tolan Tiga Indonesia dengan Pengurus Serikat Pekerja Tolan Tiga Mandiri (SPTTM) periode 2018-2020”.</p> <ul style="list-style-type: none"> - Regular working hours of 7 hours per day regulated under Chapter IV; - Salary regulated under Chapter V; - Deductions regulated under Chapter IV; - Overtime regulated under Chapter X, referring to “Keputusan Menteri Tenaga Kerja dan Transmigrasi RI No.102/MEN/VI/2004 tentang Waktu Kerja dan Upah Kerja Lembur”; - Sick leave regulated under Chapter VII; 	Complied

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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>PT. Tolan Tiga Indonesia have documented the pay and working condition in accordance to labour law (Undang-undang No.13 tahun 2003 tentang Ketenagakerjaan), as established under "Perjanjian Kerja Bersama (PKB) PT. Tolan Tiga Indonesia dengan Pengurus Serikat Pekerja Tolan Tiga Mandiri (SPTTM) periode 2018-2020".</p> <ul style="list-style-type: none"> - Regular working hours of 7 hours per day regulated under Chapter IV; - Salary regulated under Chapter V; - Deductions regulated under Chapter IV; - Overtime regulated under Chapter X, referring to "Keputusan Menteri Tenaga Kerja dan Transmigrasi RI No.102/MEN/VI/2004 tentang Waktu Kerja dan Upah Kerja Lembur"; - Sick leave regulated under Chapter VII; - Annual leave entitlement regulated under Chapter VII; - Maternity leave regulated under Chapter VII; - Reasons for dismissal regulated under Chapter XXI; - Period of notice regulated under Chapter XXI; - Pension regulated under Chapter XVI; - Resolution upon industrial dispute on Chapter XXIII; 	Complied																				
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>Daftar Sarana dan Prasarana Perlabian Estate:</p> <table border="1" data-bbox="1131 1236 1977 1388"> <thead> <tr> <th>Facility</th> <th>Unit</th> <th>Facility</th> <th>Unit</th> </tr> </thead> <tbody> <tr> <td>Masjid</td> <td>4</td> <td>Volley ball court</td> <td>4</td> </tr> <tr> <td>Kindergarten</td> <td>5</td> <td>Football field</td> <td>2</td> </tr> <tr> <td>Day care</td> <td>3</td> <td>Tennis court</td> <td>1</td> </tr> <tr> <td>Employee Hall</td> <td>3</td> <td>School bus</td> <td>1</td> </tr> </tbody> </table>	Facility	Unit	Facility	Unit	Masjid	4	Volley ball court	4	Kindergarten	5	Football field	2	Day care	3	Tennis court	1	Employee Hall	3	School bus	1	Complied
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6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	<p>Field visit to housing area of Perlavian Estate and Tolan Estate and interview with the housewives in the premise. Audit team found</p> <ul style="list-style-type: none"> - Company works together with employee cooperative in provision of rice, as part of in-kind benefit for worker. Koperasi Serba Usaha OMI is distributing rice for all workers. - Company allows food seller to enter the housing compound. - Nearest market selling staple food, vegetables, meat, fish located 1km from Perlavian Estate (Lohsari Village) and 2km from Tolan Estate. 	Complied																																							
6.2.6	A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours.	<p>PT. Tolan Tiga Indonesia has prepared the prevailing wage calculation. The company referred to RSPO Guidance for Implementing Decent Living Wage. Company have taken into calculation the component:</p> <ul style="list-style-type: none"> - Reference Family Size (incl. Total Fertility Rate/TFR and Child Mortality Rate/CMR – Indonesia year 2020). <i>Total Fertility Rate for Indonesia, year 2020 at 2.28 (BPS); Child Mortality Rates for Indonesia, year 2020 at 17.7/1000 births.</i> Reference Family Size at 4.23. - Full time equivalent per Family (incl. Labor Force Participation Rate/LFPR, Unemployment rate, People Working Part Time – 	Complied																																							

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		<p>Indonesia year 2020). <i>Labour Participation Force Rate for Indonesia, year 2020 at 69.32% (BPS); Unemployment Rate for Indonesia, year 2020 at 4.99% (BPS); People Working Part Time for Indonesia, year 2020 at 23.74% (BPS).</i> Full Time equivalent per family at 1.5802.</p> <ul style="list-style-type: none"> - Food cost (with 2,100 calories, footnote 19 RSPO Guidance on Implementing DLW) and noted company provided in kind benefit, rice; - Housing cost at 0 (provided by company); - Non Food Non Housing cost (electricity, clean water, medical treatment, education, school children transportation cost – provided by company) based on sampling to 10 workers in Perlabian POM, 10 workers Perlabian Estate, 10 workers in Tolan Estate. - Mandatory deduction (from tax and BPJS levy); <p>Sample of DLW calculation at Tolan Estate, as follow:</p> <ul style="list-style-type: none"> - Minimum Wage of Labuhanbatu Selatan Regency in 2020 is Rp. 3,300,000. - Gross Living Wage at Rp 2,651,324; - Prevailing wage at Rp. 3,906,764; - Living Wage Gap at Rp. 1,225,440 (positive); <p>Perlabian POM:</p> <ul style="list-style-type: none"> - Minimum Wage of Labuhanbatu Selatan Regency in 2020 is Rp. 3,300,000. - Gross Living Wage at Rp 2,542,550; - Prevailing wage at Rp. 4,531,126; - Living Wage Gap at Rp. 1,988,576 (positive); <p>Perlabian Estate:</p> <ul style="list-style-type: none"> - Minimum Wage of Labuhanbatu Selatan Regency in 2020 is Rp. 3,300,000. - Gross Living Wage at Rp 3,058,324; 	
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		- Prevailing wage at Rp. 4,917,029; - Living Wage Gap at Rp. 1,858,705 (positive);	
6.2.7	Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal	Core work in Perlabian POM such as process operators, boiler operators, tractor driver all permanent fulltime (SKU – Syarat Kecakapan Umum). Perlabian POM recruited 4 contract workers as mill gardener, cleaning gang and mechanic. Core work in Perlabian Estate such as harvesters, spraying gang, manuring gang, FFB truck driver, pest & disease census was all permanent fulltime (SKU – Syarat Kerja Umum). Bukit Maradja Estate recruited 120 PKWT workers as loose fruit picker, driver jeep, upkeep field immature, field supervision.	Complied
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	(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.	PT. Tolan Tiga Indonesia established Freedom of Association Policy No.QMM-40-01-P13/27-03-2019 signed by President Director on 27 March 2019. The policy stated 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. The policy available in Bahasa Indonesia. Implementation: The worker union in PT. Tolan Tiga Indonesia was registered to Manpower Service Labuhanbatu Selatan Regency; through “Surat Dinas Sosial Tenaga Kerja dan Transmigrasi Kabupaten Labuhanbatu Selatan tentang Tanda Bukti Pencatatan Serikat Pekerja Tolan Tiga Mandiri PT. Tolan Tiga Indonesia Nomor Bukti 560/115/DSTKT/2011” dated 14 September 2011.	Complied

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		<p>Socialization of this policy for Tolan Estate has conducted. For example, sighted the record of company's socialization on "Kebijakan Kebebasan Berserikat" socialization on 10 September 2020. The socialization attended by 43 workers from Division I (harvesters, P&D census, waterman, baby sitter, harvesting mandors) and 34 contract workers/PKWT (loose fruit collectors, gardener); 34 workers from Division II (harvesters, spraying team, harvesting mandors); 83 workers from Division III (harvesters, harvesting mandors, tally clerk, manuring); 39 workers from Division IV (harvesters, harvesting mandors); 41 workers from Division V (harvesters, waterman, baby sitter, harvesting mandors); 48 workers from Division Transport (tractor driver, dump truck driver, quality controller, helper dump truck, carpenter, electrician, school bus driver);</p> <p>During interview with 3 harvesters, 2 sprayers and 2 fertilizer applicators in Tolan Estate, they understand the implementation to join "Serikat Pekerja" (worker union).</p> <p>In Perlabian POM, the freedom of association policy has been disseminated to 36 workers from Processing Shift B dated 21 February 2020; to 27 workers from Processing Shift A dated 25 February 2020.</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>Meeting between Tolan Estate management and worker union carried out on regular basis. Latest meeting on 26 February 2021. The meeting was attended by Estate Manager, Field Head Assistant, SPTTM PUK Tolan Estate, Treasury SPTTM, SP TTM members. The meeting agenda related to harvest target in Oil Palm planting year 1994, 1996, 1997, 1998, 1999; request to raise harvesting premium and pruning rate; request to raise recovery price (no change since 2018); SPTTM request to expedite COVID-19 vaccine for staff and employees. Management response: management has put into consideration and escalate the issue harvesting target in particular oil palm planting year 1994, same goes for pruning and premium; recovery price is under review by</p>	Complied

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		<p>Regional Management Office North Sumatera; for vaccine provision, will be proposed to Regional Management Office North Sumatera.</p> <p>Meeting between Perlabian Estate management and worker union carried out on regular basis. Latest meeting on 4 June 2020. The meeting was attended by Estate Manager, Field Head Assistant, SPTTM PUK Perlabian Estate, Treasury SPTTM, SP TTM members. The meeting agenda related to COVID-19 status and update estate condition post Eid Al Fitr holiday.</p> <p>Meeting between Perlabian Estate management and worker union carried out on regular basis. Latest meeting on 27 February 2021. The meeting was attended by Estate Manager, Field Head Assistant, SPTTM PUK Perlabian Estate, Treasury SPTTM, SP TTM members. The meeting agenda related to COVID-19 status and productivity.</p> <p>Meeting between management Perlabian POM and worker union carried out. Records as in "Hasil Rapat Bipartit PT. Tolan Tiga Indonesia dan SPTTM PUK Perlabian POM" dated 20 February 2020, attended by Mill Manager, Mill Assistant, Office Head Assistant, Chairman worker union Serikat Pekerja Tolan Tiga Mandiri Unit Perlabian POM, Secretary to worker union Serikat Pekerja Tolan Tiga Mandiri Unit Perlabian POM, Treasury to worker union Serikat Pekerja Tolan Tiga Mandiri Unit Perlabian POM. The meeting agenda related to additional parking spot for motorcycle in the mill, wastewater disposal, minimizing use of water. Records as in "Notulen Rapat LKS Bipartit" dated 16 November 2020, attended by Mill Manager, Mill Assistant, Office Head Assistant, Chairman worker union Serikat Pekerja Tolan Tiga Mandiri Unit Perlabian POM, Secretary to worker union Serikat Pekerja Tolan Tiga Mandiri Unit Perlabian POM, Treasury to worker union Serikat Pekerja Tolan Tiga Mandiri Unit Perlabian POM. The meeting agenda related to formation of LKS Bipartit, sport activity such as volley and badminton after COVID-19 pandemic ends.</p>	
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6.3.3	Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.	<p>Based on interview with representative of worker union in Tolan Estate the management allows worker union formation to be independent. The worker union member in Tolan Estate participated in free election of worker union chairman in 2020.</p> <p>Based on interview with representative of worker union in Perlabian POM the management allows worker union formation to be independent. The worker union member in Perlabian POM participated in free election of worker union chairman.</p>	Complied
Criteria 6.4: Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	<p>PT. Tolan Tiga Indonesia established Child Labour Policy No.QMM-40-01-P08/27-03-2019 signed by President Director 27 March 2019. PT. Tolan Tiga Indonesia believes children should have the right to education and a healthy life and is committed to ensuring that children under the age of 18 years are not employed by the company for any work related purpose. Company fully supports the relevant Republic of Indonesia laws and other international agreements, such as ILO Child Labour Convention, 1999. PT. Tolan Tiga will not knowingly participate in any activities which could be classed as using child labour. In pursuing the objective, the company will ensure that at time of hiring, the age of all worker (permanent or not) is positively checked (if the person) has an ID card or another official document. When no documents are available to check the age, the company worker/manager in charge will use her/his best judgement and can refuse employment in case of doubt. People refused employment on this basis will be informed that they can file a grievance with the company, for a review of their situation. Contractors and other parties performing work for the company are to be informed of this policy, which will be considered as integral part of their contractual obligations toward the company. In the event of an occurrence of child labour being discovered, the relevant manager must be immediately informed, and immediate</p>	Complied

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		<p>action must be taken to correct the situation. It is the obligation of workers and managers to report child labour activities that they witness or that are reported to them. Disciplinary action is taken against company workers who willfully are in breach of this policy.</p> <p>Socialization of this policy in Tolan Estate has conducted regularly. For example, sighted the record of company's policy on "Kebijakan Pekerja Anak" socialization on 10 September 2020. The socialization attended by 43 workers from Division I (harvesters, P&D census, waterman, baby sitter, harvesting mandors) and 34 contract workers/PKWT (loose fruit collectors, gardener); 34 workers from Division II (harvesters, spraying team, harvesting mandors); 83 workers from Division III (harvesters, harvesting mandors, tally clerk, manuring); 39 workers from Division IV (harvesters, harvesting mandors); 41 workers from Division V (harvesters, waterman, baby sitter, harvesting mandors); 48 workers from Division Transport (tractor driver, dump truck driver, quality controller, helper dump truck, carpenter, electrician, school bus driver); During interview with 3 harvesters, 2 sprayers and 2 fertilizer applicators in Tolan Estate, they understand the implementation as prohibit accepting worker under 18 years old or still in school.</p> <p>Contract: "Surat Perjanjian Kerja No.02/PLM-HO/ENG/2021 antara PT. Tolan Tiga Indonesia dengan PT. Persada Dinamika Jaya untuk pekerjaan Replacement Cake Breaker Conveyor No.1 (ribbon, liner c/w bearing) Perlabian POM" signed on 2 February 2021. The contract, section 6 stipulates contractor not employ worker under 18 years old.</p> <p>Contract: "Surat Perjanjian Kerja No.01/RMO-TLE/TG/I/2020 antara PT. Tolan Tiga Indonesia dengan CV Tua Gabe tentang Angkut FFB" signed on 2 January 2020. The contract, section 5 stipulates contractor shall not employ worker under 18 years old.</p>	
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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.	PT. Tolan Tiga Indonesia demonstrated document Manpower establishment. - Perlabian Palm Oil Mill, as of 1 February 2021; total manpower 97 personnel. Youngest worker Wildan Gilang Pradana, birth date 2 February 2020, first date of work 1 September 2020 – at 20 years and 7 months. KTP/ID card checked and verified. - Perlabian Estate, as of February 2021; total manpower 557 personnel. Youngest worker Yopi Syahputra, birth date 16 October 2001, first date of work 1 February 2021 – at 19 years and 4 months. KTP/ID card checked and verified.	Complied
6.4.3	(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.	No worker under 18 years old employed by PT. Tolan Tiga Indonesia. PT. Tolan Tiga Indonesia demonstrated document Manpower establishment. - Perlabian Palm Oil Mill, as of 1 February 2021; total manpower 97 personnel. Youngest worker Wildan Gilang Pradana, birth date 2 February 2020, first date of work 1 September 2020 – at 20 years and 7 months. KTP/ID card checked and verified. - Perlabian Estate, as of February 2021; total manpower 557 personnel. Youngest worker Yopi Syahputra, birth date 16 October 2001, first date of work 1 February 2021 – at 19 years and 4 months. KTP/ID card checked and verified.	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.	The record of company’s dissemination on “Kebijakan Pekerja Anak” to Perlabian Estate worker on 17 February 2021. The socialization attended by 17 workers from Division I (harvesters, harvesting mandors, tally clerk); 16 workers from Division II (harvesters, harvesting mandors); on 15 February 2021 for 11 workers from Division III (sprayers and mandors); Socialization of this policy in Tolan Estate has conducted regularly. For example, sighted the record of company’s policy on “Kebijakan Pekerja Anak” socialization on 10 September 2020. The socialization attended by 43 workers from Division I (harvesters, P&D census, waterman, baby	Complied

		<p>sitter, harvesting mandors) and 34 contract workers/PKWT (loose fruit collectors, gardener); 34 workers from Division II (harvesters, spraying team, harvesting mandors); 83 workers from Division III (harvesters, harvesting mandors, tally clerk, manuring); 39 workers from Division IV (harvesters, harvesting mandors); 41 workers from Division V (harvesters, waterman, baby sitter, harvesting mandors); 48 workers from Division Transport (tractor driver, dump truck driver, quality controller, helper dump truck, carpenter, electrician, school bus driver); During interview with 3 harvesters, 2 sprayers and 2 fertilizer applicators in Tolan Estate, they understand the implementation as prohibit accepting worker under 18 years old or still in school.</p>	
<p>Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
<p>6.5.1</p>	<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>PT. Tolan Tiga Indonesia established Sexual Harassment Policy No.QMM-40-01-P10/27-03-2019 signed by President Director on 27 March 2019. The policy stated PT. Tolan Tiga Indonesia is committed to ensuring harmonious and productive work environment for its workers. This commitment recognises that the workplace should be free of sexual harassment. Sexual harassment is unwanted, unwelcome and offensive behaviour and will not be tolerated under any circumstances. PT. Tolan Tiga Indonesia 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 victimised for reporting sexual harassment.</p> <p>The record of company's dissemination on "Kebijakan Pelecehan Seksual" for Perlarian Estate on 17 February 2021. The socialization attended by 17 workers from Division I (harvesters, harvesting mandors, tally clerk); 16 workers from Division II (harvesters, harvesting</p>	<p>Complied</p>

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		<p>mandors); on 15 February 2021 for 11 workers from Division III (sprayers and mandors);</p> <p>Socialization of this policy for Tolan Estate has conducted regularly. For example, sighted the record of company's policy on "Kebijakan Pelecehan Seksual" socialization on 10 September 2020. The socialization attended by 43 workers from Division I (harvesters, P&D census, waterman, baby sitter, harvesting mandors) and 34 contract workers/PKWT (loose fruit collectors, gardener); 34 workers from Division II (harvesters, spraying team, harvesting mandors); 83 workers from Division III (harvesters, harvesting mandors, tally clerk, manuring); 39 workers from Division IV (harvesters, harvesting mandors); 41 workers from Division V (harvesters, waterman, baby sitter, harvesting mandors); 48 workers from Division Transport (tractor driver, dump truck driver, quality controller, helper dump truck, carpenter, electrician, school bus driver);</p> <p>During interview with 3 harvesters, 2 sprayers and 2 fertilizer applicators in Tolan Estate, they understand the implementation as identification type of sexual harassment: verbal or action; prohibit sexual harassment and household violence.</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>The record of Perlarian Estate's dissemination on "Kebijakan Pelecehan Seksual" on 17 February 2021. The socialization attended by 17 workers from Division I (harvesters, harvesting mandors, tally clerk); 16 workers from Division II (harvesters, harvesting mandors); on 15 February 2021 for 11 workers from Division III (sprayers and mandors);</p> <p>Socialization of this policy in Tolan Estate has conducted regularly. For example, sighted the record of company's policy on "Kebijakan Perlindungan Hak-Hak Reproduksi" socialization on 10 September 2020. The socialization attended by 43 workers from Division I (harvesters, P&D census, waterman, baby sitter, harvesting mandors) and 34 contract workers/PKWT (loose fruit collectors, gardener); 34 workers</p>	Complied

		<p>from Division II (harvesters, spraying team, harvesting mandors); 83 workers from Division III (harvesters, harvesting mandors, tally clerk, manuring); 39 workers from Division IV (harvesters, harvesting mandors); 41 workers from Division V (harvesters, waterman, baby sitter, harvesting mandors); 48 workers from Division Transport (tractor driver, dump truck driver, quality controller, helper dump truck, carpenter, electrician, school bus driver);</p> <p>During interview with 2 sprayers and 2 fertilizer applicators in Tolan Estate, they understand the implementation in operational as prohibit pregnant female worker to work with chemical/manual fertilizer application, worker can take menstruation leave; all sprayers are male worker; for breastfeeding worker, the mother given half to one hour break to breastfeed their baby in one day – apart from lunch break.</p> <p>Tolan Estate implement monitoring on pregnant mother and breastfeeding mother, working as fertilizer applicators – recorded under “Daftar Absensi Tenaga Kerja Tidak Hamil dan Menyusui – periode Oktober 2020-Februari 2021”. The record shows 17 female workers, but no pregnant or breastfeeding female workers; sample: February 2021, worker Yanti taking menstruation leave on 2-3 February 2021, absent on 8 February 2021, total working 20 days.</p>	
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>PT. Tolan Tiga Indonesia and worker union has agreed on breastfeeding time, as stipulated in “Perjanjian Kerja Bersama (PKB) PT. Tolan Tiga Indonesia dengan Pengurus Serikat Pekerja Tolan Tiga Mandiri (SPTTM) periode 2018-2020”, Chapter XIV – Section 5.b. “Pengusaha memberikan kesempatan yang cukup kepada pekerja wanita untuk menyusukan anaknya” – company provides sufficient opportunity for female worker to breastfeed their children.</p> <p>Consultation conducted via questionnaire “Formulir Interview dengan Ibu Baru Bersalin/Menyusui”, filled in by respondent field assistant on 30 March 2020. The questionnaire: status of work? presence of children needing breastfeeding? exclusive breastfeeding? breastfeeding</p>	Complied

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		<p>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>Based on interview with Gender Committee member in Perlabian POM, nursing mother given opportunity to breastfeed their baby every day, half to one hour outside lunch break. The nursing mother can do this for six months.</p> <p>Based on interview with female worker, working as fertilizer applicators, nursing mother given opportunity to return home or to day care to breastfeed their baby every day, half to one hour outside lunch break. The nursing mother can do this for six months.</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>In Tolan Estate company has "Prosedur Membuat Keluhan" equipped with flowchart: stakeholder made grievance (through email or directly) -> Estate Manager respond to grievance and sign agreement -> GM Human Resource form mediation forum -> GM Human Resource discuss to seek solution (within 30 days) and then sign agreement -> Mediation/tripartite forum giving recommendation to both parties and sign agreement. This procedure has been disseminated to Kampung Sripinang on 11 February 2021, attended by village head and community representatives 21 attendants.</p> <p>Estate manages "Buku Keluh Kesah Internal Eksternal". In year 2020 consisted of 52 request from workers. No external complaint recorded yet. Majority related to housing renovation. Sample: On 8 June 2020, Yani Suryani – manuring team, request for housing No.0635 repair, septic tank full/clogged. Responded by Field Head Assistant on same date, ordering carpenter/civil engineering to repair". Septic tank repair completed.</p>	Complied

Criteria 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports; • Payment of recruitment fees; • Contract substitution without worker’s consent • Involuntary overtime; • Lack of freedom of workers to resign • Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement • Debt bondage • Withholding of wages 	<p>Based on interview with workers, worker union representative, and manpower service Labuhanbatu Selatan Regency, stated that the unit of certification does not practiced forced labour:</p> <ul style="list-style-type: none"> - Retention of identity documents or passports: Interview with PKWT worker in Perlabian POM, his ID card was not hold by company. - Payment of recruitment fees: Interview with PKWT worker in Perlabian POM, during his application and recruitment in September 2020, not paying any recruitment fees. - Contract substitution: Interview with PKWT worker in Perlabian POM, his contract with company under PKWT, signed 1 September 2020 was consistently implemented. - Involuntary overtime: Interview with harvesters in Tolan Estate, company offers overtime/additional harvesting work during peak crop (usually on Sunday), but it was up to individual worker to decide whether they joined overtime. - Lack of freedom of workers to resign: Based on interview with herbicide sprayers in Tolan Estate, they can resign anytime – following regulation in PKB (one-month notice). - Penalty for termination of employment: Based on interview with herbicide sprayers in Tolan Estate, they can resign anytime, and no penalty imposed – following regulation in PKB (one month notice). - Debt bondage: Interview with harvesters in Tolan Estate, they understand forced labor. There is no debt bondage. - Withholding of wages: Interview with fertilizer applicators in Tolan Estate, wage paid every month. There is no salary withholding. 	Complied
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>PT. Tolan Tiga Indonesia established a set of procedure for recruitment of temporary worker (Specified Time Work Agreement/PKWT). There is no migrant worker in PT. Tolan Tiga Indonesia – confirmed with Manpower Service of Labuhanbatu Selatan Regency and Worker Union. SOP Recruitment for PKWT No.HRD-01-03/09-03/2020/Rev.2 dated 17</p>	Complied

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		<p>March 2020. This SOP regulates the recruitment process for temporary worker are done according to valid procedures and approved manpower plan. The SOP stated Office Assistant/ Field Assistant/ Mill Assistant prepare a proposal for PKWT based on budget available, work experience, achievements. Proposal verified by Field Head Assistant/ Mill Head Assistant/ Technical Head Assistant and sent to Regional Manager Office. General Manager/ Regional Director verified and approved the employee request. Office Assistant create work agreement which is signed by Estate Manager/ Mill Manager and PKWT.</p> <p>Section 10 of the SOP stipulates that Free Labour and PKWT are not allowed to do the main work such as harvesting and processing. PKWT can only be implemented for a maximum 2 (two) years with following conditions: first PKWT no longer than 1 year. The second PKWT no longer than 1 year. Furthermore if approved by BOD, renewal of extension of PKWT can only held after exceeding 30 (thirty) days grace period since the end of second PKWT and may only be done 1 (one) time and a maximum of 2 (two).</p> <p>PKWT shall be registered with BPJS Ketenagakerjaan and BPJS Kesehatan program.</p> <p>The basis of payment for PKWT wages per day is UMP/UMSP/UMK/UMSK divided by 25 if working time is 6 days a week or divided by 21 if working time is 5 days a week.</p> <p>Evidence: - "Perjanjian Kerja Waktu Tertentu Ebert Reyvaldi Siahaan dan PT. Tolan Tiga Indonesia Perlabian Palm Oil Mill", signed on 1 September 2020. The PWKT stipulates: Clause 1: PKWT for Ebert as upkeep mill; PKWT period 1 September 2020 – 1 September 2021 (1 year); Clause 4: Salary paid per month, equal to UMP/UMSP/UMK/UMSK applicable to the company. Employee entitled for the salary including rice 15kg/month.</p>	
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		<p>Clause 5: Company provides medical treatment for employee as per regulation.</p> <p>Clause 7: Company will register employee to BPJS Ketenagakerjaan.</p>	
Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	<p>PT. Tolan Tiga Indonesia has established Occupational Health and Safety Policy No.QMM-40-01-P04/27-03-2019 dated 27 March 2019. PT. Tolan Tiga Indoensia recognizes that a safe and healthy workplace is of the utmost importance. We therefore committed to provide a safe working environment for our workers and all other stakeholders. Company believe in continually improving our health and safety and this will be achieved through: hazards and risks identification and reduction, provision of adequate resources for effective implementation of the OHS programmes and procedures, including strict compliance reviews; Ensuring the OHS policy and procedures integrate with all other company policies.</p> <p>For Perlabian POM, the Safety Officer has attended OHS training 24 February – 7 March 2014. The appointment as Safety Officer as per “Keputusan Menteri Ketenagakerjaan Republik Indonesia No.5/8822/AS.02.04/XII/2019 tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum atas nama Siti Khairunnisa Br. Bangun”, dated 4 December 2019 and valid for 3 years. SIO Ahli K3 Umum No.79260/PK3/AJ/12/2019/P0 – expiry date 4 December 2022.</p> <p>For Perlabian Estate, the Safety Officer appointed as per “Keputusan Menteri Ketenagakerjaan Republik Indonesia No.KEP.17562/NAKER-BINWASK3/V/2018 tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum atas nama Eldira Fatia Barus”, dated 2 May 2018 and valid for 3 years.</p> <p>For Tolan Estate, the Safety Officer attended OHS training on 24 February – 7 March 2014. Appointment as Safety Officer as per</p>	Complied

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		<p>"Keputusan Menteri Ketenagakerjaan Republik Indonesia No.5/9317/AS.02.04/X/2020 tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum atas nama Marwin", dated 19 October 2020 and valid for 3 years.</p> <p>OHS Committee Meeting</p> <ul style="list-style-type: none"> - OHS Safety Meeting December 2020 "Rapat P2K3LHS periode Desember 2020" on 4 January 2021, discussed COVID-19 situation, and explanation on Memorandum HRD No.74/HRD-CIR/X/2020 tentang Virus Corona (COVID-109) Level 4 Emergency Situation; prohibit gathering and to follow health protocol. - OHS Safety Meeting January 2021 "Rapat P2K3LHS periode Januari 2021" on 3 February 2021, discussed COVID-19 situation, and explanation on Memorandum HRD No.74/HRD-CIR/X/2020 tentang Virus Corona (COVID-109) Level 4 Emergency Situation; prohibit gathering and to follow health protocol. 	
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>In Perlabian Estate, the record of company's dissemination on "Kebijakan Kesehatan dan Keselamatan Kerja" on 17 February 2021. The socialization attended by 17 workers from Division I (harvesters, harvesting mandors, tally clerk); 16 workers from Division II (harvesters, harvesting mandors); on 15 February 2021 for 11 workers from Division III (sprayers and mandors);</p> <p>Socialization of this policy in Tolan Estate has conducted regularly. For example, sighted the record of company's policy on "Kebijakan Kesehatan dan Keselamatan Kerja" socialization on 10 September 2020. The socialization attended by 43 workers from Division I (harvesters, P&D census, waterman, baby sitter, harvesting mandors) and 34 contract workers/PKWT (loose fruit collectors, gardener); 34 workers from Division II (harvesters, spraying team, harvesting mandors); 83 workers from Division III (harvesters, harvesting mandors, tally clerk, manuring); 39 workers from Division IV (harvesters, harvesting</p>	Complied

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		mandors); 41 workers from Division V (harvesters, waterman, baby sitter, harvesting mandors); 48 workers from Division Transport (tractor driver, dump truck driver, quality controller, helper dump truck, carpenter, electrician, school bus driver); During interview with 3 harvesters, 2 sprayers and 2 fertilizer applicators in Tolan Estate, they understand the implementation as identification of hazard and risk, provision of PPE, standing by first aider (mandors); BPJS Ketenagakerjaan and BPJS Kesehatan; referral to hospital when accident occurs.	
6.7.3	(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.	Implementation in Tolan Estate, PPE provided by company to workers for free. Company provided gumboot for 12 sprayers (including sampled worker Aga Jiwar, Nunung Bastiar) on April 2020; Company provided masker for 11 sprayers (including sampled worker Aga Jiwar, Nunung Bastiar) on 5 October 2020; Company provided apron, nitrile hand glove and safety goggles for 11 sprayers (including sampled worker Aga Jiwar, Nunung Bastiar) on 30 June 2020; Company provided gumboot for 45 fertilizer applicators (including sampled worker Dewi Yuliani, Supriyanto) on 21 November 2020; Company provided gumboot for 26 fertilizer applicators (including sampled worker Dewi Yuliani, Supriyanto) on 25 January 2021; Based on interview with 3 harvesters, 2 herbicide sprayers, 2 fertilizer applicators the provision of PPE was free. Perlabian Estate: PPE provided by company to workers for free. Company provided gumboot and sickle cover for 13 harvesters on 24 February 2020;	Complied
6.7.4	All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.	Based on direct interview with sample of workers visited, the workers stated that medical and accident insurance are covered under "BPJS Ketenagakerjaan" and "BPJS Kesehatan" and it's provided by the company. An accident insurance is covered under "BPJS Ketenagakerjaan" with Accident and Life Program (JKK and JK). According to Employee Database February 2021:	Complied

		<p>Perlabian POM: total employees covered by accident insurance (BPJS Ketenagakerjaan) is 93 employees.</p> <p>Perlabian Estate: total employees covered by accident insurance (BPJS Ketenagakerjaan) is 587 employees.</p> <p>Tolan Estate: total employees covered by accident insurance (BPJS Ketenagakerjaan) is 401 employees.</p>	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	<p>Summary of Work Incident 2020 Perlabian Estate: There are 8 cases incident occurs with Total Lost Time Incident is 40 LTI.</p> <p>Summary of Work Incident 2020 Tolan Estate: There are 14 cases incident occurs with total Lost Time Incident is 133 LTI and 1 case is fatality. Those cases already reported and claim to accident insurance services (BPJS Ketenagakerjaan).</p> <p>Summary of Work Incident 2020 Perlabian POM: There is three cases incident occurs from helper sterilizer and Mechanic with total Lost Time Incident is 10 LTI. Those cases already reported and claim to accident insurance services (BPJS Ketenagakerjaan).</p>	Complied
<p>Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.</p>			
<p>Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>			
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control.	<p>Integrated Pest Management plan in Perlabian Estate is evident, as titled "Program Pengendalian Hama Terpadu 2021", established 5 January 2021. Barn owl box in first semester; monitoring on barn owl box on monthly basis; planting of beneficial plant (<i>Turnera subulata</i> and <i>Cassia</i> sp), Nursery and upkeep beneficial plant (<i>Turnera subulatta</i>, <i>Cassia tora</i> and <i>Antigonon leptopus</i>) on monthly basis; identification of beneficial plant available on the field every quarter; pest detection and pest and disease census on monthly basis; white ant census on monthly basis; <i>Ganoderma</i> monitoring on 6 monthly basis.</p>	Complied

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		<p>Realization of 2020 Integrated Pest Management was documented., e.g. Monitoring of termite stated that there is no significant termite attack in 2020; Monitoring of Ganoderma stated that there was 4,936 palm infected by Ganoderma during 2020; Map of nettle caterpillar attack period December 2020, nettle caterpillar attack controlled by biological control; monitoring of Barn Owl box. Rat are naturally control by barn owl. Beneficial plant identification described census result of Nettle Caterpillar natural enemy: <i>Euchanticona</i>, <i>Sycanus</i>, <i>Dolichogenidae</i>, <i>Systropus</i>, <i>Cordyceps</i>; Beneficial Plants: <i>Turnera subulatta</i>, <i>Casia coabnensis</i>, <i>Casia tora</i>, <i>Antigonon leptopus</i>; Beneficial weeds: <i>Nephrolepis</i>, <i>Axonopus</i>, <i>Kretekkan</i>, <i>Pakis Sayur</i>.</p> <p>Integrated Pest Management plan in Tolan Estate is evident, as titled "Program Pengendalian Hama Terpadu 2021", established 5 January 2021. The plan consists of monthly basis activity, e.g. planting of beneficial plant, census of leaf eater caterpillar, termite census, upkeep beneficial plant, <i>Sycanus</i> reproduction, and <i>Sycanus</i> release; quarterly basis activity, e.g. development and maintenance of barn owl box. Realization of IPM monitoring recorded in "Tolan Estate - Program Pengendalian Hama Terpadu Tahun 2020", e.g. based on Ganoderma census 2020, there are 3,124 palms infected in Div. 1; 10,379 palms infected in Div. 2; 3,486 palms infected in Div. 3; 5,862 palms infected in Div. 4; 4,295 palms infected in Div. 5. Control has been performed by uprooting infected palms.</p> <p>Biological control performed by planting and upkeep beneficial plant. During field visit, it was observed <i>Turnera subulatta</i> planted in most of the collection road or transport road, as well as <i>Antigonon leptopus</i> and <i>Casia tora</i>.</p>	
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7.1.2	Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.	The unit of certification has a list of Global Invasive Species and evaluate the status of existence in certified area on 14 February 2021 in Perlavian Estate and on 22 February 2021 in Tolan Estate. Some species are naturally existing in the area and the spreading are controlled manually, e.g. <i>Achatina fulica</i> , <i>Ageratum conizoides</i> , <i>Clidemia hirta</i> , <i>Imperata cylindrica</i> , <i>Lantana camara</i> , <i>Mikania micranta</i> and <i>Mimosa pudica</i> . There are no species in the list that used to manage areas in unit of certification.	Complied																																										
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	Based on field visit and document review, there is no use of fire for pest control in whole area of Perlavian Estate and Tolan Estate.	Complied																																										
Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.																																													
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.	<p>The unit of certification has recorded list of herbicides used, completed with active ingredient, WHO class, trademark, target, registration number and expiry date.</p> <table border="1" data-bbox="1131 879 1977 1380"> <thead> <tr> <th>Trademark</th> <th>Active Ingredient</th> <th>WHO Class</th> <th>Target</th> <th>Registration Number</th> <th>Expiry date</th> </tr> </thead> <tbody> <tr> <td>Smart AS 486</td> <td>sopropil amina lufosaf 486 g/l</td> <td>U</td> <td>Grasses weed</td> <td>RI.010301199 71313</td> <td>12/11/2023</td> </tr> <tr> <td>Basta SL 150</td> <td>monium lufosinat 150 /l</td> <td>III</td> <td>Grass weed, broad leaf</td> <td>RI.010301199 21113</td> <td>12/11/2023</td> </tr> <tr> <td>Kenlon EC 480</td> <td>triklopir 480 g/l</td> <td>III</td> <td>Brush weed/ wood</td> <td>RI.010301200 62433</td> <td>12/12/2021</td> </tr> <tr> <td>Metsulindo 20 WP</td> <td>metil netsulfuron 0%</td> <td>U</td> <td>Ferns, Broad Leaf, Sedges</td> <td>RI.010301199 91484</td> <td>11/05/2021</td> </tr> <tr> <td>Garlon Mix 333/17</td> <td>aminopiralid potassium 17 /l</td> <td>III</td> <td><i>Tetracera indica</i>, <i>Melastoma malabatricum</i>, <i>Clidemia hirta</i>, <i>Lantana camara</i></td> <td>RI.010301201 55148</td> <td>31/01/2025</td> </tr> <tr> <td>Starthene 75 WDG</td> <td>acephate 75%</td> <td>III</td> <td>Bagworm, nettle caterpillar</td> <td>RI.010101200 72983</td> <td>08/08/2022</td> </tr> </tbody> </table>	Trademark	Active Ingredient	WHO Class	Target	Registration Number	Expiry date	Smart AS 486	sopropil amina lufosaf 486 g/l	U	Grasses weed	RI.010301199 71313	12/11/2023	Basta SL 150	monium lufosinat 150 /l	III	Grass weed, broad leaf	RI.010301199 21113	12/11/2023	Kenlon EC 480	triklopir 480 g/l	III	Brush weed/ wood	RI.010301200 62433	12/12/2021	Metsulindo 20 WP	metil netsulfuron 0%	U	Ferns, Broad Leaf, Sedges	RI.010301199 91484	11/05/2021	Garlon Mix 333/17	aminopiralid potassium 17 /l	III	<i>Tetracera indica</i> , <i>Melastoma malabatricum</i> , <i>Clidemia hirta</i> , <i>Lantana camara</i>	RI.010301201 55148	31/01/2025	Starthene 75 WDG	acephate 75%	III	Bagworm, nettle caterpillar	RI.010101200 72983	08/08/2022	Complied
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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.	<p>Document "Rekapitulasi Penggunaan Pestisida Tahun 2020" recorded pesticides use including active ingredients, LD50, area treated, amount of active ingredients applied per Ha and per ton FFB.</p> <p>Pesticide use in Perlabian Estate and Tolan Estate in 2020:</p> <table border="1"> <thead> <tr> <th rowspan="2">Trademark</th> <th colspan="2">Volume</th> <th rowspan="2">UoM</th> </tr> <tr> <th>Perlabian</th> <th>Tolan</th> </tr> </thead> <tbody> <tr> <td>Basta 150 SL</td> <td>640,73</td> <td>297,60</td> <td>Ltr</td> </tr> <tr> <td>Becano 500 EC</td> <td>60,52</td> <td>0,79</td> <td>Ltr</td> </tr> <tr> <td>Garlon 670 EC</td> <td>24,70</td> <td>62,80</td> <td>Ltr</td> </tr> <tr> <td>Satarane 290 EC</td> <td>116,39</td> <td>-</td> <td>Ltr</td> </tr> <tr> <td>Agristick</td> <td>148,54</td> <td>63,12</td> <td>Kg</td> </tr> <tr> <td>Decis 25 EC</td> <td>30,79</td> <td>-</td> <td>Ltr</td> </tr> <tr> <td>Marathon 500 WSC</td> <td>56,13</td> <td>-</td> <td>Ltr</td> </tr> <tr> <td>Starthene 75 WG</td> <td>5,50</td> <td>-</td> <td>Kg</td> </tr> <tr> <td>Regent 50 EC</td> <td>4,97</td> <td>-</td> <td>Ltr</td> </tr> <tr> <td>Marshall 5 GR</td> <td>5.184,46</td> <td>-</td> <td>Kg</td> </tr> <tr> <td>Metsulindo WP</td> <td>210,42</td> <td>135,32</td> <td>Kg</td> </tr> <tr> <td>Smart 486 AS</td> <td>6.200,23</td> <td>3.566,69</td> <td>Ltr</td> </tr> <tr> <td>Thuricide HP</td> <td>170,92</td> <td>-</td> <td>Ltr</td> </tr> <tr> <td>Tikumin</td> <td>107,46</td> <td>-</td> <td>kg</td> </tr> </tbody> </table>						Trademark	Volume		UoM	Perlabian	Tolan	Basta 150 SL	640,73	297,60	Ltr	Becano 500 EC	60,52	0,79	Ltr	Garlon 670 EC	24,70	62,80	Ltr	Satarane 290 EC	116,39	-	Ltr	Agristick	148,54	63,12	Kg	Decis 25 EC	30,79	-	Ltr	Marathon 500 WSC	56,13	-	Ltr	Starthene 75 WG	5,50	-	Kg	Regent 50 EC	4,97	-	Ltr	Marshall 5 GR	5.184,46	-	Kg	Metsulindo WP	210,42	135,32	Kg	Smart 486 AS	6.200,23	3.566,69	Ltr	Thuricide HP	170,92	-	Ltr	Tikumin	107,46	-	kg	Complied
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7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	Use of pesticide are minimized as part of the plan, and in accordance with IPM Plans, there are no pesticide application outside of the targeted species and planned intervals. Pesticide are only used to reduce/eliminate existing pest, which has exceeded the economic threshold.						Complied																																																														
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.	There is no use of prophylactic use of pesticides throughout PT. Tolan Tiga Indonesia. Pesticide/Herbicides are only used to reduce/eliminate existing pest, which has exceeded the economic threshold.						Not Applicable																																																														

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7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <p>7.2.5a Judgment of the threat and verify why this is a major threat.</p>	<p>There is no use of WHO Class 1A or 1B pesticide in whole plantation operation. The use of paraquat has been stopped since 2017. The company's General Manager of North Sumatera has issued Memorandum No.117/GMO-All Estate/XI/2016, dated 1 December 2015. The memorandum stated that the use of paraquat as contact pesticide is not allowed as of 1 January 2017. Target: Zero use of paraquat effective since 1 January 2017.</p> <p>Based on visit in field operation and agrochemical storage in Perlabian Estate and Tolan Estate, there was no paraquat found. Based on report of "Daftar Pestisida yang digunakan di Tahun 2020" – there were no paraquat noted in the report.</p>	Complied
	7.2.5b Why there is no other alternative which can be used.	There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.	
	7.2.5d Process to limit the negative impacts of the application.	There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.	
	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 that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.	
7.2.6	(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	All Estate (Perlabian and Tolan Estate) have provided basic training related to pesticide, understanding material safety data sheet/MSDS, limited pesticide training, emergency condition training and first aid training.	Complied

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	<p>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>Chemical warehouse and its infrastructure is ready (see criterion 4.6.6). Standard PPE for sprayer: goggle, masker, apron, rubber glove, rubber boot. Standard PPE for chemical mixer/chemical storekeeper: faceshield, masker, apron, rubber glove, safety boot.</p> <p>Record of training for person who handling pesticides, such as:</p> <ul style="list-style-type: none"> - Attendance list of "Pelatihan Kaliberasi Sprayer dan Perawatan Alat kerja" dated 11th January 2021, location in Mixing Area Perlabian Estate, was attended by 18 workers. - Attendance list of "Training Pencampuran Pesticida", dated 2nd March 2020, location in Go-Down Tolan Estate, was attended by 7 workers. <p>After March 2020 up to December 2020, no training provided due to COVID-19 pandemic.</p>	
7.2.7	<p>(C) Storage of all pesticides in accordance with recognized best practices.</p>	<p>The storage is equipped with sufficient air ventilation to provide air circulation. Hazard signs, emergency shower, secondary containment, spill kit, appropriate PPE (face shield, permeable gloves, apron and mask) is available and ready for use.</p> <p>Working instruction for pre-mixing, stacking and storing pesticide is current, MSDS is also readily available. Material Data Safety Sheets (MSDS) are obtained for all chemicals used and are available at the areas of mixing. These were all seen be controlled by date and were readily available. No concentrates are taken into the field as all spray solutions are pre- mixed in a designated area.</p> <p>Empty pesticide container was triple rinsed before sent for temporary hazardous waste storage.</p> <p>Auditor team has visited the location where the temporary storage of hazardous and toxic waste. The conditions for the hazardous waste warehouse are in accordance with the permits and the requirements stated in the Decree of the Head of Bapedal No.Kep-01/Bapedal/09/1995.</p>	Complied

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		The company supplies two sets of overalls to all pesticide operators so that one can always be considered clean. Overalls are washed at the pesticide mixing areas in specially constructed wash areas so that sprayers and mixers do not need to take them home and therefore the risk of cross contamination with family members is reduced and eliminated.	
7.2.8	All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.	All pesticide and agrochemical containers that produced from Estate and Mill are disposed and store at registered hazardous and toxic substances waste temporary storage (TPS LB3) which located at Perlabian POM and Tolan Estate. Permit of hazardous and toxic substances waste temporary storage (TPS LB3) Perlabian POM as referred No.503/0003/DPMPPTSP-LS/V/2020, dated 8 May 2020. Validity for 5 years. Source of waste covering Perlabian POM and Perlabian Estate. Permit of hazardous and toxic substances waste temporary storage (TPS LB3) Tolan Estate as referred No.503/0004/DPMPPTSP-LS/V/2020, dated 8 May 2020. Validity for 5 years. Source of waste covering Tolan Estate. Auditor team has visited the location where the temporary storage of hazardous and toxic waste. The conditions for the hazardous waste warehouse are in accordance with the permits and the requirements stated in the Decree of the Head of Bapedal No.Kep-01/Bapedal/09/1995.	Complied
7.2.9	(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.	Unit of Certification applying pesticides through manual by persons/sprayer. Therefore, no aerial spraying is available. Not applicable	Not Applicable
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	Tolan Estate, the Medical Check Up for 12 herbicide sprayers carried out on 3 October 2019 (including sampled worker Aga Jiwara and Nunung	Complied

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		<p>Bastiar). The result has been communicated to each worker – no intoxication symptoms.</p> <p>In Perlabian Estate, Medical Check Up for 70 herbicide sprayers, fertilizer applicators carried out on 2 October 2019. The result has been communicated to each worker – no intoxication symptoms.</p> <p>MCU for pesticide operators in 2020 was postponed, due to COVID-19 pandemic.</p>	
7.2.11	<p>(C) No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives.</p>	<p>Tolan Estate implement monitoring on pregnant mother and breastfeeding mother, working as fertilizer applicators – recorded under “Daftar Absensi Tenaga Kerja Tidak Hamil dan Menyusui – periode Oktober 2020-Februari 2021”. The record shows 17 female workers, but no pregnant or breastfeeding female workers.</p> <p>Perlabian Estate implement monitoring on pregnant mother and breastfeeding mother, working as fertilizer applicators – recorded under “Data Karyawan Tidak Hamil dan Menyusui – periode Februari 2021”. The record shows 22 female workers (sprayers and fertilizer applicators), but no pregnant or breastfeeding female workers.</p>	Complied
<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>All pesticide and agrochemical containers that produced from Estate and Mill are disposed and store at registered hazardous and toxic substances waste temporary storage (TPS LB3) which located at Perlabian POM and Tolan Estate.</p> <p>Permit of hazardous and toxic substances waste temporary storage (TPS LB3) Perlabian POM as referred No.503/0003/DPMPPTSP-LS/V/2020, dated 8 May 2020. Validity for 5 years. Source of waste covering Perlabian POM and Perlabian Estate.</p> <p>Permit of hazardous and toxic substances waste temporary storage (TPS LB3) Tolan Estate as referred No.503/0004/DPMPPTSP-LS/V/2020,</p>	Complied

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		<p>dated 8 May 2020. Validity for 5 years. Source of waste covering Tolan Estate.</p> <p>The Auditor Team has conducted a visit to the location of the temporary storage of hazardous and toxic waste. The conditions for the hazardous waste warehouse are in accordance with the permits they have, and the requirements stated in the Decree of the Head of Bapedal No.Kep-01/Bapedal/09/1995.</p> <p>While, each housing compound unit has had permitted wastewater treatment installation. For degradable waste, unit of certification has certain location for landfill with dumping system.</p>	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	<p>Domestic waste from workers compound at Estate level are disposed in landfill and located in specific Block. Type of waste is only for inorganic waste, mostly plastic waste. Besides, the organic wastes are buried at the backyard of worker's compound.</p> <p>Unit of certification also complied with regulation regarding on Domestic Wastewater Management Installation.</p> <p>Based on field visit at worker's compound Division 2 Tolan Estate and Central Compound Perlarian Estate, the domestic wastewater management already installed in accordance with its permit.</p>	Complied
7.3.3	The unit of certification does not use open fire for waste disposal.	<p>Domestic waste from workers compound at Estate level are disposed in landfill and located in specific Block. Type of waste is only for inorganic waste, mostly plastic waste. Besides, the organic wastes are buried at the backyard of worker's compound.</p> <p>Unit of certification also complied with regulation regarding on Domestic Wastewater Management Installation.</p> <p>Based on field visit at worker's compound Division 2 Tolan Estate and Central Compound Perlarian Estate, the domestic wastewater management already installed in accordance with its permit.</p>	Complied
Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			

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7.4.1	Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.	<p>The unit of certification has numbers of procedure for good agriculture practices to maintain soil fertility and minimize environmental impact, as available under SOP:</p> <ol style="list-style-type: none"> 1. OPM-06-01; Inorganic Fertiliser. 2. OPM-06-02; Organic Fertiliser. 3. OPM-06-03; Leaf Sampling Unit (LSU): Palm Marking. 4. OPM-06-04; Leaf Sampling Unit (LSU) and Rachis Sampling Unit (RSU) sample taking. <p>Fertilizer are applied to maintain and increase soil fertility, fertilizer applied following the fertilizer recommendation which established based on soil and leaf analysis. Due to COVID-19 pandemic, leaf analysis 2020 postponed to 2021, therefore fertilizer recommendation for 2021 is according to fertilizer recommendation 2020. Available "Oil Palm Fertilizer Recommendation for PT. Tolan Tiga Indonesia – Perlabian Estate 2020", "Oil Palm Fertilizer Recommendation for PT. Tolan Tiga Indonesia – Tolan Estate 2020". Fertilizer application records are documented in "Monthly Manuring Program Sheet". Field visit conducted to fertilizer application activity at Block G08 Division 4 Perlabian Estate. Type of fertilizer is Rock Phosphate dosage 0.75 kg/palms. Fertilizer weighing 0.75 kg in a plastic bag is distributed into each oil palms, then the applicator applied it on the circle. Based on interview, fertilizer applications are performed according to the SOP that refer Best Agriculture Practice and minimize the environmental impacts. By using methods correct type, correct target, and correct dosage. Application near the drainage are avoided.</p>	Complied
7.4.2	Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.	The latest periodical leaf analysis in Perlabian Estate conducted in February 2021, based on "Surat Pengantar Annual LSU PLE Tahun 2021" for preparing Fertilizer recommendation of 2 nd Semester 2021 and 1 st Semester 2022. Leaf sample analysis performed by SIPEF Group R&D team, which is Verdant Bioscience Plant and Soil Nutrition Laboratory.	Complied

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		<p>Result of leaf analysis documented on "Lembar Hasil Analisa LSU dan RSU".</p> <p>Example of analysis result: date of analysis 24 January – 20 February 2020; Lab. No. B4926; sample type – Leaf; Perlabian Estate; Division-3; Block 06H05A-H07A; Material PM-01; YOP 2006; wide 79,14 Ha; Analysis result: 2.67% N; 0.165% P; 1.07% K; 0.34% Mg; 0.71% Ca; 21 ppm B; 3 ppm Cu and 11 ppm Zn.</p> <p>The last periodical leaf sample analysis in Tolan Estate conducted in May 2019 for preparing fertilizer recommendation 2020. Fertilizer recommendation 2020 were evident. Leaf Analysis Report was issued by Verdant Plant and Soil Nutrition Laboratory with Ref number 03/STC-spl/III/19, received date 11 Mar 2019, number of samples 6 bags, analysis date 9 May 2019, document number PSNL/TTI/IV/19/170. Sample seen Lab No.B683; Sample type-Leaf; Estate-TLE; Div-III; Block 99C21A; Sampling date 20/02/2019; Material BLRS; Plant Year 1999; 40.53 Ha. Analysis result: 2.44% N; 0.154% P; 0.85% K; 0.27% Mg; 0.63% Ca; 11 ppm B. Sample seen Lab No.B688; Sample type-Rachis; Estate-TLE; Div-I; Block 05D5-6; Sampling date 22/02/2019; Material BLRS; Plant Year 2005; 49.49 Ha. Analysis result: 0.148% P; 2.53% K; 0.11% Mg; and 0.46% Ca.</p> <p>Due to Covid-19 pandemic, there is no leaf sample taking in 2020 in Perlabian Estate and Tolan Estate. Leaf sample unit taking performed in February 2021, however the result is in process of analysis.</p> <p>Soil analysis performed in 6 years interval for each block. Soil analysis result of Perlabian Estate are documented in "Hasil Analisis Pengujian Tanah" by Bangun Bandar Analytical Laboratory, PT Socfin Indonesia. Sample verified is request code No. 01/STC-soil/III/2016, Ref No. S16-021/LAB-SSPL/III/2016, taken from 42 soil sample. Sample received on 19 March 2016, analyse finished on 23 April 2016. Sample result for Lab</p>	
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		<p>code no. S1600162; user code PLE M21 MIX; depth 0-20 cm; 5,2 pH H₂O; 63.6% sand; 14.5% sludge; 21.8% loam; 0.44% N: 3.01% C; 61.3% P; 38.77% CEC; 0.14% K; 0.19% Ca; 0.42% Mg; and 7.53% Na.</p> <p>Soil analysis result for Tolan Estate is available e.g. Request code 01/STC-soil/III/2016, Ref. no. S16-020/LAB-SSPL/III/2016, taken from 27 soil sample. Sample received on 19 March 2016, analyse finished on 23 April 2016. Lab. Code S1600135; user code TLE D34 MIX; depth 0-20 cm; 4.8 pH H₂O; 54.6% sand; 10.5% sludge; 34.9% loam; 0.33% N: 0.88% C; 33.92% P; 29.70% CEC; 0.10% K; 0.64% Ca; 0.25% Mg and 0.00% Na.</p> <p>JH Agriculture Service conducted the Semi-Detailed Soil Survey in October 2009 for PT Tolan Tiga Indonesia, within the semi-detailed soil survey report, topographic condition, soil fertility status and other information has been accounted into.</p>																							
7.4.3	<p>A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p>	<p>Nutrient recycling strategy is present at unit of certification. The company using all palm by-products for soil nutrient, such as: EFB and POME (is applied to palm nearby mill) and frond stacking.</p> <p>Permit of POME for land application as per "Keputusan Kepala Badan Pelayanan Perizinan Terpadu dan Pernamanan Modal Kabupaten Labuhanbatu Selatan No.503/641/BPPTPM-LS/2016 tentang Izin Pemanfaatan Air Limbah Industri Minyak Kelapa Sawit pada Tanah di Perkebunan Kelapa Sawit PT. Tolan Tiga Indonesia" dated 27 July 2016.</p> <p>Record of POME application are documented in "Data Volume Land Application", as example for Perlabian Estate in 2021:</p> <table border="1" data-bbox="1131 1236 1944 1361"> <thead> <tr> <th rowspan="2">Month</th> <th colspan="4">Application Volume (m³)/Block</th> <th rowspan="2">Total</th> </tr> <tr> <th>05C12A</th> <th>05C11A</th> <th>05C10A</th> <th>05C09A</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>5.477</td> <td>-</td> <td>2.691</td> <td>-</td> <td>8.168</td> </tr> <tr> <td>February</td> <td>6.883</td> <td>887</td> <td>-</td> <td>-</td> <td>7.770</td> </tr> </tbody> </table>	Month	Application Volume (m ³)/Block				Total	05C12A	05C11A	05C10A	05C09A	January	5.477	-	2.691	-	8.168	February	6.883	887	-	-	7.770	Complied
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7.4.4	Records of fertilizer inputs are maintained.	<p data-bbox="1131 933 1977 1061">Fertilizer recommendation 2020 described the fertilizer need for each Estate. Records of fertilizer inputs are available in "Monthly Manuring Program" for each Division and "Rekapitulasi Penggunaan Fertilizer Tahun 2020" for estate recapitulation.</p> <p data-bbox="1131 1093 1977 1152">Record of fertilizer inputs in Perlabian Estate for period January – December 2020 and January – February 2021 are as follow:</p> <table border="1" data-bbox="1131 1157 1863 1396"> <thead> <tr> <th>Fertilizer type</th> <th>2020 (kg)</th> <th>2021 (kg)</th> </tr> </thead> <tbody> <tr> <td>Borate</td> <td>46,347.00</td> <td>5,321.00</td> </tr> <tr> <td>CIRP</td> <td>79.30</td> <td>-</td> </tr> <tr> <td>Dolomite</td> <td>65,218.00</td> <td>-</td> </tr> <tr> <td>Kieserite</td> <td>358,103.00</td> <td>12,689.12</td> </tr> <tr> <td>MOP</td> <td>894,622.00</td> <td>90,598.00</td> </tr> <tr> <td>NPK 12:12:17:2</td> <td>-</td> <td>451.12</td> </tr> </tbody> </table>	Fertilizer type	2020 (kg)	2021 (kg)	Borate	46,347.00	5,321.00	CIRP	79.30	-	Dolomite	65,218.00	-	Kieserite	358,103.00	12,689.12	MOP	894,622.00	90,598.00	NPK 12:12:17:2	-	451.12	Complied
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Criteria 7.5: Practices minimise and control erosion and degradation of soils.																																				
7.5.1	(C) Maps that identify marginal and fragile soils, including steep sloped land are available.	<p>PT. Tolan Tiga Indonesia has conducted a Semi Detailed Soil Survey in 2009 by JH Agriculture Service, October 2009 where the document has described in detail the topographical conditions of the entire work area of PT. Tolan Tiga Indonesia, namely:</p> <p>51% of Perlabian area (2,358 ha) has a flat topography (0 - 2 °) and 2,266 ha (49%) has a sloping topography (0 - 6 °) while for Tolan Estate it has topography ranging from flat to hill with the following distribution; Flat (0 - 2 °) covering an area of 146 ha, Sloping (0 - 6 °) covering an area of 2,357 ha, Undulating (2 - 12 °) covering an area of 326 ha and hilly (6 - 20 °) covering an area of 797 ha.</p> <p>There is no marginal and fragile soils was identified.</p>	Complied																																	
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.	Unit of Certification has no steep terrain area. All the replanting area in Perlabian Estate and Tolan Estate is Flat to Undulating.	Complied																																	

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7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.	PT. Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development.	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.	<p>PT. Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development.</p> <p>Semi Detailed Soil Survey in 2009 by JH Agriculture Service, October 2009 where the document has described in detail the topographical conditions of the entire work area of PT. Tolan Tiga Indonesia, namely: 51% of Perlabian area (2,358 Ha) has a flat topography (0 - 2 °) and 2,266 Ha (49%) has a sloping topography (0 - 6 °). Tolan Estate it has topography ranging from flat to hill with the following distribution; Flat (0 - 2 °) covering an area of 146 Ha, Sloping (0 - 6 °) covering an area of 2,357 Ha, Undulating (2 - 12 °) covering an area of 326 Ha and hilly (6 - 20 °) covering an area of 797 Ha. There is no marginal and fragile soils was identified.</p>	Complied
7.6.2	Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan.	<p>PT. Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development.</p> <p>Semi Detailed Soil Survey in 2009 by JH Agriculture Service, October 2009 where the document has described in detail the topographical conditions of the entire work area of PT. Tolan Tiga Indonesia, namely: 51% of Perlabian area (2,358 Ha) has a flat topography (0 - 2 °) and 2,266 Ha (49%) has a sloping topography (0 - 6 °).</p>	Complied

		<p>Tolan Estate it has topography ranging from flat to hill with the following distribution; Flat (0 - 2 °) covering an area of 146 Ha, Sloping (0 - 6 °) covering an area of 2,357 Ha, Undulating (2 - 12 °) covering an area of 326 Ha and hilly (6 - 20 °) covering an area of 797 Ha.</p> <p>There is no marginal and fragile soils was identified.</p>	
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p>	<p>PT. Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development.</p> <p>Semi Detailed Soil Survey in 2009 by JH Agriculture Service, October 2009 where the document has described in detail the topographical conditions of the entire work area of PT. Tolan Tiga Indonesia, namely: 51% of Perlabian area (2,358 Ha) has a flat topography (0 - 2 °) and 2,266 Ha (49%) has a sloping topography (0 - 6 °).</p> <p>Tolan Estate it has topography ranging from flat to hill with the following distribution; Flat (0 - 2 °) covering an area of 146 Ha, Sloping (0 - 6 °) covering an area of 2,357 Ha, Undulating (2 - 12 °) covering an area of 326 Ha and hilly (6 - 20 °) covering an area of 797 Ha.</p> <p>There is no marginal and fragile soils was identified.</p>	Complied
<p>Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.</p>			
7.7.1	<p>(C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas.</p>	<p>PT. Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development.</p> <p>Semi Detailed Soil Survey in 2009 by JH Agriculture Service, October 2009 where the document has described in detail the soil type in the study area consist of 7,622 Ha (93%) is soil with good drainage; and 628 Ha (7%) consist of alluvial soil with poor drainage and seasonal flood.</p>	Complied

		There is no peat soils was identified within the unit of certification.	
7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).	<p>PT. Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development.</p> <p>Semi Detailed Soil Survey in 2009 by JH Agriculture Service, October 2009 where the document has described in detail the soil type in the study area consist of 7,622 Ha (93%) is soil with good drainage; and 628 Ha (7%) consist of alluvial soil with poor drainage and seasonal flood.</p> <p>There is no peat soils was identified within the unit of certification.</p>	Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised.	<p>PT. Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development.</p> <p>Semi Detailed Soil Survey in 2009 by JH Agriculture Service, October 2009 where the document has described in detail the soil type in the study area consist of 7,622 Ha (93%) is soil with good drainage; and 628 Ha (7%) consist of alluvial soil with poor drainage and seasonal flood.</p> <p>There is no peat soils was identified within the unit of certification.</p>	Not Applicable
7.7.4	(C) Availability of implementation evidence of the water and land cover management program.	<p>PT. Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development.</p> <p>Semi Detailed Soil Survey in 2009 by JH Agriculture Service, October 2009 where the document has described in detail the soil type in the study area consist of 7,622 Ha (93%) is soil with good drainage; and</p>	Not Applicable

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		628 Ha (7%) consist of alluvial soil with poor drainage and seasonal flood. There is no peat soils was identified within the unit of certification.	
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 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.	PT. Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. Semi Detailed Soil Survey in 2009 by JH Agriculture Service, October 2009 where the document has described in detail the soil type in the study area consist of 7,622 Ha (93%) is soil with good drainage; and 628 Ha (7%) consist of alluvial soil with poor drainage and seasonal flood. There is no peat soils was identified within the unit of certification. Drainability assessment is not required.	Not Applicable
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).	PT. Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. Semi Detailed Soil Survey in 2009 by JH Agriculture Service, October 2009 where the document has described in detail the soil type in the study area consist of 7,622 Ha (93%) is soil with good drainage; and 628 Ha (7%) consist of alluvial soil with poor drainage and seasonal flood. There is no peat soils was identified within the unit of certification.	Not Applicable
7.7.7	(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	PT. Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development.	Not Applicable

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	<p>'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>Semi Detailed Soil Survey in 2009 by JH Agriculture Service, October 2009 where the document has described in detail the soil type in the study area consist of 7,622 Ha (93%) is soil with good drainage; and 628 Ha (7%) consist of alluvial soil with poor drainage and seasonal flood.</p> <p>There is no peat soils was identified within the unit of certification.</p>	
<p>Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.</p>			
<p>7.8.1</p>	<p>A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters:</p> <p>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>Perlabian Estate and Tolan Estate has prepared water management plan under "Program Pengelolaan Air" issued on 4 January 2021. The program consists of reporting of deep-water usage; quality analysis of deep water; establish silt pit at terrace contour; making individual terrace on plant that have high risk of erosion; pesticide mixing only done in mixing area. The Estate management monitor the progress monthly. The Estate has provided access to clean water for the communities. The Estate has eliminated potential pollution to the watercourse by conduct mixing of pesticide in the mixing area only.</p> <p>Water management plan available in document "Water Management Plan & Praktek Meminimalisir Pengendalian Erosi dan Degradasi Tanah 2021", such as:</p> <ul style="list-style-type: none"> - Efficient of water usage in mill and estate, included water usage for FFB process. - Install the platform on hill. - Individual terrace. - Prevent contamination in river water: planting vetiver grass, install dam, upkeep "Bronjong". - Maintain water level and piezometer in peat areas. - Planting <i>Mucuna</i>. 	<p>Complied</p>
	<p>7.8.1b Workers have adequate access to clean water.</p>	<p>The unit of certification is located near the public settlements and is close to the main road. Then, employees consume drinking water by</p>	

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		<p>buying ready-to-use bottled water because they consider it more practical. Even, the company also provide an accessible clean water.</p>																																																												
<p>7.8.2</p>	<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>PT. Tolan Tiga Indonesia has developed a Water Management Plan, last updated in January 2021. In example, Perlamban Estate 2021 has five programs, namely the washing water tank which was held on 5 January 2021; Groundwater analysis (ABT); Surface Water analysis (APU); socialization on the use of clean water and reservoir cleaning. The Groundwater Permit has been in accordance with the Decree of the Governor of North Sumatra Number: 546/594, dated 19 May 2020 (valid until 18 May 2023). Max allowable discharge: 380 m³ / day.</p>	<p>Complied</p>																																																											
<p>7.8.3</p>	<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>The measurement results of wastewater has been carried out every month by an independent laboratory accredited by KAN (PT. Mutuagung Lestari) and the results show is still below the quality standards established under Ministry of Environment Decree No.28 year 2003 on Technical Guidelines for Use of Wastewater from Oil Industry Palm Oil on Land in Oil Palm Plantations. The test measures the level of acidity (pH), BOD, COD, oils and fats, Cu, Pb, Cd, Zn and discharge (daily).</p> <p>Effluent Wastewater Analysis Reports Final Results, Perlamban POM 2020:</p> <table border="1" data-bbox="1131 978 1848 1401"> <thead> <tr> <th rowspan="2">Month</th> <th colspan="2">BOD (mg/L)</th> <th rowspan="2">COD (mg/L)</th> <th rowspan="2">Oil & Grease (mg/L)</th> <th rowspan="2">pH</th> </tr> <tr> <th>Result</th> <th>Thresh old</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>526</td> <td rowspan="12">5.000</td> <td>840</td> <td>< 5,0</td> <td>6,65</td> </tr> <tr> <td>Feb</td> <td>572</td> <td>919</td> <td>2,18</td> <td>6,38</td> </tr> <tr> <td>Mar</td> <td>498</td> <td>979</td> <td>3,50</td> <td>7,77</td> </tr> <tr> <td>Apr</td> <td>1.873</td> <td>3.274</td> <td>< 5,0</td> <td>7,15</td> </tr> <tr> <td>Mei</td> <td>875</td> <td>1.926</td> <td>2,07</td> <td>6,92</td> </tr> <tr> <td>Jun</td> <td>820</td> <td>1.018</td> <td>3,87</td> <td>7,92</td> </tr> <tr> <td>Jul</td> <td>991</td> <td>1.140</td> <td>10,53</td> <td>7,80</td> </tr> <tr> <td>Agu</td> <td>874</td> <td>892</td> <td>7,67</td> <td>7,78</td> </tr> <tr> <td>Sep</td> <td>674</td> <td>1.636</td> <td>2,48</td> <td>6,21</td> </tr> <tr> <td>Okt</td> <td>728</td> <td>1.143</td> <td>2,53</td> <td>6,36</td> </tr> </tbody> </table>	Month	BOD (mg/L)		COD (mg/L)	Oil & Grease (mg/L)	pH	Result	Thresh old	Jan	526	5.000	840	< 5,0	6,65	Feb	572	919	2,18	6,38	Mar	498	979	3,50	7,77	Apr	1.873	3.274	< 5,0	7,15	Mei	875	1.926	2,07	6,92	Jun	820	1.018	3,87	7,92	Jul	991	1.140	10,53	7,80	Agu	874	892	7,67	7,78	Sep	674	1.636	2,48	6,21	Okt	728	1.143	2,53	6,36	<p>Complied</p>
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7.8.4	Mill water use per tonne of FFB is monitored and recorded.	<p>Water use monitoring data of Perlabian POM period January - December 2018, 2019 and 2020 are as follows:</p> <table border="1"> <caption>Water Usage for Mill Processing Perlabian Palm Oil Mill period 2018 - 2020</caption> <thead> <tr> <th>Month</th> <th>2018</th> <th>2019</th> <th>2020</th> <th>Water budget (m3/ton FFB)</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>0.95</td><td>0.83</td><td>0.83</td><td></td></tr> <tr><td>Feb</td><td>0.9</td><td>0.95</td><td>0.9</td><td></td></tr> <tr><td>Mar</td><td>0.75</td><td>0.98</td><td>0.85</td><td></td></tr> <tr><td>Apr</td><td>0.85</td><td>0.87</td><td>0.85</td><td></td></tr> <tr><td>May</td><td>0.99</td><td>0.83</td><td>0.84</td><td></td></tr> <tr><td>Jun</td><td>1.29</td><td>0.84</td><td>0.87</td><td></td></tr> <tr><td>Jul</td><td>1</td><td>0.88</td><td>0.84</td><td></td></tr> <tr><td>Aug</td><td>0.76</td><td>0.79</td><td>0.76</td><td></td></tr> <tr><td>Sep</td><td>0.82</td><td>0.76</td><td>0.78</td><td></td></tr> <tr><td>Oct</td><td>0.9</td><td>1.07</td><td>1.07</td><td></td></tr> <tr><td>Nov</td><td>0.9</td><td>1.45</td><td>1.45</td><td></td></tr> <tr><td>Dec</td><td>0.91</td><td>0.94</td><td>1.27</td><td></td></tr> </tbody> </table>						Month	2018	2019	2020	Water budget (m3/ton FFB)	Jan	0.95	0.83	0.83		Feb	0.9	0.95	0.9		Mar	0.75	0.98	0.85		Apr	0.85	0.87	0.85		May	0.99	0.83	0.84		Jun	1.29	0.84	0.87		Jul	1	0.88	0.84		Aug	0.76	0.79	0.76		Sep	0.82	0.76	0.78		Oct	0.9	1.07	1.07		Nov	0.9	1.45	1.45		Dec	0.91	0.94	1.27		Complied
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Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.

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>In Tolan Estate, the use of HSD oil per MT FFB 2020 monitored:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB production (MT)</th> <th>HSD oil use* (liters)</th> <th>HSD oil / MT FFB (liters/MT)</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>7,333.77</td><td>9,966.20</td><td>1.36</td></tr> <tr><td>Feb</td><td>6,514.71</td><td>11,697.00</td><td>1.80</td></tr> <tr><td>Mar</td><td>6,809.35</td><td>11,837.00</td><td>1.74</td></tr> <tr><td>Apr</td><td>6,562.30</td><td>11,767.70</td><td>1.79</td></tr> <tr><td>May</td><td>5,517.14</td><td>8,677.00</td><td>1.57</td></tr> <tr><td>Jun</td><td>6,537.29</td><td>12,615.00</td><td>1.93</td></tr> <tr><td>Jul</td><td>6,504.09</td><td>10,520.09</td><td>1.61</td></tr> <tr><td>Aug</td><td>9,032.11</td><td>13,681.30</td><td>1.51</td></tr> <tr><td>Sept</td><td>10,118.54</td><td>14,438.50</td><td>1.43</td></tr> <tr><td>Oct</td><td>7,882.71</td><td>13,601.00</td><td>1.73</td></tr> <tr><td>Nov</td><td>6,667.43</td><td>12,204.00</td><td>1.83</td></tr> <tr><td>Dec</td><td>6,761.32</td><td>13,493.80</td><td>2.00</td></tr> <tr><td></td><td>86,276.76</td><td>144,544.40</td><td>1.68</td></tr> <tr><td>Jan 2021</td><td>6,421.70</td><td>13,802.00</td><td>2.15</td></tr> <tr><td>Feb 2021</td><td>5,203.95</td><td>11,840.00</td><td>2.28</td></tr> <tr><td></td><td>11,625.650</td><td>25,642.00</td><td>2.21</td></tr> </tbody> </table> <p><i>*) HSD oil use from backhoe loader, genset, jeep, road grader, school bus, vibrating roller, tractor, dump truck.</i></p> <p>Use of fertilizer Tolan Estate January - December 2020</p> <table border="1"> <thead> <tr> <th>Type</th> <th>Volume 2020</th> <th>Volume 2021</th> </tr> </thead> <tbody> <tr><td>Borate</td><td>28,803 kg</td><td>-</td></tr> <tr><td>Dolomite</td><td>482,030 kg</td><td>-</td></tr> <tr><td>Kieserite</td><td>-</td><td>-</td></tr> <tr><td>MOP</td><td>1,412,672 kg</td><td>23,045 kg</td></tr> <tr><td>Urea</td><td>1,198,261 kg</td><td>527,676 kg</td></tr> <tr><td>Rock Phosphate</td><td>1,008,598 kg</td><td>-</td></tr> </tbody> </table>	Month	FFB production (MT)	HSD oil use* (liters)	HSD oil / MT FFB (liters/MT)	Jan	7,333.77	9,966.20	1.36	Feb	6,514.71	11,697.00	1.80	Mar	6,809.35	11,837.00	1.74	Apr	6,562.30	11,767.70	1.79	May	5,517.14	8,677.00	1.57	Jun	6,537.29	12,615.00	1.93	Jul	6,504.09	10,520.09	1.61	Aug	9,032.11	13,681.30	1.51	Sept	10,118.54	14,438.50	1.43	Oct	7,882.71	13,601.00	1.73	Nov	6,667.43	12,204.00	1.83	Dec	6,761.32	13,493.80	2.00		86,276.76	144,544.40	1.68	Jan 2021	6,421.70	13,802.00	2.15	Feb 2021	5,203.95	11,840.00	2.28		11,625.650	25,642.00	2.21	Type	Volume 2020	Volume 2021	Borate	28,803 kg	-	Dolomite	482,030 kg	-	Kieserite	-	-	MOP	1,412,672 kg	23,045 kg	Urea	1,198,261 kg	527,676 kg	Rock Phosphate	1,008,598 kg	-	Complied
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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>PT. Tolan Tiga Indonesia (Perlavian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. To monitor GHG emission, Unit of Certification is calculating and submit periodically the GHG value through PalmGHG Calculator.</p>	Complied																																																								
7.10.3	<p>(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.</p>	<p>Unit of Certification has prepared a strategy in effort to reduce and mitigate pollution and emission. Monitoring of pollution and emission quality for plantation has been planned and implemented, e.g. air quality ambient for boiler and power generator, water quality test for surface and ground water, effluent water quality, noise level, etc. The monitoring result is incorporated in RKL/RPL (environmental</p>	Complied																																																								

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		management and monitoring plan) and reported regularly to the government. In Perlabian POM, all emission are monitored.	
Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	(C) Land for new planting or replanting is not prepared by burning.	PT. Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. The current activities only replanting which using manual method, tractor ploughing, cover crops planting and oil palm planting.	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.	Unit of Certification has list of "Sarana dan Prasarana Pengendalian Kebakaran Lahan Perkebunan" where the list fire equipment as referred to Minister of Agriculture Regulation No. 05/PERMENTAN/KB.410/1/2018.	Complied
7.11.3	The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.	Unit of certification engages stakeholders in adjacent locations for fire prevention and control measures, such as surrounding villages of Tolan Estate are Meranti village; Seri Pinang village; Kampung Bangun. Due to villager which often to collecting grass within the Tolan Estate, there are potentially fire occurs in Estate.	Complied
Criteria 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	(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. 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).	PT. Tolan Tiga Indonesia have conducted the HCV assessment for Perlabian Estate in cooperation with "Yayasan Kelapa Sawit Berkelanjutan" in 2009 based on Indonesian Toolkit – 2008. The assessment team comprise of: Ir Purwo Susanto, (Team Leader, RSPO approved HCV Assessor); Dr. Kunkun Jaka Gurmaya, (biodiversity, RSPO approved HCV Assessor); Neny Indriyana, S.Hut, M.T, (Biodiversity); Ir. Riswan SHut, (GIS); Dr. Edy Syahputra, (environmental service); Dr. Asril Darussamin, (HCV Trainer). At the time of the preparation of HCV documents there has been no scheme related ALS, however, team leader has qualified as an "assessor RSPO HCV Approved". The HCV	Complied

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		<p>assessment exercise carried out on 23-29 July 2009 with involvement from surrounding community through focus group discussion and interviews. The public consultation process done in 3 August 2009, with 36 representatives from surrounding village, individuals, traditional leaders, district head, NGO presence.</p> <p>Based on HCV assessment, there was no primary forest and/or peat ecosystem in the estate; mainly cultivated with oil palm and the rest was road infrastructure, housing, and other worker facilities.</p> <p>Based on document and field verification, HCV area identified:</p> <ul style="list-style-type: none"> a. Area HCV 1 of 30.67 Ha in form of Reservoir Pond, whereby overlapping with b. Area HCV 4 of 30.67 Ha in form of Reservoir Pond. c. Area Potential HCV 1 and HCV 4 of 188.16 Ha in form of riparian zone of Alangan III River, Tolan River and Perlabian River. <p>Note: Potential HCV means HCV that might present inside planted area; as recommended by YASBI, potential HCV becomes HCV after the planted area being replanted. Potential HCV in planted area treated same as HCV area, whereby no chemical regime, upkeep, etc.</p> <ul style="list-style-type: none"> d. Area HCV 6 of 3.45 Ha in form of graveyard In Division I (Block L08), Division II (Block I09), Division III (Block E05) and Division V (Block B12 dan E17). <p>Total HCV Area identified in Perlabian Estate was 59.38 Ha, comprise of area of HCV 1 (overlapping with) and HCV 4 of 30.67 Ha; and HCV 6 of 3.45 Ha. An additional HCV 1 and 4 of 25.26 Ha comes from potential HCV.</p> <p>PT. Tolan Tiga Indonesia have conducted the HCV assessment for Tolan Estate in cooperation with "Yayasan Kelapa Sawit Berkelanjutan" in 2009 based on Indonesian Toolkit – 2008. The assessment team comprise of: Ir Purwo Susanto, (Team Leader, RSPO approved HCV Assessor); Dr. Kunkun Jaka Gurmaya, (biodiversity, RSPO approved HCV Assessor);</p>	
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		<p>Neny Indriyana, S.Hut, M.T, (Biodiversity); Ir. Riswan SHut, (GIS); Dr. Edy Syahputra, (environmental service); Dr. Asril Darussamin, (HCV Trainer). At the time of the preparation of HCV documents there has been no scheme related ALS, however, team leader has qualified as an "assessor RSPO HCV Approved". The HCV assessment exercise carried out on 29-31 July 2009 with involvement from surrounding community through focuse group discussion and interviews. The public consultation process done in 3 August 2009, with 36 representatives from surrounding village, individuals, traditional leaders, district head, NGO presence.</p> <p>Based on HCV assessment, there was no primary forest and/or peat ecosystem in the estate; mainly cultivated with oil palm and the rest was road infrastructure, housing, and other worker facilities.</p> <p>Based on document and field verification, HCV area identified:</p> <ul style="list-style-type: none"> - Area HCV 1 of 32.99 Ha in form of forested land, riparian to Kwan Heng Lake and end of ex-airstrip. - Area HCV 4 of 50.78 Ha in form of riparian to water spring, riparian to Kwan Heng Lake, and hilly area in block F36. - Area Potential HCV 1 of 248.18 Ha in form of riparian zone to Perlabian River, riparian zone to Tolan River, riparian zone Sisumut River, riparian zone of Merbau/Sosopan River. Note: Potential HCV means HCV that might present inside planted area; as recommended by YASBI, potential HCV becomes HCV after the planted area being replanted. Potential HCV in planted area treated same as HCV area, whereby no chemical regime, upkeep, etc. - Area HCV 6 of 0.19 Ha in form of graveyard in Division II (Block E10), Division V (Block C33). <p>Total HCV Area in Tolan Estate was 55.99 Ha comprise of HCV 1 on 32.99 Ha and (some overlapping with) HCV 4 of 50.78 Ha; and area HCV 6 of 0.19 Ha. HCV 1, 4 and 6 of 51.06 Ha, and additional HCV 1 of 4.93 Ha from potential HCV 1.</p>	
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		Total HCV area in PT. Tolan Tiga Indonesia are 115.37 Ha; this figure was comprised of HCV area in Perlabian Estate of 59.38 Ha and HCV area in Tolan Estate of 55.99 Ha (total 115.37 Ha). Audit team verified during field visit, even after replanting in Perlabian Estate, the HCV area maintained with boundary.	
7.12.2	<p>(C) HCV and HCS forests, and other conservation areas are identified as follows:</p> <p>7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.</p> <p>7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.</p>	<p>Perlabian POM and its supply bases is long-established plantation. HCV assessment conducted in 2009 and still using RSPO HCV Approved assessor.</p> <p>There is no land clearing after 15 November 2018 by unit of certification.</p>	Complied
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>	Not applicable for Indonesia.	Not Applicable
<p>PROCEDURAL NOTE for 7.12.3: 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</p>	<p>PT. Tolan Tiga Indonesia have conducted the HCV assessment for Perlabian Estate in cooperation with “Yayasan Kelapa Sawit Berkelanjutan” in 2009 based on Indonesian Toolkit – 2008.</p> <p>Based on HCV assessment, there was no primary forest and/or peat ecosystem in the estate; mainly cultivated with oil palm and the rest was road infrastructure, housing, and other worker facilities.</p>	Complied

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	<p>least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p>	<p>According to HCV management and monitoring plan, there are only two concern program that continuous implement, such as monitoring of threats activities along riparian area and wildlife animal monitoring. There is no peatlands and forest were identified within unit of certification. There is no land clearing after 15 November 2018. HCV assessment conducted in 2009.</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>HCV assessment conducted in 2009. There is no land clearing after 15 November 2018.</p>	Complied
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>HCV programme that implemented by unit of certification is more concern to monitor any threat activities near watercourse/riparian and wildlife animal monitoring. HCV Area Monitoring Checklist dated 31 January 2021. All identified HCV in well condition and managed. HCV 6: Cemetery (Block C33 Division 5 Tolan Estate) – No RTE species founded, common birds and long tail macaque are identified; HCV 4: Buffer zone (Block 36 Division 5 Tolan Estate) – No RTE species found, bushes bird founded. HCV 1: Protected Forest (Block D19 and E20 Division III Tolan Estatae) – Lizard, Long tail macaque. OFI 2028017-202103-I1: Tolan Estate has conduct and record monitoring upon RTE species and other wild animal in the HCV identified area. Consideration for broad monitoring RTE species and other wild animal in other area such as plantation boundaries.</p>	Complied

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7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	HCV assessment conducted in 2009. There is no land clearing after 15 November 2018. HCV Area Monitoring Checklist dated 31 January 2021. All identified HCV in well condition and managed. HCV 6: Cemetery (Block C33 Division 5 Tolan Estate) – No RTE species founded, common birds and long tail macaque are identified; HCV 4: Buffer zone (Block 36 Division 5 Tolan Estate) – No RTE species found, bushes bird founded. HCV 1: Protected Forest (Block D19 and E20 Division III Tolan Estate) – Lizard, Long tail macaque.	Complied
7.12.8	(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.	PT. Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. HCV assessment conducted in 2009. There is no land clearing after 15 November 2018. The current activities only replanting which using manual method, tractor ploughing, cover crops planting and oil palm planting.	Complied

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Appendix B: Approved Time Bound Plan

Name of company	Name of Mill	Location	Supply Base	Time Bound Plan	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
			PT Mukomuko Agro Sejahtera: - Air Manjunto Estate - Malin Deman Estate	2014	Certified
			Ex. PT Asri Rimba Wirabhakti (acquisition in 2018)	2021	A new NPP submitted in 2020 to cover Ex PT ARWB as PT MMAS; Changes due to Covid-19 pandemic
PT Tolan Tiga	Bukit Maradja POM	Simalungun Regency, North Sumatera, Indonesia	- Bukit Maradja Estate (PT Eastern Sumatra Indonesia) - Kerasaan Estate (PT Kerasaan Indonesia) - PT Timbang Deli Indonesia	2010 2018	Certified May 2010 Certified in 2018 as supply base of Bukit Maradja POM, PT Eastern Sumatra Indonesia
	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 POM	Labuhan Batu Selatan Regency, North Sumatera, Indonesia	UMW South Estate, UMW North Estate and Toton Usaha Mandiri Estate	2014	Certified in March 2015
PT Agro Kati Lama	Kati Lama POM	Musirawas Regency, South Sumatera, Indonesia		2023	Certification to take place after obtaining HGU; A new 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		2023	Part of Muara Rupit POM supply base; Certification to take place after obtaining HGU.
PT Agro Muara Rupit	Muara Rupit POM	Musirawas Regency, South Sumatera, Indonesia		2023	Certification to take place after obtaining HGU; A new NPP submitted in 2019 to cover new areas licenced at the end of 2018.

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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	RSPO Certified in April 2014
PT Dendymarker Indah Lestari	Dendymarker POM	Musirawas Utara Regency, South Sumatera Province, Indonesia	Sei Mandang Estate, Sei Liam Estate	2015	Acquired on 1 August 2017. RSPO certified in 2015.
PT Citra Sawit Mandiri	No mill	Labuhanbatu Regency, North Sumatera Province		2022	Certification to take place after HGU, following review by RSPO.

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in 2020 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 2020 for Perlabian POM and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.60
PKO	0.00

Extraction	%
OER	21.97
KER	5.79

Production	t/yr
FFB Process	179502.03
CPO Produced	39431.6
PKO Produced	10390.3

Land Use	Ha
OP Planted Area	7827.34
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	141.11
Total	7968.45

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	68466.67	0.38	0.00	0.00	0.00	0.00	68466.67	0.38
CO ₂ Emission from fertilizer	32514.40	0.18	0.00	0.00	0.00	0.00	32514.40	0.18
NO ₂ Emission from fertilizer	37227.42	0.21	0.00	0.00	0.00	0.00	37227.42	0.21
Fuel Consumption	848.89	0.00	0.00	0.00	0.00	0.00	848.89	0.00
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-62989.78	-0.35	0.00	0.00	0.00	0.00	-62989.78	-0.35
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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Total	76067.60	0.42	0.00	0.00	0.00	0.00	76067.60
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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	2163.63	0.01
Fuel Consumption	855.15	0.00
Grid Electricity Utilization	631.01	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	3622.78	0.00

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO₂e
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) (%)	0
Divert to methane captured (energy generation) (%)	100

Appendix D: Supply Chain Declaration

A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	Mar 2020	13,852.70	-	13,852.70
2	Apr 2020	12,838.81	-	12,838.81
3	Mei 2020	10,872.80	-	10,872.80
4	Jun 2020	13,269.28	-	13,269.28
5	Jul 2020	14,353.27	-	14,353.27
6	Aug 2020	19,698.26	-	19,698.26
7	Sept 2020	22,185.91	-	22,185.91
8	Oct 2020	17,525.92	-	17,525.92
9	Nov 2020	14,141.84	-	14,141.84
10	Dec 2020	14,064.61	-	14,064.61
11	Jan 2021	13,603.49	-	13,603.49
12	Feb 2021	11,988.92	-	11,988.92
	Total	178,395.81	-	178,395.81

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Mar 2020	3,060.22	874.35
2	Apr 2020	2,885.26	723.44
3	Mei 2020	2,383.32	596.99
4	Jun 2020	2,841.96	732.37
5	Jul 2020	3,124.79	791.33
6	Aug 2020	4,288.83	1,086.81
7	Sept 2020	4,861.13	1,375.19
8	Oct 2020	3,877.05	1,073.51
9	Nov 2020	3,049.41	792.97
10	Dec 2020	3,201.87	831.82
11	Jan 2021	2,997.35	754.36
12	Feb 2021	2,710.91	746.03
	Total	39,282.10	10,379.17

C. 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	SMRT	TR-4beb33d4-ac8b	0	73.38
2	IMT	TR-69ca01be-9770	0	292.89
3	SMRT	TR-97048e98-b0f8	0	248.20
4	IMT	TR-a50e4fd8-a421	0	27.52
5	SMRT	TR-364f8187-c119	0	375.00
6	IMT	TR-5f44bf3a-9d25	0	345.16
7	IMT	TR-981fbc48-5bc1	0	226.62

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8	SMRT	TR-331826fc-77f7		7.11
9	SMRT	TR-eed66a69-8101	0	7.85
10	IMT	TR-b33c5a27-42c0	0	368.49
11	SMRT	TR-ab5df904-e5f8	0	29.84
12	IMT	TR-66dd1d8e-0ef7	0	380.63
13	SMRT	TR-6e227e66-16ed	0	211.68
14	IMT	TR-7a46b5ab-a7d2	0	195.63
15	SMRT	TR-c842371e-4576	0	19.37
16	IMT	TR-cda18091-9835	0	31.51
17	SMRT	TR-a8b4967c-9598	0	194.09
18	IMT	TR-4cb92dda-5f95	0	307.80
19	SMRT	TR-011d48e9-b30a	0	163.32
20	IMT	TR-292a8267-9624	0	179.37
21	IMT	TR-6e2193e7-4845	0	375.00
22	SMRT	TR-711193ed-7061	0	151.19
23	IMT	TR-70c1a080-e0c8	0	5.91
24	IMT	TR-e32231cd-efd4	0	192.20
25	IMT	TR-b155b0ab-98bc	0	780.11
26	IMT	TR-c61b0c9d-b4b7	0	50.00
27	IMT	TR-2daf67a0-afa7	0	273.81
28	IMT	TR-22740f90-d59e	0	1098.05
29	IMT	TR-e30480e4-8486	0	19.89
30	SMRT	TR-3c980f35-59cc	0	1319.37
31	IMT	TR-99708153-6e42	0	1.95
32	SMRT	TR-0a63c023-6862	0	530.29
33	IMT	TR-d7e6b55b-2c7f	0	180.63
34	SMRT	TR-4ae6d014-66e4	0	393.30
35	SMRT	TR-40054780-31fb	0	569.71
36	IMT	TR-30ac1aec-6f5d	0	260.41
	Total		0	10,361.75

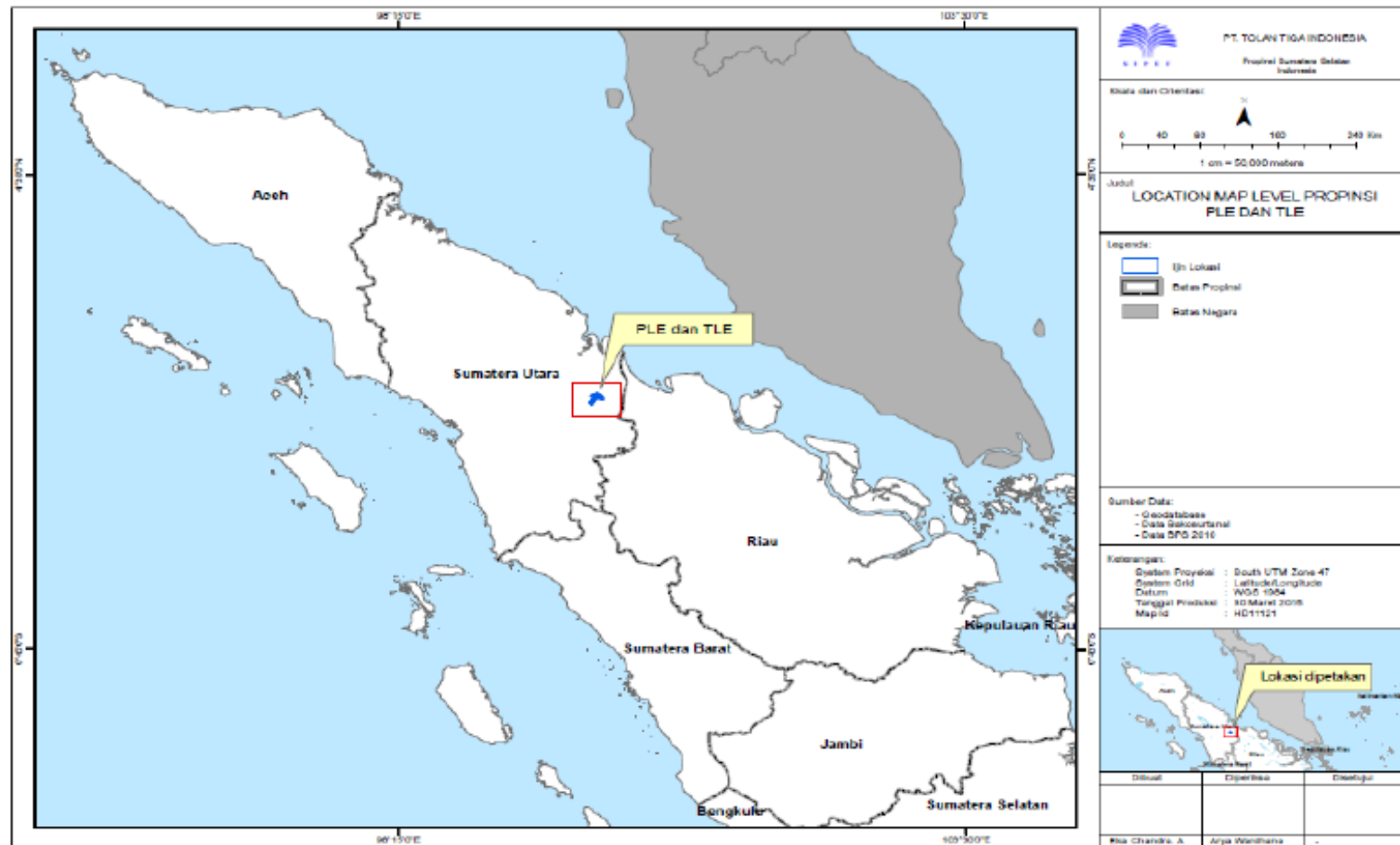
D. Records of CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	Mar 2020 – "IMT"	ISCC	2,272.17	-
2	Apr 2020 – "IMT"	ISCC	2,706.97	-
3	May 2020 – "IMT"	ISCC	2,674.64	-
4	Jun 2020 – "IMT"	ISCC	2,032.26	-
5	Jul 2020 – "IMT"	ISCC	3,593.37	-
6	Aug 2020 – "IMT"	ISCC	2,720.28	-
7	Sept 2020 – "IMT"	ISCC	3,068.47	-
8	Oct 2020 – "IMT"	ISCC	5,329.15	-
9	Nov 2020 – "IMT"	ISCC	2,969.13	-
10	Dec 2020 – "IMT"	ISCC	4,486.80	-
11	Jan 2021 – "IMT"	ISCC	4,363.70	-
12	Feb 2021 – "IMT"	ISCC	2,619.24	-
	Total		38,836.18	-

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E. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
	Nil		

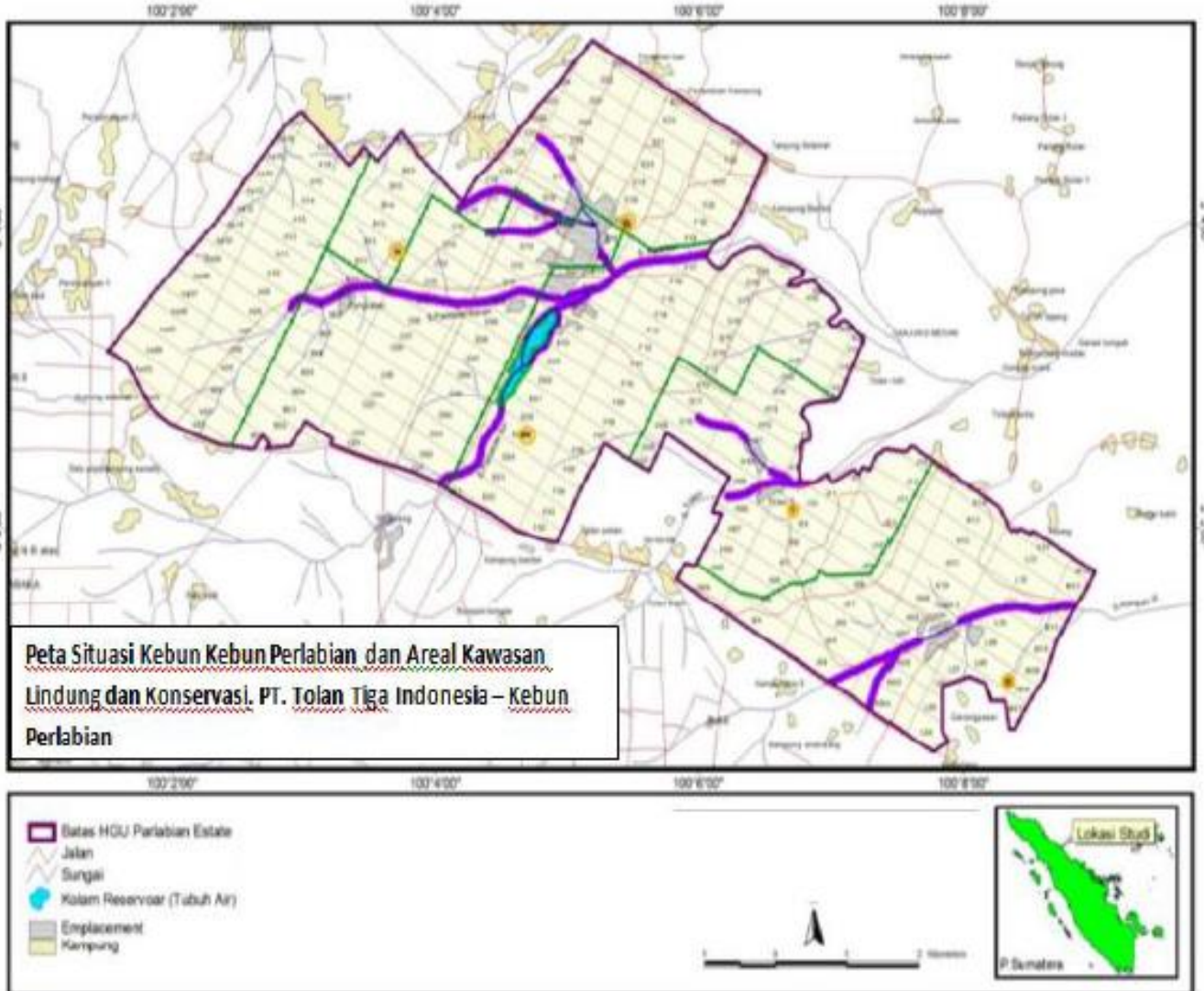
F. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
	Nil		

Appendix E: Location Map of Certification Unit and Supply bases

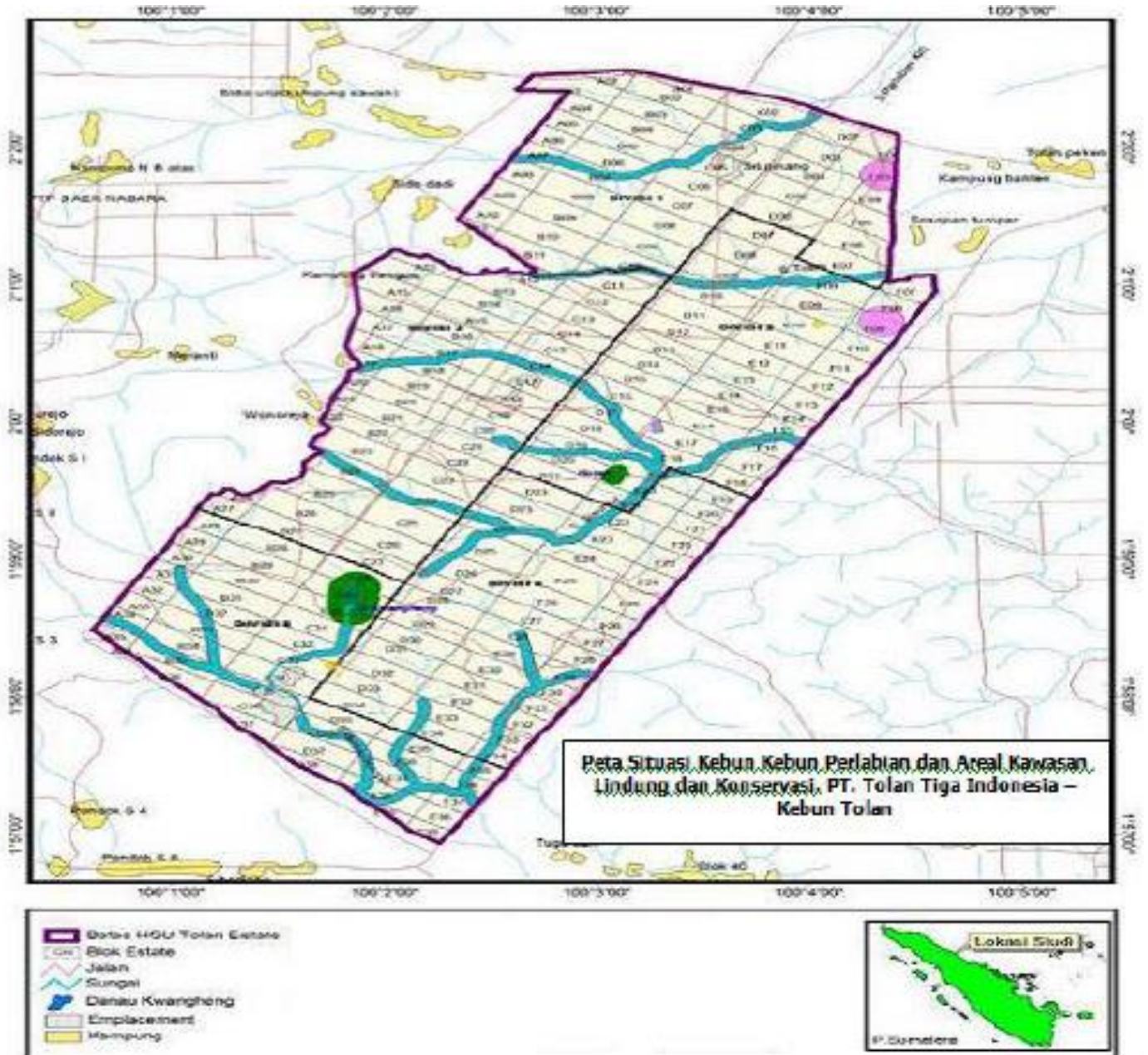


Appendix F: Estate Field Map

Perlabian Estate



Tolan Estate



Appendix G: List of Smallholder Sampled

Not Applicable

Appendix H: List of Abbreviations

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