

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment** (Choose an item.)
- Recertification Assessment (RA 2)**
- Extension of Scope**

<b>Client Company name (Parent Company):</b> <b>PT Inti Indosawit Subur</b>
Client company Address: Jl. MH. Thamrin No 31 Jakarta 10230, Indonesia
Certification Unit: <b>PT Inti Indosawit Subur – Ukui II Palm Oil Mill</b>
Location of Certification Unit: Village of Ukui, Sub-District of Ukui, Pelalawan Regency, Riau Province, Indonesia
Date of Final Report: 25/08/2021

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## Section 1: Scope of the Certification Assessment

1. Company Details			
<b>Parent Company</b>	PT. Inti Indosawit Subur		
<b>RSPO Membership Number</b>	1-0022-06-000-00	<b>Membership Approval Date</b>	6/02/2006
<b>Address</b>	Jl. MH. Thamrin No 31 Jakarta 10230, Indonesia		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	PT Inti Indosawit Subur – Ukui II Palm Oil Mill		
<b>Location / Address</b>	Village of Ukui, Sub-District of Ukui, Pelalawan Regency, Riau Province, Indonesia		
<b>Website</b>	<a href="http://www.asianagri.com">www.asianagri.com</a>		
<b>Management Representative</b>	Mr. Putu Ghrayte Yonata Aksa	<b>E-mail</b>	<a href="mailto:Putu_Aksa@asianagri.com">Putu_Aksa@asianagri.com</a>
<b>Telephone</b>	021 2301119	<b>Facsimile</b>	021 2301120

2. Certification Information			
<b>Certificate Number</b>	RSPO 565807	<b>Date of First Certification</b>	01/03/2011
		<b>Certificate Start Date</b>	25/08/2021
		<b>Certificate Expiry Date</b>	24/08/2026
<b>Scope of Certification</b>	Production of Palm Oil and Palm Kernel		
<b>Visit Objectives</b>	<ul style="list-style-type: none"> <li>• To conduct onsite audit as a continuation of previous remote audit for Recertification assessment</li> <li>• Determination of the conformity and consistency of Ukui II POM and its supply bases with RSPO Principle and Criteria.</li> <li>• Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.</li> </ul>		
<b>Assessment Cycle</b>	<input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Recertification Assessment (RA 2) <input type="checkbox"/> Annual Surveillance Assessment (RA Choose an item. ; ASA Choose an item.) <input type="checkbox"/> Scope Extension		
<b>Applicable Standards</b>	<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		
<b>Supply Chain Module</b>	<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
ID05/65250	ISO 14001:2015	SGS	10/06/2023
EU-ISCC-Cert-DE100-20442021	ISCC (Ukui II POM)	SGS	2/02/2022
SGS-ID-ISPO-0032	ISPO	SGS	20/03/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Ukui-II POM	Village of Ukui, Sub-District of Ukui, Pelalawan Regency, Riau Province	00° 16' 39.51" S	102° 07' 3.99" E
Soga Estate	Ukui Dua village, Ukui Sub-District, Pelalawan Regency, Riau Province	00° 12' 47.18" S	102° 09' 13.61" E
Sei Lala Estate	Ukui village, Ukui Sub-District, Pelalawan Regency, Riau Province	00° 16' 39.51" S	102° 07' 3.99" E
KUD Tani Subur (390 smallholders)	Sei Beberas Hilir village, Lubuk Batu Jaya Sub-district, Indragiri Hulu Regency, Riau Province	00° 23' 09.5" S	102° 07' 52.8" E
KUD Karya Tani (367 smallholders)	Sei Beras Beras village, Lubuk Batu Jaya Sub-District, Indragiri Hulu Regency, Riau Province	00° 23' 14.8" S	102° 04' 58.7" E
KUD Mekar Abadi (287 smallholders)	Tasik Juang village, Lubuk Batu Jaya Sub- District, Indragiri Hulu Regency, Riau Province	00° 22' 37.3" S	102° 05' 01.0" E
KUD Trani Maju (481 smallholders)	Pontian Mekar village, Lubuk Batu Jaya Sub-District, Indragiri Hulu Regency, Riau Province	00° 20' 35.3" S	102° 05' 03.3" E
KUD Tani Bahagia (683 smallholders)	Kulim Jaya village, Lubuk Batu Jaya Sub-District, Indragiri Hulu Regency, Riau Province	00° 22' 50.1" S	102° 07' 31.0" E
KUD Usaha Tani (646 smallholders)	Air Putih village, Lubuk Batu Jaya Sub-District, Indragiri Hulu Regency, Riau Province	00° 18' 15.6" S	102° 07' 30.5" E

(Note for Auditors: Deg °; Minutes' ; Seconds". The format must be two decimal points) (Eg. 3° 51' 14.01" N)

5. Description of Supply Base					
Estate/ Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Soga Estate	2,926	34	28	2,988	97.92

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Sei Lala Estate	3,064	82	32	3,178	96.41
<b>Sub total A</b>	<b>5,990</b>	<b>116</b>	<b>60</b>	<b>6,166</b>	<b>96.16</b>
KUD Tani Subur (390 smallholders)	780			780	100
KUD Karya Tani (367 smallholders)	734	0	0	734	100
KUD Mekar Abadi (287 smallholders)	574	0	0	574	100
KUD Trani Maju (481 smallholders)	962	0	0	962	100
KUD Tani Bahagia (683 smallholders)	1,366	0	0	1,366	100
KUD Usaha Tani (646 smallholders)	1,292	0	0	1,292	100
<b>Sub Total B</b>	<b>5,708</b>	<b>0</b>	<b>0</b>	<b>5,708</b>	<b>100</b>
<b>Total</b>	<b>11,698</b>	<b>116</b>	<b>60</b>	<b>11,874</b>	<b>99.29</b>

**6. Plantings & Cycle**

Estate/ Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Soga Estate	0	0	1,644	1,087	195	2,926	0
Sei Lala Estate	277	10	318	0	2,459	2,787	277
KUD Tani Subur	0	0	0	44	736	780	0
KUD Karya Tani	0	0	0	0	734	734	0
KUD Mekar Abadi	0	0	0	130	444	574	0
KUD Trani Maju	0	0	0	84	878	962	0
KUD Tani Bahagia	0	0	0	0	1,366	1,366	0
KUD Usaha Tani	0	0	0	0	1,292	1,292	0
<b>Total (ha)</b>	<b>277</b>	<b>10</b>	<b>1,962</b>	<b>1,345</b>	<b>8,104</b>	<b>11,421</b>	<b>277</b>

**Note:**

**7. Certified Tonnage of FFB (Own Certified Scope)**

Estate	Tonnage / year		
	Estimated	Actual	Forecast

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	(Mar 2020 – Feb 2021)	(Dec 2019 - Feb 2021)		(Aug 2021- July 2022)
		<i>Previous license period</i> (Dec 2019 – Feb 2020) 15 months	<i>Current license period</i> (Mar 2020 – Feb 2021) 12 months	
Soga Estate	124,728	18,359	73,702	79,265
Sei Lala Estate	22,011	17,999	73,844	67,176
KUD Tani Subur	18,658	3,841	16,415	17,181
KUD Karya Tani	17,570	3,935	16,442	16,491
KUD Mekar Abadi	14,672	6,829	29,654	32,393
KUD Trani Maju	24,329	3,051	13,624	13,293
KUD Tani Bahagia	34,925	3,855	21,068	23,274
KUD Usaha Tani	34,528	3,971	28,708	27,164
<b>Total</b>	<b>291,421</b>		<b>335,300</b>	<b>276,238</b>

**Note:**

<b>8. Certified Tonnage of FFB (from other certified unit(s))</b>				
Estate	Tonnage / year			Forecast (Aug 2021- July 2022)
	Estimated (Mar 2020 – Feb 2021)	Actual (Dec 2019 - Feb 2021)		
	N/A	<i>Previous license period</i> (Dec 2019 – Feb 2020)	<i>Current license period</i> (Mar 2020 – Feb 2021)	N/A
Nil				
<b>Total</b>				

**Note:**

<b>9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)</b>				
Independent FFB Supplier	Tonnage / year			Forecast (Aug 2021- July 2022)
	Estimated (Mar 2020 – Feb 2021)	Actual (Dec 2019 - Feb 2021)		
		<i>Previous license period</i> (Dec 2019 – Feb 2020)	<i>Current license period</i> (Mar 2020 – Feb 2021)	
Third Party Supplier	Nil			

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**Note:** Ukui II POM doesn't receive non certified FFB from third party supplier.

10. Certified Tonnage				
Mill Capacity: 60 MT/hr	Estimated (Mar 2020 – Feb 2021)	Actual (Dec 2019 - Feb 2021)		Forecast (Aug 2021- July 2022)
	FFB	FFB		FFB
	372,421* mt	<i>Previous license period (Dec 2019 – Feb 2020)</i>	<i>Current license period (Mar 2020 – Feb 2021)</i>	276,238 mt
		61,842.30 mt	273,458.12 mt	
		335,300.42 mt		
	CPO (OER: 21.18%)	CPO (OER:21.05%)		CPO (OER: 21.43%)
	78,946* mt	13,272.16 mt	57,575.27 mt	59,207 mt
		70,847.43		
	PK (KER: 5.60%)	PK (KER: 5.45%)		PK (KER: 5.50%)
20,920* mt	3,485.28 mt	14,902.13 mt	15,193 mt	
TOTAL	N/A	18,387.41 mt		N/A

**Note:** \* The volume of FFB, CPO and PK has included the volume extension.

11. Actual Sold Volume (CPO)					
Current License period (Mar 2020 – Feb 2021)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	56,501.93	0	0	0	56,501.93
Previous License period (Dec 2019 – Feb 2020)					
CPO (MT)	13,434.64	0	0	0	13,434.64
Total	69,936.57	0	0	0	69,936.57

12. Actual Sold Volume (PK)					
Current License period (Mar 2020 – Feb 2021)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
PK (MT)	14,891.80	0	0	0	14,891.80



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Previous License period (Dec 2019 – Feb 2020)					
<b>PK (MT)</b>	3,434.04	0	0	0	3,434.04
<b>Total</b>	18,325.84				18,325.84

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

## Section 2: Assessment Process

### Certification Body:

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

BSI is a leading global provider of management systems assessment and certification, with more than 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 **22 – 26 March 2021**. The audit programme is included as Section 2.3. Due to the COVID-19 pandemic, this assessment involved a partial remote audit as allowed by RSPO Secretariat – RSPO P&C On-site & Remote Audits dated 24<sup>th</sup> March 2020. The remote audit was conducted on **2 – 3 December 2020**.

The Critical NC close out on-site assessment was conducted on 25 June 2021. The audit programs are included in 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, Indonesia National Interpretation 2020 for the Production of Sustainable Palm Oil 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. Stakeholder notification has been made on 25<sup>th</sup> February 2021 and uploaded in the RSPO website <https://www.rspo.org/certification/public-announcement>

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

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the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

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

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**

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Recertification 2)</b>	<b>Year 2 (ASA2_1)</b>	<b>Year 3 (ASA2_2)</b>	<b>Year 4 (ASA2_3)</b>	<b>Year 5 (ASA2_4)</b>
Ukui II POM	X	X	X	X	X
Soga Estate	X	X	X	X	X
Ukui Estate (Division V)	X	X	X	Not Exist	
Sei Lala Estate	Not Exist			X	X
KUD Tani Subur		X		X	
KUD Karya Tani		X		X	
KUD Mekar Abadi		X			X
KUD Trani Maju			X		X
KUD Tani Bahagia	X		X	X	
KUD Usaha Tani	X		X		X

**Tentative Date of Next Visit: April 26, 2022 - April 30, 2022**

**Total No. of Mandays: 29**

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**2.2 BSI Assessment Team:**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Mujinius Jalaraya	Team Leader	He hold Bachelor degree from Faculty of Forestry, Bogor Agricultural University (IPB) in 2008, Majoring in Forest Resources Conservation and Ecotourism. He have a working experience in palm oil plantations as SHE Assistant at PT. Astra Agro Lestari Tbk in 2008 - 2012 and as Supervisor Sustainability at Teladan Prima Group in 2012 – 2014. He involved in RSPO certification since 2014 as a team member subsequently as a Lead Auditor. He has completed the training, such as: Lead Auditor ISO 9001 course, Lead Auditor ISPO course, Lead Auditor RSPO endorsed course, RSPO SCCS Lead Auditor endorsed course, HCV Identification and management, Internal Auditor ISO 14001 Training, Lead Auditor ISO 45000 course, Training for Trainers, OHS Expert Training, etc. He is fluently speaking in English and Bahasa Indonesia. During this assessment, he assessed on the aspects of HCV management and monitoring, supply chain for mill, partial certification and timebound plan.
Edy Widodo	Team member	Edy Widodo graduated as bachelor of the Faculty of Agriculture, Department of Agricultural Technology, University of Padjadjaran, Bandung. Earlier he worked as an Assistant Estates Manager in PT SMART Tbk. (1999 to 2005). He is the Lead Auditor for ISO 9001: 2008. He has working experience in the industrial sector and audit Plantation and also the processing industry and agricultural mechanization. He also the ISPO auditor who has obtained a certificate from the ISPO Commission, Ministry of Agriculture of Indonesia, on February 2013. He had got a certificate of training on Understanding ISO 14001: 2004 & Auditing ISO 14001: 2004 in 2013. He also had joined RSPO P&C training (2013) and also Course RSPO Lead Auditor 2016 - RSPO Endorsed RSPO Supply Chain Certification Training Course on April 2016. During this assessment, he assessed on the aspects of transparency, company policy, social and labor.
Andi Pratama Pasaribu	Team member	Indonesian citizen. Bachelor degree, majoring social economy. He has several of work experiences (more than 5 years) as the operational staff since 2008. He has been followed the Training of Lead Auditor Indonesian Sustainable Palm Oil (ISPO) which was held by ISPO Commission in 2013 and Training of Lead Auditor Roundtable on Sustainable Palm Oil (RSPO) by Proforest and Daemeter in 2016. He has been attended several kinds of training, such as High Conservation Value (HCV) Training, Lead Auditor ISO 9001:2008, Lead Auditor ISO 14001:2005, auditor OHSAS, lead auditor RSPO supply chain by BMTRADA etc. He has some experiences of Sustainability Palm Oil scheme audit in Indonesian and Malaysia in best management practices, land legality, environmental, social and worker welfare aspect and supply chain. During this audit, he verify legal aspect and best management practices aspect for mill and estate.
Imam Fachrurozi	Team member	Imam holds degree in Agriculture Technology and graduated from Gadjah Mada University, Yogyakarta on 2011. He had 2 (two) years working experience related to oil palm industry, as a sustainability and HSE officer in oil palm Plantation Company in Indonesia. Imam has completed a number of relevant trainings, the training includes ISO 9001:2008 and EMS 14001:2004

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		<p>Lead Auditor, Lead Auditor of SMK3, RSPO P&amp;C Lead auditor endorsed course. Currently he works for BSI Group based in Jakarta office. He is one of the BSI qualified RSPO auditor. He had been involved in RSPO auditing since 2015. During this assessment, he assessed on the aspects of OHS and Environmental management and monitoring.</p>
<p>Dr Suhaili Sahari</p>	<p>Peer Reviewer</p>	<p>Education: Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato' Mohd Muda.</p> <p>Work Experience: Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p>Training attended:</p> <ol style="list-style-type: none"> <li>1. ISO 9001:2015 Lead Auditor and Internal Auditor</li> <li>2. TS16949</li> <li>3. Safety</li> <li>4. ISO 14001:2015 Standard</li> <li>5. RSPO Standards: RSPO P&amp;C 2018 MY-NI 2019</li> <li>6. MSPO Standards : MS 2530 : 2013 part 1, 2 , 3 and 4</li> <li>7. Problem Solving Technique : 8 D, ICC, QCC, Systematic PS</li> <li>8. HACCP MS 1480:2019</li> <li>9. GAP Standard : Global GAP, Euru GAP</li> </ol>

**Accompanying Persons:** Nil

**2.3 Assessment Plan**

The Assessment plan was sent to the client prior to the assessment (attached assessment plan).

Remote Assessment Plan:

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Date	Time	Subjects	MJ	AP	EW	IF	ICT Planned
Wednesday, 2 Dec 2020	08.00 – 08.30	Opening meeting <ul style="list-style-type: none"> <li>Auditee Speech (Introduction of PIC, Profile of Certified Management Unit)</li> <li>Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)</li> </ul>	√	√	√	√	Video conference meeting using Zoom link.
	08.30 – 12.00	Document Review <b>Ukui II POM, Soga Estate &amp; Sei Lala Estate:</b> <ul style="list-style-type: none"> <li>Legal &amp; Land Rights</li> <li>Social and Transparency</li> <li>Environmental, Waste Management &amp; HCV</li> <li>Occupational Health &amp; Safety</li> <li>Best Management Practices</li> <li>Worker Welfare</li> <li>Review of previous assessment findings.</li> </ul>	√	√	√	√	Video conference meeting using Zoom link.  Document review using appropriate sharing application such as email, Whatsapp or any other application agreed by auditor and auditee.
	12.00 – 14.00	Lunch Break	√	√	√	√	
	14.00 – 16.30	Document review continuation	√	√	√	√	Video conference meeting using Zoom link.  Document review using appropriate sharing application such as email, Whatsapp or any other application agreed by auditor and auditee.
	16.30 – 17.00	Wash up meeting (if needed)	√	√	√	√	

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Date	Time	Subjects	MJ	AP	EW	IF	ICT Planned
Thursday, 3 Dec 2020	08.00 – 12.00	<p>Document Review of <b>Scheme</b></p> <p><b>Smallholder:</b></p> <ol style="list-style-type: none"> <li>1. Legal &amp; Land Rights</li> <li>2. Social and Transparency</li> <li>3. Environmental, Waste Management &amp; HCV</li> <li>4. Occupational Health &amp; Safety</li> <li>5. Best Management Practices</li> <li>6. Worker Welfare</li> <li>7. Review of previous assessment findings.</li> </ol> <p>Smallholder taken as audit sample:</p> <ol style="list-style-type: none"> <li>1. <b>KUD Tani Bahagia</b></li> <li>2. <b>KUD Usaha Tani</b></li> <li>3. <b>KUD Karya tani</b></li> </ol>	✓	✓	✓	✓	<p>Video conference meeting using Zoom link.</p> <p>Document review using appropriate sharing application such as email, Whatsapp or any other application agreed by auditor and auditee.</p>
	12.00 – 14.00	Lunch Break	✓	✓	✓	✓	
	16.00 – 17.00	Closing Meeting	✓	✓	✓	✓	Video conference meeting using Zoom link.

Onsite Assessment Plan:

Date	Time	Subjects	MJ	EW	IF	AP
Monday 22/03/2021	07.45 – 09.20	Flight Jakarta – Pekanbaru	✓	✓	✓	✓
	09.30 – 13.00	Travel from Pekanbaru to PT IIS – Ukui II	✓	✓	✓	✓
	13.00 – 14.00	Break	✓	✓	✓	✓
	14.00 – 14.30	<p><b>Opening Meeting</b></p> <p>Presentation by PT. IIS – Ukui II POM, Estate and Smallholder</p> <p>Presentation by BSI Indonesia</p>	✓	✓	✓	✓
	14.30 – 17.00	<p><b>Document Review</b></p> <p><b>Ukui II POM &amp; Estate:</b></p> <ul style="list-style-type: none"> <li>- Occupational Health and Safety, HCV, Environment Aspect, time bound plan.</li> <li>- Social Aspect and workers welfare, worker consultation, Stakeholder Consultation, impact assessments, policies.</li> <li>- Best Management Practice for Mill and supply chain for mill.</li> </ul>	✓	✓	✓	✓

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		- Operation Procedure, organization commitments, Legal compliance, continous improvement, long term business plan.				
Tuesday 23/03/2021	08.00 – 12.00	<b>Field Visit to Ukui Estate:</b> - Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, HCV's, riparian zones, etc. - Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, riparian zones, Hazardous Waste, waste management, etc. - Boundaries inspection, worker interviews, social amenities, etc. - Interview with: Labour Union and Gender Committee.	√	√	√	√
	08.00 – 12.00	<b>Stakeholder consultation:</b> Local government of Pelalawan Regency (DLH, Disbun, Dinsakertrans & BPN), Village head, surrounding community, NGO.		√		
	12.00 – 14.00	<b>Break</b>	√	√	√	√
	14.00 – 17.00	<b>Document Review for Ukui Estate &amp; Sei Lala Estate</b>	√	√	√	√
Wednesday 24/03/2021	08.00 – 12.00	<b>Field Visit to Sei Lala Estate:</b> - Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, HCV's, riparian zones, etc. - Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, riparian zones, Hazardous Waste, waste management, etc. - Boundaries inspection, worker interviews, social amenities, etc. Interview with: Labour Union and Gender Committee.	√	√	√	√
	12.00 – 14.00	<b>Break</b>	√	√	√	√
	14.00 – 17.00	<b>Document Review Sei Lala Estate</b> <b>Document Review for Scheme Smallholder</b> Cooperative (KUD) document review, management of smallholder, Group Manager, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc.	√	√	√	√
Thursday 25/03/2021	08.00 – 12.00	<b>Field Visit to Scheme Smallholder:</b> <b>KUD Usaha Tani</b> Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. (18 sample)	√	√	√	√
	12.00 – 14.00	<b>Break</b>	√	√	√	√



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	14.00 – 17.00	<b>Field Visit to Scheme Smallholder: KUD Karya Tani</b> Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. (16 sample)	√	√	√	√
Friday, 26/03/2021	08.00 – 12.00	<b>Field Visit to Scheme Smallholder: KUD Tani Bahagia</b> Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. (18 sample)	√	√	√	√
	12.00 – 14.00	<b>Break</b>	√	√	√	√
	14.00 – 17.00	<b>Document Review for Scheme Smallholder</b> Cooperative (KUD) document review, management of smallholder, Group Manager, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc.	√	√	√	√
Saturday, 27/03/2021	08.00 – 09.30	<b>Audit continue</b>	√	√	√	√
	09.30 – 10.30	<b>Report Preparation</b>	√	√	√	√
	10.30 – 12.00	<b>Closing Meeting</b>	√	√	√	√

NCR Closure Assessment Plan

Date	Time	Subjects	MJ
Friday, 25/06/2021	07.45 – 09.20	Flight Jakarta – Pekanbaru	√
	09.30 – 13.00	Travel from Pekanbaru – Ukui II	√
	13.00 – 17.00	NCR Follow up Verification	√
	17.00 – 17.30	Closing Meeting	√

### Section 3: Assessment Findings

#### 3.1 Normative requirement applied for this assessment:

- € PT Inti Indosawit Subur 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 time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	PT Inti Indosawit Subur has explained the certification plan for all of its subsidiaries; indicating all palm oil mills, company-owned estates and scheme smallholder as the supply base.	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	<p>There is remaining mill and estate that has not certified as below:</p> <ol style="list-style-type: none"> <li>1. PT Mitra Unggul Pusaka - Segati Palm Oil and its supply bases: Segati Estate &amp; Gondai Estate; Penarikan Palm Oil Mill and its supply bases: Penarikan Estate located in Pelalawan, Riau. PT Mitra Unggul Pusaka – Segati Mill and Penarikan Mill and its supply bases. The unit has gone through the RSPO Stage 2 certification audit in 2014, however it was not succeed because there are plantings carried out after November 2005 and 2010 which must go through the NPP and RaCP processes completed prior to certification. The company’s sustainability team has conducted latest RSPO internal audit on December 2020. PT Mitra Unggul Pusaka will planned Re-Audit after RaCP process completed and concept note approved by RSPO, estimated in year 2022. Status of disclosure and NPP PT MUP has been submitted to RSPO by email since 29 November 2017. The latest email correspondences from RSPO dated 3 December 2020 confirmed that the concept note draft has been submitted by PT MUP, concept note were still under review by RSPO and there was a comments from RSPO to be followed up</li> </ol>	Complied

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	<p>by company to improved for resubmission on clarity and precision of the content. PT MUP has reply the email by 6 May 2021 to RSPO for submission the revise of Concept Note and response for RSPO Comment; also attach the supporting document as part of Concept Note.</p> <ol style="list-style-type: none"> <li>2. Bahilang Estate (PT Nusa Pusaka Kencana/NPK). RaCP still under Process. Certification audit will be planed on 2022. According to email correspondence with RSPO and PT NPK Bahilang Estate dated 26 July 2021, LUCA has been sent by company and acknowledge document receipt by RSPO, LUCA has been placed in the queue.</li> <li>3. Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planned on 2022. LUCA submission has been sent on 28 Dec 2020, latest update from RSPO email dated 18 March 2021 to company, LUCA still under review and report needs clarification and still follow up by company.</li> <li>4. Teluk Panji Estate. HGU for this unit has not been obtained and still under process. Certification audit will be planned on 2022. Latest updated July 2021, HGU still under process in Badan Pertanahan Nasional.</li> </ol>	
<p>Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.</p>	<p>No, there is no new acquisition conducted by PT Inti Indosawit Subur and its subsidiary.</p>	<p>Complied</p>
<p>Any deviations from the maximum periods requires approval by the RSPO Secretariat.</p>	<p>There is no deviation of timeboundplan. However there is a revision of timeboundplan due to RaCP process and HGU process still on going.</p>	<p>Complied</p>
<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p>	<p>Yes, there is time bound plan revision dated 1 July 2021, signed by Management Representative. Justification available:</p> <ol style="list-style-type: none"> <li>1. PT Mitra Unggul Pusaka - Segati Palm Oil and its supply bases: Segati Estate &amp; Gondai Estate; Penarikan Palm Oil Mill and its supply bases: Penarikan Estate located in Pelalawan, Riau. RaCP still</li> </ol>	<p>Complied</p>

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	<p>under process of concept note review by RSPO. Certification audit will be planned on 2022</p> <p>2. Bahilang Estate (PT). RaCP still under Process. Certification audit will be planned on 2022.</p> <p>3. Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planned on 2022.</p> <p>4. Teluk Panji Estate. HGU has not been obtained and still under process on government side. Certification audit will be planned on 2022.</p>	
<p>Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised</p>	<p>There is no any isolated lapses in implementation of the plan. There are the changing on the plan due to the process of RaCP for PT Mitra Unggul Pusaka, Bahilang Estate and Sentral Estate and HGU issuance process for Teluk Panji Estate.</p>	<p>Complied</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised</p>	<p>There is no fundamental failure to proceed with implementation of the plan. Company has taken action to proceed all uncertified unit to complete the RaCP and to obtained the HGU for Teluk Panji Estate.</p>	<p>Complied</p>
<p><b>Un-Certified Units or Holdings</b></p>		
<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&amp;C criterion 7.12.</p>	<p>According to Land Use change analysis, there are several area conversion from rubber plantation to become palm oil plantation in PT Mitra Unggul Pusaka, cacao plantation in Bahilang Estate and Sentral Estate, no primary forest.</p> <p>Latest progress of RaCP PT Mitra Unggul Pusaka based on email correspondence between company and RSPO dated 3 December 2020, confirmed that RSPO has review the concept note and there is a comment to be improved and company has give the feedback and revision of Concept Note on 6 May 2021 and waiting for the review from RSPO secretariat.</p> <p>Bahilang Estate (PT Nusa Pusaka Kencana/NPK). RaCP still under Process. Certification audit will be planned on 2022. According to email correspondence with RSPO and PT NPK Bahilang Estate dated 26 July 2021, LUCA has been sent by company and acknowledge document receipt by RSPO, LUCA has been placed in the queue.</p>	<p>Complied</p>

	<p>Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planned on 2022. LUCA submission has been sent on 28 Dec 2020, latest update from RSPO email dated 18 March 2021 to company, LUCA still under review and report needs clarification and still follow up by company.</p> <p>Teluk Panji Estate. HGU for this unit has not been obtained and still under process. Certification audit will be planed on 2022. Latest updated July 2021, HGU still under process in Badan Pertanahan Nasional.</p>	
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	<p>PT Mitra Unggul Pusaka – Segati Mill, PT NPK Bahilang Estate and Sentral Estate RaCP and relevant issues are still in progress and waiting for RSPO feedback. According to Land Use change analysis, there are several area conversion from rubber plantation to become palm oil plantationin PT Mitra Unggul Pusaka, cacao plantation in Bahilang Estate and Sentral Estate no primary forest.</p> <p>Latest progress of RaCP PT Mitra Unggul Pusaka based on email correspondence between company and RSPO dated 3 December 2020, confirmed that RSPO has review the concept note and there is a comment to be improved and company has give the feedback and revision of Concept Note on 6 May 2021 and waiting for the review from RSPO secretariat.</p>	Complied
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	<p>According to internal audit result on December 2020, there is no land conflict occur in PT Mitra Unggul Pusaka – Segati Mill. In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p>	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	<p>According to internal audit result on December 2020, there is no Labor disputes occur in PT Mitra Unggul Pusaka – Segati Mill. In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p>	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	<p>According to internal audit result on December 2020, there is no legal noncompliance occur in PT Mitra Unggul Pusaka – Segati Mill. In addition the company has been certified for ISPO</p>	Complied

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	(Indonesian Sustainable Palm Oil) since December 2016.	
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	PT Mitra Unggul Pusaka – Segati Mill conduct the internal audit each year. Latest internal audit on December 2020. Report of internal audit are available.  Internal audit covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12. Positive assurance by Internal Audit Dept. statement are available: There is no land conflict occur, no labor disputes occur, no legal noncompliance, HCV monitoring and management well implemented.  In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	According to internal audit report for uncertified unit, there is no Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12. Report of internal audit can be shown during audit.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	During internal audit December 2020, the stakeholder consultation including NGO cannot be done due to Pandemic Covid-19 circumstances. The stakeholder consultation will be conducted after the normal situation.	Complied

### 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.	Yes, PT Inti Indosawit Subur Group has including 100% the scheme smallholder in their certification.	Complied

### 3.4 Details of Nonconformities

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

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During this Assessment there were 1 Critical nonconformities and 1 Minor nonconformities raised. The PT Inti Indosawit Subur – Ukui II POM submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

<b>Non-conformity</b>			
<b>NCR Ref #</b>	2040085-202103-M1	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	RSPO INA NI 2020, Clause 6.2.7 minor (Escalated to Major NC)
<b>Date Issued</b>	27 March 2021	<b>Due Date</b>	27 June 2021
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	25 June 2021
<b>Statement of Nonconformity:</b>	During audit temporary workers remain employed as a core work (harvesting and mill process), program to promote casual workers as permanent workers was not run accordingly.		
<b>Requirement Reference:</b>	Permanent, full-time 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.		
<b>Objective Evidence:</b>	<ul style="list-style-type: none"> <li>- Sei Lala Estate: PHL workers promotion program has been determined to promote 15 casual (PHL) workers to become permanent workers in a year, however the actual promotion is only 12 casual workers. In addition during 2021 there was a new recruitment of 32 casual workers. Based on database there are remain 83 casual workers for harvesting.</li> <li>- Soga Estate PHL promotion program has been determined to promote 10 casual (PHL) workers to become permanent workers in a year, however in 2021 there was a new recruitment of 13 casual workers for harvesting. Based on database there was still 74 of casual workers for harvesting</li> <li>- Ukui II POM Based on database there was still 13 of casual workers for mill processing that has not been promote to become permanent workers.</li> </ul>		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>- Coordinate with the Department of Manpower regarding the PHL appointment program and make a program for the gradual appointment of temporary (PHL) workers that is known by the Manpower Department.</li> <li>- Propose and appoint temporary (PHL) workers for phase 1 (attached timeline) according to the 2021 program.</li> </ul>		
<b>Root Cause Analysis:</b>	- The program for the appointment of PHL employees to SKU has not previously been analyzed, monitored and evaluated in accordance with the needs of the workforce ratio for core work.		

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	<ul style="list-style-type: none"> <li>- Since pandemic covid-19 circumstances 2020 has quite an effect on the company's financial condition and has an effect on the employee recruitment program.</li> <li>- Turnover of workers was high due to the condition of old plants with a fairly high level of difficulty in harvesting on high trees.</li> </ul>
<p><b>Corrective Actions:</b></p>	<ul style="list-style-type: none"> <li>- Make a memorandum of the temporary (PHL) workers to become permanent (SKU) workers as part of the company's commitment.</li> <li>- Monitor and evaluate the annual appointment program.</li> <li>- Ensure the use of temporary workers in accordance with labor regulations and are not fully employed for harvesting activities (during peak season/additional workers) but also employed for other jobs.</li> </ul>
<p><b>Assessment Conclusion:</b></p>	<ul style="list-style-type: none"> <li>- PT Inti Indosawit Subur – Ukui II POM has analyzed the needs of the workforce ratio for core work, particularly for harvesting and mill processing. According to ratio for core work, company has determined the needs of workers for harvesting as below:  <u>Sei Lala Estate</u>  Mature plantation: 2,553 ha, workers needs 128, existing permanent workers 54, temporary workers 74, plan for promotion 74 workers.  <u>Soga Estate</u>  Mature plantation: 2,926 ha, workers needs 146, existing permanent workers 55, temporary workers 91, plan for promotion 91 workers.  <u>Ukui I POM</u>  Workers needs 104, existing permanent workers 87 workers, temporary workers 17, plan for promotion 17 workers.</li> <li>- PT Inti Indosawit Subur – Ukui II POM has coordinate with the Department of Manpower regarding the PHL appointment program and make a program for the gradual appointment of temporary (PHL) workers. PT Inti Indosawit Subur – Ukui II POM has made the promotion program for Temporary workers to become permanent workers. The program was made with timeframe 5 years for Soga and Sei lala Estate and 3 years for Ukui II POM according to the company's ability. This has also been consulted by the company with the manpower department. This 5-year worker promotion program has been known and approved by the Manpower Office Pelalawan Regency.  During NCR Close out, interview with Manpower Office (Head of industrial relations and work requirements) confirmed that they have approved the workers promotion program by PT Inti Indosawit Subur – Ukui II POM; this has been calculated according to the company's ability and does not violate labor regulations.  Evidence of Permanent workers promotion program are available as per: <ul style="list-style-type: none"> <li>✓ Program Promosi Pemanen PHL Ke SKU-H Kebun Soga (KSA). There are 91 temporary workers will promote to become permanent workers. In 2021 semester I will promote 14 workers and semester II will promote 4 workers. In 2022 until 2025 will promote 73 workers.</li> </ul> </li> </ul>



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	<ul style="list-style-type: none"> <li>✓ Program Promosi Pemanen PHL Ke SKU-H Kebun Sei Lala (KSL). There are 74 temporary workers will promote to become permanent workers. In 2021 semester I will promote 7 workers and semester II will promote 7 workers. In 2022 until 2025 will promote 60 workers.</li> <li>✓ Program Promosi PHL Ke SKU-H Pabrik Ukui Dua (PUD). There are 17 temporary workers will promote to become permanent workers. In 2021 semester I will promote 3 workers and semester II will promote 4 workers. In 2022 until 2023 will promote 10 workers.</li> <li>- PT Inti Indosawit Subur – Ukui II POM (HR Ops Manager) has propose and appoint temporary (PHL) workers for phase 1 (attached timeline) according to the 2021 program. This was stated in "Timeline Pengangkatan SKU-H Karyawan Panen &amp; Pabrik Ukui Group". According to timeline 2021 for promotion of temporary workers to permanent workers, company has determined the step process for promotion: <ul style="list-style-type: none"> <li>✓ Administration and personalia document submission ( 1 – 3 July 2021). Company has prepare and collect all administration and personalia document for 18 temporary workers to promote. Evidence of administration preparation and collection can be demonstrated during audit.</li> <li>✓ Selection of administration and personalia (5 – 6 July 2021). Selection will be conducted based on Recruitment procedure.</li> <li>✓ Medical Checkup (7 – 10 July 2021). MCU will conducted as one of recruitment process requirement. MCU will be conducted by company doctor and cooperated with external laboratory.</li> <li>✓ Evaluation (12 – 15 July 2021). Evaluation conducted for selection process before appointment.</li> <li>✓ Appointment of SKU based on evaluation (16 July 2021).</li> </ul> </li> <li>- PT Inti Indosawit Subur – Ukui Group has issued the Memorandum regarding temporary (PHL) labor regulation. Memorandum has been made as per "Memorandum No. GM-KUK/MEMO/06/21" June 2021. The memorandum stated that temporary workers shall be regulate to use not only for harvesting but will be use for another supporting jobs such as: upkeeping, pruning, EFB application). Estate manager and assistant will be monitor the temporary workers usage in accordance with labor regulation.</li> <li>- Monitoring of temporary workers promotion will be conducted each semester according to timeline and program of PHL promotion.</li> <li>- PT Inti Idnosawit Subur – Ukui Group will ensure the use of temporary workers in accordance with labor regulations and are not fully employed for harvesting activities (during peak season/additional workers) but also employed for other jobs. It was also refer to Memorandum issued by company as per "Memorandum No. GM-KUK/MEMO/06/21" June 2021.</li> </ul> <p>Company will evaluate the load work in the old plantation for harvester. Basis of FFB harvesting in old plantation has been determined by Ukui Group in accordance with harvester average ability. Currently company also has implementing replanting program. Replanting has been running since 2017 and will be finished</p>
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	<p>on 2027. Currently Sei Lala Estate has done replanting for ± 495 ha and Soga Estate will be start replanting on 2022. Non Conformity has been Closed on 25 June 2021.</p>
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Non-conformity			
<b>NCR Ref #</b>	2040085-202103-N1	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	RSPO INA NI 2020, Clause 7.3.2
<b>Date Issued</b>	27 March 2021	<b>Due Date</b>	27 June 2021
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	Next Assessment
<b>Statement of Nonconformity:</b>	During audit found that disposal of domestic waste was not consistent with waste management plan		
<b>Requirement Reference:</b>	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
<b>Objective Evidence:</b>	<p>PT Inti Indosawit Subur – Ukui Group has a waste management plan, identifying type and source of waste and the disposal plan. A documented waste management plan to avoid or reduce pollution and its implementation available under document of Environmental Aspect-Impacts (Evaluasi Aspek-Dampak Lingkungan) year 2020.</p> <p>However, based on field visit in landfill in Soga Estate (dated 23<sup>rd</sup> March 2021, Division 1), It was found that disposal of domestic waste was done by open dumping not by landfill system, it was not consistent with waste management plan.</p>		
<b>Corrections:</b>	Soga Estate Immediately made the trash hole in the area of landfill/domestic waste disposal site. The domestic waste exist upper the ground immediately evacuate to the trash hole provided.		
<b>Root Cause Analysis:</b>	Soga Estate has a landfill system, however the available trash hole is full and closed so that the domestic waste temporary collect upper the ground/open dumping.		
<b>Corrective Actions:</b>	<p>Monitoring the domestic waste handling and monitor the landfill area to ensure that if the trash hole has been full will immediately closed and made the new trash hole.</p> <p>Provide the sufficient domestic hole (2 domestic hole) in each estate to cover organic and inorganic domestic waste.</p>		
<b>Assessment Conclusion:</b>	To be verified in the next surveillance assessment.		

Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

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Positive Findings	
PF #	Description
PF 1	Nil

### 3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
<b>NCR Ref #</b>	1861406-201911-M1	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	RSPO P&C Generic 2018, Clause 3.6.2 Critical
<b>Date Issued</b>	14 Dec 2019	<b>Due Date</b>	13 Mar 2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	20 Feb 2020
<b>Statement of Nonconformity:</b>	Unit of Certification has establish the H&S Plan according to HIRAC 2019 including monitoring of H&S Plan, however there is no sufficient monitoring against effectiveness of the H&S plan to address health and safety risks.		
<b>Requirement Reference:</b>	The effectiveness of the H&S plan to address health and safety risks to people is monitored.		
<b>Objective Evidence:</b>	During field visit at <ul style="list-style-type: none"> <li>- Loading Ramp station Ukui II POM, found that driver and FFB loader were not use appropriate PPE at workplace. While, the safety regulation at Ukui II POM, all workers shall be use appropriate PPE at Mill area.</li> <li>- Sterilizer operator Ukui-II POM not use appropriate PPE (safety shoes) at workplace.</li> <li>- Soga Estate and Sei Lala Estate found unsafe action that FFB loader seat at the top of truck cabin.</li> <li>- Ukui II POM, found that 4 fire hose at 5 Hydrant box are not properly function, while the checklist inspection stated that all Hydrant equipment were in good condition.</li> <li>- KUD Mekar Abadi, sighted 2 FFB loader not use PPE during work.</li> </ul>		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>▪ PT IIS – Ukui II POM and Estate has taken action regarding the implementation of discipline to use the appropriate PPE provided by company according to risk analysis.</li> </ul> Ukui II POM has issued the Memorandum No. 018/MI-PUD/MEMO/02/20 dated 18 February 2020 concerning the discipline of PPE usage. The Memorandum is apply for all workers including visitor in Palm oil Mill to use appropriate PPE according to the workplace area such as: safety helmet (all station), safety shoes (all station), masker (if necessary), other PPE as per risk analysis and company policy. Sanction will be given to workers and visitor who violate the this regulation including reprimand letter and blacklist to violater (driver and		

	<p>FFB transport from Plasma), reprimand letter to field foreman and workers both mill and estate.</p> <p>Memorandum has been disseminated to all employee/workers at Ukui II Palm Oil Mill, Soga and Sei Lala Estate and Plasma. Sample seen on socialization dated 18 February 2020 to FFB loader workers at Afdeling/Division I – IV Soga Estate. During interview with FFB loaders and driver from Soga Estate dan Sei Lala confirmed that they have understand regarding the obligation of PPE usage during working and visit to Ukui II POM; they also aware regarding the sanction given if they violate the regulation according the memorandum No. 018/MI-PUD/MEMO/02/20 dated 18 February 2020.</p> <ul style="list-style-type: none"> <li>▪ Management Plasma Ukui also has give the training and awareness to smallholder member of KUD Mekar Abadi and KUD Karya Tani on 30 December 2019. Training subject was related to Occupational Health and Safety including the awareness of PPE usage during working. Training record shon as per “Notulen Pelatihan Keselamatan dan Kesehatan Kerja dan Basic Safety (Penggunaan APD)”. Attendant list training and photo documentation were available. During interview with dirver and FFB loader workers at KUD Mekar Abadi and KUD Karya Tani confirmed that they have attend the training awareness of basic safety and understand regarding their obligation to obey the OHS rule and PPE usage. During field observation at KUD Mekar Abadi and KUD Karya Tani for FFB transportation activity shown that the driver and FFB loaders were using appropriate PPE (Saftey shoes, safety helmet and hand gloves). Mangement plasma Ukui also provide the new PPE for FFB loaders and dirver at KUD Mekar Abadi and KUD Karya Tani. As per “Berita Acara Penyerahan APD untuk Sopir dan Tukang Muat TBS Plasma” dated 30 December 2019.</li> <li>▪ Ukui II POM has repair and replacing the fire hose hydrant with the new one (4 fire hose) as per “Berita Acara Penggantian Selang Hydrant” dated 12 February 2020. The hydrant fire hose are found properly function and new condition, verification on hydrant box at loading ramp station, workshop station, sterilizer station and storage tank. Hydrant test also done and found in good condition and properly function with the sufficient high pressure.</li> </ul>
<p><b>Root Cause Analysis:</b></p>	<ul style="list-style-type: none"> <li>▪ Lack of Supervision function by Field Foreman/Field assistant including mill assistant to workers including FFB loaders at the workplace.</li> <li>▪ Lack of awareness and concern of workers including FFB loaders for health and safety at work because there are no sanctions given to violators of OHS norms in the field.</li> <li>▪ Lack of monitoring regarding the Hydrant installation including the equipment tools, the monitoring result made was not proper monitor by OHS expert due to mutation of OHS expert to another place.</li> </ul>
<p><b>Corrective Actions:</b></p>	<ul style="list-style-type: none"> <li>▪ PT IIS – Ukui II POM and Estate has made the program to monitor the PPE usage by workers particularly for driver and FFB loaders. The monitoring was done daily by field supervision (foreman) as per “Daftar Pemeriksaan Alat Pelindung Diri (APD)”. Sample seen on monitoring checklist of PPE usage at Loading ramp station, sterilizer station, Engine room, FFB loader at Soga Estate and Sei Lala Estate Division I – IV period February 2020.</li> <li>▪ Plasma Ukui also has made the program to monitor the PPE usage by workers (driver and FFB loaders), dailuy monitoring was done as per “Checklist Monitoring Pemakaian APD” Tahun 2020. Sample seen for KUD Mekar Abadi and KUD Karya Tani, monitoring period January and February 2020. During</li> </ul>

	<p>field visit at KUD Mekar Abadi and KUD Karya Tani shown that all FFB loaders and driver were use appropriate PPE (safety shoes and safety helmet for driver and loader and handgloves only for FFB loaders). During interview with driver and FFB loaders at KUD Mekar Abadi and KUD Karya Tani confirmed that they have attend the training awareness of basic safety and understand regarding their obligation to obey the OHS rule and PPE usage.</p>
<b>Assessment Conclusion:</b>	<p>According to corrective action made and based on field verification during NCR Major visited on 20 February 2020, this NC is closed satisfactorily.</p> <p>Verification during onsite assessment:</p> <p>Based on field verification and cocument review, confirmed that Ukui II POPM and Estate has implementing the program to monitor the PPE usage by workers. Monitoring was done daily by field supervision (foreman) as per "Daftar Pemeriksaan Alat Pelindung Diri (APD" Sample seen on monitoring checklist of PPE usage at Ukui II POM (Loading ramp station, sterilizer station, Engine room, loading ramp), FFB loader at Soga and Sei Lala Estate. Sample on period January 2021.</p> <p>Plasma Ukui also implementing the program to monitor the PPE usage by workers (driver and FFB loaders), daily monitoring was done as per "Checklist Monitoring Pemakaian APD". Sample seen on monitoring period January 2021 at KUD Usaha Tani, KUD Karya Tani and KUD Tani Bahagia.</p> <p>The NC remain close and corrective action are effectively implemented.</p>

Non-conformity			
<b>NCR Ref #</b>	1861406-201911-M2	<b>Clause &amp; Category (Major / Minor)</b>	5.3.2 Supply Chain Mill Requirements Module-D (Critical)
<b>Date Issued</b>	14 Dec 2019	<b>Due Date</b>	13 Mar 2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	20 Feb 2020
<b>Statement of Nonconformity:</b>	Result of internal audit that conducted on 24 Oct 2019 is not effective to ensures implementation and maintaining the standard requirements within organisation.		
<b>Requirement Reference:</b>	<p>5.3.2 Internal Audit (Supply Chain Mill Requirements, Module-D)</p> <p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> <li>• Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>• Effectively implements and maintains the standard requirements within its organisation.</li> </ul> <p>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 organisation shall be able to maintain the internal audit records and reports.</p>		
<b>Objective Evidence:</b>	1. PT. Inti Indosawit Subur - Ukui II POM has choose RSPO Supply Chain Module D - CPO Mills: Identity Preserved, however an internal audit that conducted on		

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	<p>24 Oct 2019 is not effective to ensuring implementation and maintaining the standard requirements within organisation, i.e.:          Clause 5.5 only stated about PK transport, whilst CPO transport activities was not included in the Internal Audit report.</p> <p>2. There was no evidence of management review in Ukui II POM that discussed result of internal audit and all actions taken to correct non-conformities as result of internal audit on 24 October 2019.</p>
<p><b>Corrections:</b></p>	<ul style="list-style-type: none"> <li>- PT IIS – Ukui II POM has conduct re internal audit on 30 December 2019 against RSPO Supply Chain Module D - CPO Mills: Identity Preserved. Internal audit carried out by Syafrizal (Sustainability staff). Internal audit report can be demonstrated, during verification can be shown that clause 5.5 regarding outsource transporter has been assess/audit. Report of audit can be demonstrated during NCR verification and found to be sufficient.</li> <li>- PT IIS – Ukui II POM has conducted the management review on 6 January 2020 after internal audit done. Management review was attend by POM key personel including Mill manager, KTU, mill process assistant, clerk, weighing clerk and sustainability team. Management review input has follow the RSPO SCC standard including:             <ul style="list-style-type: none"> <li>✓ Result of audit (internal and external)</li> <li>✓ Customer feedback</li> <li>✓ Process performance and evaluation</li> <li>✓ Preventive and corrective action status</li> <li>✓ Follow up action from previous management review</li> <li>✓ Change that affect the system management</li> <li>✓ Recommendation for improvement</li> </ul> </li> </ul> <p>Minutes of management review can be demonstrated and found to be sufficient.</p>
<p><b>Root Cause Analysis:</b></p>	<ul style="list-style-type: none"> <li>- PT IIS Ukui II POM deemed that transporter has comply to RSPO SCC and under the monitoring of company so that the internal audit has not include the transporter.</li> <li>- Minutes of management review were not present completely all the things discuss during management review, sustainability team Ukui II POM were not monitor the minutes of management review result.</li> </ul>
<p><b>Corrective Actions:</b></p>	<ul style="list-style-type: none"> <li>- Training on RSPO SCC standard and SOP Internal Audit AA-SOP-ES-6001-R5, Lampiran 1 has been done to key personel of Ukui II Palm Oil Mill including Mill manager, KTU, mill process assistant, production clerk and weighing clerk</li> <li>- Review the internal audit report by Sustainability team Jakarta to Ensure the sufficiency of internal audit process and result according to RSPO SCCS 2017. Internal audit report on 30 December 2019 against RSPO Supply Chain Module D - CPO Mills: Identity Preserved by Syafrizal (Sustainability staff) has been review by Welly Joel (Sustainability Jakarta).</li> <li>- Programmed the internal audit of RSPO SCCS at least twice a year by Internal Audit team. PT IIS - Ukui II POM has create the program of internal audit of integrated sustainability standard including RSPO SCCS at least twice a year (for RSPO SCCS only). Internal audit program 2020 has been made and for RSPO SCCS internal audit will be plaed to conducted on March and November 2020.</li> </ul>

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<b>Assessment Conclusion:</b>	<p>According to corrective action made and based on field verification during NCR Major visited on 19 February 2020, this NC is closed satisfactorily.</p> <p>Verification during onsite assessment:</p> <p>PT. Inti Indosawit Subur – Ukui II POM has a procedure to conduct internal audit RSPO, refer to SOP Internal Audit Nomor: AA-SOP-ES-6001-R5 dated 1 August 2020; Chapter 4.0 stated that Internal audit conducted minimum once a year considering the critical area.</p> <p>Last internal audit conducted on 4<sup>th</sup> September 2020. The report available under document “Internal Audit Sustainability Integrasi”. Report of internal audit has been review and discuss in the management review dated 10<sup>th</sup> September 2020, was attended by Technical Controller, POM Manager, Sustainability Staff. Result of internal audits has been followed up and all findings closed.</p> <p>The NC remain close and corrective action are effectively implemented.</p>
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Non-conformity			
<b>NCR Ref #</b>	1861406-201911-M3	<b>Clause &amp; Category (Major / Minor)</b>	5.6.1 Supply Chain Mill Requirements Module-D Major (Critical)
<b>Date Issued</b>	14 Dec 2019	<b>Due Date</b>	13 Mar 2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	20 Feb 2020
<b>Statement of Nonconformity:</b>	There are discrepancy between Shipping Announcement of CSPO and CSPK in Palm Trace compare to CSPO and CSPK delivery according to monthly Book Keeping of Ukui II POM during period December 2018 to November 2019. It was indicated over sold volume of CSPO and CSPK.		
<b>Requirement Reference:</b>	5.6.1 Sales and Goods Out (Supply Chain Mill Requirements Module-D) The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer; <ul style="list-style-type: none"> <li>• The name and address of the seller;</li> <li>• The loading or shipment / delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number of the seller;</li> <li>• A unique identification number.</li> <li>• 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).</li> <li>• For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements</li> </ul>		

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	and Confirmations on the RSPO IT platform per shipment or group of shipments.																																																				
<b>Objective Evidence:</b>	<ol style="list-style-type: none"> <li>1. According to CSPO delivery based on monthly Book Keeping record of Ukui II POM, for period December 2018 to November 2019, CSPO delivery to PT SDS was 21,665.65 MT. Whilst according to RSPO PalmTrace Transaction, since December 2018 to November 2019, Shipping Announcement made for CSPO was 36,668.49 MT. There is discrepancy of CSPO sold volume in RSPO Palm Trace with amount 15,002.84 MT.</li> <li>2. According to CSPK delivery based on monthly Book Keeping record of Ukui II POM, for period December 2018 to November 2019, CSPK delivery to Ukui I KCP was 16,061.38 MT. Whilst according to RSPO PalmTrace Transaction, since December 2018 to November 2019, Shipping Announcement made for CSPK was 18,193.77 MT. There is discrepancy of CSPK sold volume in RSPO Palm Trace with amount 2,132.39 MT.</li> </ol>																																																				
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>- PT IIS Ukui II – POM has shown the correction on the book keeping record at Palm Oil Mill coordination with Marketing/Logistic team Head office to provide the information of palmtrace announcement. The book keeping record has included the information of RSPO palmtrace announcement for CSPO and CSPKO. The information is necessary to monitor the CSPO and CSPKO transaction on palmtrace to prevent the exceed volume transaction according to delivery of CSPO and CSPK. During verification audit, POM unit can be demonstrated that actually there is no discrepancy of CSPO and CSPK delivery and Palmtrace transaction (oversold).</li> <li>- According to Shipping/BL date confirmed that 36,668.49 MT of CSPO were shipping from 26/11/2018 – 30/10/2019 and DO from August 2018. While Palmtrace announcement was done by Marketing/Logistic team Head office 4 month later after shipping on December 2018. Since August 2018 until November 2019, CSPO delivery from Ukui II POM was 45,620.50 MT while the CSPO sold volume based on DO and Shipping confirmation during that period was 36,668.49 MT.</li> </ul> <p>Below are the description of CSPO delivery and CSPO transaction on Palmtrace:</p> <table border="1" data-bbox="549 1491 1465 2027"> <thead> <tr> <th>Month</th> <th>RSPO CSPO Delivery</th> <th>RSPO Announcement (Palmtrace)</th> <th>Transaction date (Shipping/BL date)</th> </tr> </thead> <tbody> <tr> <td>August 2018</td> <td>5,586.60</td> <td>-</td> <td>-</td> </tr> <tr> <td>September 2018</td> <td>6,050.39</td> <td>-</td> <td>-</td> </tr> <tr> <td>October 2018</td> <td>5,492.89</td> <td>-</td> <td>-</td> </tr> <tr> <td>November 2018</td> <td>6,824.97</td> <td>-</td> <td>2,039.95</td> </tr> <tr> <td>December 2018</td> <td>444.20</td> <td>6,439.95</td> <td>4,400.00</td> </tr> <tr> <td>January 2019</td> <td>-</td> <td>4,079.95</td> <td>9,265.67</td> </tr> <tr> <td>February 2019</td> <td>3,226.83</td> <td>8,485.67</td> <td>3,299.95</td> </tr> <tr> <td>March 2019</td> <td>2,985.84</td> <td>-</td> <td>-</td> </tr> <tr> <td>April 2019</td> <td>-</td> <td>4,138.41</td> <td>5,188.41</td> </tr> <tr> <td>May 2019</td> <td>3,425.12</td> <td>2,549.88</td> <td>2,999.88</td> </tr> <tr> <td>June 2019</td> <td>3,323.30</td> <td>3,000</td> <td>1,500</td> </tr> <tr> <td>July 2019</td> <td>597.05</td> <td>-</td> <td>1,000</td> </tr> </tbody> </table>	Month	RSPO CSPO Delivery	RSPO Announcement (Palmtrace)	Transaction date (Shipping/BL date)	August 2018	5,586.60	-	-	September 2018	6,050.39	-	-	October 2018	5,492.89	-	-	November 2018	6,824.97	-	2,039.95	December 2018	444.20	6,439.95	4,400.00	January 2019	-	4,079.95	9,265.67	February 2019	3,226.83	8,485.67	3,299.95	March 2019	2,985.84	-	-	April 2019	-	4,138.41	5,188.41	May 2019	3,425.12	2,549.88	2,999.88	June 2019	3,323.30	3,000	1,500	July 2019	597.05	-	1,000
Month	RSPO CSPO Delivery	RSPO Announcement (Palmtrace)	Transaction date (Shipping/BL date)																																																		
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August 2019	-	1,000	374.97
September 2019	367.32	1,374.88	3,499.91
October 2019	5,659.44	5,599.75	3,099.75
November 2019	1,636.55	-	-
Total	45,620.50	36,668.49	36,668.49

So that according to the RSPO CSPO Delivery August 2018 to November 2019 compare to RSPO shipping announcement, the number of delivery CSPO is 45,620.50 MT while the Palmtrace announcement during that period was 36,668.49 MT, the rest of CSPK is becoming stock.

- According to Shipping/BL date confirmed that 18,193.77 MT of CSPK were shipping from 30/09/2018 – 31/10/2019 and DO from September 2018. While Palmtrace announcement was done by Marketing/Logistic team Head office 3 month later after shipping on December 2018. Since September 2018 until November 2019, CSPK delivery from Ukui II POM was 19,807.86 MT while the CSPK sold volume based on DO and Shipping confirmation during that period was 18,193.77 MT.

Below are the description of CSPK delivery and CSPK transaction on Palmtrace:

Month	RSPO CSPK Delivery	RSPO Announcement (Palmtrace)	Transaction date (Shipping/BL date)
September 2018	294.73		308.14
October 2018	1,814.00		1,698.11
November 2018	1,637.75		1,729.09
December 2018	1,357.93	3,544.79	1,357.26
January 2019	1,435.77	1,357.26	1,411.20
February 2019	1,207.97	1,411.20	1,130.34
March 2019	1,459.10	1,320.89	-
April 2019	1,312.88	-	2,636.52
May 2019	948.79	-	996.45
June 2019	1,106.79	2,636.52	1,105.24
July 2019	1,534.66	-	1,495.92
August 2019	1,547.84	-	1,572.34
September 2019	1,083.77	2,601.16	1,000.25
October 2019	1,822.92	-	1,752.91
November 2019	1,242.96	5,321.95	-
Total	19,807.88	18,193.77	18,193.77

So that according to the RSPO CSPK Delivery September 2018 to November 2019 compare to RSPO shipping announcement, the number of delivery CSPK is

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	19,807.88 MT while the Palmtrace announcement during that period was 18,193.77 MT, the rest of CSPK is becoming stock.
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>- Palmtrace announcement was done by Marketing/Logistic team Head office, whilst delivery and book keeping record was done by Ukui II POM; Lack of coordination between marketing team and POM unit so that there is a discrepancy of CSPO/CSPK delivery &amp; announcement.</li> <li>- Lack of monitoring from sustainability team regarding Book Keeping and Palmtrace announcement/transaction.</li> </ul>
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- Requests for CSPO announcements are made based on Ukui I POM delivery of CSPO/CSPK, to ensure that the actual CSPO sent actually comes from Ukui I POM, the information of which will be conveyed by the sustainability officer to the logistics party as the basis for the announcement (Maximum 3 months). Sustainability team Jakarta has brief the information to Marketing/Logistic team Head office and Ukui II POM through Sustainability Ukui Group.</li> <li>- Add Announcement Column and Transaction Date Column (to ensure the volume checked by the auditor will be the same, based on the download period on palmtrace) and Refresh Socialization related to mass balance format with additional announcement columns specifically for RSPO SCCS. Book keeping record at Ukui II POM has been change as per document record keeping period January – December 2019. Record keeping has include the information of CPO/PK production certified and non certified, delivery CPO/PK certified and non certified, first stock and final stock CPO &amp; PK certified and non certified, CPO/PK sold as certified and non certified, CSPO/CSPK Palmtrace announcement and date of transaction. During audit verification, record keeping period January – December 2018 and 2019 can be demonstrated and found completed and balance between production, delivery, sales and stock.</li> <li>- Sustainability team Jakarta and Ukui Group has monitor each month the record keeping. Latest monitoring conducted on January 2020. According to latest monitoring, there is no discrepancy of CPO/PK delivery and sales.</li> </ul>
<b>Assessment Conclusion:</b>	<p>According to corrective action made and based on field verification during NCR Major visited on 20 February 2020, this NC is closed satisfactorily.</p> <p>Verification during onsite assessment:</p> <p>Sustainability team Jakarta and Ukui Group has monitor each month the record keeping. Latest monitoring conducted on January 2021. According to latest monitoring, there is no discrepancy of CPO/PK delivery and sales.</p> <p>PT Inti Indosawit Subur – Ukui II POM has made Shipping Announcement in RSPO IT Platform to announce sales of RSPO certified CPO or PK per group of shipments (DO).</p> <p>The NC remain close and corrective action are effectively implemented.</p>

Non-conformity			
<b>NCR Ref #</b>	1861406-201911-M4	<b>Clause &amp; Category (Major / Minor)</b>	4.1.1 Critical (Major)
<b>Date Issued</b>	14 Dec 2019	<b>Due Date</b>	13 Mar 2020

<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	20 Feb 2020
<b>Statement of Nonconformity:</b>	Unit of Certification cannot demonstrated policy of human right that include prohibiting retaliation against Human Rights Defenders (HRD), prohibitions of intimidation and harassment by the unit of certification and contracted services.		
<b>Requirement Reference:</b>	4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.		
<b>Objective Evidence:</b>	PT. Inti Indosawit Subur already has a Policy to respect human rights as outlined in the Corporate Policy issued by the Managing Director of Asian Agri on 1 December 2014, especially at Point 13. However, the policy does not mentioned about prohibiting retaliation against Human Rights Defenders (HRD), prohibits intimidation and harassment by the unit of certification and contracted services.		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>- PT IIS Ukui I POM has made coordination with Jakarta Regional Office (JRO) to follow up an update corporate policy. PT Inti Indosawit Subur under Asian Agri Group has issued the corporate policy under “Kebijakan Perusahaan” updated on 31 December 2019 signed by Managing Director. In particular of human right policy, company has issued “Human Rights Policy” dated 1 December 2019 and signed by Managing Director. Asian Agri respect and support the Universal Declaration of Human Rights (UDHR) as well as the international labour organization declaration on fundamental principles and rights at work. Asian Agri have pledged itself to achieve the promotion of universal respect for and observance of human rights and fundamental freedoms. The document is based on the United Nations (UN) Guiding principles on Business and Human Rights framework to guide the development and implementation of Human rights. Human right policy cover 6 aspect of workplace right and community right including grievance of whistle blowing. Details on requirements to protect the rights of Human Right Defenders, including complainants, whistleblowers and community spokespersons, are set out in “Memorandum No: 005/GM-KUK/MEMO/02/20 dated 10 February 2020 “Kebijakan Melarang Adanya Tindakan Balas Dendam, Intimidasi, dan Pelecehan untuk Pelapor/Pembela Hak Asasi Manusia (Human Right Defender). To protect the complainants, whistleblowers and community spokespersons company also has a procedure of “Penyampaian dan Penyelesaian keluhan karyawan” SOP No: AA-HR-308.5-R1 dated 5 December 2019.</li> <li>- Company policy has disseminated to all staff and employee. Sample seen: socialization on 10 February 2020 to all staff PT Inti Indosawit Subur (Ukui I &amp; Ukui II POM and supply bases); Socialization on 14 February 2020 to employee Afd III; Socialization on 13 February 2020 to employee Afd. I. Company also provide the policy in the banner which installed in the strategic place (in front of estate/division office and main road). During interview with workers at Ukui II POM, Soga and Sei Lala Estate and smallholder confirmed that they have</li> </ul>		

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	understand on the company policy regarding Human Right Defenders, including complainants, whistleblowers and community spokespersons.
<b>Root Cause Analysis:</b>	Human right policy was not updated and adjust to new RSPO standard, the new policy has not been approved by top management.
<b>Corrective Actions:</b>	<p>Kept the updated company policy and filed in soft and hard copies and disseminated to all employees. Updating the company pollicy according to current RSPO standard and relevant regulation and disseminated to all employees if there is an updated and changing of policy.</p> <p>PT IIS – Ukui II POM has kept the current corporate policy “Kebijakan Perusahaan” “Kebijakan Perusahaan” updated on 31 December 2019 signed by Managing Director. In particular of human right policy, company has issued “Human Rights Policy” dated 1 December 2019 and signed by Managing Director. Details on requirements to protect the rights of Human Right Defenders, including complainants, whistleblowers and community spokespersons, are set out in “Memorandum No: 005/GM-KUK/MEMO/02/20 dated 10 February 2020 “Kebijakan Melarang Adanya Tindakan Balas Dendam, Intimidasi, dan Pelecehan untuk Pelapor/Pembela Hak Asasi Manusia (Human Right Defender).</p> <p>To protect the complainants, whistleblowers and community spokespersons company also has a procedure of “Penyampaian dan Penyelesaian keluhan karyawan” SOP No: AA-HR-308.5-R1 dated 5 December 2019.</p>
<b>Assessment Conclusion:</b>	<p>According to corrective action made and based on field verification during NCR Major visited on 20 February 2020, this NC is closed satisfactorily.</p> <p>Verification during onsite assessment:</p> <p>PT IIS – Ukui II POM has kept the current corporate policy “Kebijakan Perusahaan” “Kebijakan Perusahaan” updated on 31 December 2019 signed by Managing Director. In particular of human right policy, company has issued “Human Rights Policy” dated 1 December 2019 and signed by Managing Director. Details on requirements to protect the rights of Human Right Defenders, including complainants, whistleblowers and community spokespersons, are set out in “Memorandum No: 005/GM-KUK/MEMO/02/20 dated 10 February 2020 “Kebijakan Melarang Adanya Tindakan Balas Dendam, Intimidasi, dan Pelecehan untuk Pelapor/Pembela Hak Asasi Manusia (Human Right Defender).</p> <p>The policy has been communicated to all workers, it was confirmed during interview with workers. It was noted that there is no case on human right violation since last audit.</p> <p>The NC remain close and corrective action are effectively implemented.</p>

Non-conformity			
<b>NCR Ref #</b>	1861406-201911-M5	<b>Clause &amp; Category (Major / Minor)</b>	4.2.1 Critical (Major)
<b>Date Issued</b>	14 Dec 2019	<b>Due Date</b>	13 Mar 2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	20 Feb 2020

<p><b>Statement of Nonconformity:</b></p>	<p>Resolve disputes system which developed by unit of certification is not follows the RSPO policy on respect for Human Right Defender (HRD).</p>
<p><b>Requirement Reference:</b></p>	<p>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.</p>
<p><b>Objective Evidence:</b></p>	<p>- Company Policy related to respect for Human Right Defender (HRD) without risk of reprisal or intimidation is not approved.          - "SOP Penanganan Keluhan Masyarakat" No: AA-GL-510.1-R0, dated 1 January 2013 was not refer to policy on respect for HRD.</p>
<p><b>Corrections:</b></p>	<p>PT IIS – Ukui Group has updated the procedure of grievances and complaint handling as per “SOP Penyampaian dan Penyelesaian keluhan karyawan” SOP No: AA-HR-308.5-R1 dated 5 December 2019. This procedure is to handling the internal grievances and complaint handling from employee. This procedure has include the mechanism of protection to Human Right Defenders, including complainants, whistleblowers and spokespersons.</p> <p>In particular of human right policy, company has issued “Human Rights Policy” dated 1 December 2019 and signed by Managing Director. Details on requirements to protect the rights of Human Right Defenders, including complainants, whistleblowers and community spokespersons, are set out in “Memorandum No: 005/GM-KUK/MEMO/02/20 dated 10 February 2020 “Kebijakan Melarang Adanya Tindakan Balas Dendam, Intimidasi, dan Pelecehan untuk Pelapor/Pembela Hak Asasi Manusia (Human Right Defender).</p> <p>The eksternal grievances and complaint handling was stipulated as per “Mekanisme Keluhan” which provided in the Website of Asian Agri and can be accessed by all stakeholder of Asian Agri at <a href="https://www.asianagri.com/id/panel-keberlanjutan/keluhan-pengaduan">https://www.asianagri.com/id/panel-keberlanjutan/keluhan-pengaduan</a> .</p> <p>Asian Agri stakeholders include but are not limited to the Government, farmers, suppliers, vendors, academics, NGOs, media, etc., provided different complaint channels to report their complaints / findings. Reporters can submit complaints and information related to business violations, corruption, harassment, criminal acts, the environment, and others. All reports are confidential and if deemed appropriate, updates will be publicly available according to Grievance Mechanism:</p> <div data-bbox="416 1473 1489 1971" style="border: 1px solid black; padding: 10px;"> <p style="text-align: center;"><b>Main Steps of AA Grievance Procedure</b></p> <p><small>1 The Grievance Raiser may nominate a third party to act on their behalf.</small></p> </div>

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<b>Root Cause Analysis:</b>	The updated SOP for handling public complaints containing Human Rights Defenders (HRD) is still in the process of revision and Approved by management.
<b>Corrective Actions:</b>	<p>Updated complaints handling SOPs are stored and filed in soft and hard copies and disseminated to employees.</p> <p>Dissemination of procedure and policy has been conducted on 10 – 15 February 2020. Evidence of socialization can be demonstrated during audit verification such as: attendant list, photo documentation. Company also provide the policy in the banner which installed in the strategic place (in front of estate/division office and main road). During interview with workers at Soga and Sei Lala Estate and smallholder confirmed that they have understand on the company policy regarding Human Right Defenders, including complainants, whistleblowers and community spokespersons.</p>
<b>Assessment Conclusion:</b>	<p>According to corrective action made and based on field verification during NCR Major visited on 20 February 2020, this NC is closed satisfactorily.</p> <p>Verification during onsite assessment:</p> <p>Resolves disputes system which developed by unit of certification has follows the RSPO Policy on respect for Human Right Defender (HRD), it was mentioned in the Human Rights Policy dated 1 December 2019 and signed by Managing Director. Details on requirements to protect the rights of Human Right Defenders, including complainants, whistleblowers and community spokespersons, are set out in "Memorandum No: 005/GM-KUK/MEMO/02/20 dated 10 February 2020 "Kebijakan Melarang Adanya Tindakan Balas Dendam, Intimidasi, dan Pelecehan untuk Pelapor/Pembela Hak Asasi Manusia" (Human Right Defender). The external grievances and complaint handling was stipulated as per "Mekanisme Keluhan" which provided in the Website of Asian Agri and can be accessed by all stakeholder of Asian Agri at <a href="https://www.asianagri.com/id/panel-keberlanjutan/keluhan-pengaduan">https://www.asianagri.com/id/panel-keberlanjutan/keluhan-pengaduan</a>.</p> <p>Asian Agri stakeholders include but are not limited to the Government, farmers, suppliers, vendors, academics, NGOs, media, etc., provided different complaint channels to report their complaints/findings. Reporters can submit complaints and information related to business violations, corruption, harassment, criminal acts, the environment and others.</p> <p>The NC remain close and corrective action are effectively implemented.</p>

Non-conformity			
<b>NCR Ref #</b>	1861406-201911-M6	<b>Clause &amp; Category (Major / Minor)</b>	6.7.3 Critical (Major)
<b>Date Issued</b>	14 Dec 2019	<b>Due Date</b>	13 Mar 2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	20 Feb 2020
<b>Statement of Nonconformity:</b>	Workers not use appropriate PPE at workplace.		
<b>Requirement Reference:</b>	6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are		

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	available, so that workers can change out of PPE, wash and put on their personal clothing.
<b>Objective Evidence:</b>	<p>During field visit at</p> <ul style="list-style-type: none"> <li>- Loading Ramp station Ukui II POM, found that driver and FFB loader were not use appropriate PPE at workplace. While, the safety regulation at Ukui II POM, all workers shall be use appropriate PPE at Mill area.</li> <li>- Sterilizer operator Ukui-II POM not use appropriate PPE (safety shoes) at workplace.</li> <li>- KUD Mekar Abadi, sighted 2 FFB loader not use PPE during work.</li> </ul>
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>- PT IIS – Ukui II POM and Estate has taken action regarding the implementation of discipline to use the appropriate PPE provided by company according to risk analysis.  Ukui II POM has issued the Memorandum No. 018/MI-PUD/MEMO/02/20 dated 18 February 2020 concerning the discipline of PPE usage. The Memorandum is apply for all workers including visitor in Palm oil Mill to use appropriate PPE according to the workplace area such as: safety helmet (all station), safety shoes (all station), masker (if necessary), other PPE as per risk analysis and company policy. Sanction will be given to workers and visitor who violate the this regulation including reprimand letter and blacklist to violater (driver and FFB transport from Plasma), reprimand letter to field foreman and workers both mill and estate.  Memorandum has been disseminated to all employee/workers at Ukui II Palm Oil Mill, Soga and Sei Lala Estate and Plasma. Sample seen on socialization dated 18 February 2020 to FFB loader workers at Afdeling/Division I – IV Soga Estate. During interview with FFB loaders and driver from Soga Estate dan Sei Lala confirmed that they have understand regarding the obligation of PPE usage during working and visit to Ukui II POM; they also aware regarding the sanction given if they violate the regulation according the memorandum No. 018/MI-PUD/MEMO/02/20 dated 18 February 2020.</li> <li>- Management Plasma Ukui also has give the training and awareness to smallholder member of KUD Mekar Abadi and KUD Karya Tani on 30 December 2019. Training subject was related to Occupational Health and Safety including the awareness of PPE usage during working. Training record shon as per "Notulen Pelatihan Keselamatan dan Kesehatan Kerja dan Basic Safety (Penggunaan APD)". Attendant list training and photo documentation were available. During interview with dirver and FFB loader workers at KUD Mekar Abadi and KUD Karya Tani confirmed that they have attend the training awareness of basic safety and understand regarding their obligation to obey the OHS rule and PPE usage. During field observation at KUD Mekar Abadi and KUD Karya Tani for FFB transportation activity shown that the driver and FFB loaders were using appropriate PPE (Saftey shoes, safety helmet and hand gloves). Mangement plasma Ukui also provide the new PPE for FFB loaders and dirver at KUD Mekar Abadi and KUD Karya Tani. As per "Berita Acara Penyerahan APD untuk Sopir dan Tukang Muat TBS Plasma" dated 30 December 2019.</li> </ul>

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<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>- Lack of Supervision function by Field Foreman/Field assistant including mill assistant to workers including FFB loaders at the workplace.\</li> <li>- Lack of awareness and concern of workers including FFB loaders for health and safety at work because there are no sanctions given to violators of OHS norms in the field.</li> </ul>
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- PT IIS – Ukui II POM and Estate has made the program to monitor the PPE usage by workers particularly for driver and FFB loaders. The monitoring was done daily by field supervision (foreman) as per “Daftar Pemeriksaan Alat Pelindung Diri (APD)”. Sample seen on monitoring checklist of PPE usage at Loading ramp station, sterilizer station, Engine room, FFB loader at Soga Estate and Sei Lala Estate Division I – IV period February 2020.</li> <li>- Plasma Ukui also has made the program to monitor the PPE usage by workers (driver and FFB loaders), daily monitoring was done as per “Checklist Monitoring Pemakaian APD” Tahun 2020. Sample seen for KUD Mekar Abadi and KUD Karya Tani, monitoring period January and February 2020. During field visit at KUD Mekar Abadi and KUD Karya Tani shown that all FFB loaders and driver were use appropriate PPE (safety shoes and safety helmet for driver and loader and handgloves only for FFB loaders). During interview with driver and FFB loaders at KUD Mekar Abadi and KUD Karya Tani confirmed that they have attend the training awareness of basic safety and understand regarding their obligation to obey the OHS rule and PPE usage.</li> </ul>
<b>Assessment Conclusion:</b>	<p>According to corrective action made and based on field verification during NCR Major visited on 20 February 2020, this NC is closed satisfactorily.</p> <p>Verification during onsite assessment:</p> <p>PT. Inti Indosawit Subur – Ukui II POM has a procedure to conduct internal audit RSPO, refer to SOP Internal Audit Nomor: AA-SOP-ES-6001-R5 dated 1 August 2020; Chapter 4.0 stated that Internal audit conducted minimum once a year considering the critical area.</p> <p>Last internal audit conducted on 4<sup>th</sup> September 2020. The report available under document “Internal Audit Sustainability Integrasi”. Report of internal audit has been review and discuss in the management review dated 10<sup>th</sup> September 2020, was attended by Technical Controller, POM Manager, Sustainability Staff. Result of internal audits has been followed up and all findings closed.</p> <p>The NC remain close and corrective action are effectively implemented.</p>

Non-conformity			
<b>NCR Ref #</b>	1861406-201911-N1	<b>Clause &amp; Category (Major / Minor)</b>	6.2.7 Minor
<b>Date Issued</b>	14 Dec 2019	<b>Due Date</b>	Next Surveillance
<b>Closed (Yes / No)</b>	No, Escalated to Major NC	<b>Date of nonconformity Closure</b>	Next Surveillance
<b>Statement of Nonconformity:</b>	Unit of certification employed harvester as core work with non-permanent and full-time employment.		



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<b>Requirement Reference:</b>	6.2.7 Permanent, full-time 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.
<b>Objective Evidence:</b>	<p>Based on list of employee's data at Sei Lala Estate period November 2019, there is total 95 temporary workers (harvester and FFB loader) as core work performed. Whereby, promotion program for temporary/casual workers cannot demonstrate by unit of certification.</p> <p>Based on interview with harvesting supervisor in Block D90a, Afdeling 4 (Soga Estate) it was informed that 2 temporary harvester and 7 temporary harvester in Block D91d, Afdeling 4 (Sei Lala Estate) are still employed by the unit of certification. However, promotion program for temporary/casual workers cannot demonstrate by unit of certification.</p>
<b>Corrections:</b>	Create a promotion program for harvest employees and cargo workers in 2020 - 2035
<b>Root Cause Analysis:</b>	The mechanism of promotion of harvest employees and loaders has not yet been finalized
<b>Corrective Actions:</b>	Ensuring that all core workers related to palm oil plantation are permanent workers. Monitoring the casual workers each month by KTU to ensure that they don't performed the core work and ensure that casual workers work more than 3 month are promote to be permanent workers according to labor regulation.
<b>Assessment Conclusion:</b>	This NC still OPEN and escalated to Major NC.

Opportunity for Improvement	
OFI#	Description
<b>OFI 1</b>	<p>1861406-201911-I1</p> <p>Indicator 7.12.7</p> <p>Considering re-delineated measurement of HCV area along the riparian at replanting area, to prevent double counting in planted area.</p> <p><u>RC2 status:</u></p> <p>Company has delineated HCV area at replanting area. During audit, company has signed the boundary of HCV area in the replanting area to ensure that HCV area protect and no activity of replanting in HCV area.</p>

**3.4.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1412038M1	MAJOR	4.6.5	1-11-2016	Closed. 31-01-2017
1412038M2	MAJOR	4.7.2	1-11-2016	Closed. 31-01-2017

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1412038M3	MAJOR	4.4.2	1-11-2016	Closed. 31-01-2017
1412038N1	minor	4.7.6	1-11-2016	Closed. 21-12-2017
1569381-201712-M1	MAJOR	4.7.1	21-12-2017	Closed. 13-02-2018
1569381-201712-M2	MAJOR	6.1.3	21-12-2017	Closed. 13-02-2018
1569381-201712-N1	Minor	5.1.3	21-12-2017	Closed. 19-12-2018
1569381-201712-N2	Minor	5.2.4	21-12-2017	Closed. 19-12-2018
1569381-201712-N3	Minor	5.4.1	21-12-2017	Closed. 19-12-2018
1722078-201812-M1	MAJOR	4.7.2	22 Dec 2018	Closed. 13-02-2019
1722078-201812-M2	MAJOR	3.2.ii) General CoC requirements for the supply chain.	22 Dec 2018	Closed. 13-02-2019
1722078-201812-M3	MAJOR	5.8.2 General CoC requirements for the supply chain.	22 Dec 2018	Closed. 13-02-2019
1722078-201812-M4	MAJOR	5.13.2 General CoC requirements for the supply chain.	22 Dec 2018	Closed. 13-02-2019
1722078-201812-M5	MAJOR	5.13.3 General CoC requirements for the supply chain.	22 Dec 2018	Closed. 13-02-2019
1722078-201812-N1	Minor	4.7.5	22 Dec 2018	Closed on 14 Dec 2019
1722078-201812-N2	Minor	4.7.7	22 Dec 2018	Closed on 14 Dec 2019
1722078-201812-N3	Minor	5.3.3	22 Dec 2018	Closed on 14 Dec 2019
1861406-201911-M1	Critical	3.6.2	14 Dec 2019	Closed on 20 Dec 2020
1861406-201911-M2	Critical	5.3.2	14 Dec 2019	Closed on 20 Dec 2020
1861406-201911-M3	Critical	5.6.1	14 Dec 2019	Closed on 20 Dec 2020
1861406-201911-M4	Critical	4.1.1	14 Dec 2019	Closed on 20 Dec 2020
1861406-201911-M5	Critical	4.2.1	14 Dec 2019	Closed on 20 Dec 2020
1861406-201911-M6	Critical	6.7.3	14 Dec 2019	Closed on 20 Dec 2020
1861406-201911-N1	Minor	6.2.7	14 Dec 2019	Escalated to Major NC
2040085-202103-M1	Critical	6.2.7	27 Mar 2021	Closed on 25 Jun 2021
2040085-202103-N1	Minor	7.3.2	27 Mar 2021	OPEN

### 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 Inti Indosawit Subur – Ukui II POM

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Certification Unit’s environmental and social performance, legal and any known dispute issues. Stakeholder notification has been made on 22<sup>nd</sup> February 2021 and uploaded in the RSPO website <https://www.rspo.org/certification/public-announcement>

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.

<b>List of Stakeholders contacted</b>	
<p><b>Internal Stakeholders</b></p> <p><b>Gender Committee:</b>            Ibu Anisa (Secretaries of Gender Committee of Sei Lala Estate)            Ibu Yuliana Syarifah (Chairman of Gender Committee of Ukui Estate)            Ibu Efa Kurnia (Secretaries of Gender Committee of Soga Estate)</p> <p><b>Workers of PT Inti Indosawit Subur – Buatan I POM and Supply Bases</b></p>	<p><b>Union/Contractors</b></p> <p><b>Labour Union:</b>            Bpk. Zaina Arifin Hargan (Chairman of KSPSI – Soga Estate)            Bpk. Natangsa Sembiring (Chairman of KSPI – Ukui Estate)</p> <p><b>Head of Ukui Dua Village</b>            Bpk. Suwardi (0852***)</p> <p><b>Secretaries of Bagan Limau Village</b>            Bpk. Harahap (0821***)</p>
<p><b>Government Departments</b></p> <ul style="list-style-type: none"> <li>▪ <b>Environmental Office of Pelalawan Regency</b>              Bpk. Tohaji Ajit (0853***)</li> <li>▪ <b>Department of Plantation Pelalawan Regency</b>              Bpk. Heri (0852***)              Bpk. Davis Riswan (0852***)</li> <li>▪ <b>Department of Manpower of Pelalawan Regency:</b>              Bpk. Iskandar and Bpk Zul (0852***)</li> </ul> <p>Consultation was conducted by phone to prevent the covid-19 outbreak and follow the social distancing policy.</p>	<p><b>NGO</b></p> <p><b>LSM Kabar Riau</b>            Bpk. Rudi (0822***)</p>

<b>Stakeholders comment</b>	
	<b>Feedbacks:</b>

<p><b>1.</b></p>	<p><b>Department of Plantation Pelalawan Regency</b>            Bpk. Heri (0852***) and            Bpk. Davis Riswan (0852***)</p> <ul style="list-style-type: none"> <li>▪ PT Inti Indosawit Subur – Ukui Group (Ukui I dan II) has obtained HGU and in line with spatial planning for Pelalawan Regency, as cultivation/plantation area.</li> <li>▪ Company has reported the plantation operation activities on regular basis to “Dinas Kehutanan dan Perkebunan Kabupaten Pelalawan Semester II 2020”.</li> <li>▪ There was issue related to request from community for company to release cemetery land and request for company to release land for marketplace development.</li> <li>▪ The company has obtained Plantation Business Permit (IUP)</li> <li>▪ There is no report related to land claim and land dispute occurred and submit by community or other company.</li> <li>▪ FFB price established based on market price, and company was not bound to FFB price regulated by “Keputusan Penyusunan Harga TBS Propinsi Riau”. Based on report, PT Inti Indosawit Subur – Ukui I and II Group has price structure better than other companies.</li> <li>▪ If the plasma replanting program has been agreed by all parties, it should be immediately submitted to the Pelalawan District Plantation Office.</li> <li>▪ There are rumors circulating that there are 2 options for plasma farmers of PT IIS - Ukui group regarding the replanting program to be implemented, namely: partnership scheme smallholder (Plasma) and self-management (independent).</li> </ul> <p><b>Management Responses</b></p> <p>Company acknowledge the comment from Plantation Agency.</p> <ul style="list-style-type: none"> <li>▪ Related to the Replanting Scheme smallholder Ukui Group Program:              There are about 422 hectares of oil palm plantations that will be uprooted and replanted with Topaz superior oil palm seeds. The KUD Sumber Bahagia oil palm replanting program received support from Asian Agri through its business unit PT Inti Indosawit Subur - Ukui Plasma Plantation.</li> <li>▪ The replanting of KUD Sumber Bahagia phase 1 also managed to get funding for oil palm replanting from BPDPKS (<i>Badan Pengelola Dana Perkebunan Kelapa Sawit</i>-Palm Oil Plantation Fund Management Agency) IDR 25,000,000/ha with an area of 410 Ha</li> <li>▪ There are 2 replanting schemes; namely partnering with companies which are partnership schemes (Plasma) and self-help schemes (independent). PT IIS - Ukui Group as coach of the farmers oil palm, his party continues to facilitate whatever farmers choose through deliberation between members through the KUD forum.</li> </ul> <p><b>Audit Team Findings</b></p> <p>Audit team will continue to monitor PT Inti Indosawit Subur – Ukui Group related to Plantation management and monitoring performance.            The replanting program in scheme smallholder-Plasma will be verified at the next audit.</p>
<p><b>2.</b></p>	<p><b>Feedbacks:</b>  <b>Department of Manpower of Pelalawan Regency:</b>            Bpk. Iskandar and Bpk Zul (0852***)</p> <ul style="list-style-type: none"> <li>▪ Generally, PT Inti Indosawit – Ukui Group has built good communication with Manpower and Transmigration Office – Pelalawan Regency.</li> </ul>

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- PT Inti Indosawit Subur – Ukui Group has complied well with legislation related to employment, i.e;
  - Company has provided all normative rights for employee, such as salary as lined out in minimum wage for province level, leave entitlement, employees registered with social insurance for worker (BPJS), benefit for religious festival, provision of facilities (housing, electricity, clean water, medical clinic, school/school bus, worship house, personal protective equipment, working tools, etc.).
  - There was no report/complaint logged in related to discriminative action by company. There was no report/complaint logged in related to the use of child worker/under age worker.
  - Company has submitted health and safety performance report regularly to the manpower agency.
  - Complaint received from worker union related to medical service provided by “BPJS Kesehatan”, in particular medical treatment service from hospital/clinic where no cooperation with BPJS.
  - There is no industrial relationship dispute occurred from the last year.
  - No identified issues related to the use of child labor, violence and forced labor.
  - Company has prepared infrastructure and facility for worker’s welfare such as: housing, clean water, electricity, medical facility, education, etc.

Suggestions:

- 1) In relation to the daily worker (PHL), so that the appointment program can be made as a permanent worker if it meets the requirements.
- 2) PKB is still made by HO Medan, can be considered to make Derivative PKB

**Management Responses:**

- 1) The company has identified that it is related to the main work in oil palm plantations Based on Circular Letter from GAPKI No. 073/GAPKI/II/2013 dated 8 February 2013 concerning Circular for the Flow of Work Implementation Process Activities in the Oil Palm Plantation Business Sector, stating that; only 2 (two) jobs that are the main activities in the Oil Palm Plantation industry, namely **harvesting and product processing activities**.

Based on document of employee’s master period February 2020 verification, as follow;

**UKUI II**

Soga Estate:

In detail the list of harvesters in Soga Estate as follows:

- PHL : 72 harvesters
- PKWT : 18 harvesters
- Total : 90 harvester**

As of February 2021, the company has proposed the promotion of PHL harvest employees to SKU as many 16 harvester, based on 070/MI-KSA/MEMO/02/21 dated February 5, 2021.

Sei Lala Estate:

In detail the list of harvesters in Soga Estate as follows:

- PHL : 90 harvesters
- PKWT : 5 harvesters
- Total : 95 harvester**

As per March 2021 Sei Lala Estate has applied for the promotion of 12 harvesters through Memorandum Estate Manager No. 045/ES-KSL/MEMO/03/21 dated March 12, 2021.

Ukui Dua POM:

	<p>In detail the list of processing in Ukui II POM as many 13 workers.</p> <p><b><u>UKUI I</u></b> <b><u>Ukui I Estate:</u></b></p> <p>In detail the list of harvesters in Ukui Estate as follows:</p> <ul style="list-style-type: none"> <li>- PHL : 88 harvesters</li> <li>- PKWT : 6 harvesters</li> </ul> <p><b>Total : 94 harvester</b></p> <p>Based on Memorandum No. 042/HR-RO2/MEMO/SK/2/2020 dated 26 February 2020 as much as 6 harvesters and Memorandum No. 069/HR-RO2/MEMO/SK/02/2021 dated 27 February 2021 as much as 12 harvesters.</p> <p>So on period 2020 – 2021 (up to March 2021), there are promotion from temporary to permanent as many 18 harvesters.</p> <p>On Period 2020, based on Memorandum No. 356/ES-KUK/MEMO/12/20 dated 7 December 2020 there are recruitment of harvesters as much as 10 harvesters.</p> <p>So, up to March 2021, there are 94 harvesters in Ukui Estate with non permanent (PHL and PKWT) status.</p> <p><b><u>Ukui Satu POM:</u></b></p> <p>Based on Master list of employees period February 2021, there are employee of processing in Ukui I POM as many 15 workers.</p> <p>Company has already programmed an annually employee promotion on 2019 until 2021, that is: "Program 3 Years of Ukui Group to Appointment of PHL employees to SKU</p> <p>2) Worker Agreement (PKB) between company and labour union is referred in working regulation, Worker Agreement was registered by "Dirjen Pembinaan Hubungan Industrial dan Jaminan Sosial Tenaga Kerja"</p> <p>PT IIS – Ukui Group already has Collective Work Agreement (PKB) period 2018-2020 which has been approved by the Director General of Industrial Relations and Social Security of Workers through Decision Letter no. B.319/PHIJSK/X/2018 dated 26 October 2018 concerning Registration of "PKB Badan Kerjasama Perusahaan Perkebunan Sumatera (BKS-PPS)" with Central Board of Federasi Serikat Pekerja Pertanian dan Perkebunan - SPSI. PKB is binding for all SKU-H and SKU-B levels. The PKB is valid for 2 years and build in Indonesian language.</p> <p>Making Working Agreement - PKB which is a derivative of PKB from HO Medan and agreement with PUK SPSI Medan still needs to be communicated and socialized related to the formation of a derivative PKB.</p>
	<p><b>Audit Team Findings:</b></p> <p>The company has taken action in accordance with well-established procedures and persuasive approach, so there is no turmoil / issue.</p> <p>With respect to wages, the use of PPE and SIO, the company has implemented in accordance with relevant law and regulations.</p> <p>Regarding the formation of PKB derived from PUK SPSI, the auditor team will carry out verification at the next audit visit.</p>
<p><b>3.</b></p>	<p><b>Feedbacks:</b></p> <p><b>Dinas Lingkungan Hidup Kabupaten Pelalawan</b> Bpk. Tohaji (Kadis DLH Pelalawan Regency)</p> <ul style="list-style-type: none"> <li>▪ Company has revised the AMDAL document and report to Environmental Agency.</li> </ul>

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- Company has an environmental document related to development of biogas plant and kernel crushing plant.
- Replanting activity has been covered in environmental management and monitoring plan.
- Company has consistently reporting the environmental management: Laporan RKL-RPL, Laporan Pengelolaan Limbah B3, Laporan Pemanfaatan Limbah Cair.
- PT Inti Indosawit Subur – Ukui I & II POM has performed environmental management in good manner.
- Hazardous waste/LB3 monitoring report on Shelter Temporary (TPS) Hazardous waste/LB3 has been done.
- Company has managed the hazardous waste, obtained permit for temporary storage – in accordance with relevant regulation.
- There are an issue related to a leak or broken in the waste pool at Ukui I POM, i.e:  
On February 2, 2021, a notification letter was received from the Mill Manager of PT Inti Indosawit Subur - Palm Oil Mill Ukui 1, Ukui District, Pelalawan Regency to the Pelalawan Regency Environment Service, Riau Province Number: 009/Ext-PUS/02/2021 dated 02 February 2021 that there had been the embankment of the waste buffered water pond in the WWTP is broken, namely Pool 8 (Secondary Anaerobic Pound 2), Pool 9 (Secondary Anaerobic Pound 3) and Pool 10 (Sedimentation Pound).

#### **Management Responses:**

Company acknowledge the comment from Plantation Agency.

Regarding the issue of the leakage of the waste pool at Ukui I Mill:

PT IIS – Ukui Group already has procedures for waste water management and control of WWTP pool leakage. AA-KL-01-EFP Rev.02 dated December 1, 2010.

- The chronology of the leakage of the WWTP pool in Ukui I POM has been reported by Mill Manager ( bpk. Prima Hutagaol) as of February 1, 2021, as follows:
  1. The incident was reported by a security officer who was on patrol in the Ukui I POM IPAL area on February 1, 2021.
  2. The Factory Assistant reports to the Mill Manager that the WWTP pool is broken.
  3. The Mill Manager instructs all workers in the factory to go to the waste pool with the equipment.
  4. Factory assistants and employees carry out emergency embankment construction
  5. Factory assistants and employees close ditches in the HGU area leading to the Pematang river to prevent the flow of wastewater from entering the Pematang river
  6. Heavy equipment (Excavators) dig soil to dam up the ditch in the HGU location leading to the Pematang river to prevent the flow of waste water into the Pematang river
  7. Then the heavy equipment (Excavator) fills the embankment of the WWTP that has broken.

Chronological Report is attached.

- PT Inti Indosawit Subur PMKS UKUI-1 reported the incident of the breakdown of the WWTP waste pool to the Pelalawan Environment Agency on October 1, 2021. (Letter attached)
- The Environmental Service of Pelalawan Regency (Head of Arrangement: Bpk Tohaji, Head of Environmental Complaints and Law Enforcement Services: Bpk. Hechi Valentino and Defenda Yanti. N.) conducted a field verification on February 2, 2021.

District Environmental Office. Pelalawan witnessed by the company took water samples and measured the PH of the water in situ as follows:

1. Sample 1 is located in Pool 10 (Sedimentation Pound).
2. Sample 2 is in a company trench which is 1 km from the location of Pond 10 (Sedimentation Pound)

	<p>3. Sample 3 is in the upstream location of the Pematang River which is 3 km from the location of Pond 10 (Sedimentation Pound)</p> <p>4. Sample 4 is in the Pematang River location which is 7 km from the Pool 10 location (Sedimentation Pound)</p> <p>5. Sample 5 is located at the Air Hitam River location which is 25 km from the location of Pond 10 (Sedimentation Pound)</p> <p>The results of the verification and the Minutes of Sampling by the Pelalawan Regency Environmental Service are attached.</p> <p>Based on the results of checking 5 samples dated 10 February 2021 by the Health and Environment Laboratory of the Riau Provincial Health Office, that the measurement parameters are still below the quality standard (based on the Minister of Environment Regulation No. 5 of 2004, attachment III and Government Regulation No. 82 of 2001) . The laboratory test results are attached.</p> <p><b>Audit Team Findings:</b></p> <p>During audit, auditor team was conducted field observation and verification to the location. Based on the observation that the conditions at the location have been controlled properly, including the river water flowing in the area (petang river), no pollution has occurred.</p> <p>Audit team will continue to monitor PT Inti Indosawit Subur – Ukui Group and will carry out monitoring and verification related to environmental aspects around plantations and mills.</p>
<p><b>4.</b></p>	<p><b>Feedbacks:</b></p> <p><b>NGO</b></p> <p><b>LSM Kabar Riau</b></p> <p>Bpk. Rudi (0822***)</p> <p>In February 2021, there were allegations of environmental pollution caused by the breakdown of the IPAL PT Indosawit Subur Palm Oil Mill (PKS) 1 in Ukui village, Pelalawan, Riau.</p> <p><b>Management Responses:</b></p> <p>The explanation has been described in the comments from the Pelalawan District Environmental Service Issue above.</p> <p><b>Audit Team Findings:</b></p> <p>Audit team will continue to monitor PT Inti Indosawit Subur – Ukui Group and will carry out monitoring and verification related to environmental aspects around plantations and mills.</p>
<p><b>5.</b></p>	<p><b>Feedbacks:</b></p> <p><b>Head of Ukui Dua Village</b></p> <p>Bpk. Suwardi (0852***)</p> <p><b>Secretaries of Bagan Limau Village</b></p> <p>Bpk. Harahap (0821***)</p> <ul style="list-style-type: none"> <li>- Generally, the communication between the village government or local community and company has going well.</li> <li>- The company has always responded to each problem or issue submitted by government officials from village and surrounding communities.</li> <li>- The Company has realized a CSR program to the local community and involve them in the CSR program planning process in each village. However, need more intensive communication to make it harmonize with ADD program.</li> </ul>



	<ul style="list-style-type: none"> <li>- Surrounding communities feels positive due to benefits from the presence of the company, for the maintenance of road infrastructure, public health, education and community economic development (trainings on productive enterprises).</li> <li>- There was no report from the community working in the company related to forced labor practices by the company.</li> <li>- Employees working at PT IIS (Ukui Group) have received the wages as determined by the government.</li> <li>- Communities has understood the rules of the company prohibiting the acceptance of underage workers / child laborers.</li> <li>- Maintenance transport access roads for transportation of FFB and CPO.</li> </ul> <p><b>Management Responses:</b>  The company has made a road maintenance program through CSR programs that are conducted twice a year. Maintenance of this road consists of the formation of roads, hardening using rock and road compacting. Access road maintenance FFB and CPO carried out scheduled, every 4 months once done using heavy equipment (motor grader) good maintenance or hoarding the road and compacter. In the dry season done watering the road every day (in the morning and evening).</p> <p><b>Audit Team Findings:</b>  Audit team will continue to monitor PT Inti Indosawit Subur - Ukui Group related to manpower and communications and transparency information.</p>
<p><b>6.</b></p>	<p><b>Feedbacks:</b></p> <p><b>Labour Union:</b>  Bpk. Zaina Arifin Hargan (Chairman of KSPSI – Soga Estate)  Bpk. Natangsa Sembiring (Chairman of KSPI – Ukui Estate)</p> <p><b>Gender Committee:</b>  Ibu Anisa (Secretaries of Gender Committee of Sei Lala Estate)  Ibu Yuliana Syarifah (Chairman of Gender Committee of Ukui Estate)  Ibu Efa Kurnia (Secretaries of Gender Committee of Soga Estate)</p> <ul style="list-style-type: none"> <li>- The Company has realized Normative Rights of employees such as remuneration in accordance with applicable regulations, Allowance/THR, BPJS Program.</li> <li>- Legally SPSI members is a labor consist of SKU labor and also staff however operationally SPSI also consider the problems that occur at the level of non permanent workers/PHL.</li> <li>- Non permanent workers has had a Labour Agreement (SPK) with the company.</li> <li>- Performance appraisals are conducted once a year as management considerations for evaluation, promotion and rotation.</li> <li>- There is no indication that the company conducted discrimination against its workers.</li> <li>- The company has provided Personal Protective Equipment (PPE) for all workers.</li> <li>- The company has providing facilities for employees adequately for example housing, water, electricity, toilets, Sanitation, School Bus, clinics, places of worship.</li> <li>- The Company has registered all the workers in BPJS program (Employment and Health BPJS) including PHL (non-permanent employees).</li> <li>- There has never happened employees demonstration to the company management.</li> <li>- The Company has provided wages in accordance with existing regulations.</li> <li>- There is no indication of the company in violation of Human Rights.</li> <li>- There is no indication of forced or coercive labor practice of work.</li> </ul>

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	- "Lembaga kerjasama Bipartit (LKS Bipartit)"/Cooperation Institution has been established as a medium of communication between the company and employees.
	<b>Management Responses:</b> For the positive things that have been done will be maintained and improved by the management to be better in the future.
	<b>Audit Team Findings:</b> The company has maintained good management of occupational and social policy, all feedback from workers union are positive as well as previous assessment, audit team acknowledge the positive feedback.

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Nil					
PT Inti Indosawit Subur – Ukui II POM has established since 1985 and has planting palm oil since 1987, 1988, 1989. Currently the palm oil has been replanting since 2017 – 2027.					

Previous land owner / user comment	
	<b>Feedbacks:</b> Nil
	<b>Management Responses:</b> Nil
	<b>Audit Team Findings:</b> Nil

**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 Inti Indosawit Subur – Ukui II POM has complied with the RSPO Principles and Criteria 2018, Indonesia National Interpretation 2020 for Sustainable Palm Oil 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 Inti Indosawit Subur – Ukui II POM is continued.

<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name: Mujinius Jalaraya</b>	<b>Name: Putu Ghryate Yonata Aksa</b>
<b>Company Name: BSI Services Malaysia Sdn. Bhd</b>	<b>Company Name: PT Indo Sepadan Jaya</b>
<b>Title: Lead Auditor</b>	<b>Title: Sustainability Coordinator</b>
<b>Signature:</b> 	<b>Signature:</b>   <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i>
<b>Date: 15 July 2021</b>	<b>Date: 19 July 2021</b>

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance
<p><b>Principle 1: Behave ethically and transparently</b></p>		
<p>Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>		
<p><b>Criteria 1.1:</b> The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p>		
<p>1.1.1</p>	<p><b>(C)</b> Management documents that are specified in the RSPO P&amp;C are made publicly available.</p> <p>Company has a set of publicly available document in form of “<i>Daftar Dokumen dan Informasi Untuk Diakses Publik PT Inti Indosawit Subur</i>” updated on 6 January 2020. The provision of publicly available document segregates based on stakeholder category: Government, community and NGO: AMDAL document, RKL/RPL report, Social Impact Assessment, HCV identification and monitoring report, land permit (Izin Lokasi – location permit, Izin Prinsip – principle permit, HGU/land title certificate), environmental permit, palm oil mill machinery permits and licenses, safety committee report, plantation business progress report, conservation management plan document, environmental management program, corporate social responsibility/CSR documents, FFB price, forest and land firefighting report, ground water use report, tax and retribution payment documents, radio station permit, company policies, continuous improvement program, social procedures, hazardous waste handling report, POME land application permit and report, manpower report, employee’s medical checkup result, physical and chemical analysis of river water, land compensation report, public summary report.</p> <p>A number of documents are determined to be available for public (e.g: Government, local communities, NGO and public figure), with approval from management:</p> <ul style="list-style-type: none"> <li>▪ Report on the Implementation of the RKL-RPL every 6 months (environmental management and monitoring report);</li> <li>▪ Report on B3 waste balance every 3 months (hazardous waste balance report);</li> <li>▪ Social Impact Assessment (SIA)</li> </ul>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>▪ HCV identification report</li> <li>▪ Company Policy (e.g: Human Rights, manpower policy including health and safety policy, etc.)</li> <li>▪ CSR annually report</li> <li>▪ Reports of liquid and solid waste every 3 months (solid and liquid waste report);</li> <li>▪ Report on the use of surface and underground water every once a year (Underground and surface water usage report);</li> <li>▪ P2K3 report every 3 months period (health and safety report);</li> <li>▪ Mandatory Report</li> <li>▪ Manpower report once a year (manpower report);</li> <li>▪ Plantation business progress report every 1 year period (plantation business progress report);</li> <li>▪ Reports on the results of high conservation value monitoring (high conservation value monitoring report);</li> <li>▪ Report on monitoring and preventing land fires every 6 months (land fire monitoring and prevention activity report);</li> <li>▪ Employee's medical checkup result;</li> <li>▪ Report on air emissions (air emission test report);</li> <li>▪ Report on river physical and chemical analysis (river water's physical and chemical test results);</li> <li>▪ Public Summary Report of RSPO and ISPO</li> </ul> <p><b>Scheme Smallholder:</b>  The Smallholder Manager has determined type of documents which can be accessed by public as "<i>Daftar Dokumen yang Dapat Di Akses (tahun 2020</i>" updated on 2 January 2020, that covers:</p>	
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		<ul style="list-style-type: none"> <li>▪ Copies of Sertifikat Hak Milik (SHM) – and ownership certificate.</li> <li>▪ Group working Program</li> <li>▪ HCV</li> <li>▪ Standard Operational Procedure of Good Agriculture Practices.</li> <li>▪ Social Impact Assessment (SIA)</li> <li>▪ ICS Policy including Human rights policy, man powering, helath and safety etc.</li> <li>▪ Social Activity Documents including CSR Report.</li> <li>▪ Local Development Documents.</li> <li>▪ Prices of Fresh Fruit Bunches</li> <li>▪ Public Summary Report of RSPO</li> <li>▪ RAT document of Cooperative</li> </ul>	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	<p>PT Inti Indosawit Subur – Ukui Group has had list of information and listed in “<i>Daftar Dokumen dan Informasi untuk Diakses Publik PT Inti Indosawit Subur - Ukui II</i>” has established on 15 January 2020, there are 32 type of document of information, including:</p> <ol style="list-style-type: none"> <li>1. Land titles/user rights (Izin Lokasi, Izin Prinsip, IPKH, Sertifikat HGU, HGB and IMB)</li> <li>2. Occupational health and safety plans (Laporan Pelaksanaan P2K3)</li> <li>3. Plans and impact assessments relating to environmental and social impacts (AMDAL, Environmental licensing and Environmental Management Program)</li> <li>4. HCV &amp; HCS documentation (Conservation Management Plan, HCV Report, Social Impact Assessment and HCV Identification Report)</li> <li>5. Pollution prevention and reduction plans (Environmental Management Program, Hazardous waste Report-Laporan LB3, Land Application Report and also Report of physical and chemical analysis of river water)</li> <li>6. Details of complaints and grievances (Procedure of Information handling,</li> </ol>	Complied

		<p>Procedure of “keluhan konflik lahan” and records of and recording of deliberation process and compensation).</p> <ol style="list-style-type: none"> <li>7. Negotiation procedures (Recording of deliberation process and compensation)</li> <li>8. Continuous improvement plans (Continuous Improvement Program)</li> <li>9. Human Rights Policy (including in the Company Policy update on 1 December 2019 including the policy on protection of human rights defenders (HRDs)/Whistleblowers and has been dissemination to all operation at workplace on 3-7 February 2020)</li> </ol> <p>Its List provides in Bahasa Indonesia and the form can be understand with all stakeholders. The list of information has been dissemination at the time of with the company Policy on 3-7 February 2020 to all operation at workplace.</p> <p><b>Scheme Smallholder:</b></p> <p>Plasma Ukui II has a list of documents that can be access by Stakeholder updates as of 15 January 2020. Its List provides in Bahasa Indonesia and the form can be understand with all stakeholders. The list of information has been dissemination at the time of with the company Policy on 3-7 February 2020 to all operation at workplace. There are 32 type of document of information, including:</p> <ul style="list-style-type: none"> <li>- Land titles/user rights (Sertifikat SHM, Akta KUD and IMB)</li> <li>- Occupational health and safety plans (Laporan Pelaksanaan P2K3)</li> <li>- Plans and impact assessments relating to environmental and social impacts (AMDAL, Environmental licensing and Environmental Management Program)</li> <li>- HCV &amp; HCS documentation (Conservation Management Plan, HCV Report, Social Impact Assessment and HCV Identification Report)</li> <li>- Pollution prevention and reduction plans (Environmental Management Program)</li> <li>- Details of complaints and grievances (Procedure of Information handling,</li> </ul>	
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		<p>Procedure of “keluhan konflik lahan” and records of and recording of deliberation process and compensation).</p> <ul style="list-style-type: none"> <li>- Negotiation procedures (Recording of deliberation process and compensation)</li> <li>- Continuous improvement plans (Continuous Improvement Program)</li> <li>- Human Rights Policy (including in the Company Policy update on 1 December 2019 including the policy on protection of human rights defenders (HRDs)/Whistleblowers and has been dissemination to all operation at workplace on 3-7 February 2020)</li> </ul>	
1.1.3	<p><b>(C)</b> Records of requests for information and responses are maintained.</p>	<p>The company has established procedure to handle stakeholder information request in “<i>SOP Penanganan Permintaan Informasi Stakeholder</i>” (SOP No. AA-GL-5008.1-RI, Rev. 1) dated 22 August 2011. The procedure described that information request can be receive by oral or written, or by representative of communities; the company will responded according to respective authorities, starts from Humas (public relation), Estate/Mill manager, Group Manager and Regional Office. The company has set time to respon information request, it is 14 working days.</p> <p>Record of information request and response/information logbook is maintained by company. Records of information are kept for minimum three (3) years. Below are seen and verified Sample:</p> <ul style="list-style-type: none"> <li>▪ P2K3 Activities Report (Safety Committee report) Ukui I and II Palm Oil Mill Period July – September 2020 PT Indosaeit Subur Ukui II, sent to Manpower Agency of Riau Province on 12 November 2020.</li> <li>▪ Report on Environment Management and monitoring (UKL-UPL) Measuring Palm Oil Mill I, KSA and KSL period January - June 2020, sent to the Environment Agency of Pelalawan Regency. on 11 November 2020.</li> <li>▪ Report on the Implementation of Land Applications and Utilization of Solid Waste (Land Application report) Measure I and II Palm Oil Mill, KSA and KSL period July – September 2020, sent to the Environment Agency of Pelalawan Regency on 11 November 2020.</li> <li>▪ Report on the Implementation of Land Applications and Utilization of Solid</li> </ul>	Complied



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		<p>Waste (Land Application report) Assess the Palm Oil Mill, KSA and KSL period from July - September, sent to the Environment Agency of Riau Province on 11 November 2020.</p> <ul style="list-style-type: none"> <li>▪ Request for information from Head of Silikuan Hulu Village on 25 June 2020 by letter no. 620/Pemdes-SH/2020/114 related request for assistance in building a village connecting access road and has responded on 25 June 2020 by Humas-Public Relations.</li> <li>▪ Request for information from Dewan Pengurus Cabang Serikat Buruh Sejahtera Indonesia Kabupaten Pelalawan on 2 July 2020 by letter no. 01/DPC.SBSI/PLLW/VII/2020 related Pemberitahuan susunan pengurus Kosisariat (PK) DPC SBSI 1992 and has been responded by Humas on 2 July 2020.</li> <li>▪ A request for information from the National Police of the Republic of Indonesia Resort Pelalawan Sektor Ukui on July 13, 2020 through letter no.B/171/VII/2020/Ukui, concerning: an invitation to socialize food security programs during the Covid-19 pandemic, has been responded to on 13 July 2020.</li> </ul> <p><b>Scheme Smallholder:</b></p> <p>All information request were documented in Logbook of "<i>Catatan Permintaan Informasi dan Tanggapan</i>", up to November 2019, there were 25 information request, e.g.:</p> <ul style="list-style-type: none"> <li>▪ Request for information from Head of Air Emas Village on 1 July 2020, letter no. 07/PBAB/AE/VI/2020 related to requests for request for heavy equipment assistance (Grader and Compacter/Bomag) for 2 days (20 HM), has been responded and approved on 4 July 2020 according Memorandum from Mgr. Kebun Plasma Ukui II No. 040ES-KLU/MEMO/08/2020.</li> <li>▪ Request for information from Head of Sungai Beras Beras Village on 28 April 2020, letter no. 140/2006/063 related to requests for request for heavy equipment assistance (Grader and Compacter/Bomag) for 1 days (10 HM), has</li> </ul>	
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		<p>been responded and approved on 5 May 2020 according Memorandum from Mgr. Kebun Plasma Ukui II No. 028/ES-KLU/MEMO/05/2020.</p>	
<p>1.1.4</p>	<p><b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p>	<p>Company has developed a communication procedure under "<i>Mekanisme Penanganan Permintaan Informasi Stakeholder</i>" (No. SOP; AA-GL-5008.1-R1) dated 22 August 2011. The procedure described that information request can be receive by oral or written, or by representative of communities; the company will responded according to respective authorities, starts from Humas (public relation), Estate/Mill manager, Group Manager and Regional Office. The company responses against all information request sent by stakeholders including response time of 14 working days after information request accepted. In addition, record related to information request and company response kept and maintained for three (3) years.</p> <p>Based on public stakeholder consultation with KUD/cooperative chairman, local contractor, NGO and public official, it was revealed that company has communicating in good manner. Company also provide response to information request in accordance to authority and the communication SOP.</p> <p><b>Scheme Smallholder:</b></p> <p>The Smallholder Manager has established mechanism for communication and consultation "<i>Prosedur Konsultasi dan komunikasi Didokumentasikan, Diungkap, Diimplementasikan Tersedia dan Dijelaskan Kepada Semua Stakeholder</i>" dated 16 January 2017, shaped flow Chart that describes the process of incoming information requests up to the responses provided. Responsible for the response of information from the stakeholders is done by the Field Assistant then will be arranged to the Estate Manager.</p> <ul style="list-style-type: none"> <li>- Each smallholder member has "<i>Buku Panduan dan Catatan Petani Plasma</i>", whereas explains the flow process of consultation and communication. Both of communication by written or verbal communication to group management are acceptable.</li> </ul>	<p>Complied</p>

<p>1.1.5</p>	<p>An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.</p>	<p>List of stakeholders updated in November 2020, there were 3 types of stakeholders i.e: government (agency office in Pelalawan Regency, Kapolsesk Ukui, Camat Ukui, head of village), Kebun Masyarakat (20 smallholders) and NGO (WWF, Scale Up). The stakeholder list completed with name of chairman, address and contact number. List of information that can be access by relevant stakeholders available in indicator 1.2.1. The list is consist of information related to the contact person, contact number, address or office that can be visit etc.</p> <p>The list of stakeholder list updated annually by Public Relation. Last update performed in November 2020, consist of 35 stakeholders which related to company operation, as follows:</p> <ul style="list-style-type: none"> <li>▪ Government institution, consist of Surrounding villages, District Head, and related agency of Pelalawan Regency (Dinas Lingkungan Hidup, Dinas, Perkebunan, Dinas Tenaga Kerja, BPN).</li> <li>▪ Chairman of Koperasi Unit Desa (KUD) which under company scheme smallholder.</li> <li>▪ Informal institution around the company, e.g. FK-KPPS, GWKAK, Worker Union and WKAK.</li> <li>▪ NGO around the company i.e: WWF, Scale Up, etc. `</li> </ul> <p><b>Scheme Smallholder:</b></p> <p>The Smallholder Manager has consistently updated the list of stakeholders, the last update performed on 2 January 2020, where there are 59 stakeholder, e.g:</p> <ol style="list-style-type: none"> <li>1. Stakeholders from PT IIS (9 stakeholders)</li> <li>2. Stakeholders from local government (18 stakeholders)</li> <li>3. Stakeholders related agency in Pelalawan Regency (8 stakeholders)</li> <li>4. Stakeholder from banks (6 stakeholders)</li> <li>5. Stakeholder from KUD (18 stakeholders).</li> </ol>	<p>Complied</p>
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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 Inti Indosawit Subur has revised the company policy by including commitment to a code of ethical business conduct, it was signed by Managing Director on 1 December 2019. The Policy has mention that: "Committed to be ethical in doing business in all transactions and business operations, banning all forms of corruption, bribery and fraud in the use of funds and resources".</p> <p>The policy has been disseminated to all employees by installing signboard of company policy and by direct dissemination, e.g.:</p> <ul style="list-style-type: none"> <li>a. In 2020, dissemination has performed on 2 July 2020 attended by 25 personnel from Sei Lala Estate (KSL) and Soga Estate (KSA). On 10 February 2020 attended by 24 participants of contractors and 15 participants of workers.</li> <li>b. In 2019, dissemination has performed on 10 September 2019 attended by 32 personnel from KSA Estate, on 10 April 2019 attended by 72 personnel at KSL and Ukui POM List of attendance was available at the time of audit.</li> </ul> <p>In the recruitment process policies have been applied related to business ethics, which are stipulated in the Work Agreement Letters both PHL, PKWT and in the Collective Labor Agreement (PKB).</p> <p>In the Daily worker Agreement and PKWT Work Agreement, it is also explained in relation to company policy stated in appendix 1, that is:</p> <p>Disgraceful Acts / Actions of Workers That Result in the Termination of the Work Agreement; "Committing and / or directly or indirectly involved in a fraud and / or theft and / or embezzlement of goods and / or money belonging to the company, embezzling company money, accepting gifts from other parties due to work results. "<i>Perbuatan/Tindakan Tercela Tenaga Kerja yang Mengakibatkan Berakhirnya Perjanjian Kerja; "Melakukan dan/atau terlibat langsung maupun tidak langsung dalam suatu penipuan dan/atau pencurian dan/atau penggelapan barang dan/atau uang milik perusahaan, Menggelapkan uang milik perusahaan, meneripa uang pemberian dari pihak lain karena hasil kerja"</i>.</p>	Complied

		<p>At the recruitment process has been applied policy related to business ethics and also set forth in the letter of the work agreement both PHL, PKWT and in PKB.</p> <p>In the daily freelance work agreement and the PKWT work agreement, it is also explained in relation to the company policy stated in Appendix 1; Occupational action/actions that resulted in the expiration of the employment agreement; "Doing and/or engaging directly or indirectly in a fraud and/or theft and/or embezzlement of the company's goods and/or money, darkening the company's money, terrorize the awarding of the other party due to work</p> <p>PKB period 2018-2020 has explained related to business ethics in article XXII about "Obligations of The Company and Employees"; including: employers and workers are obliged to maintain good character and do not contradict the legal norms and moral values, employers and workers are obliged to comply with and enforce all regulations and legislation on Applicable employment.</p> <p>PT IIS – Ukui II in some of its activities cooperates with second parties (contractors), related to the policy of the code of business ethics has been set forth in the contract agreement Article 13; Manipulation and pesengkongkolan, taken sample of contract:</p> <ul style="list-style-type: none"> <li>- Perjanjian Kerjasama Transportasi – Transportation Cooperation Agreement No. 03/VI/BJB-IIS/2020 dated 4 June 2020, cooperation agreement between PT Inti Indosawit Subur –Ukui and PT Buana Jaya Bersama for transportation CPO, Palm Kernel and CPKO.</li> <li>- Perjanjian Kerjasama Transportasi – Transportation Cooperation Agreement No. 02/VI/JP-IIS/2020 dated 4 June 2020, cooperation agreement between PT Inti Indosawit Subur –Ukui and CV Jaya Pertama for transportation CPO, Palm Kernel and CPKO.</li> <li>- Surat Perjanjian Kerja - Letter of Employment Agreement (Rent a School Bus), No. 023/P2/KSL/VI/20 dated 30 May 2020, cooperation agreement between PT IIS _ Ukui II-KSL and Mr. Kuntaryadi (Bus owner).</li> <li>- Perjanjian Sewa-Menyewa Alat Berat - Heavy Equipment Lease Agreement No. 022/E2PUD/05/20 dated 15 Mei 2020, agreement between PT IIS _ Pabrik</li> </ul>	
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		<p>Ukui II and PT Teknik Jaya Abadi for backhoe loader JCB 4 CX-4WS. Related to the business ethics policy stated in Article 16; about manipulation and conspirator.</p> <p><b>Scheme Smallholder:</b></p> <p>The Smallholder Manager already has a Code of Ethical Business Policy that included on "<i>Kebijakan Manajer Group ICS</i>" signed on 11 August 2020, and has been disseminated to each member through the "Kegiatan Refresh Pelatihan P&amp;C RSPO" was performed on 11 August 2020 attended by 83 farmers where in point 2 stated "<i>Committed to ethical conduct in business in overall transactions and business operations, prohibition all forms of corruption, bribery and fraud in the use of funds and resources</i>".</p> <p>Document verification shows that all farmer members have stated approval of all policy issued by Smallholder Manager, including policy related to code of ethic which described in the Agreement Letter. Document seen: Member of KUD Tani Bahagia, KUD Karya Tani and KUD Usaha Tani as many as 412 kavling (plot) have signed Cooperation</p> <p>Separately, the policy of the business code of conduct is stated in the cooperation contract with the second party. Statements relating to business ethics are mentioned in Article 8; About Prohibition: that: The owner of the fleet (Transporter) is charged with fraud, theft and embezzlement of TBS, e.g;</p> <ul style="list-style-type: none"> <li>- Surat Perjanjian Kerja Armada -Transport Work Agreement between KUD Karya Tani with FFB Transporter on behalf of Bahri (location at Sei Beras Beras Village, Sub district of Lubuk Batu Jaya, District of Indra Giri Hulu).</li> <li>- Surat Perjanjian Kerja Armada - Transport Work Agreement between KUD Usaha Tani with FFB Transporter on behalf of Okta (location at Air Putih Village, Sub District of Lubuk Batu Jaya, District of Indra Giri Hulu).</li> </ul> <p>Based on interview with smallholders shows that they have a good understanding of the Code of Business Conduct policy issued by the Smallholder Manager.</p>	
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<p>1.2.2</p>	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p>	<p>UKUI Group including scheme smallholder has mechanism regarding reporting guarantees and case disclosures; from the case report referring to procedure AA-GL/510.1-R0, Public Relations will convey the information to GM and keep the reporting party confidential. GM and Public Relations provide a maximum response of 14 days for a whistle-blower case referring to the related procedure: refer to the AA-GL-5009.1 R0 procedure for settlement with the local community and resolution of employee complaints related to employment referring to the AA-HR-308.5-R0 procedure. This mechanism has been disseminations on 10 February 2020.</p> <p>The Company - UKUI Group (including scheme smallholder) has implemented business conduct policy to all employees, it is repeated an in employment contract with PKB employees period 2018-2020. Describes on article XXII about "<i>Kewajiban Perusahaan dan Pekerja</i>"; these included: <i>Pengusaha dan pekerja berkewajiban memelihara budi pekerti yang baik dan tidak bertentangan dengan norma hukum dan nilai susila, Pengusaha dan pekerja berkewajiban mematuhi dan menjalankan segala peraturan dan perundangan tentang ketenagakerjaan yang berlaku</i>".</p> <p>At the recruitment process has been applied policy related to business ethics and also set in the letter of the work agreement both PHL, PKWT and in PKB.</p> <p>In the daily worker agreement and the PKWT work agreement, it is also explained in relation to the company policy stated in Appendix 1; Occupational action/actions that resulted in the expiration of the employment agreement; "Doing and/or engaging directly or indirectly in a fraud and/or theft and/or embezzlement of the company's goods and/or money, darkening the company's money, terrorize the awarding of the other party due to work</p> <p>Based on the interview with some employees and stakeholders, that they have understood linked to the the company's policy.</p> <p>Sample employee recruitment: In September 2020, the recruitment of employees for TBS grading positions at Ukui II POM on behalf of Rivaldy A. Novinsyah, some verified documents include: applicant's diploma, Health Certificate, CV dan Freelance Daily Work Agreement dated September 18, 2020 (including Attachment related to business code of conduct) and company policy and human right policy as well.</p>	<p>Complied</p>
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<b>Principle 2: Operate legally and respect rights</b>																								
Implement legal requirements as the basic principles of operation in any jurisdiction.																								
<b>Criteria 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.																								
2.1.1	<b>(C)</b> The unit of certification complies to relevant regulations.	<p>Unit of certification within this scope are UKUI-II Mill supplied by SOGA Estate, SEI LALA Estate and 6 Smallholders Cooperatives. Legal requirements of land use rights in Indonesia is recognize as "Hak Guna Usaha" or Land Title. Where the Land Title issued by National Land Department. The legal land use-rights for this scope as follow:</p> <table border="1"> <thead> <tr> <th><b>Estates</b></th> <th><b>Area (Ha)*</b></th> <th><b>Land Title</b></th> </tr> </thead> <tbody> <tr> <td>Soga</td> <td>2,988</td> <td>HGU Certificate No. 013, 6 Jul 2009. Exp: 9 Jun 2044. Total area: 2,704.22 Ha. SK. Ka. BPN RI No: 78-HGU-BPN RI-2008, dated 19 Dec 2008.</td> </tr> <tr> <td>Sei Lala</td> <td>3,178</td> <td>HGU Certificate No. 016, 3 Nov 2010. Exp: 3 Nov 2045. Total area: 299.51 Ha. (remain area is from HGU certificate No. 01 Year 1989 with area 6,727.40 Ha) SK Ka. BPN No: 156/HGU/BPN/2004, dated 11 November 2004.</td> </tr> <tr> <th><b>Smallholders</b></th> <th><b>Area (Ha)*</b></th> <th><b>Land Title</b></th> </tr> <tr> <td>KUD Tani Subur</td> <td>780</td> <td>SHM (Certificate of Land Ownership)</td> </tr> <tr> <td>KUD Karya Tani</td> <td>734</td> <td>SHM (Certificate of Land Ownership)</td> </tr> <tr> <td>KUD Mekar Abadi</td> <td>574</td> <td>SHM (Certificate of Land Ownership)</td> </tr> </tbody> </table>	<b>Estates</b>	<b>Area (Ha)*</b>	<b>Land Title</b>	Soga	2,988	HGU Certificate No. 013, 6 Jul 2009. Exp: 9 Jun 2044. Total area: 2,704.22 Ha. SK. Ka. BPN RI No: 78-HGU-BPN RI-2008, dated 19 Dec 2008.	Sei Lala	3,178	HGU Certificate No. 016, 3 Nov 2010. Exp: 3 Nov 2045. Total area: 299.51 Ha. (remain area is from HGU certificate No. 01 Year 1989 with area 6,727.40 Ha) SK Ka. BPN No: 156/HGU/BPN/2004, dated 11 November 2004.	<b>Smallholders</b>	<b>Area (Ha)*</b>	<b>Land Title</b>	KUD Tani Subur	780	SHM (Certificate of Land Ownership)	KUD Karya Tani	734	SHM (Certificate of Land Ownership)	KUD Mekar Abadi	574	SHM (Certificate of Land Ownership)	Complied
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**RSPO P&C Public Summary Report**  
**Revision 11 (Sept 2020)**

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		<b>TOTAL</b>	<b>11,874</b>	
		<p>Smallholders:  Establishment deed, for example:  1. KUD Tani Bahagia</p>		

**RSPO P&C Public Summary Report**  
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		<p>Cooperative Establishment Deed No. 481 dated 16 January 2015 listed by public notary Desy Arisandi SK, MKn on behalf of Koperasi Tani Bahagia located in Kulim Jaya Village, Subdistrict of Lubuk Batu Jaya, District of Indragiri Hulu.</p> <p>2. KUD Usaha Tani          Cooperative Establishment Deed – Amendment Deed on behalf of KUD Usaha Tani issued by Minister of Cooperatives and Small Entrepreneurs on 27 February 1996.</p> <p>3. KUD Karya Tani,          Cooperative Establishment Deed – Amendment Deed Number 01/KPTS/PAD/IV.2/02/V/2009 on behalf of KUD Karya Tani issued by Minister of Cooperatives and Small Entrepreneurs on 18 May 2009.</p> <p>In addition, all KUD’s has had the business permit, plantation permit, tax number and environmental permit from the local government.</p>	
2.1.2	A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.	Public affair department has conducted annual evaluation of legal compliance. The last evaluation is on February 2021. Based on the evaluation document obtained information that there are 7 (seven) new regulation related to plantation business. For example, Government Act No. 36 year 2021 related to payments. According to the evaluation, the company has complied with the regulation. Another regulation that has been evaluated was Presidential Regulation No. 44/2020 and Agricultural Minister Decree No. 38/2020 related to Indonesian Sustainable Palm Oil (ISPO).	Complied
2.1.3	Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.	<p>According to the national regulation, land title (HGU) holder shall maintain the condition of boundary poles. Based on field visit concluded that the boundary poles area well maintained. For example:</p> <p>Sei Lala Estate</p> <ul style="list-style-type: none"> <li>• Boundary poles BPN 29 Block D91c Afdeling 4</li> <li>• Boundary poles BPN 30 Block C91b Afdeling 3</li> <li>• Boundary poles BPN 33 Block C91b Afdeling 3</li> <li>• Boundary poles BPN 36 Block C91b Afdeling 3</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>Boundary poles BPN 40 Block C89e Afdeling 3 Soga Estate</li> <li>Boundary poles BPN 26 Block D97a Afdeling 4</li> <li>Boundary poles BPN 28 Block D97b Afdeling III</li> </ul> <p>The boundary poles recorded in document <i>"Monitoring Pemeriksaan Patok Batas"</i>. The poles monitored twice a year. The last monitoring held on December 2020. All poles (40 unit in Sei Lala and 31 unit in Soga Estate) reported in good condition.</p>	
<b>Criteria 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is available.	<p>The company has had several contracts related to third parties as follows:</p> <ol style="list-style-type: none"> <li>CV Teman Setia (CPO/PK/CPKO Transporter)</li> <li>CV Jaya Pertama (CPO/PK/CPKO Transporter)</li> <li>CV Jaya Bersama (CPO/PK/CPKO Transporter)</li> <li>PT Buana Jaya Bersama (CPO/PK/CPKO Transporter)</li> <li>CV Jasa Sumber Asahan (CPO/PK/CPKO Transporter)</li> <li>CV Jasa Sahabat Abadi (CPO/PK/CPKO Transporter)</li> <li>CV Sumber Kencana (CPO/PK/CPKO Transporter)</li> </ol> <p>During this audit, management units has had several contracts related to third parties as follows:</p> <ul style="list-style-type: none"> <li>Mill: <ol style="list-style-type: none"> <li>CV Jaya Pertama (CPO/PK/CPKO Transporter)</li> <li>PT Buana Jaya Bersama (CPO/PK/CPKO Transporter)</li> <li>CV Jasa Sahabat Abadi (CPO/PK/CPKO Transporter)</li> <li>CV Sumber Kencana (CPO/PK/CPKO Transporter)</li> </ol> </li> <li>Soga Estate: <p>PT Teknik Jaya Abadi (Road Maintenance)</p> </li> </ul>	Complied

		<ul style="list-style-type: none"> <li>• Sei Lala Estate             <ol style="list-style-type: none"> <li>1. Kuntaryadi (school bus)</li> <li>2. PT Karunia Mandiri Sejahtera Abadi (Replanting)</li> <li>3. CV Cipta Jasa Abadi (Replanting)</li> </ol> </li> </ul> <p><b>Scheme Smallholder:</b></p> <p>In smallholder activity, FFB transport from their land to mill by using the association of FFB-Transporter (usually smallholder members that owned truck). For example, sighted the annual FFB-Transporter contract between KUD Karya Tani and Mr. Bahri, KUD Tani Bahagia and Mr. Wira, KUD Usaha Tani and Mr Okta (those three persons was (FFB-Transporter representatives).</p> <p>Based on interview with boards of KUD during the field visit, FFB transportation costs are billed to each farmer every month and paid directly to the FFB-Transporter. The transportation costs are different for each KUD because the charges are in accordance with the agreement at the annual meeting of the KUD. There is no payment dispute so far.</p>	
2.2.2	All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.	Ukui II POM implemented identity preserved module. Mill only received FFB from certified sources which is own estate (Soga and Sei Lala Estate) and 6 smallholder scheme KUD Tani Subur, Karya Tani, Mekar Abadi, Trani Maju, Tani Bahagia and Usaha Tani.	Complied
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.	<p>Third party contract with some FFB has completed with some important clause such as:</p> <ul style="list-style-type: none"> <li>• The company policy related to children/underage worker, anti-drugs etc.</li> <li>• Workers payment referred to local minimum payment's regulation.</li> <li>• All worker will be register in health insurance and workers insurance according to national regulation.</li> </ul> <p>The same regulation also implemented in smallholder scheme. All of contract data kept by Head Clerk in estate and mill.</p>	Complied

<b>Criteria 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p><b>(C)</b> For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> <li>Information regarding the geolocation of FFB origins;</li> <li>Proof of ownership status, right/claim of the land by grower/smallholder;</li> <li>If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB.</li> </ul>	<p>As stated in sustainability reports of Asian Agri 2017 – 2018 (2019 still on progress) stated that <i>"Asian Agri reinforced its commitment to traceability by engaging Meo Carbon Solution from Germany and SNV from The Netherlands as traceability consultants to assist with our supply chain traceability project. Commencing in October 2018, Asian Agri began supply chain traceability projects in North Sumatra and Riau. These projects complement the first traceability verification programmes for our partner independent smallholders in Riau Province which began in 2016 and were done in collaboration with IDH and Yayasan SETARA Jambi. These ongoing projects will eventually provide us with recommendations on how to further improve our systems and procedures for a more traceable and responsibly supply chain"</i>.</p> <p>Ukui II POM has chosen the Identity Preserved Module, thus there is no record of uncertified FFB supplier.</p>	Complied
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1.	Ukui II POM has chosen the Identity Preserved Module, thus there is no record of uncertified FFB supplier.	Complied
<p><b>Principle 3: Optimise productivity, efficiency, positive impact and resilience</b>            Implement plans, procedures and systems for continuous improvement.</p>			
<b>Criteria 3.1:</b> There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.			
3.1.1	<p><b>(C)</b> A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.</p>	<p>Certificate holder has provided long-term management plan in document <i>Rencana Jangka Panjang period 2020 – 2025</i>. This document described the five-year business projection of PT Inti Indosawit Subur.</p> <p>Long-term management plant of PT Inti Indosawit Subur has documented in <i>Rencana Jangka Panjang period 2020 – 2025</i>. The long-term management plan covered parameter as follows:</p> <ul style="list-style-type: none"> <li>Hectare statement of mature and immature area</li> <li>Estimation of production (Tonnes)</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>• Estimation of FFB purchase (for Mass Balance Mill)</li> <li>• Extraction projected (%)</li> <li>• Cost estimation (IDR/Kg)</li> <li>• Estimation of price (IDR/Tonnes)</li> <li>• Estimation of profit (IDR)</li> </ul> <p>The same information of long-term management plan document also sighted for smallholders.</p> <p>Based on interview with sustainability staff, PT Inti Indosawit Subur has started to engage with independent smallholder named Create Share Value (CSV) near the Inti Indosawit Subur’s concession since a couple year ago and renewed annually.</p>																																																																
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	<p>The unit of certification was able to demonstrate annual replanting program. Replanting starts at 2017. Based on document verification, the record of replanting program as follows:</p> <table border="1" data-bbox="981 858 1662 1394"> <thead> <tr> <th rowspan="2">Year</th> <th colspan="3">Estate (Ha)</th> </tr> <tr> <th>Ukui</th> <th>Soga</th> <th>Sei Lala</th> </tr> </thead> <tbody> <tr><td>2017</td><td>542</td><td>277</td><td>-</td></tr> <tr><td>2018</td><td>455</td><td>-</td><td>-</td></tr> <tr><td>2019</td><td>-</td><td>-</td><td>-</td></tr> <tr><td>2020</td><td>-</td><td>-</td><td>-</td></tr> <tr><td>2021</td><td>494</td><td>-</td><td>511</td></tr> <tr><td>2022</td><td>557</td><td>195</td><td>540</td></tr> <tr><td>2023</td><td>649</td><td>391</td><td>657</td></tr> <tr><td>2024</td><td>-</td><td>516</td><td>751</td></tr> <tr><td>2025</td><td>-</td><td>594</td><td>-</td></tr> <tr><td>2026</td><td>-</td><td>560</td><td>-</td></tr> <tr><td>2027</td><td>-</td><td>470</td><td>328</td></tr> <tr><td>2028</td><td>-</td><td>-</td><td>-</td></tr> <tr><td>2029</td><td>-</td><td>-</td><td>-</td></tr> <tr><td>2030</td><td>-</td><td>-</td><td>-</td></tr> </tbody> </table>	Year	Estate (Ha)			Ukui	Soga	Sei Lala	2017	542	277	-	2018	455	-	-	2019	-	-	-	2020	-	-	-	2021	494	-	511	2022	557	195	540	2023	649	391	657	2024	-	516	751	2025	-	594	-	2026	-	560	-	2027	-	470	328	2028	-	-	-	2029	-	-	-	2030	-	-	-	Complied
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2030	-	-	-																																																															

		<b>Total</b>	<b>2,697</b>	<b>3,003</b>	<b>2,787</b>									
		<b>Scheme smallholders:</b>												
<b>SP</b>	<b>KUD</b>	<b>Replanting Program (Ha)</b>												
		2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	
1A	Sumber Makmur	-	-	-	-	-	-	806	-	756	-	-	-	
2A	Bina Usaha Baru	<b>472</b>	-	-	-	-	-	144	-	-	-	-	-	
3A	Karya Bersama	-	-	-	422	-	422	-	-	-	-	-	-	
4A	Sawit Subur	-	<b>538</b>	-	-	-	-	200	170	-	-	-	-	
5A	Bina Sejahtera	-	-	-	-	-	574	-	662	-	-	-	-	
6A	Sumber Bahagia	-	-	-	<b>422</b>	-	302	482	-	-	-	-	-	
Ukui -II	Bukit Potalo	-	-	-	-	-	-	-	-	-	-	494	-	
R. Seko	Usaha Baru	-	-	-	-	-	-	-	-	-	-	494	-	



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1B	Tani Subur	-	-	-	-	-	-	-	-	308	472	-	-
2B	Karya Tani	-	-	-	-	-	-	-	-	184	330	220	-
3B	Mekar Abadi	-	-	-	-	-	-	-	-	270	304	-	-
4B	Trani Maju	-	-	-	-	-	-	-	374	284	304	-	-
5B	Tani Bahagia	-	-	-	-	-	394	-	420	552	-	-	-
6B	Usaha Tani	-	-	-	-	496	-	-	390	406	-	-	-
<b>Grand Total</b>		472	538	-	844	496	2,102	2,022	2,090	2,354	1,410	1,208	-

The record of program vs realization as follows:

Year	Estate (Ha)					
	Ukui		Soga		Sei Lala	
	Prog	Real	Prog	Real	Prog	Real
2017	542	542	277	277	-	-
2018	455	455	-	-	-	-
2019	-	-	-	-	-	-
2020	-	-	-	-	-	-
2021	494	217*	-	-	511	110*
2022	557	-	195	-	540	-
2023	649	-	391	-	657	-
2024	-	-	516	-	751	-
2025	-	-	594	-	-	-
2026	-	-	560	-	-	-

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		<table border="1"> <tr> <td>2027</td> <td>-</td> <td>-</td> <td>470</td> <td>-</td> <td>328</td> <td>-</td> </tr> <tr> <td>2028</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>2029</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>2030</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td><b>Total</b></td> <td><b>2,697</b></td> <td></td> <td><b>3,003</b></td> <td></td> <td><b>2,787</b></td> <td></td> </tr> </table> <p><i>*: update per February 2021</i></p> <p>Smallholders: Sighted the record of replanting realization 2020 was 422 Ha (located in KUD Sumber Bahagia).</p>	2027	-	-	470	-	328	-	2028	-	-	-	-	-	-	2029	-	-	-	-	-	-	2030	-	-	-	-	-	-	<b>Total</b>	<b>2,697</b>		<b>3,003</b>		<b>2,787</b>		
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<b>Total</b>	<b>2,697</b>		<b>3,003</b>		<b>2,787</b>																																	
3.1.3	The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.	<p>The company has had annual internal audit activity namely Visit Agronomy (VA) and Visit Engineering (VE). For example, sighted the last VE Report of Sei Lala Estate 9 – 13 June 2020 and VA Report of Soga Estate on 24 – 31 August 2020.</p> <p><b>Soga Estate:</b> Report No. VA/KSA/OCT/FULL/02-2020, date of visit 26 – 29 October 2020. There were no main issues in this estate, however current issues and recommendation of immature area related to weeding control in circles/path and interrows, manuring, pest &amp; disease, castration, supplying and consolidation. Generally, management performance is increasing and has a lot of improvement especially road maintenance and pruning.</p> <p><b>Sei Lala Estate:</b> Report No. VA/KSL/DEC/FULL/02-20, date of visit 13 – 17 December 2020. The main issues affecting performance was unsatisfactory field preparation for harvesting. Through the issue, management of Sei Lala Estate was taking the action by preparing the harvesting infrastructure.</p> <p><b>VE Ukui II POM:</b></p>	Complied																																			

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		<p>Report No. VE-PUD-AUG-FULL-01-2020-Full Visit, date of visit 24- 31 August 2020. There were no main issues in this visit. However, there were a key issue related to wastage, machinery upkeep and maintenance standards. All the issues have been corrected by management unit.</p> <p><b>Scheme smallholders:</b> There was a record of Deputy Head of Smallholder on 09 October 2020. Based on the minutes of meeting, Coordinator Smallholder Region 2 has captured the issues related to:</p> <ul style="list-style-type: none"> <li>• FFB price in outside mill higher than smallholder FFB Smallholder price.</li> <li>• Losses fruit losses</li> <li>• More than 620 ton of FFB/month from KUD Bakti does not sent to mill due to replanting.</li> </ul> <p>Each smallholder association has had annual monitoring activity to ensuring annual target inline with the implementation. Sighted monitoring inspection of plot conditions document year 2020 of KUD Tani Bahagia, KUD Usaha Tani and KUD Karya Tani.</p> <p>Parameter to be monitored was weeding in circle, path and collection point, pruning and frond stacking.</p>	
<p><b>Criteria 3.2:</b> The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p>			
3.2.1	<p><b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification.</p>	<p>To increase work productivity, the company always creates new improvements with the hope that the company's operational activities will be more efficient. For this reason, staff and employees are given the opportunity to create new innovations. One of the efforts to increase crop productivity is by using harvest sticks (Palm Pro). Based on the recapitulation of harvester productivity, it is known that there is an increase in yield per harvester by up to 22%.</p>	Complied

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		<p>The use of Palm Pro as harvesting tools of Sei Lala and Soga Estate. Based on monitoring form Nov 2020, productivity kg/mandays of using Palm Pro pole are increase 22% at average compare to Aluminium Pole. The company has established mechanism for using Palm Pro as on Operational Readiness Package (ORP) Palm Pro (AA-ORP-ESTATE-01) dated 25 Feb 2019. The document consists of Introduction; Manual of Palm Pro; Guideline for maintenance and repair; Monitoring of Palm Pro.</p> <p>Meanwhile, Ukui II POM has compiled improvements to reduce overtime costs. Several important points related to this improvement include:</p> <table border="1" data-bbox="981 667 1966 1161"> <thead> <tr> <th data-bbox="981 667 1265 715">Objective</th> <th data-bbox="1265 667 1966 715">Strategic Focus</th> </tr> </thead> <tbody> <tr> <td data-bbox="981 715 1265 866">Oil losses</td> <td data-bbox="1265 715 1966 866">Reduce oil losses on Press Fibre Reduce oil losses on Heavy Phase Reduce oil losses on Empty Fruit Bunch Improve maintenance of worm screw and body cage</td> </tr> <tr> <td data-bbox="981 866 1265 914">Kernel losses</td> <td data-bbox="1265 866 1966 914">Reduce kernel losses on wet cell</td> </tr> <tr> <td data-bbox="981 914 1265 962">Kernel usage</td> <td data-bbox="1265 914 1966 962">Improve Boiler Equipment &amp; Operations strategy</td> </tr> <tr> <td data-bbox="981 962 1265 1074">Resources utilization</td> <td data-bbox="1265 962 1966 1074">Management of overtime Management of heavy equipment Management of power</td> </tr> <tr> <td data-bbox="981 1074 1265 1161">Equipment and parts service life</td> <td data-bbox="1265 1074 1966 1161">Benchmarking equipment and parts service life Review equipment and parts "fit for purpose"</td> </tr> </tbody> </table> <p>Based on root cause identification, mill team has created corrective action as follows:</p> <ul style="list-style-type: none"> <li>• Overtime monitoring:             <ul style="list-style-type: none"> <li>a. Update the number of overtime hours each day</li> <li>b. Review overtime hours every day</li> </ul> </li> </ul>	Objective	Strategic Focus	Oil losses	Reduce oil losses on Press Fibre Reduce oil losses on Heavy Phase Reduce oil losses on Empty Fruit Bunch Improve maintenance of worm screw and body cage	Kernel losses	Reduce kernel losses on wet cell	Kernel usage	Improve Boiler Equipment & Operations strategy	Resources utilization	Management of overtime Management of heavy equipment Management of power	Equipment and parts service life	Benchmarking equipment and parts service life Review equipment and parts "fit for purpose"	
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		<ul style="list-style-type: none"> <li>• Work arrangements on holidays</li> <li>• Employee settings for the entry &amp; return process</li> </ul> <p>Through some consistent and monitored improvement during November 2020, there was a reduction in processing overtime costs from 7.27 IDR / Kg to 4.90 IDR / Kg (0.22 hour / ton FFB to 0.17 hour / ton FFB).</p>	
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.	RSPO Annual Communication of Progress 2020 of PT Inti Indosawit Subur has been available in RSPO website under membership number 1-0022-06-000-00. The report has been submitted on 4 June 2020.	Complied
<b>Criteria 3.3:</b> Operating procedures are appropriately documented, consistently implemented and monitored.			
3.3.1	<b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.	<p><b>Soga &amp; Sei Lala Estate:</b></p> <p>Estate has had Standard Operational Procedures (SOP) that covering entire operational activity as follows:</p> <ul style="list-style-type: none"> <li>• SOP AA-APM-OP-1100.01-R4 dated 5 September 2016: <i>Pembibitan</i> (Nursery).</li> <li>• SOP AA-APM-OP-1100.02-R3 dated 10 June 2015: <i>Penanaman Areal Baru</i> (New Planting).</li> <li>• SOP AA-APM-OP-1100.03-R2 dated 24 July 2015: <i>Pembuatan dan Perawatan Jalan dan Jembatan</i> (Road and Bridge construction and maintenance);</li> <li>• SOP AA-APM-OP-1100.04-R3 dated 7 Decmeber 2015: <i>Pembuatan dan Pemeliharaan Parit</i> (Drainage Construction and Maintenance).</li> <li>• SOP AA-APM-OP-1100.05-R3 dated 23 November 2016: <i>Konservasi Tanah dan Air</i> (Soil &amp; Water Conservation).</li> <li>• SOP AA-APM-OP-1100.06-R6 dated 16 February 2017: <i>Menanam kacang</i> (Planting cover crops).</li> <li>• SOP AA-APM-OP-1100.07-R6 dated 16 February 2017: <i>Menanam Kelapa Sawit</i> (Planting Oil Palms).</li> <li>• SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i></li> </ul>	Complied

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		<p>(Weed control).</p> <ul style="list-style-type: none"> <li>• SOP AA-APM-OP-1100.09. R5 dated 26 December 2018: <i>Pemupukan</i> (Fertilizer application).</li> <li>• SOP AA-APM-OP-1100.10. R6 dated 23 November 2016: <i>Pengendalian Hama dan Penyakit</i> (Pests &amp; Disease Control).</li> <li>• SOP AA-APM-OP-1100.11. R1 dated 1 February 2009: <i>Pestisida dan Pengendaliannya</i> (Pesticide Handling).</li> <li>• SOP AA-APM-OP-1100.12. R3 dated 23 November 2016: <i>Kastrasi</i> (Palm castration) explain cutting all generative product (mal flower, female flower, all fruit, to support vegetative growth) – done 5-6 months before being harvested.</li> <li>• SOP AA-APM-OP-1100.13. R3 dated 4 March 2016: <i>Tunas Pokok</i> (Pruning).</li> <li>• SOP AA-APM-OP-1100.14. R3 dated 16 February 2017: <i>Sensus dan Identifikasi Pokok</i> (Census and Palm Identification).</li> <li>• SOP AA-APM-OP-1100.15. R2 dated 1 October 2010: <i>Sensus Produksi</i> (Production Census).</li> <li>• SOP AA-APM-OP-1100.16. R1 dated 1 February 2009: <i>Konsolidasi Pohon Tumbang</i> (Provision of Support to Fallen Palm).</li> <li>• SOP AA-APM-OP-1100.17. R1 dated 23 October 2014: <i>Pengelolaan Air</i> (Water Management).</li> <li>• SOP AA-APM-OP-1100.18.R3 dated 20 April 2015: <i>Potong Buah</i> (Harvesting).</li> <li>• SOP AA-APM-OP-1100.19.R1 dated 1 February 2009: <i>Pengelolaan Transport</i> (FFB Transport).</li> <li>• SOP AA-APM-OP-1100.20-R6 dated 1 May 2019: <i>Peremajaan</i> (Replanting).</li> </ul> <p>Ukui II POM has documented and implemented procedure related to process of FFB to become CPO and PK, starts from FFB receiving to dispatch of CPO and PK:</p> <ol style="list-style-type: none"> <li>1. SOP AA-MPM-OP-1400.02.R2 dated 1 September 2011: <i>Stasiun Penerimaan</i> for FFB Receiving Station;</li> </ol>	
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		<ol style="list-style-type: none"> <li>2. SOP AA-MPM-OP-1400.03.R1 dated 1 February 2009: <i>Stasiun Rebusan</i> for Sterilizer;</li> <li>3. SOP AA-MPM-OP-1400.04.R1 dated 1 February 2009: <i>Stasiun Pemisahan Berondolan</i> for Loose Fruit Separation;</li> <li>4. SOP AA-MPM-OP-1400.05-R1 dated 1 February 2009: <i>Stasiun Pengadukan dan Pengempaan</i> for Pressing Station;</li> <li>5. SOP AA-MPM-OP-1400.06-R1 dated 1 February 2009: <i>Stasiun Pemurnian</i> for Clarification;</li> <li>6. SOP AA-MPM-OP-1400.07-R1 dated 1 February 2009: <i>Stasiun Pemisahan Nut dan Fiber</i> for Nut and Fiber Separation;</li> <li>7. SOP AA-MPM-OP-1400.08-R1 dated 1 February 2009: <i>Stasiun Kernel</i> for Kernel Station;</li> <li>8. SOP AA-MPM-OP-1400.09-R1 dated 1 February 2009: <i>Stasiun Boiler</i>;</li> <li>9. SOP AA-MPM-OP-1400.10-R1 dated 1 February 2009: <i>Stasiun Engine Room</i>;</li> <li>10. SOP AA-MPM-OP-1400.11-R1 dated 1 February 2009: <i>Stasiun Water Treatment</i>;</li> <li>11. SOP AA-MPM-OP-1400.12-R1 dated 1 February 2009: <i>Laboratorium</i>;</li> <li>12. SOP AA-MPM-OP-1400.13-R1 dated 1 February 2009: <i>Stasiun Pengelolaan Limbah</i> for Palm Oil Mill Effluent Treatment;</li> <li>13. SOP AA-MPM-OP-1400.14-R2 dated 1 September 2011: <i>Stasiun Penimbunan dan Pengiriman CPO dan Kernel</i> for CPO and PK Bulking and Despatch Operation;</li> <li>14. SOP AA-MPM-OP-1400.15-R1 dated 1 February 2009: <i>Perawatan</i> for Preventive Maintenance;</li> <li>15. SOP AA-MPM-OP-1400.19.R2 dated 1 September 2011: <i>Manajemen dan Metode Menghitung Emisi Gas Rumah Kaca (GHG)</i></li> <li>16. SOP AA-MPM-OP-1400.18-R4 Book Keeping</li> <li>17. AA-MPM-OP-1400.17-R6 Traceability</li> </ol>	
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		<p>Those documents above are available in each unit.</p> <p><b>Scheme Smallholder:</b></p> <p>Scheme smallholder has had best management practices procedure as follows:</p> <ul style="list-style-type: none"> <li>• AA-PLASMA-PP-KS-01 <i>Pembibitan</i> (Nursery)</li> <li>• AA-APM-OP-1100.09-R3 <i>Pemupukan</i> (Manuring) dated 20 April 2015</li> <li>• AA-PLASMA-PP-KS-04 <i>Potong Buah</i> (Harvesting)</li> <li>• AA-PLASMA-PP-KS-05 <i>Pengangkutan TBS</i> (FFB Transport)</li> <li>• AA-APM-OP-1100.10-R5 <i>Pengendalian Hama dan Penyakit</i> (Pest and Disease Control) dated 11 January 2016</li> <li>• AA-APM-OP-1100.20-R5 <i>Peremajaan</i> (Replanting) dated 4 March 2016</li> <li>• AA-MM-508-1-RO <i>Penerimaan TBS Plasma</i> (FFB Plasma Receiving) 1 September 2015</li> <li>• AA-MM-508-2-RO <i>Penentuan Taksasi TBS Plasma</i> (FFB Plasma Estimation)</li> <li>• AA-APM-OP-1100.8-R5 <i>Pengendalian Gulma</i> (Weed Control)</li> <li>• AA-FA-220-2-RO <i>Stempel</i> (Stamp)</li> <li>• AA-MPM-OP-1400-17-R6 <i>Ketertelusuran</i> (Traceability) dated 1 September 2017</li> <li>• AA-APM-OP-1100.02-R3 <i>Penanaman Area Baru</i> (New Planting)</li> <li>• AA-SOP-ES-6001-R4 <i>Audit Internal Sustainability</i> (Internal Audit Sustainability)</li> <li>• AA-KL-12-EFP <i>Restorasi Riparian dan Areal di Sekitar Danau/Waduk dan Mata Air Lainnya</i> (Restoration of Riparian Area or Near Area of Lake/Damp or Water Sources) dated 1 August 2010</li> <li>• AA-HR-305.2-RO <i>Rekrutmen dan Seleksi Karyawan</i> (Recruitment and Selection of Employee).</li> </ul>	
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		<p>During onsite audit, auditor has conducted field visit to the Soga and Sei Lala Estate as follows:</p> <ul style="list-style-type: none"> <li>• Harvesting in Block C98g Afdeling 3 Soga Estate. The implementation was good, the harvester can demonstrate the best management practices for harvesting and also safety working procedure.</li> <li>• Barn owl box Block C899g Afdeling 3 Soga Estate. The management unit using natural predator to control rat infestation.</li> <li>• Chemical weeding, Block 16 Afdeling 1 Sei Lala Estate. Circle and path, using micron herby (VVLV). Isopropyl amina glifosat and metil metsulfuron.</li> <li>• Harvesting, Block 15 Afdeling 1. The implementation was good, the harvester can demonstrate the best management practices for harvesting and also safety working procedure.</li> <li>• Land application, Block C89k Afdeling 4 Estate. Management unit using palm oil mill effluent to enrich the soil fertility. In accordance with the land application permit, Sei Lala Estate has 264 Ha of land application areas and applied with dosage 800 m3/Ha/year.</li> <li>• Fertilizer application Block 15 Afdeling 1 Sei Lala Estate According to fertilizer recommendation, Sei Lala Estate conducted fertilizer application using HGFB with dosage 7.5 gr/palm. The fertilizer applicator can demonstrate the application and safety working procedure.</li> <li>• EFB application Block C89g Afdeling 3 Soga Estate. Unit management using EFB in immature palm to enrich the soil fertility, maintain soil moisture and reducing weeding especially in circle. EFB placing in each palm circle with dosage 27 ton/Ha or equal to 200 – 250 kg/palm.</li> </ul>	
3.3.2	A mechanism to check consistent implementation of procedures is in place.	To ensuring field implementation consistent with procedures, management has a mechanism such as:	Complied

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		<ul style="list-style-type: none"> <li>• Annual Visit Agronomy (VA) and Visit Engineering (VE). Last visit in Soga Estate on 26 – 29 October 2020 and Ukui II POM on 6 – 11 November 2019.</li> <li>• Annual Quality Control visit conducted by Quality Control Assistant.</li> <li>• Monthly Management Meeting. For example, there is a record of management meeting Soga Estate on 12 November 2019 that attended by group manager, estate manager, field assistant and head clerk.</li> </ul> <p>Some issues during the VA/VE visit recorded in the report as follows:</p> <p><b>VA Soga Estate:</b></p> <p>Report No. VA/KSA/OCT/FULL/02-2020, date of visit 26 – 29 October 2020. There were no main issues in this estate, however current issues were seedling in circle and path, frond placement, pruning and riparian area. Those issues classified as high priority and should be handled as soon as possible.</p> <p><b>Sei Lala Estate:</b></p> <p>Report No. VA/KSL/DEC/FULL/02-20, date of visit 13 – 17 December 2020. The main issues affecting performance was unsatisfactory field preparation for harvesting. Through the issue, management of Sei Lala Estate was taking the action by preparing the harvesting infrastructure.</p> <p><b>VE Ukui II POM:</b></p> <p>Report No. VE-PUD-AUG-FULL-01-2020-Full Visit, date of visit 24- 31 August 2020. There were no main issues in this visit. However, there were a key issue related to wastage, machinery upkeep and maintenance standards.</p> <p>The advisory visit scheduled annually. Generally conducted on July.</p>	
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3.3.3	Records of monitoring and any actions taken are maintained and available.	<p>Certificate holder conducted monitoring of operational activity in all level of workers. Each field supervisor has equipped with monitoring sheets/worksheets. For example, harvesting supervisor collected harvesting record and quality of each harvesters. The report submitted to estate manager daily.</p> <p>Therefore, daily operational activity also recorded in daily worksheet by mill supervisor before reported to the mill manager.</p> <p>To ensuring the result of operational activity in line with the procedures, mill/estate manager conducted regularly monitoring of and management review to solve the findings issues. All results of management review shall be implemented by respective staff.</p>	Complied
<b>Criteria 3.4:</b> A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	<b>(C)</b> SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.	<p><u>Environmental Impact Assessment:</u></p> <p>The environmental impact analysis documented in ANDAL, RKL RPL included consultation with relevant stakeholders to identify impacts and to develop any mitigation measures. PT Inti Indosawit Subur – Ukui group is able to demonstrate environmental impact assessment in AMDAL document (Studi Analisis Dampak Lingkungan/ANDAL Perkebunan Kelapa Sawit Pola PIR – Transmigrasi dan Pabrik Minyak Kelapa Sawit/PMKS di Kabupaten Kampar, Indragiri Hulu dan Bengkalis Propinsi Riau). AMDAL document has approval as per “SK Menteri Pertanian No.013/ANDAL/HA/V/95” dated 05/05/1995. In addition, environmental management and monitoring plan - RKL/RPL as per “Surat Keputusan Menteri Pertanian No.03/RKL-RPL/BA/IV/1996” dated 04/04/1996. Initial EIA was performed by Independent consultant PT Swastika Aryindo Buana, consist of the professional and competent assessor.</p> <p>EIA document was included the impacts of any smallholder/outgrower scheme. PT Inti Indosawit Subur – Ukui Group has increase the mill capacity in 2009, Social Environmental Impact Assessment for mill capacity increase has been conducted and presented in “Dokumen Pengelolaan dan Pemantauan Lingkungan Hidup</p>	Complied

		<p>(DPPL) Peningkatan kapasitas PMKS dan Sarana Pendukung PT Inti Indosawit Subur Kebun Ukui". DPPL document has been approved by Riau Governor as per "Surat Keputusan Gubernur Riau No.976/X/2009 tentang Dokumen Pengelolaan dan Pemantauan Lingkungan (DPPL) untuk Peningkatan Kapasitas PMKS dan sarana pendukung PT Inti Indosawi – Kebun Ukui untuk Kebun Inti dan Kebun Plasma dengan Kapasitas Ukui I POM (90 ton TBS/jam) dan Ukui II (75 ton TBS/jam)", dated 28/10/2009. SEIA for mill capacity increase was performed by independent consultant PT Holistika Primagrahita, consist of the professional and competent assessor.</p> <p>Environmental impact assessment covered in ANDAL, RKL RPL document and environmental aspect and impact, e.g:</p> <p><u>Pre construction:</u></p> <ul style="list-style-type: none"> <li>• Employee recruitment</li> <li>• Construction</li> <li>• Nursery</li> <li>• Land clearing and planting preparation</li> <li>• Infrastructure and supporting facility construction and development</li> <li>• Land preparation</li> <li>• Imature Palm oil plant upkeeping</li> <li>• Mill location planning</li> <li>• Palm Oil Mill construction</li> </ul> <p><u>Operation:</u></p> <ul style="list-style-type: none"> <li>• Mature plantation upkeeping</li> <li>• Soil and water conservation</li> <li>• Land application (waste water application to palm oil plantation) and EFB application</li> <li>• Harvesting and collecting FFB</li> </ul>	
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		<ul style="list-style-type: none"> <li>• FFB transportation to Palm Oil Mill</li> <li>• FFB Processing in Palm Oil Mill</li> <li>• Transportation facility providing and maintenance</li> <li>• CPO and PK transportation</li> <li>• Waste water processing</li> <li>• Replanting</li> <li>• Partnership cooperation</li> </ul> <p><u>Social Impact Assessment:</u></p> <p>Social Impact Assessment has been conducted by independent consultant from "Fakultas Kehutanan Institut Pertanian Bogor" on July 2010.</p> <p>The SIA method was taken by participatory ways and involving the affected stakeholder at study location in 19 villages consist of 11 villages at Pelalawan Regency and 8 Villages at Indragiri Hulu Regency.</p> <p>Social Environmental impact assessment was conducted through regular environmental monitoring, e.g. river water quality, mill effluent quality, air emission, economical condition, social and culture of community and wildlife conservation.</p> <p>Social Environmental monitoring and management report reported in regular basis each semester in "Laporan Pelaksanaan Izin Lingkungan". Report semester I (Period January – June 2020) has been sent to the government on 11 November 2020 (Dinas Lingkungan Hidup Kab. Pelalawan and Dinas Lingkungan Hidup dan Kehutanan Provinsi Riau, PPE Region Sumatera and to KLH/Ministry of Environment and Forestry). Evidence of report submission can be demonstrated in "Daftar Distribusi Eksternal" and "Tanda terima Elektronik Sistem Informasi Pelaporan Elektronik Lingkungan Hidup (SIMPEL) KLHK.</p> <p>Last report for Environmental Performance, Monitoring and Evaluation conducted of second semester 2020 (period July – December 2020) to Environmental Agency in Pelalawan Regency, received by Mr Rawani on 23rd March 2021.</p>	
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		<p><b><u>Scheme Smallholder</u></b></p> <p>Social Environmental Impact Assessment of Ukui Plasma has included in AMDAL document (Studi Analisis Dampak Lingkungan/ANDAL Perkebunan Kelapa Sawit Pola PIR – Transmigrasi dan Pabrik Minyak Kelapa Sawit/PMKS di Kabupaten Kampar, Indragiri Hulu dan Bengkalis Propinsi Riau).</p> <p>SEIA identified the significant potential environmental impacts deriving from operational activities such as land clearing, land development and road construction at palm oil plantations.</p> <p>Smallholder management also provide update SEIA for smallholder operation as per “Penilaian Dampak Sosial dan Lingkungan (SEIA) Kebun Plasma Ukui Tahun 2020”. Smallholder manager has identified the social aspect and impact has identified such as:</p> <ul style="list-style-type: none"> <li>• Consistency of company for villages development</li> <li>• Company responsibility for road maintenance</li> <li>• Replanting activity</li> <li>• Harvesting and FFB transportation : air pollution and road condition, FFB stealing, FFB quality</li> <li>• FFB pricing mechanism</li> <li>• Labor recruitment and</li> <li>• Land legality</li> </ul> <p>Another Environmental aspect and impact evaluation was also conducted as per “Evaluasi Aspek – Dampak Lingkungan” EMS-431-002-LT updated on 3 January 2020. Involving of smallholder and stakeholder on SEIA were evident as per “Notulen Sosialisasi Upaya Pemantauan dan Pengelolaan Dampak Sosial” dated 11 August 2020 and 15 August 2020, participant from Local community villages representative, Cooperatives, Farmer group and Plasma Management wit number of participant 68 person.</p>	
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<p>3.4.2</p>	<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><b>Ukui II POM, Soga &amp; Sei lala Estate:</b></p> <p>Social Environment management and monitoring plan document were available in Environmental management plan (RPL-Rencana Pengelolaan Lingkungan) document. Document has been approved by Governor Riau as per "Surat Keputusan Gubernur Riau No.976/X/2009 tanggal 28 Oktober 2009 tentang Dokumen Pengelolaan dan Pemantauan Lingkungan. Environmental management based on document, e.g:</p> <ul style="list-style-type: none"> <li>• Air quality and noisy management from FFB processing performed by installing the emission monitoring facility in the boiler and genset stack; installing safety in boiler stack, install the cyclone and dust trap in boiler stack, control the emission, controlling fuel efficiency, emission measurement of vehicle, boiler and generator, standard muffler usage, reduce the vehicle speed in emplacement, road maintenance and signboard installation, OHS implementation in Palm Oil Mill.</li> <li>• Surface water quality and water biota management performed in order to prevent and control the physic and chemist quality of surface water comply to PP Nomor 82 tahun 2001. Performed by create terracing, land cover crop planting in open area and sloping area, organic fertilizer usage, natural predator usage for pest control, operating IPAL, land application, flat bed maintenance in land application area, housekeeping implementation and proper waste handling.</li> <li>• Soil quality management performed by land application management according to KepMen LH No. 28 Tahun 2003, groundwater quality check, flat bed maintenance, vegetation planting around waste water pond and maintenance of waste water pond, domestic and hazardous waste management.</li> <li>• Erossion and sedimentation management performed by creating and maintenance the individual terrace (tapak kuda) in area with slope 3 – 15% and maintain the land cover crop (Leguminosae), frond stacking and EFB application.</li> <li>• Flora fauna management performed by signboard installation regarding prohibition of plant destruction in conservation area, vegetation enrichment in conservation area, wildlife protection and maintain the conservation area.</li> </ul>	<p>Complied</p>
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		<ul style="list-style-type: none"> <li>• Community perception management performed in order to prevent and control the negative perception and potential conflict from community against employee recruitment process. Company has conducted workers recruitment transparently, each vacancy were publish to surrounding village, FFB purchasing from local plantation surrounding company, coaching and conseling to plasma member, CSR programme implementation.</li> </ul> <p>Based on RKL-RPL implementation report, verified that environmental management plan has been implemented as per document RKL-RPL. The evaluation of social environmental management plan effectivity has been carried out and presented in RKL-RPL report semester I (January – June) 2020. The report has been sent to the environmental agency on 11 November 2020 and reported to Ministry of Environment and Forestry on 9 July 2020, TTE No. 1594283997-1745.</p> <p>Last report for Environmental Performance, Monitoring and Evaluation conducted of second sementer 2020 (period July – December 2020) to Environmental Agency in Pelalawan Regency, received by Mr Rawani on 23nd March 2021.</p> <p><b><u>Scheme Smallholder:</u></b></p> <p>Ukui Smallholder has develop the social environment management and monitoring plan as per "Rencana Kelola Sosial Terkait Aspek Permasalahan Sosial Kebun Plasma Ukui", covering:</p> <ul style="list-style-type: none"> <li>• Villages development, PT Inti Indosawit Subur – Ukui Group as a facilitator of Ukui Smallholder has responsibility to villages development by implementing CSR program.</li> <li>• Road condition, company has responsibility for road maintenance due to FFB transportation activity; Company provide the assistance of heavy equipment (grader, compactor, bacholader) for road maintenance.</li> <li>• Replanting activity, company propose the replanting plan program for smallholder plantation and socialize to smallholder member.</li> </ul>	
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		<ul style="list-style-type: none"> <li>• FFB harvesting, company give the training to improve FFB quality from smallholder plantation, strict sanction to FFB stealing.</li> <li>• Air pollution by FFB transportation, company has a program for road maintenance minimum once a year.</li> <li>• FFB pricing mechanism, company informed the FFB price regularly according to pricing determination by Disbun Provinsi Riau.</li> </ul> <p>Ukui Smallholder Manager has developed mitigation plan to reduce environmental risks, presented in "Progress Perbaikan Lingkungan Kebun Plasma Ukui" dated 3 January 2020.</p> <p>Mitigation plan develop by Group Manager such as:</p> <ul style="list-style-type: none"> <li>• Optimize FFB transportation, by one way and not returning to the kavling/block to reduce the fossil fuel usage</li> <li>• TPH arrangement along the side collection road to become one way to ease the FFB transportation</li> <li>• Performing the proper fertilizing and appropriately to reduce the water pollution, prohibit to fertilizing in riparian area (3 m from left and right side)</li> <li>• Use the appropriate PPE to reduce the impact of spraying activity and cooperate with TUS team PT Inti Indosawit to handling the chemical weeding in Plasma Ukui.</li> <li>• Planting vetiver grass in riparian zone and near to waterways to reduce the soil erosion.</li> </ul> <p>Fronn stancking to reduce soil erosion and use the palm frond as mulching/organic fertilizer.</p>	
3.4.3	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p>	<p>Social Environment management and monitoring plan as per RKL – RPL document has been implemented by PT Inti Indosawit Subur – Ukui Group. The evidence "Lingkungan". Based on verification on Environmental management and monitoring report, confirmed that the management and monitoring plan has been well implemented accordingly. Data verified during audit :</p>	Complied

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		<ul style="list-style-type: none"> <li>• Air quality and noisy monitoring from FFB processing performed by emission measurement against Boiler and generator each semester, ambient air quality measurement each semester, noisy measurement (indoor and outdoor) each semester, odor measurement each semester.</li> <li>• Air emission quality in Ukui II POM analyze by Sucofindo Testing Laboratory. However monitoring of air quality and noisy semester I 2020 cannot be done due to Pandemic Covid-19, it was also explain by Sucofindo as per Letter of statement No. 1600/MDN-VI/P&amp;K/2020 regarding the postponement of operational activity.</li> <li>• Surface water quality and water biota monitoring to prevent and control the physic and chemist quality of surface water comply to PP Nomor 82 tahun 2001. Perfomed by waste water quality monitoring each month, hazardous waste monitoring, land application monitoring, surface water quality monitoring each semester. Waste water quality monitoring analyse by UPT Laboratorium Bahan Konstruksi Dinas PU &amp; Penataan Ruang Prov. Riau. Waste water analysis result since January – October 2020 shown comply with regulation Peraturan Gubernur Riau No. 35 Tahun 2007 &amp; KepMENLH No. 28 tahun 2003.</li> <li>• Surface water quality test (Sungai Pematang River and Air hitam river upstream and downstream) by Sucofindo cannot be done due to Pandemic Covid-19, it was also explain by Sucofindo as per Letter of statement No. 1600/MDN-VI/P&amp;K/2020 regarding the postponement of operational activity.</li> <li>• Soil quality monitoring performed by soil sampling analysis in "rorak, antar rorak and lahan control", EFB application monitoring, groundwater analysis each year. Due to Pandemic Covid-19, soil analysis 2020 cannot be done. Latest soil analysis conducted on 16 May 2019 by "Laboratorium Pengujian Kualitas Lingkungan Pro – Enviro Medan", Report of analysis No. 118-10/T/ENVIRO/VI/2019. Groundwater analysis conducted on 6<sup>th</sup> May 2019 in Well control of land application (LA) and non LA by UPT Laboratorium Bahan Konstruksi Dinas PU &amp; Penataan Ruang Prov. Riau. Report of Analysis No. MT.1/01.03.06.79.172 and</li> </ul>	
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		<p>MT.1/01.03.06.79.173 shown comply with regulation PerMenKes No. 416/MENKES/Per/IX/1990.</p> <ul style="list-style-type: none"> <li>• Erosion and sedimentation monitoring performed by erosion measurement according to USLE method. Measurement result since January – June 2019 shown erosion level average below 6 ton/ha/year for Soga and Sei Lala Estate categorized as very good criteria.</li> <li>• Flora fauna monitoring performed by wildlife monitoring and monitoring the conservation area each month. Monitoring Since January - June 2020 at Soga Estate and Sei Lala Estate shown that there were species of mammal presence (<i>Macaca fascicularis</i>, <i>Macaca nemestrina</i>, <i>Calosciurus notatus</i>, <i>Sus crofa</i>, <i>Rattus sp</i>, <i>Felis bengalensis</i>, <i>Paradoxurus sp</i>), 13 species of birds (such as: <i>Halcyon smyrnensis</i>, <i>Rhipidura javanica</i>, <i>Centropus bengalensis</i>, <i>Pycnonotus aurigaster</i>), 4 species of reptile (<i>Varanus salvator</i>, <i>fejevarya sp</i>, <i>Mabouya sp</i>, <i>Denrelaphis caudolineatus</i>).</li> <li>• Community perception monitoring performed by community interview, employee data monitoring, interview with village head or public figure regarding their perception to company. Company has monitored the public perception through questioner each year. Questioner to public perception regarding the impact of company presence has been disseminated to surrounding community. Latest monitoring of public perception has been performed in 2018, questioner of public perception can be demonstrated and well documented in RKL-RPL report semester I 2020. Generally public perception was positive regarding the company presence and contribution to the surrounding community.</li> </ul> <p>All management and monitoring plan has been implemented well by company according to RKL-RPL document. The implementation report has been reviewed and reported to government agency per semester (six monthly).</p> <p>During document verification and interview with management, it can be demonstrated that all the environmental monitoring plan has been implemented as per document RKL-RPL. The evaluation of environmental monitoring plan effectivity</p>	
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		<p>has been carried out and presented in RKL-RPL report semester II 2020 (July – December 2020).</p> <p>Evaluation consist of:</p> <ul style="list-style-type: none"> <li>• Trend evaluation of air ambient quality, air emission, odor, ground water quality, wate water quality, surface water quality, soil erosion shown that the result of monitoring are all parameter is met with the standard of regulation. Trend evaluation of water usage still under the budget/standard; biodiversity trend evaluation shown that there were still found the presence of animal including protected animal; Social economic trend evaluation shown increasing each year. Overall the trend evaluation shown the consistency and increasing in environmental performance.</li> <li>• Critical evaluation, the critical point in environmental monitoring is waste water quality and surface water usage. Based on the result of monitoring shown that waste water quality since January – June 2020 was met with regulation (BOD &lt; 5,000 mg/l and pH 6 – 9).</li> <li>• Compliance evaluation to regulation. According to evaluation of impact against soil erosion, water quality, soil quality, air quality, biodiversity, surrounding social and economic, health and safety, indicated that PT Inti Indosawit Subur – Ukui II POM has comply with all relevant regulation.</li> <li>• Public perception monitoring for 2020 has been carried out and there is no negative perception occured.</li> </ul> <p>Certicates of environmental analysis year 2020, such as:</p> <ul style="list-style-type: none"> <li>• Report of analysis, no: CBT99.4.00742020.32 dated 14<sup>th</sup> December 2020, sampling type for emission air, location in Genset 01 Cummins Ukui II POM. The result shown comply with environmental regulation. The testing conducted by Acrediated Laboratory - Sucofindo</li> <li>• Report of analysis for water quality, dated 10<sup>th</sup> December 2020, location in Bengkarai River. The result was shown comply with Gorvernment Regulation No 82 year 2001, class II.</li> </ul>	
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		Report of analysis for air ambient, dated 9 <sup>th</sup> December 2020, location in Ukui II POM, tested by Sucofindo. The result was shown comply with PERMENAKER No 5 tahun 2018.	
<b>Criteria 3.5:</b> A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.	<p>PT Inti Indosawit Subur – Ukui II Group has prepared a procedure for hiring workers, regulated that hiring and promotion of workers based on skill, work experiences, and job evaluation. Procedure for worker recruitment (SDM-A-001-00) and procedure for employee assessment (HRD C-002-00) was available and mentioned there was no discrimination treatment during recruitment and promotion process. Promotion of worker will be done base on work period, annual evaluation result, and availability of position. This procedure is accordance with the UU no. 13 / 2003 related to the Employment.</p> <p>In the recruitment process, the company has set the standard of competence that inferred in the Position Description and Job Profile. Recruitment selection, hiring and promotion has based on skills, capabilities, qualities, and medical fitness.</p> <p>Job opportunities were communicated and given to surrounding villagers at first priority where no discrimination found observed during interview and related records of workers being employed. All workers has treated equally in accordance with company regulation including rights of worker as well. The compliance in accordance with national laws has evaluated by the organization as described in criterion 2.1. Annuals performance evaluation result of worker has shown.</p>	Complied
3.5.2	Employment procedures are implemented and records are maintained.	<p>PT IIS has established mechanism related to the employees and payments of wages, including:</p> <ol style="list-style-type: none"> <li>1. SOP recruitment and employee selection No. SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding "<i>penerimaan karyawan baru</i>" (recruitment and selection of employee), explained that: When candidates have passed in the process of selection, next recruitment sends the candidate in full data system averis into HR-it) to be made an agreement work (made 2 duplicate and should be sign by candidates in question. <p>For example:</p> </li> </ol>	Complied

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		<ul style="list-style-type: none"> <li>- Perjanjian Kerja Harian Lepas – Daily worker agreement No. 013/PKHL/KTS/12/2020 dated 15 Desember 2020 on behalf of Dervi Sitohang as Child Care worker at pondok batu. This Daily worker agreement has made duplicate.</li> <li>- Perjanjian Kerja Harian Lepas – Daily worker agreement No. 012/PKHL/KTS/08/2020 dated 1 August 2020 on behalf of Dervi Sitohang as Child Care worker at pondok batu. This Daily worker agreement has made duplicate.</li> </ul> <p>2. PT Inti Indosawit Subur – Ukui II POM and Estate has issued the specific labour policy and procedures for temporary workers (PHL/PKWT); The policy and procedure are issued for each unit as below:</p> <ul style="list-style-type: none"> <li>- Ukui II POM: Memorandum No. 64/MI-PUD/09/2020, dated 25 September 2020.</li> <li>- Sei Lala Estate: Memorandum No. 111/ES-KSL/MEMO/XI/2020, dated 18 November 2020.</li> <li>- Soga Estate: Memorandum No. 183/ES-KSA/MEMO/XI/2020, dated 14 November 2020.</li> </ul> <p>The policy and procedure has been communicated to workers, especially to temporary workers at Ukui II POM on 25 October 2020, while in Sei Lala Estate socialization conducted on 15 Deceber 2020 to workers of Afdeling I - III, Traksi and administration and at Soga Estatte was socialited on 10 December 2020. The procedure was explain the detail of mechanism for temporary workers recruitment, promotion of temporary workers to be permanent workers, term and condition and requirement of temporary workers in accordance with National regulation (UU No. 13 tahun 2003).</p> <p>3. Company has established a mechanism to handle complaint from external party, as written in "<i>Mekanisme Penanganan Keluhan</i>" – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under "<i>Mekanisme Penyampaian Keluhan dan</i></p>	
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		<p><i>Penyelesaian Keluhan Karyawan</i> – Employee’ complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05).</p> <p>4. SOP related to the payments No. AA-FA-219.1-R5: “Pengupahan” (Wages) dated 1 May 2016. Described in this SOP, including:</p> <ul style="list-style-type: none"> <li>- The use of presensi card becomes a procedure of using fingerprints</li> <li>- The addition of leave monitoring analysis in the PMS system</li> <li>- Changes in payroll procedures from direct giving to employees to transfers via banks in cooperation with companies</li> <li>- Eliminate potentially fictitious payment characteristics.</li> </ul>	
<p><b>Criteria 3.6:</b> An Occupational health and safety (H&amp;S) plan is documented, effectively communicated and implemented.</p>			
3.6.1	<p><b>(C)</b> All operational activities risks assessed to identify the H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p>	<p>PT Inti Indosawit Subur – Ukui Group have been established a health and safety policy under “Kebijakan Perusahaan”, updated 1st December 2019, was signed by Managing Director. In point 3, the company commit to implement and maintain occupational health and safety management system in compliance with national and international applicable regulation. Point 5. Integrating social, environmental, food security, occupational health and safety issues into operational activities, adopting best technology available, and maintain trained manpower, with skills, and motivated to improve performance through continuous improvement program. The policy was also displayed at in public board in Ukui II POM, Soga Estate and Sei Lala Estate</p> <p>HIRADC for Ukui II POM have been prepared, last review and update 26 January 2020 covering all activities and location for mill scope: office, mill road area, security pos, parking area, all station mill, laboratory, POME instalation/IPAL.</p> <p>The document of OHS Program available under “Program Manajemen K3 PMKS Ukui II PT Inti Indosawit Subur Tahun 2021”, such as:</p> <ul style="list-style-type: none"> <li>- Established the document of hazard identification, risk assesement and its control</li> <li>- Meeting on safety committee/P2K3 (monthly basis)</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>- Report of OHS committee/P2K3 (3 months bases)</li> <li>- Training of emergency response and preparedness (annually)</li> <li>- Safety briefing (daily)</li> <li>- Providing the PPE for all employees</li> <li>- Inspection on PPE usage</li> <li>- Training for operator in POM and workshop</li> </ul> <p><b><u>Soga and Sei Lala Estate:</u></b></p> <p>Soga Estate and Sei Lala Estate has prepared HIRADC 2021 as per "Dokumen Hazard Identification Risk Assessment and Control Tahun 2021" Kebun Soga and Kebun Sei Lala. Latest review of HIRADC document was done on 5<sup>th</sup> January 2021 and 9<sup>th</sup> January 2021. Hazard and risk edentification and assessment are covering all activity at Soga Estate and Sei Lala Estate such as: Office, Housing, Material storage (fertilizer, fuel, agrochemical, sparepart, building material, etc), upkeeping (manual upkeeping and chemical upkeeping), harvesting, FFB transportation, hazardous and donmestic waste handling, road maintenance, vehicle maintenance (traksi), etc. The risk analysis and assessment has been performed according to procedure.</p> <p>Mitigation plan to reduce and minimize the risk impact has been develop by company covering:</p> <ul style="list-style-type: none"> <li>• Elimination of risk</li> <li>• Subtitution of material and process</li> <li>• Engineering control</li> <li>• Administratif control</li> <li>• Personal protective equipment.</li> </ul> <p>Engineering control was implemented to prevent hearing loss, e.g. install noise reduction agent and administrative by erected signboard of noise area, as described in Risk.</p>	
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		<p>Administratif control was performed by employee mutation/rotation, sanction for safety rules violation. Safety inspection was performed regularly to ensure the compliance of safety regulation.</p> <p>Safety shoes was provide twice a year for all process operator including mechanic. Monitoring of PPE usage can be demonstrated on document "Monitoring penggunaan APD" period January - November 2020 for each station.</p> <p>During Pandemic Covid-19, company has develop the business continuity plan (BCP) as a health protocol to prevent the covid-10 outbreak. The health protocol during working such as:</p> <ul style="list-style-type: none"> <li>- Temperature check before working, if the body temperature &gt; 36.5° C the workers must be referred to the clinic and may not work for further examination</li> <li>- Applying 3M (washing hands, keeping a social distancing and using a masker everywhere)</li> <li>- Restrictions on the movement of employees in and out of the plantation area and monitor the employees movement through permit.</li> </ul> <p>Based on interview and verification, there is no case of positif covid-19 in PT Inti Indosawit Subur – Ukui II POM, Soga Estate and Sei Lala Estate.</p> <p><b><u>Scheme smallholder:</u></b></p> <p>Group Manager has established the policy related to EHS as per "Kebijakan Manager Group ICS", dated 3<sup>rd</sup> January 2020 In point 3 mentioned: to pay attention and implementing health and safety culture, using personnel protective equipment, if necessary, in performing daily work and to maintain the work premises.</p> <p>Smallholder manager has prepared hazard identification and risk assessment as per "Dokumen Hazard Identification Risk Assessment and Control (HIRAC) year 2021", updated on 5<sup>th</sup> January 2021. Risk assessment has calculation of impact value, consequences value, possibility value. All activity, all area have been evaluated</p> <p>Mitigation plan to eliminate or reduce the hazard and risk has been develop according to HIRAC as per "Alternatif Kontrol Resiko untuk Tindakan Perbaikan".</p>	
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		<p>An OHS plan prepared as per "Rencana K3 (Keselamatan dan Kesehatan Kerja) majority to provide and control use of PPE, including socialization and monitoring. Group Manager of Plasma Ukui has also demonstrated under "Program Manajemen K3 Kebun Plasma PT Inti Indosawit Subur – Ukui Group tahun 2021, program such as:</p> <ul style="list-style-type: none"> <li>– Inspection and monitoring on using of PPE for harvester – daily</li> <li>– Training on emergency and preparedness – once a year</li> <li>– Training of first aider and monitoring of first aid kit</li> <li>– Refresh training of OHS including risk assessment.</li> </ul> <p>Record of implementation the OHS program provided in indicator 3.6.2.</p>	
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</p>	<p>PT Inti Indosawit Subur – Ukui II POM has demonstrated the record of realization the OHS program 2021, such as:</p> <p>Ukui II POM – PPE Provision for all workers at mill are demonstrated as per "Bukti Serah Terima Alat Pelindung Diri Pabrik Ukui II". Sample seen:</p> <ul style="list-style-type: none"> <li>– Bukti Serah Terima APD Safety Shoes for Mill process workers as much as 54 unit, dated 14 April 2020.</li> <li>– Bukti Serah Terima APD safety shoes for Maintenance workers on dated 14 April 2020 as much as 20 unit.</li> <li>– Bukti Serah Terima APD safety shoes for Grading workers on dated 14 April 2020 as much as 10 unit.</li> <li>– Bukti Serah Terima APD safety shoes for Security workers on dated 14 April 2020 as much as 7 unit.</li> <li>– Bukti Serah Terima APD safety shoes for Office workers on dated 11 April 2020 as much as 7 unit.</li> </ul> <p>Estates - PPE provision for all workers at Soga Estate and Sei Lala Estate are demonstrated as per "Bukti Serah Terima Alat Pelindung Diri". Sample seen:</p>	Complied

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		<ul style="list-style-type: none"> <li>- PPE AP Shoes provision for fertilizer workers Soga on April 2020, received by 11 workers</li> <li>- PPE Hand Gloves provision for fertilizer workers on 15 August 2020 received by 11 workers</li> <li>- PPE Apron provision for fertilizer workers on 13 August 2020 received by 11 workers</li> <li>- PPE provision for spraying workers Soga Estate: Apron, Uniform shirt, masker on February – August 2020.</li> </ul> <p>Based on field visit on 23<sup>rd</sup> March 2021 for spraying workers in block 16 in Division I Sei Lala Estate the risk impact probability was irritate and eyes diease, control by using appropriate PPE (eye wear/safety glasses, masker and handgloves) and regular training for sprayer workers.</p> <p>Dicipline of PPE usage monitoring regularly conducted by Estate management to ensure all workers use the appropriate PPE during working. Monitoring record present in "Daftar Pemeriksaan Alat Pelindung Diri (APD)". Sample seen for PPE monitoring of fertilizer workers, spraying workers and harvester period January - March 2021.</p> <p>Report of MCU for all workers in Ukui II POM was conducted by "Klinik Asian Agri Sehat", periode second sementer 2020, ik Soga Estate was attended by 59 workers, in Sei Lala Estate was conducted by 37 worker and in Ukui II POM was attended by 16 worker. The MCU was covered urine test, HSaAg and fysical test.</p> <p>Monitoring of emergency response and peparedeness facilities, i.e: fire hydrant. Based on field visit in Ukui II POM, the performance of hydrant no 5 was well.</p> <p>Report of OHS inspection report, location in Ukui II dated 23<sup>rd</sup> January 2021 – reported OK for PPE usage, and OHS facilities (fire hydrant and fire extinguisher)</p>	
<b>Criteria 3.7:</b> All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.			
3.7.1	(C) A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender-	The company has a department which is responsible for the training program, which is the Asian Agri Learning Institute. The department has a 2020 training program	Complied

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	<p>specific needs, and which covers applicable aspects of P&amp;C Principles, in a form they understand and includes assessment of the training.</p>	<p>recorded in the year 2020 training calendar including Estate and Mill.</p> <p>Through its employee data (master of employees) and training data personal records, the Asian Agri Learning Institute Department will recommend the Estate and Mill to participate in a training program annually and will also evaluate the effectiveness of the training that has been followed.</p> <p>The training program is divided into several aspects: technical, Administration, Environments &amp; Sustainability and special certifications and there are also training involving vendors or operational suppliers.</p> <p>The following is a 2020 period training program for PT Inti Indosawit Subur, including:</p> <p><u>Technical (Estate):</u></p> <ol style="list-style-type: none"> <li>1. Refresh of SOP Handling of pests and diseases in July 2020.</li> <li>2. Spraying Training; will be held in Mach to May 2020.</li> </ol> <p><u>Vendor (Estate and Mill):</u></p> <ol style="list-style-type: none"> <li>1. Unlimited Herbicide Application Training, March, June and August 2020</li> <li>2. Heavy equipment (Operational and Maintenance), will be held in March, July and August 2020.</li> </ol> <p><u>Technical (Mill and Workshop)</u></p> <ol style="list-style-type: none"> <li>1. Training on the principle in the operation of steam machine, will be held in July 2020.</li> <li>2. Road maintenance training, will be held in February, March and July 2020.</li> </ol> <p><u>Environmental &amp; Sustainable:</u></p> <ol style="list-style-type: none"> <li>1. Sustainability awareness (include traceability, mass balance and HCV), will be held in February, March, May, July and September 2020.</li> <li>2. Basic fire training and fire equipment and service, will be held in February and May 2020.</li> <li>3. Job safety analysis training, will be held in February 2020.</li> </ol>	
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		<p>4. Accidents Inspection and observation training. <u>Certification:</u></p> <ol style="list-style-type: none"> <li>1. Certification of AK3U, will be held in March 2020.</li> <li>2. Certification for Pesawat Angkat Angkut Operator, will be held in March 2020.</li> <li>3. Certification for welder operator, will be held in March 2020.</li> <li>4. First aider certification training, will be held in April 2020.</li> <li>5. Hyperkes certification, will be held in April 2020</li> <li>6. Electricians' certification, will be held in April 2020.</li> </ol> <p>The company has also been conducting socialization on all health protocol related workers for pandemic Covid-19 on 26-27 March 2020.</p> <p>Plasma UKUI has established training program for KUD, KT and farmer member FY2020, the training consists of:</p> <ol style="list-style-type: none"> <li>1. P&amp;C RSPO Group Certification, will be held on 8 August 2020</li> <li>2. PPE (Basic Safety), will be held on 8 August 2020</li> <li>3. HCV, SEIA, Soil and Water Conservation, will be held on 8 August 2020</li> <li>4. OHS (Basic Safety), will be held on 10 October 2020</li> <li>5. First Aid Training, will be held on 25 November 2020</li> <li>6. Basic Fire, will be held on 14 November 2020</li> <li>7. Limited Pesticide Application, will be held on 14 November 2020</li> <li>8. Weed Control, will be held on 9 December 2020</li> <li>9. Fertilizer Application, will be held on 9 December 2020</li> <li>10. Integrated Pest Management, will be held on 9 December 2020</li> </ol> <p>Harvesting, will be held on 9 December 2020</p>	
3.7.2	Records of training are maintained, where appropriate on an individual basis.	Record of training are available, such as training attendant list, as sample described below:	Complied

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		<ol style="list-style-type: none"> <li>1. Basic fire, conducted on 27 January 2020, attended by 26 workers of Soga Estate, Sei Lala Estate and Ukui I POM and Ukui II POM.</li> <li>2. Medical Waste, conducted on 8 March 2021, attended by 5 workers of Ukui Estate, Ukui I POM, and Polyclinic.</li> <li>3. Refresh of Mill Procedures on 6 June 2020, attended by 21 workers of Ukui I POM.</li> <li>4. Refresh of Traceability Procedure on 20 July 2020, attended by 8 workers of Ukui I POM.</li> <li>5. Refresh of SOP Administration, conducted on 10 August 2020, attended by 13 workers of Sei Lala Estate.</li> <li>6. Sustainability Awareness, conducted on 19 October 2020, attended by 21 workers of Soga Estate, Sei Lala Estate, Ukui I POM and Ukui II POM.</li> <li>7. Plantation Management System, conducted on 8 December 2020, attended by 5 workers of Ukui Estate.</li> <li>8. Occupational safety and health investigations, conducted on 10 December 2020, attended by 34 workers of Soga Estate and Ukui I POM Supply Chain Training, conducted on 26 January 2021, attended by 8 workers of Ukui I POM and Ukui II POM.</li> </ol> <p>Scheme Smallholder Training:</p> <ol style="list-style-type: none"> <li>1. P&amp;C RSPO Group Certification, conducted on 11 August 2020, attended by 20 farmers.</li> <li>2. PPE (Basic Safety), conducted on 11 &amp; 15 August 2020, attended by 35 farmers.</li> <li>3. HCV, SEIA, Soil and Water Conservation, conducted on 11 &amp; 15 August 2020, attended by 35 farmers.</li> <li>4. OHS (Basic Safety), conducted on 11 &amp; 15 August 2020, attended by 34 farmers.</li> </ol>	
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		<ol style="list-style-type: none"> <li>5. First Aid Training, conducted on 25 November 2020, attended by 164 farmers.</li> <li>6. Basic Fire, conducted on 10 October 2020, attended by 136 farmers.</li> <li>7. Limited Pesticide Application, conducted on 25 November 2020, attended by 164 farmers.</li> <li>8. Weed Control, conducted on 9 December 2020, by attended by 74 farmers.</li> <li>9. Fertilizer Application, conducted on 9 December 2020, attended by 74 farmers.</li> <li>10. Integrated Pest Management, conducted on 9 December 2020, attended by 74 farmers.</li> <li>11. Harvesting, conducted on 9 December 2020, attended by 74 farmers.</li> </ol> <p>Personal data training of staff, workers and scheme smallholders are available, e.g.:</p> <ul style="list-style-type: none"> <li>• Hans MF Pinem, Sustainability Staff-Ukui Estate, has attend training of First Aider on 28/11/2019; OHS on 29/11/2019; Basic Fire on 11/04/2019; environment impact and aspect on 18/11/2019; Limited pesticide use on 24/04/2019; Basic fire on 27/02/2020; HCV Awareness on 10/10/2020.</li> <li>• Tri Hardono, Security-Ukui Estate, has attend training of Basic Fire on 21/03/2016; HCV Awareness on 21/04/2016; Fist Aider on 14/07/2017; Basic Fire on 03/09/2018 and 27/02/2020.</li> <li>• Edisah Lubis, Production Clerk-Ukui I POM, has attend training of Supply chain on 15/04/2018, 12/02/2020 and 26/01/2021, refresh of PMS on 18/12/2018; refresh SOP Traceability Book Keeping on 10/02/2019 and 20/07/2020; refresh of Plantation Management System on 8/12/2020; covid-19 awareness on 20/03/2020; GHG calculation on 19/05/2019; SOP Mass Balance and Traceability on 07/09/2019.</li> <li>• Heri Kusniawan Manurung, Mechanic-Sei Lala Estate, has attend training of Basic Fire on 9/03/2018 and 4/11/2019, Emergency response on 10/12/2020.</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Wiwit Muliono, KTU-Soga Estate, has attend training of refresh Plantation Management System 8/12/2020; Medical Waste on 27/02/2020; Basic Fire 27/02/2020.</li> <li>• Lamijo, Foreman Plasma-Ukui SP 1A, has attend training of RSPO P&amp;C for Group Certification on 11 August 2020; basic safety on 11 &amp; 15/08/2020; HCV, EIA and Soil and Water Conservation on 11 &amp; 15/08/2020; First Aid on 25/11/2020; Basic Fire on 14/11/2020; limited pesticides on 25/11/2020; weed control on 9/12/2020; fertilizer application on 9/12/2020; integrated pest management on 9/12/2020; harvesting on 9/12/2020.</li> <li>• Boyke Silitonga, KTU Ukui II POM, has attend training of environmental permit report on 17/04/2019; Traceability and Mass Balance on 8/11/2019; ISCCS on 26/01/2021.</li> <li>• Aston Sirait, Production Clerk Ukui II POM, has attend training of Traceability and Mass Balance on 8/11/2019; ISCCS on 26/01/2021.</li> </ul> <p>The company has also made recording for all trainings that have been attended by employees in the recording of "Personal Data Training".</p> <p>- Some documents can be shown at the time of the audit for example: The Calendar Training document period 2020, the list of participants attending the trainees, and some photographs of the activities at the time of training.</p>	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	Training for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) has been carried out by company on 26 January 2021 online by Zoom meeting. Training attend by 5 participants (Mill Manager, Production clerk, weighbridge clerk, KTU/administration, Dispatch and Sustainability team). Evidence of training can be demonstrated. During interview with mill personel confirmed that they have understand regarding the RSPO SCCS implementation and process in Buatan I Palm Oil Mill.	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)



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<p>3.8.1</p>	<p><b>Identity Preserved Module</b>  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&amp;C), or against the Group Certification scheme.  Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>Management described PT Inti Indosawit Subur – Ukui II POM to implement RSPO Supply Chain Identity Preserved Module. Ukui II POM only received and process FFB from certified company-owned estate and certified scheme smallholder. There was no received FFB from third-party or non-certified FFB supplier.  PT Inti Indosawit Subur - Ukui II Palm Oil Mill currently hold a valid RSPO P&amp;C certificate, as certificate number RSPO 565807, valid until 28<sup>th</sup> February 2021, with supply chain model is Identity Preserved.  All FFB are received from certified supply bases, which are from:</p> <ul style="list-style-type: none"> <li>• Company-owned estates, e.g: Soga Estate and Sei Lala Estate;</li> </ul> <p>Scheme smallholders consist of 6 (six) smallholder cooperatives (KUD), e.g.: KUD Tani Subur, KUD Karya Tani, KUD Mekar Abadi, KUD Tani Maju, KUD Tani Bahagia and KUD Usaha Tani.</p>	<p>Complied</p>
<p>3.8.2</p>	<p><b>Mass Balance Module</b>  A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Not applicable.  Management described PT Inti Indosawit Subur – Ukui II POM to implement RSPO Supply Chain Identity Preserved Module. Ukui II POM only received and process FFB from certified company-owned estate and certified scheme smallholder. There was no received FFB from third-party or non-certified FFB supplier.</p>	<p>Not Applicable</p>
<p>3.8.3</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&amp;C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The 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.  The estimated tonnage of CPO and PK products that could potentially produce by PT Inti Indosawit Subur – Ukui II POM has been recorded in BSI’s public summary report, certificate and RSPO IT Paltform.  Below are the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year 2020:</p>	<p>Complied</p>

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		<p><u>Forecast volume (March 2020 – February 2021)</u>            FFB :291,421 MT            CPO : 61,746 MT (OER: 21.18%)            PK : 16,320 (KER: 5.60%)</p> <p><u>Actual production volume (March 2020 – February 2021)</u>            FFB: 273,458 MT            CPO: 57,575.27 MT (OER: 21.05%)            PK: 14,902.13 MT (KER: 5.45%)</p> <p><u>Actual sold volume (March 2020 – February 2021)</u>            CPO: 57,501.93 MT            PK: 14,901.80 MT</p>	
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<p>PT. Inti Indosawit Subur – Buatan I POM is subsidiary of PT. Inti Indosawit Subur, a member of RSPO, with RSPO membership No.1-0022-06-000-00 since 6 February 2006.</p> <p>PT Inti Indosawit Subur – Ukui II POM has meet all registration and reporting requirements.</p> <p>RSPO IT Platform/PalmTrace account RSPO_PO1000002491.</p>	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</p>	<p>PT. Inti Indosawit Subur – Ukui II POM can demonstrate procedures as follow:</p> <ul style="list-style-type: none"> <li>• Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R7) dated 1 October 2019. The procedures cover traceability of CPO and PK, since FFB receiving from Buatan Estate and Smallholder, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years.</li> <li>• Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4). The procedure explains method to check only certified product received. The book keeping mass balance stated every 3 months: January-March, April-June, July-September, and October-December each year. Head of Environment and</li> </ul>	Complied

	<p>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</p> <p>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> <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>Sustainability will inform to Certification Body in the case of projected overproduction.</p> <ul style="list-style-type: none"> <li>• SOP for mill operation Mill Policy Manual: <ul style="list-style-type: none"> <li>- SOP AA-MPM-OP-1400.02.R2 Stasiun Penerimaan for FFB receiving station;</li> <li>- SOP AA-SOP-OP-101.5-R0 Grading;</li> <li>- SOP AA-MPM-OP-1400.03.R1 Stasiun Rebusan for sterilizer;</li> <li>- SOP AA-MPM-OP-1400.04.R1 Stasiun Pemisahan Berondolan for loose fruit separation;</li> <li>- SOP AA-MPM-OP-1400.05-R1 Stasiun Pengadukan dan Pengempaan for pressing station;</li> <li>- SOP AA-MPM-OP-1400.06-R1 Stasiun Pemurnian for clarification;</li> <li>- SOP AA-MPM-OP-1400.07-R1 Stasiun Pemisahan Nut dan Fiber for nut and fiber separation;</li> <li>- SOP AA-MPM-OP-1400.08-R1 Stasiun Kernel for kernel station;</li> <li>- SOP AA-MPM-OP-1400.09-R1 Stasiun Boiler;</li> <li>- SOP AA-MPM-OP-1400.10-R1 Stasiun Engine Room;</li> <li>- SOP AA-MPM-OP-1400.11-R1 Stasiun Water Treatment;</li> <li>- SOP AA-MPM-OP-1400.12-R1 Laboratorium;</li> <li>- SOP AA-MPM-OP-1400.13-R1 Stasiun Pengelolaan Limbah for palm oil mill effluent treatment;</li> <li>- SOP AA-MPM-OP-1400.14-R2 Stasiun Penimbunan dan Pengiriman CPO dan Kernel for CPO and PK bulking and despatch operation;</li> <li>- SOP AA-MPM-OP-1400.15-R1 Perawatan for preventive maintenance;</li> <li>- SOP AA-MPM-OP-1400.18-R4 Book Keeping</li> <li>- SOP AA-MPM-OP-1400.17-R7 Traceability</li> </ul> </li> </ul>	
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		<p>PT. Inti Indosawit Subur – Ukui II POM is able to demonstrate complete and up-to-date records and report demonstrating compliance with the supply chain’s general requirement and modular requirement, including training records.</p> <p>As per Procedure of Traceability (AA-MPM-OP-1400.17-R7), the responsible person in charge to the supply chain system is Mill Manager. During audit, the mill manager is able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill.</p> <p>PT IIS Ukui II POM has a procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill, as described in SOP AA-MPM-OP-1400.17-R7 Traceability, dated 1 October 2019.</p>	
<p>3.8.6</p>	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p> <p>ii) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>iii) Effectively implements and maintains the standard requirements within its organisation.</p> <p>iv) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>PT. Inti Indosawit Subur – Ukui II POM has a procedure to conduct internal audit RSPO, including RSPO SCCS as per Procedure of Traceability (AA-MPM-OP-1400.17-R7) chapter 6.7, Sustainability Internal Audit Manager conducted internal audit annually, to ensure all operational and documentation activities are comply with the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. Internal audit for all scheme including RSPO SCCS also refer to SOP Internal Audit Nomor: AA-SOP-ES-6001-R5 dated 1 August 2020; Chapter 4.0 stated that Internal audit conducted minimum once a year considering the critical area.</p> <p>Last internal audit conducted on 4<sup>th</sup> September 2020. The report available under document “Internal Audit Sustainability Integrasi”.</p> <p>Management review dated 10<sup>th</sup> September 2020, was attended by Technical Controller, POM Manager, Sustainability Staff. Document of Management Review available and recorded in minutes of meeting:</p> <ul style="list-style-type: none"> <li>• Result of internal audits, covering RSPO Supply Chain Certification Standard: Internal audit for Ukui II POM carried out 4<sup>th</sup> September 2020 - all findings closed.</li> <li>• Customer feedback: No complaint received related to CSPO and/or CSPK product.</li> </ul>	<p>Complied</p>

		<ul style="list-style-type: none"> <li>• Status of preventive and corrective actions: status of preventive and corrective action related to internal audit have been discussed during management review meeting. This including opportunity for improvements.</li> <li>• Follow-up actions from management reviews:</li> <li>• Recommendations for improvement:             <ul style="list-style-type: none"> <li>○ Maintain customer satisfaction by enhance CPO and PK quality</li> <li>○ Mill maintenance enhancememnt</li> <li>○ Transporting agreement renewal according to agreement.</li> </ul> </li> </ul>	
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>PT Inti Indosawit Subur - Ukui II POM use supply chain model Identity Preserved, therefore the mill not received and processed non-certified FFB.</p> <p>Procedure of Traceability (AA-MPM-OP-1400.17.R7) with latest revision dated 1 Oct 2019 described that KTU who verify and documented tonnage and source of certified FFB in "Laporan Harian Pabrik", then Mill Manager who verify and approve it.</p> <p>All FFB are received from certified supply bases, which are from:</p> <ul style="list-style-type: none"> <li>• Company-owned estates, e.g: Soga Estate and Sei Lala Estate;</li> </ul> <p>Scheme smallholders consist of 6 (six) smallholder cooperatives (KUD), e.g.: KUD Tani Subur, KUD Karya Tani, KUD Mekar Abadi, KUD Tani Maju, KUD Tani Bahagia and KUD Usaha Tani.</p> <p>The procedure also mentioned mechanism that Head of Environmental and Sustainability will inform to certification body if there is case of projected overproduction.</p> <p>Data verified:</p> <ol style="list-style-type: none"> <li>1. Daily Production Report Ukui II POM: "Laporan Harian Pabrik" dated 31 October 2020; described FFB received from Soga Estate and Sei Lala Estate, and Scheme Smallholder (Plasm Ukui), total todate is 21,77,321 MT;</li> <li>2. Weighbridge card No.PUDA120118991 dated 25<sup>th</sup> May 2020; commodity is FFB certified; source is Sei Lala Estate Div 3 Block C90a; amount 266 bunches; nett weight is 6,410 kg; Certificate No. RSPO 565807; DN</li> </ol>	Complied

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		<p>#KSLDT0220190930170804; transporter internal BM 8341 TC; driver Ekawan Putra;</p> <p>3. Weighbridge card No.PUDA120119001 dated 21<sup>st</sup> September 2020 commodity is FFB certified; source is Soga Estate Div 3 Block C98b; amount 302 bunches; nett weight is 8,1600 kg; Certificate No. RSPO 565807; DN #007390; transporter internal BM 9183 FC; driver Amir Yadah;</p> <p>4. Record of FFB received from KUD Tani Bahagia; Followed up by weighbridge card No.PUDA220112464, dated 4<sup>th</sup> May 2020; commodity is FFB certified; source is Kebun Plasma (Scheme Smallholders); mount 325 bunches; nett weight is 8,330 kg; Certificate No. RSPO 565807; DN #30/Plasma; transporter by plasma,</p> <p>- Record of FFB received from KUD Usaha Tani; Followed up by weighbridge card No.PUDA220112469, dated 30<sup>th</sup> October 2020; commodity is FFB certified; source is Kebun Plasma (Scheme Smallholders); mount 346 bunches; nett weight is 9,947 kg; Certificate No. RSPO 565807; DN #30/Plasma; transporter by plasma.</p>	
<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> <li>The name and address of the buyer;</li> <li>The name and address of the seller;</li> <li>The loading or shipment / delivery date;</li> <li>The date on which the documents were issued;</li> <li>RSPO certificate number;</li> </ol>	<p>Traceability AA-MPM-OP-1400.17.R7 with latest revision dated 1 Oct 2019. The procedures cover traceability of palm products (CPO and PK) since receiving of fresh fruit bunches from Soga Estate, Sei Lala Estate and 6 scheme smallholder cooperatives, processing of up to shipping of CPO and PK as well as Daily production report Ukui II POM.</p> <p>PT Inti Indosawit Subur – Ukui II POM has made Shipping Announcement in RSPO IT Platform to announce sales of RSPO certified CPO or PK per group of shipments (DO). During this surveillance period Ukui II POM sold certified product in form of CSPO and CSPK.</p> <p>Sales and goods out documents seen are as follows:</p> <ul style="list-style-type: none"> <li>PalmTrace Shipping Announcement: TR-cde980fc-91c8; dated 31<sup>st</sup> August 2020, member ID RSPO_PO1000002491; buyer PT Inti Indisawit Ukui I KCP;</li> </ul>	<p>Complied</p>

	<p>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</p> <p>g) The quantity of the products delivered;</p> <p>h) Any related transport documentation;</p> <p>i) A unique identification number.</p>	<p>product CSPK, supply chain model IP; volume 1,49 MT. confirmation date 21<sup>st</sup> October 2020</p> <ul style="list-style-type: none"> <li>• DO number: 08305/DC10/12/20, Weighbridge Card No.PUDC220200446 dated 10<sup>th</sup> August 2020; product is PK certified RSPO; Nett weight is 20,380 kg; SC model is Identity Preserved; certificate is RSPO 565807; transporter CV Buana Jaya Bersama; BM 9542 RC; driver Supriyadi; deliver to KCP PMKS Ukui I.</li> <li>• PalmTrace Shipping Announcement: R-973c029f-4e89; dated 30<sup>th</sup> September 2020, member ID RSPO_PO1000002491; buyer PT Sari Dumai Sejati; product CSPO, supply chain model IP; volume 599.87 MT. confirmation date 12<sup>th</sup> October 2020,</li> </ul> <p>DO number: 09011/DC10/02/20, Weighbridge Card No.PUDC120201755 dated 14<sup>th</sup> August 2020; product is CPO certified RSPO; Nett weight is 23,430 kg; SC model is Identity Preserved; certificate is RSPO 565807; transporter CV Sumber Kenca; BM 8878 BH; driver Gusnaldi; deliver to PT Sari Dumai Sejati (Lubuk Gaung, Dumai).</p>	
<p>3.8.9</p>	<p><b>Outsourcing Activities</b></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</p>	<p>PT. Inti Indosawit Subur – Ukui II POM not outsource its milling activities however operate subcontractor for CPO and PK transporter.</p> <p>The transporter for RSPO certified sustainable CPO delivery were carried out by several contractors. These contractors were appointed, contracted and instructed by PT Inti Indosawit Subur – Ukui II POM.</p> <p>PT Inti Indosawit Subur – Ukui II POM control the outsourced transporter by “Surat Perintah Kerja (SPK)” and “Daftar Periksa Kesiapan Kerja Pengiriman”. SPK covered information as explain in indicator 5.5.2 b. while “Daftar Periksa Kerja” is the tool to control the transporter:</p> <ul style="list-style-type: none"> <li>• Before shipping (completeness of vehicle including legality and safety, tank condition, faucet out, main hole tank, hinge/key lock faucet out);</li> <li>• After shipping (completeness of vehicle including legality and safety, tank condition, faucet out, main hole tank, hinge/key lock faucet out, seal number and seal condition);</li> <li>• The quantity of CPO monitored by Weighbridge Card and SPK (with 0.20%</li> </ul>	<p>Complied</p>

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	<p>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>tolerance).</p> <p>PT. Inti Indosawit Subur – Ukui II POM having legal ownership of material being transported by appointed outsourced companies.</p> <p>PT. Inti Indosawit Subur – Ukui II POM have a contract agreement with transporter as below:</p> <ul style="list-style-type: none"> <li>- “Perjanjian Pengangkutan Nomor: 06/VI/SKI-IIS/2020” dated 4 June 2020 between PT Inti Indosawit Subur and PT Sumber Kencana. Contract transport for CPO &amp; PK.</li> <li>- “Perjanjian Pengangkutan Nomor: 05/VI/JSA-IIS/2020” dated 4 June 2020 between PT Inti Indosawit Subur and CV Jasa Sahabat Abadi. Contract transport for CPO &amp; PK.</li> <li>- “Perjanjian Pengangkutan Nomor: 02/VI/JP-IIS/2020” dated 4 June 2020 between PT Inti Indosawit Subur and CV Jaya Pertama. Contract transport for CPO &amp; PK.</li> <li>- “Perjanjian Pengangkutan Nomor: 03/VI/BJB-IIS/2020” dated 4 June 2020 between PT Inti Indosawit Subur and PT Buana Jaya Bersama. Contract transport for CPO &amp; PK.</li> </ul> <p>Contract agreement are signed and enforceable by both parties. According to contract agreement article 7 point 1.m stated that “bersedia memenuhi persyaratan system sertifikasi rantai pasok saat pengangkutan bahan baku dan bersedia untuk diaudit oleh auditor internal perusahaan dan auditor pihak eksternal dari badan sertifikasi yang ditunjuk oleh pihak kedua jika diperlukan” – Transporter are willing to comply with certification system of RSPO Supply Chain during transport material and willing to be audit by internal auditor company (PT IIS – Ukui II POM) and external auditor from Certification Body if necessary.</p>									
3.8.10	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p>PT Inti Indosawit Subur – Ukui II POM has record the names and contact details of the transporter, which contain in “Perjanjian Pengangkutan”.</p> <table border="1" data-bbox="981 1318 1953 1391"> <thead> <tr> <th data-bbox="981 1318 1167 1391">Name of Transporter</th> <th data-bbox="1167 1318 1458 1391">Address</th> <th data-bbox="1458 1318 1704 1391">Contact Person</th> <th data-bbox="1704 1318 1953 1391">Phone Number</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Name of Transporter	Address	Contact Person	Phone Number					Complied
Name of Transporter	Address	Contact Person	Phone Number								



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		CV Sumber Kencana	Jl Veteran No 77, Rengat, Riau	Atun/Hendra	08127580****/085278043****	
		CV Jasa Sahabat Abadi	Jl Besar Kisaran, Medan	Darmin Tanudjaja	085372344****	
		CV Jasa Bersama	Jl Siak No 2, Pekanbaru	Suwito Djingga/Lesi	08126062****/08127512****	
		PT Buana Jaya Bersama	Pekanbaru, Riau	Eltono	082169511****/082170430****	
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.	PT Inti Indosawit Subur – Ukui II POM aware to inform its CB regarding the name and contact detail of any new contractor prior to next assessment. The site committed to inform CB related name and contact details of any new contractors as mentioned in Procedure “SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019”.				Complied
3.8.12	Record keeping 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:	Based document review, PT Inti Indosawit Subur – Ukui II POM able to demonstrate complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain Certification Standard requirements. Records and report verified are as follows: <ul style="list-style-type: none"> <li>• Sample of Mill Daily Report; dated 31<sup>st</sup> December 2020 and 28<sup>th</sup> February 2021</li> <li>• Sample of Weighbridge Card for FFB</li> <li>• Sample of Weighbridge Card for CPO</li> <li>• Sample of Weighbridge Card for PK</li> <li>• Delivery Order CPO and PK</li> <li>• Sales contract</li> <li>• Shipping Announcement</li> <li>• Mass balance report</li> <li>• Internal audit RSPO SCCS and Management review</li> </ul>				Complied

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	<p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>Based on procedure of Traceability (AA-MPM-OP-1400.7.R7) dated 1 Oct 2019, section 6.9 requires that all records and reports related to traceability and book keeping are retained for a period of 10 years.</p> <p>PT Inti Indosawit Subur – Ukui II POM is able to provide estimate volume of CPO and PK in a year period as in “Distribusi Produksi Bulanan Anggaran Tahun 2020” consists estimate of FFB receiving from certified source (Soga Estate, Sei Lala Estate and Ukui Plasma), extraction rates, processing capacity, working hour and utilization.</p> <p>PT Inti Indosawit Subur – Ukui II POM record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis as per “Book Keeping - Mass Balance CPO &amp; PK”.</p> <p>Ukui II POM has also keep an up to date record of the FFB volume received, CPO and PK produced over a period of twelve (12) months.</p>	
<p>3.8.13</p>	<p><b>Extraction Rate</b></p> <p>The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>PT Inti Indosawit Subur – Ukui II POM is able to provide estimate volume of CPO and PK in a year period as in “Distribusi Produksi Bulanan Anggaran Tahun 2020” consists estimate of FFB receiving from certified source (Soga Estate, Sei Lala Estate and Ukui Plasma), extraction rates, processing capacity, working hour and utilization.</p> <p>The actual conversion ratio is monitored on daily basis through sounding result and documented in daily report. PT Inti Indosawit Subur – Ukui II POM able demonstrate the work instruction for analysis of oil content.</p> <p>OER and KER are estimated based on associated inputs and upon past experience (previous year FFB, CPO and PK production).</p> <p>The site has set OER for budget 2020 (Jan - Dec) as 21.28% and KER as 5.60%.</p> <p>Budget FFB process 2020: certified 306,132.71 MT, non certified: 0 MT</p> <p>Budget CPO production 2020: certified 65,159.99 MT, non certified 0 MT.</p> <p>Budget PK production 2020: certified 17,143.43 MT, non certified 0 MT.</p> <p>Previous Budget vs realization on 2020 (Jan – Dec) as below:</p>	<p>Complied</p>

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		Description	Budget	Realization		
		FFB Certified	306.132,71	275.035,82		
		FFB Non Certified	0	0		
		CPO Certified	65.159,99	58.168,17		
		CPO Non Certified	0	0		
		PK Certified	17,143.43	14,997.96		
		PK Non Certified	0	0		
		OER	21.28	5.60		
		KER	5.60	5.45		
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	<p>The actual conversion ratio is monitored on daily basis through sounding result and documented in daily report. PT Inti Indosawit Subur – Ukui II POM able demonstrate the work instruction for analysis of oil content.</p> <p>PT. Inti Indosawit Subur – Ukui II POM is able to demonstrate the work instruction for analysis of oil content.</p> <p>Based on Laporan Harian Produksi dated 31 December 2020, the sounding result and production report shows that actual conversion ratios from FFB into CPO are:</p> <ul style="list-style-type: none"> <li>a. OER For FFB from Soga Estate: 22.69%</li> <li>b. OER For FFB from Sei Lala Estate: 22.19%</li> <li>c. OER For FFB from Ukui II Plasma: 20.18%</li> </ul> <p>And actual conversion ratios from FFB into PK are:</p> <ul style="list-style-type: none"> <li>a. KER For FFB from Soga Estate: 5.55%</li> <li>b. KER For FFB from Sei Lala Estate: 5.55%</li> <li>c. KER For FFB from Ukui II Plasma: 5.55%</li> </ul> <p>Actual conversion ratios year 2021 todate 28<sup>th</sup> February 2021 from FFB into CPO are:</p> <ul style="list-style-type: none"> <li>a. OER For FFB from Soga Estate: 22.70% (budget 22.80%)</li> <li>b. OER For FFB from Sei Lala Estate: 22.19% (budget 22.30%)</li> <li>c. OER For FFB from Ukui II Plasma: 20.05% (20.15%)</li> </ul>			Complied	

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		<p>And actual conversion ratios from FFB into PK are:</p> <p>a. KER For FFB from Soga Estate: 5.58% (budget 5.50%)</p> <p>b. KER For FFB from Sei Lala Estate: 5.59% (budget 5.50%)</p> <p>KER For FFB from Ukui II Plasma: 5.58% (budget 5.50%)</p>																			
3.8.15	<p><b>Processing</b></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>Management described PT Inti Indosawit Subur – Ukui II POM to implement RSPO Supply Chain Identity Preserved Module. Ukui II POM only received and process FFB from certified company-owned estate and certified scheme smallholder. There was no received FFB from third-party or non-certified FFB supplier.</p> <p>PT Inti Indosawit Subur - Ukui II Palm Oil Mill currently hold a valid RSPO P&amp;C certificate, as certificate number RSPO 565807, valid until 28<sup>th</sup> February 2021, with supply chain model is Identity Preserved.</p> <p>All FFB are received from certified supply bases, which are from:</p> <ul style="list-style-type: none"> <li>• Company-owned estates, e.g: Soga Estate and Sei Lala Estate;</li> <li>• Scheme smallholders consist of 6 (six) smallholder cooperatives (KUD), e.g.: KUD Tani Subur, KUD Karya Tani, KUD Mekar Abadi, KUD Tani Maju, KUD Tani Bahagia and KUD Usaha Tani.</li> </ul>	Complied																		
3.8.16	<p><b>Registration of Transactions</b></p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>PT Inti Indosawit Subur – Ukui II POM is a palm oil mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product (FFB), therefore the site has been registered in RSPO IT Platform with ID number RSPO_PO1000002491.</p> <p>PT Inti Indosawit Subur – Ukui II POM has made Shipping Announcement in RSPO IT Platform to announce sales of RSPO certified CPO or PK per group of shipments (DO). The sold certified product in form of CSPO and CSPK. Sample seen for registration of transaction in 2020:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Transaction ID</th> <th>Buyer</th> <th>Product</th> <th>Supply Chain Model</th> <th>Volume</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>TR-973c029f-4e89</td> <td>PT. SDS</td> <td>CSPO</td> <td>IP</td> <td>599.87</td> <td>Confirmed</td> </tr> <tr> <td>TR-cde980fc-91c8</td> <td>Ukui I KCP</td> <td>CSPK</td> <td>IP</td> <td>1491</td> <td>Confirmed</td> </tr> </tbody> </table>	Transaction ID	Buyer	Product	Supply Chain Model	Volume	Status	TR-973c029f-4e89	PT. SDS	CSPO	IP	599.87	Confirmed	TR-cde980fc-91c8	Ukui I KCP	CSPK	IP	1491	Confirmed	Complied
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TR-025b0479-2a97	PT. SDS	CSPO	IP	4371.19	Confirmed																																																																																																																
TR-2082656a-930a	Ukui I KCP	CSPK	IP	915.7	Confirmed																																																																																																																
TR-9d1be3ae-6214	Ukui I KCP	CSPK	IP	1185.62	Confirmed																																																																																																																
TR-2fd7647a-eb7b	PT. SDS	CSPO	IP	4146.91	Confirmed																																																																																																																
TR-63b8b66a-b463	PT. SDS	CSPO	IP	100	Confirmed																																																																																																																
TR-c93d6b0f-6bad	PT. SDS	CSPO	IP	4240.39	Confirmed																																																																																																																
TR-7dc3dd39-6e9a	PT. SDS	CSPO	IP	1891.81	Confirmed																																																																																																																
TR-39901c1f-9970	PT. SDS	CSPO	IP	990.49	Confirmed																																																																																																																
TR-bc90a150-6a0e	PT. SDS	CSPO	IP	2500.93	Confirmed																																																																																																																
TR-75e09888-bed3	PT. SDS	CSPO	IP	624.95	Confirmed																																																																																																																
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>PT Inti Indosawit Subur – Ukui II POM has made claims regarding the support of RSPO certified oil palm products only through Delivery document, such as Delivery Order and Weighbridge Card. By stating the RSPO certified number and the supply chain model. The organization aware about the RSPO Rules on Market Communications and Claims.</p>	Complied																																																																																																																		
<b>General corporate communications</b>																																																																																																																					

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4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	PT. Inti Indosawit Subur (with the brand Asian Agri), the parent company of Ukui II POM is highlighting its commitment to the principles of RSPO, and directly referring to RSPO website. The corporate communication can be found at <a href="http://www.asianagri.com">http://www.asianagri.com</a>	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> <li>• Display its RSPO membership status</li> <li>• Display the RSPO web address (www.rspo.org)</li> <li>• State that the member supports the work of the RSPO</li> <li>• State the member's history with regard to the RSPO.</li> <li>• Use the RSPO trademark to promote its membership of the RSPO.</li> </ul> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.</p>	<p>PT. Inti Indosawit Subur (with the brand Asian Agri), there was provide the information, e.g:</p> <ol style="list-style-type: none"> <li>1. Display its RSPO membership status: No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status. The CH only stated "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received out first RSPO certification for our estate in 2010."</li> <li>2. Display the RSPO web address: Not in direct manner. PT. Inti Indosawit Subur (with the brand Asian Agri), made a link to RSPO website.</li> <li>3. State the member supports the work of the RSPO: Not in direct manner. In the website, PT. Inti Indosawit Subur (with the brand Asian Agri), "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received out first RSPO certification for our estate in 2010."</li> <li>4. State the member's history with regards to the RSPO: Not in direct manner. In the website, In the website, PT. Inti Indosawit Subur (with the brand Asian Agri), "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received out first RSPO certification for our estate in 2010, and in 2012, the certificatoin for our smallholder scheme."</li> </ol> <p>Use of RSPO Trademark to promote its membership of the RSPO: No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not use RSPO trademark in its corporate communication such in website.</p>	Complied
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.	<p>No, PT Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status.</p> <p>There was clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.</p>	Complied

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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, PT Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status. There was clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied
4.5	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, PT Inti Indosawit Subur (with the brand Asian Agri) did not display its RSPO Corporate Logo in any document.	Not Applicable
<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	There was no use of RSPO trademark and/or RSPO corporate logo in business to business communication related to RSPO certified product; between PT Inti Indosawit Subur – Ukui II POM and their buyers.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	When confirming the sales of certified oil palm products, PT. Inti Indosawit Subur – Ukui II POM followed the requirements of the RSPO SCCS. PT Inti Indosawit Subur – Ukui II POM stating the supply chain model and certificate number under which the claim is being made.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a) If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that	Not applicable. PT Inti Indosawit Subur – Ukui II POM is not a distributor and/or wholesaler.	Not Applicable

	<p>customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>Not applicable.</p> <p>PT Inti Indosawit Subur – Ukui II POM is not producing or selling end-product to consumer. No labelling on product whatsoever.</p>	Not Applicable
<b>Business to consumer communication</b>			
6.1	<p>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.</p>	<p>Not applicable</p> <p>PT Inti Indosawit Subur – Ukui II POM is producing and selling CSPO and CSPK; and not making a business to consumer communication.</p>	Not Applicable
6.2	<p>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.</p>	<p>Not applicable.</p> <p>PT Inti Indosawit Subur – Ukui II POM is not using RSPO trademark and/or RSPO label. PT. Inti Indosawit Subur – Ukui II POM is producing and selling CSPO and CSPK; and not making a business to consumer communication.</p>	Not Applicable



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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.	Not applicable. PT Inti Indosawit Subur – Ukui II POM is not using RSPO-certified on-pack claim. PT. Inti Indosawit Subur – Ukui II POM is producing and selling CSPO and CSPK; and not making a business to consumer communication.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant’s RSPO membership status.	Not applicable. PT Inti Indosawit Subur – Ukui II POM is not making any claim related to their RSPO membership status. PT. Inti Indosawit Subur – Ukui II POM is producing and selling CSPO and CSPK; and not making a business to consumer communication.	Not Applicable
6.5	Members shall not communicate to consumers’ information about their suppliers’ RSPO membership status.	Not applicable. PT Inti Indosawit Subur – Ukui II POM is not making any information about their supplier’s RSPO membership status. PT. Inti Indosawit Subur – Ukui II POM is producing and selling CSPO and CSPK; and not making a business to consumer communication.	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.	Not applicable. PT Inti Indosawit Subur – Ukui II POM is not using RSPO trademark and/or RSPO label.	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.	Not applicable. PT Inti Indosawit Subur – Ukui II POM is not using RSPO trademark and/or RSPO label.	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	Not applicable. PT Inti Indosawit Subur – Ukui II POM is not retailers or food service company.	Not Applicable

	<p>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 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 <a href="http://www.rspo.org">www.rspo.org</a>.</p>		
<p><b>MODULE A – IDENTITY PRESERVED &amp; SEGREGATED SPECIFIC RULES</b> (delete if not applicable)</p>			
<p><b>Certified oil palm content (IP)</b></p>			
	<p>For IP, 95% or above of the oil palm content must be RSPO IP-certified.</p>	<p>The General Chain of Custody requirements of the RSPO Supply Chain Standard is applicable for PT Inti Indosawit Subur – Ukui II POM.          Ukui II POM physically process RSPO Certified FFB into Certified Sustainable Palm Oil (CSPO) and Palm Kernel (CSPK).          Ukui II POM does not process non-certified FFB, therefore the applicable RSPO SCC model is Module Identity Preserved.          Therefore 100% of the CPO and PK produced are RSPO IP-certified.</p>	<p>Complied</p>
	<p>For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.</p>	<p>PT Inti Indosawit Subur – Ukui II POM does not process non-certified FFB, therefore the applicable RSPO SCC model is Module D - CPO Mills: Identity Preserved.          Not applicable.</p>	<p>Not Applicable</p>
	<p>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</p>	<p>The General Chain of Custody requirements of the RSPO Supply Chain Standard is applicable for PT Inti Indosawit Subur – Ukui II POM.          Ukui II POM physically process RSPO Certified FFB into Certified Sustainable Palm Oil (CSPO) and Palm Kernel (CSPK).</p>	<p>Not Applicable</p>

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	<p>palm products must be covered by the purchase of RSPO Credits of equivalent volume.</p>	<p>Ukui II POM does not process non-certified FFB, therefore the applicable RSPO SCC model is Module Identity Preserved. Therefore 100% of the CPO and PK produced are RSPO IP-certified.</p>	
<b>Labelling and trademark (IP)</b>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• RSPO trademark which includes the tag 'CERTIFIED' or</li> <li>• RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.</li> </ul>	<p>Use of RSPO Trademark to promote its membership of the RSPO: No, PT Inti Indosawit Subur (with the brand Asian Agri), did not use RSPO trademark in its corporate communication such in website. When confirming the sales of certified oil palm products, PT Inti Indosawit Subur – Ukui II POM followed the requirements of the RSPO SCCS. PT Inti Indosawit Subur – Ukui II POM stating the supply chain model and certificate number under which the claim is being made.</p>	<p>Not Applicable</p>
<b>Messaging (IP)</b>			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> <li>• The oil palm products contained in this product have been certified to come from RSPO sources. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. <a href="http://www.rspo.org">www.rspo.org</a></li> </ul>	<p>No, PT Inti Indosawit Subur (with the brand Asian Agri) did not display its RSPO membership status, therefore the applicable RSPO SCC model is Module D - CPO Mills: Identity Preserved.</p>	<p>Not Applicable</p>

	<ul style="list-style-type: none"> <li>• Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• The entire supply chain is monitored by independent, RSPO-accredited auditors. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records.</li> </ul>		
<p><b>Principle 4: Respect community and human rights and deliver benefit</b></p>			
<p>Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p>			
<p><b>Criteria 4.1:</b> The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p>	<p>The Company already has a Policy to respect human rights as outlined in the Corporate Policy issued by the Managing Director of Asian Agri on 1 December 2014. Point 13 of the policy states that "<i>The Company respects human rights by treating all employees fairly, in recruitment, performance assessment, conditions and work environment and representation irrespective of tribe, caste, nationality, religion, disability, gender, sexual orientation, union membership, political affiliation and/or age</i>".</p> <p>Separately, PT IIS – Ukui Group has had a Policy regarding to Human Right Defender (HRD) published through the Memorandum of Group Manager PT Inti Indosawit Subur No. 005/GM-KUK/MEMO/02/20 dated 10 February 2020, the policy mentioned that: "<i>..Prohibited for retaliation, intimidation and harassment for whistleblowers/human rights defenders</i>"... . This policy has been disseminations to all worker, in 2020, dissemination has performed on 2 July 2020 attended by 25 personnel from KSA Estate. On 10 February 2020 attended by 24 participants of contractors and 15 participants of workers from KSL and PUD.</p>	<p>Complied</p>

		<p><b>Scheme Smallholder:</b></p> <p>Plasma Ukui II already has policies related to human rights as outlined in the ICS Group Manager Policy - Plam Plantations PT Inti Indosawit Subur Kebun Plasma Ukui, on point 9 it is explained that: Ukui Plasma respects human rights and human rights defenders (human right defender) by not treating impulse, intimidation and violence against human rights defenders by all KUD employees and farmers.</p> <p>This policy has been conveyed to all KUD employees and farmers as well as the head of farmer groups, on August 11, 2020.</p>	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.</p>	<p>Based on interview to all level of workers, contractors, scheme smallholders and stakeholders, its confirm that the unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.</p> <p>Until this recertification audit, there is no issue or case related to the acts of violence against the employees of the company.</p>	Complied
<p><b>Criteria 4.2:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.</p>			
4.2.1	<p><b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p>	<p><b>Soga Estate and Sei Lala Estate:</b></p> <p>Unit of Certification has established mechanism to handle complaint and grievances, "SOP Penanganan Keluhan dari Eksternal No.AA-GL-5005-R0 01" explains mechanism to resolve external complaint; "SOP Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan No. AA-HR-308 0.5R0" related to internal grievance mechanism, for employee, Company also provides comment box at each unit office; and there is a mechanism for land dispute resolution; "SOP Penanganan Konflik Lahan AA-GL-5003.1-R1" effective 22/08/2011 related to land conflict. The procedure covers land dispute handling mechanism, negotiation process, and verification upon legal ownership evidence up to land compensation. Should negotiation process fail, any land dispute will be processed through legal/litigation mechanism. During the process, a complete record is maintained. Based on</p>	Complied

		<p>mechanism, public relation officer will receive information of any complaint, grievance and land dispute/claims and records under the logbook.</p> <p>There is no land dispute noted, based on stakeholder consultation.</p> <p>Resolves disputes system which developed by unit of certification has follows the RSPO Policy on respect for Human Right Defender (HRD), it was mentioned in the Human Rights Policy dated 1 December 2019 and signed by Managing Director. Details on requirements to protect the rights of Human Right Defenders, including complainants, whistleblowers and community spokespersons, are set out in "Memorandum No: 005/GM-KUK/MEMO/02/20 dated 10 February 2020 <i>"Kebijakan Melarang Adanya Tindakan Balas Dendam, Intimidasi, dan Pelecehan untuk Pelapor/Pembela Hak Asasi Manusia"</i> (Human Right Defender). The external grievances and complaint handling was stipulated as per <i>"Mekanisme Keluhan"</i> which provided in the Website of Asian Agri and can be accessed by all stakeholder of Asian Agri at <a href="https://www.asianagri.com/id/panel-keberlanjutan/keluhan-pengaduan">https://www.asianagri.com/id/panel-keberlanjutan/keluhan-pengaduan</a>.</p> <p>Asian Agri stakeholders include but are not limited to the Government, farmers, suppliers, vendors, academics, NGOs, media, etc., provided different complaint channels to report their complaints/findings. Reporters can submit complaints and information related to business violations, corruption, harassment, criminal acts, the environment and others.</p> <p><b>Plasma Ukui (Scheme Smallholder):</b></p> <p>The Smallholder Manager has established mechanism for communication and consultation <i>"Mekanisme Komunikasi dan Konsultasi"</i> dated 16 January 2017, shaped flow Chart that describes the process of incoming information requests up to the responses provided. Each smallholder member has <i>"Buku Panduan dan Catatan Petani Plasma"</i>, whereas explains the flow process of communication. Both of communication by written or verbal communication to group management are acceptable. For internal communication, The Smallholder Manager has prepared the</p>	
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		<p>procedure on “<i>Komunikasi Internal Group Sertifikasi</i>”. SOP No. 007/DOK/SOP/PT IIS KLU-AA/2016 dated 26 November 2016. The SOP describes the relevant internal communication mechanisms of Group members, Extension Officers, Smallholder Manager and Group Managers. The Group Manager is responsible for responding to the Group’s internal communications.</p> <p>Based on interview with sample of smallholders in KUD Karya Tani, KUD Tani Bahagia and KUD Usaha Tani, there is no dispute raise to the company.</p>	
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p>	<p><b>Soga Estate and Sei Lala Estate:</b>  “<i>SOP Penanganan Konflik Lahan AA-GL-5003.1-R1</i>” effective 22/08/2011 related to land conflict. The procedure covers land dispute handling mechanism, negotiation process, and verification upon legal ownership evidence up to land compensation. This procedure is available in place and understood by the affected parties.</p> <p><b>Plasma Ukui (Scheme Smallholder):</b>  “<i>Komunikasi Internal Group Sertifikasi</i>”. SOP No. 007/DOK/SOP/PT IIS KLU-AA/2016 dated 26 November 2016. This procedure is available in place and understood by the smallholders.</p>	Complied
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p>	<p>Based on interview with relevant stakeholders during surveillance audit, there is no grievance or conflict raised against unit of certification both company and smallholders.</p>	Not Applicable
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 interview with relevant stakeholders during surveillance audit, there is no grievance or conflict raised against unit of certification both company and smallholders.</p>	Not Applicable
<p><b>Criteria 4.3:</b> The unit of certification contributes to local sustainable development as agreed by local communities.</p>			

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<p>4.3.1</p>	<p>Contributions to community development that are based on the results of consultation with local community are demonstrated.</p>	<p>In 2020 period, the company has established CSR program is recorded on CSR Project Tracking 2020, consisting 6 types of activities, such as Social, Economy, Education, Health, Infrastructure and Environment.</p> <p>The creation of the CSR program is done by coordinating with the local village head through the SIA report and monitoring. (see 3.4)</p> <p>CSR program have been implemented in 2020 for example:</p> <ol style="list-style-type: none"> <li>1. Social Aspects: <ul style="list-style-type: none"> <li>• Assistance to poor/orphans in Ukui II Village, Bukit Jaya, Trimulya Jaya, Air emas, Kampung Baru, Silikuan Hulu, etc.</li> <li>• Religious activity; Ramadhan safari event in Bukit Jaya Village, Kampung Baru Village, Silikuan Hulu, Ukui II, Redang Seko, Air Putih, etc.</li> </ul> </li> <li>2. Economy Aspects: <ul style="list-style-type: none"> <li>• Providing palm oil seedlings for the community of Independent Palm Village for area of 2.7 hectares.</li> </ul> </li> <li>3. Education Aspects: <ul style="list-style-type: none"> <li>• Providing equipment support for elementary schools in Ukui II Village</li> </ul> </li> <li>4. Health Care Aspects: <ul style="list-style-type: none"> <li>• Providing free medical check-up and medical assistance in Silikuan Hulu Village</li> <li>• Conducting health and nutrition checks for toddlers in Silikuan Hulu Village</li> </ul> </li> <li>5. Infrastructure Aspects: <ul style="list-style-type: none"> <li>• Repairing roads in the Bagan Limau Village along 5 Km by using heavy equipment.</li> </ul> </li> </ol>	<p>Complied</p>
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		<ul style="list-style-type: none"> <li>• Repairing road in the village of Air Putih along 5 KM by using heavy equipment.</li> <li>• Repairing road in the village of Lubuk Kembang Bungo along 5 Km by using heavy equipment.</li> <li>• Repairing road in the village of Air Hitam along 5 KM by using heavy equipment.</li> </ul> <p>Realization of CSR Year 2020 Program, for example:</p> <ul style="list-style-type: none"> <li>• 11 May 2020, provided additional food assistance in Ukui Village, Bukit Jaya, Trimulya Jaya, Air Emas, Kampung Baru, Lubuk Kembang, Silikuan Hulu, Air Hitam, Redang Seko, Sei beberas Hilir, Sei Beras Beras, Tasik Juang, Pontian Mekar, Bagan Limau and Air Putih Village.</li> <li>• May 2020, covid-19 assistance (mask, soap) in Tri Mulya Jaya Village, Air Emas, Bukit Gajah, Ukui, Redang Seko, Lubuk Kembang Sari, Silikuan Hulu, Bagan Limau, Bukit Jaya, Kampung Baru, Air Hitam, Lubuk Kembang Bunga, Sei Beras Hilir, Lubuk Batu Tiggal, Pondok Gelugur, Air Putih, Pontian Mekar, Tasik Juang, Sei Beras Beras and Kulim Jaya Village.</li> <li>• In May and June 2020, Spray disinfectant in housing community in Sei Beberas Hilir Village, Ukui, Kampung Baru, Rendang Seko, Air Emas, Lubuk Kembang Bunga, Air Hitam, Lubuk Kembang Sari, Lubuk Batu Tunggal, Bukit Jaya, Pondok gelugur, Bagan Limau, Sei Beras Beras and Kulim Jaya Village.</li> <li>• May 2020, provided assistance to build a small mosque in Lubuk Kembang Sari Village, including materials in the form of: 20-sheet boards, 1.5 cubic broti wood and 1 kodi zinc roof.</li> </ul>	
<b>Criteria 4.4:</b> Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	<b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC)	Unit of certification within this scope are UKUI-II Mill supplied by SOGA Estate, SEI LALA Estate and 6 Smallholders Cooperatives. Legal requirements of land use rights in Indonesia is recognize as "Hak Guna Usaha" or Land Title. Where the Land Title	Complied

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process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.

issued by National Land Department. The legal land use-rights for this scope as follow:

<b>Estates</b>	<b>Area (Ha)*</b>	<b>Land Title</b>
Soga	2,988	HGU Certificate No. 013, 6 Jul 2009. Exp: 9 Jun 2044. Total area: 2,704.22 Ha. SK. Ka. BPN RI No: 78-HGU-BPN RI-2008, dated 19 Dec 2008.
Sei Lala	3,178	HGU Certificate No. 016, 3 Nov 2010. Exp: 3 Nov 2045. Total area: 299.51 Ha. (remain area is from HGU certificate No. 01 Year 1989 with area 6,727.40 Ha) SK Ka. BPN No: 156/HGU/BPN/2004, dated 11 November 2004.
<b>Smallholders</b>	<b>Area (Ha)*</b>	<b>Land Title</b>
KUD Tani Subur	780	SHM (Certificate of Land Ownership)
KUD Karya Tani	734	SHM (Certificate of Land Ownership)
KUD Mekar Abadi	574	SHM (Certificate of Land Ownership)
KUD Trani Maju	962	SHM (Certificate of Land Ownership)
KUD Tani Bahagia	1,366	SHM (Certificate of Land Ownership)
KUD Usaha Tani	1,292	SHM (Certificate of Land Ownership)
<b>TOTAL</b>	<b>11,874</b>	

\* based on Area Statement September 2020.

		<p>This information has been explained within Criteria 2.1 above.</p> <p><b>Onsite Audit:</b>  <b>Own Estate:</b>            PT. Inti Indosawit Subur – Ukui Estate has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) “Prosedur Penyelesaian Sengketa Lahan No. AA-GL-5003-1-R2”, dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p><b>Scheme Smallholders:</b>            Based on interview, KUD Tani Bahagia, Karya Tani dan KUD Usaha Tani, sampled smallholder member (farmer) and relevant authority, Plantation Agency of Indra Giri Hulu Regency; there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary.            Cooperatives have a conflicts resolution mechanism in “Mekanisme Penanganan Konflik” dated 1<sup>st</sup> August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.</p>	
4.4.2	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been</p>	<p>PT. Inti Indosawit Subur is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. The land status is clear, and no land disputes raised. Copies of documents evidencing agreement-making processes and negotiated agreement detailing the FPIC process are obsolete.</p>	Complied

	provided to all affected groups, including in it information about the steps taken to involve them in decision making.		
	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;	PT. Inti Indosawit Subur is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. The land status is clear, and no land disputes raised. Copies of documents evidencing agreement-making processes and negotiated agreement detailing the FPIC process are obsolete.	
	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.	PT. Inti Indosawit Subur is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. The land status is clear, and no land disputes raised. Copies of documents evidencing agreement-making processes and negotiated agreement detailing the FPIC process are obsolete.	
4.4.3	<b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).	<p><b>Soga Estate &amp; Sei Lala Estate:</b>  Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are available within HGU map namely "Peta Gambar Situasi Khusus". This map is attached within HGU certificate.</p> <p><b>Ukui Smallholders:</b>  Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are available within Certificate of Land Ownership or "Sertipikat Hak Milik" in each smallholder.</p>	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.	<p><b>Mill &amp; Estate:</b>  PT Inti Indosawit Subur – Ukui Group is not acquired any new land for oil palm plantation. The company does not restrict local people's access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder</p>	Complied

		<p>consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b>            During field observation and interview with sample of smallholders at KUD Tani Bahagia, KUD Usaha Tani and Karya Tani, there is no land dispute within smallholder's area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	
4.4.5	<p><b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p>	<p><b>Mill &amp; Estate:</b>            PT Inti Indosawit Subur – Ukui Group is not acquired any new land for oil palm plantation. The company does not restrict local people's access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b>            During field observation and interview with sample of smallholders at KUD Tani Bahagia, KUD Usaha Tani and Karya Tani, there is no land dispute within smallholder's area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	Complied
4.4.6	<p>There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.</p>	<p><b>Estate:</b>            PT Inti Indosawit Subur – Ukui Group is not acquired any new land for oil palm plantation. The company does not restrict local people's access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala</p>	Complied

		<p>Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b>          During field observation and interview with sample of smallholders at KUD Tani Bahagia, KUD Usaha Tani and Karya Tani, there is no land dispute within smallholder’s area since the plantation developed. Smallholders land obtained based on government program “Transmigrasi” in early 1980’s, therefore all smallholders plots already have legal use rights.</p>	
<p><b>Criteria 4.5:</b> No new plantings are established on local peoples’ land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p><b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p>	<p><b>Estate:</b>          Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b>          During field observation and interview with sample of smallholders at KUD Tani Bahagia, KUD Karya Tani and Usaha Tani, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based</p>	Not Applicable

		on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.	
4.5.2	<p><b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions. All the relevant information and documents are made available, and community have option of resourced access to independent third-party advice through a documented, long-term and two-way process of consultation and negotiation.</p>	<p><b>Estate:</b>  Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b>  During field observation and interview with sample of smallholders at KUD Tani Bahagia, KUD Karya Tani and Usaha Tani, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	Not Applicable
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'agree' or 'not agree' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p>	<p><b>Estate:</b>  Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities</p>	Not Applicable

		<p>and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b>            During field observation and interview with sample of smallholders at KUD Tani Bahagia, KUD Karya Tani and Usaha tani, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights</p>	
4.5.4	<p>To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of land allocations process.</p>	<p><b>Estate:</b>            Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b>            During field observation and interview with sample of smallholders at KUD Tani Bahagia, KUD Karya Tani and Usaha Tani, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights</p>	Not Applicable
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access information and</p>	<p><b>Estate:</b></p>	Not Applicable



	<p>advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p>	<p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b>          During field observation and interview with sample of smallholders at KUD Tani Bahagia, KUD Karya Tani and Usaha Tani, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	
<p>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><b>Estate:</b>          Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p>	<p>Not Applicable</p>

		<p><b>Plasma UKUI (Smallholder Scheme):</b>          During field observation and interview with sample of smallholders at KUD Tani Bahagia, KUD Karya Tani and Usaha tani, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights</p>	
4.5.7	<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><b>Estate:</b>          Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b>          During field observation and interview with sample of smallholders at KUD Tani Bahagia, KUD Karya Tani and Usaha Tani, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	Not Applicable
4.5.8	<p><b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation.</p>	<p><b>Estate:</b>          Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil</p>	Not Applicable

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		<p>palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b>          During field observation and interview with sample of smallholders at KUD Tani Bahagia, KUD Karya Tani and Usaha tani, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights</p>	
<p><b>Criteria 4.6:</b> Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
<p>4.6.1</p>	<p><b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p>	<p><b>Estate:</b>          Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b></p>	<p>Complied</p>

		During field observation and interview with sample of smallholders at KUD Tani Bahagia, KUD Karya Tani and Usaha tani, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights	
4.6.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	<p><b>Mill &amp; Estate:</b></p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b></p> <p>During field observation and interview with sample of smallholders at KUD Tani Bahagia, KUD Karya Tani and Usaha tani, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights</p>	Complied
4.6.3	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><b>Mill &amp; Estate:</b></p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the</p>	Complied

		<p>main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b>          During field observation and interview with sample of smallholders at KUD Tani Bahagia, KUD Karya Tani and Usaha tani, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them.</p>	<p><b>Mill &amp; Estate:</b>          Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b>          During field observation and interview with sample of smallholders at KUD Tani Bahagia, KUD Karya Tani and Usaha tani, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based</p>	Complied

		on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights	
<b>Criteria 4.7:</b> Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	<b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.	<p><b>Mill &amp; Estate:</b>            Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b>            During field observation and interview with sample of smallholders at KUD Tani Bahagia, KUD Karya Tani and Usaha tani, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights</p>	Complied
4.7.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	<p><b>Mill &amp; Estate:</b>            Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company</p>	Complied

		<p>representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b></p> <p>During field observation and interview with sample of smallholders at KUD Tani Bahagia, KUD Karya Tani and Usaha tani, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.</p>	<p><b>Mill &amp; Estate:</b></p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State</p> <p>Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b></p> <p>During field observation and interview with sample of smallholders at KUD Tani Bahagia, KUD Karya Tani and Usaha tani, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights</p>	Complied

**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.

4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or legal rights within the company and scheme smallholder's areas. All company plantation and scheme smallholder area have been issued with valid land title in the form of " <i>Hak Guna Usaha/HGU</i> " for company and " <i>Sertifikat Hak Milik</i> " for smallholder. Based on interview with member of scheme smallholder Ukui Group, the boundary markers between smallholder block, as well as boundary markers with neighboring farmer group has been established. There was no land dispute noted.	Complied
4.8.2	<b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.	Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or legal rights within the company and scheme smallholder's areas. All company plantation and scheme smallholder area have been issued with valid land title in the form of " <i>Hak Guna Usaha/HGU</i> " for company and " <i>Sertifikat Hak Milik</i> " for smallholder. Based on interview with member of scheme smallholder Ukui Group, the boundary markers between smallholder block, as well as boundary markers with neighboring farmer group has been established. There was no land dispute noted.	Complied
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).	Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or legal rights within the company and scheme smallholder's areas. All company plantation and scheme smallholder area have been issued with valid land title in the form of " <i>Hak Guna Usaha/HGU</i> " for company and " <i>Sertifikat Hak Milik</i> " for smallholder. Based on interview with member of scheme smallholder Ukui Group, the boundary markers between smallholder block, as well as boundary markers with neighboring farmer group has been established. There was no land dispute noted.	Complied



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4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).	<p>Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or legal rights within the company and scheme smallholder's areas.</p> <p>All company plantation and scheme smallholder area have been issued with valid land title in the form of "<i>Hak Guna Usaha/HGU</i>" for company and "<i>Sertifikat Hak Milik</i>" for smallholder.</p> <p>Based on interview with member of scheme smallholder Ukui Group, the boundary markers between smallholder block, as well as boundary markers with neighboring farmer group has been established. There was no land dispute noted.</p>	Complied
<p><b>Principle 5: Support smallholder inclusion</b>          Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p>			
<p><b>Criteria 5.1:</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
5.1.1	Current and previous period prices for FFB are publicly available and accessible by smallholders.	<p>Based on interview with management representative ie. public affair staff, sustainability and plasma manager obtained information that the actual prices informed directly to the board of plasma or other FFB supplier. The actual prices also informed by social media messenger such as whatsapp or by phone call.</p> <p>During the audit, Kebun Plasma Ukui has showed the FFB payment receipt period February 2021 in accordance with official FFB price that issued by FFB Pricing Team of Riau Province. All smallholder classified as up to 25 year which is the lower price due to the extraction that diminished. Sighted the payments record of KUD Tani Bahagia, KUD Usaha Tani and Karya Tani period February 2021. All payments have been complied with the pricing that stipulated by FFB Pricing Team of Riau Province.</p>	Complied
5.1.2	<b>(C)</b> Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	<p>Based on document verification of Memorandum of Understanding (MoU) between the smallholders/KUD and PT Inti Indosawit Subur obtain information that the FFB pricing has followed the official FFB price stipulated by FFB Pricing Team of Riau Province. According to the local regulation in Riau Province, the FFB Price updated weekly (every 7 days). For example, minutes of meeting of FFB pricing meeting</p> <ul style="list-style-type: none"> <li>No: 03/TPH TBS-I/2021 for period 20 – 26 January 2021.</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>No: 04/TPH TBS-I/2021 for period 27 January – 2 February 2021.</li> <li>No: 05/TPH TBS-I/2021 for period 3 – 9 February 2021.</li> <li>No: 06/TPH TBS-I/2021 for period 10 – 16 February 2021.</li> <li>No: 07/TPH TBS-I/2021 for period 17 – 13 February 2021.</li> </ul> <p>The FFB payments conducted monthly. For example, there was a receipt of FFB payments period of February 2021 on behalf of KUD Usaha Tani on 2 March 2021.</p>	
5.1.3	<b>(C)</b> Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	<p>Management of PT Inti Indosawit Subur – Ukui Group has had a commitment to share the RSPO premium price in accordance with the agreement with their smallholder. Premium sharing is not distributed in the form of money but in the form of smallholder empowerment activities aimed at increasing the competence and competitiveness of smallholders based on participatory suggest from the smallholders.</p> <p>During this audit obtained information that the premium sharing for Ukui Plasma period 2020 has been handover on 10 December 2020. Ukui Plasma using that fund for:</p> <ul style="list-style-type: none"> <li>Installation of boundary poles</li> <li>Providing PPE for harvester</li> <li>Alternative income (cattle)</li> <li>Purchasing the stationery and office equipment.</li> </ul> <p>Based on interview with the smallholder’s representatives known that the training has given the positive insight to the smallholders to facing the replanting period. Some smallholders have prepared the alternative income during the replanting with other business such as quail farm, goat and cows and domestic waste composting.</p>	Complied
5.1.4	<b>(C)</b> Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These	<p>The smallholder’s member of Ukui Plasma originated from government transmigration program on 1989 – 1991. Mostly from East Java, West Java and local area (Riau Province). Based on information obtained during the onsite audit known that some of smallholders’ member were women. The annual meeting of</p>	Complied

	include involving finance, loans/credits, and re-payments through FFB price reductions for replanting and/or, other support mechanisms where applicable.	KUD always invited all members which is some women. All the decision made was involved the smallholder members, including women members.	
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	<p>Contracts are fair, legal and transparent and have an agreed timeframe, as seen in indicator 2.2.2.</p> <p>Based on interview with management representative ie. public affair staff, sustainability and plasma manager obtained information that all the contract is signed by both parties.</p> <p>During this audit, management units has had several contracts related to third parties as follows:</p> <ul style="list-style-type: none"> <li>• Mill: <ol style="list-style-type: none"> <li>1. CV Jaya Pertama (CPO/PK/CPKO Transporter)</li> <li>2. PT Buana Jaya Bersama (CPO/PK/CPKO Transporter)</li> <li>3. CV Jasa Sahabat Abadi (CPO/PK/CPKO Transporter)</li> <li>4. CV Sumber Kencana (CPO/PK/CPKO Transporter)</li> </ol> </li> <li>• Soga Estate: <ul style="list-style-type: none"> <li>PT Teknik Jaya Abadi (Road Maintenance)</li> </ul> </li> <li>• Sei Lala Estate <ol style="list-style-type: none"> <li>1. Kuntaryadi (school bus)</li> <li>2. PT Karunia Mandiri Sejahtera Abadi (Replanting)</li> <li>3. CV Cipta Jasa Abadi (Replanting)</li> </ol> </li> </ul>	Complied
5.1.6	<b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.	<p>Payments are made in timely manner and receipts specifying price, weight, deductions and amount paid are available. Sighted the evidence of smallholder's FFB payments period February 2021.</p> <p>The receipt signed by plasma assistant, head of KUD, head clerk, plasma clerk and head of smallholder group. Based on interview with board of KUD's obtain</p>	Complied

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		information that the payments have been made in a timely manner and receipts specifying price, weigh, deduction and paid given.	
5.1.7	Weighing equipment is verified by an independent third party on a regular basis.	<p>Weighbridge in Ukui II POM is verified by government agency in annual basis. Latest verification was performed on 11 November 2020 by UPTD METROLOGI LEGAL Dinas Perindustrian dan Perdagangan Kabupaten Indragiri Hulu. Weighbridges calibration certificate were sighted during audit:</p> <ul style="list-style-type: none"> <li>- Surat Keterangan Hasil Pemeriksaan Nomor: 510.3/DISPERINDAG/UPTD 260/147/XI/2020, dated 13 November 2020, valid until 11 November 2021. Weighbridge Avery weigh Tronix; Serial Number E 1205; 170350331; Ccapacity 50,000 kg.</li> <li>- Surat Keterangan Hasil Pemeriksaan Nomor: 510.3/DISPERINDAG/UPTD 260/148/XI/2020, dated 13 November 2020, valid until 11 November 2021. Weighbridge Avery weigh Tronix; Serial Number E 1205; 163450129; Ccapacity 50,000 kg.</li> </ul> <p>According to certificate it was noted that verification result were comply to requirement, endorsed based on UU RI No. 2 Year 1981 concerning Metrologi Legal.</p>	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.	Based on review of agreement, the company carried out the development and provide supervision in KUD (scheme smallholder). The company support KUD in form of supervision in upkeep, fertilizer application, harvesting, FFB transport and implementation of RSPO P&C requirements.	Complied
5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.	<p>The company has established mechanism for handling grievance from external party as in "<i>Mekanisme Penanganan Keluhan Stakeholder</i>" dated 22 Apr 2019. Smallholders are including as external in the mechanism.</p> <p>The company has also provided channel to report if there is violation to the principles and objectives, through email <a href="mailto:whistleblow@rgei.com">whistleblow@rgei.com</a> or phone (62) 81 2755 2528.</p>	Complied

<b>Criteria 5.2:</b> The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	<p>PT IIS-UKUI Group always communicates with interested smallholders including women farmers to support their livelihoods especially those related to RSPO certification. Some of the company's activities that can be considered as supporting activities towards interested smallholders, among them:</p> <ul style="list-style-type: none"> <li>• OHS (Basic Safety), conducted on 11 &amp; 15 August 2020, attended by 34 farmers.</li> <li>• First Aid Training, conducted on 25 November 2020, attended by 164 farmers.</li> <li>• Basic Fire, conducted on 10 October 2020, attended by 136 farmers.</li> <li>• Limited Pesticide Application, conducted on 25 November 2020, attended by 164 farmers.</li> <li>• Weed Control, conducted on 9 December 2020, by attended by 74 farmers.</li> <li>• Fertilizer Application, conducted on 9 December 2020, attended by 74 farmers.</li> <li>• Integrated Pest Management, conducted on 9 December 2020, attended by 74 farmers.</li> <li>• Harvesting, conducted on 9 December 2020, attended by 74 farmers.</li> </ul>	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 Inti Indosawit Subur – Ukui Group sets a scheme manager, with field assistant assigned for each cooperative to improve smallholder management, including productivity. Each year, company provisioned training program, aside from day-to-day operation monitoring by field assistant, e.g.:</p> <ul style="list-style-type: none"> <li>• Limited Pesticide Application, conducted on 25 November 2020, attended by 164 farmers.</li> <li>• Weed Control, conducted on 9 December 2020, by attended by 74 farmers.</li> <li>• Fertilizer Application, conducted on 9 December 2020, attended by 74 farmers.</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• Integrated Pest Management, conducted on 9 December 2020, attended by 74 farmers.</li> <li>• Harvesting, conducted on 9 December 2020, attended by 74 farmers.</li> </ul>	
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	<p>Ukui II Mill supplied by own estates (Soga and Sei Lala Estate) and smallholder from 6 KUD's with total 2,854 smallholders. Based on interview with smallholder representatives from KUD Karya Tani, KUD Tani Bahagia and KUD Usaha Tani obtain information that entire land has been granted by government (private land title/SHM).</p> <p>Asian Agri's through his subsidiary PT. Inti Indosawit Subur fully supported their smallholder to be certified by ensuring all FFB come from legal sources and comply with national regulation. They also conducted good engagement to demonstrated best management practices in agronomy, environmental handling and safety procedures. For example, each plot received 4 unit barn owl box to help them control rat population.</p> <p>During the audit, auditor also obtain information that PT. Inti Indosawit Subur are now assisting the smallholders on replanting project in collaborated with local government. This aims to ensure that farmers produce palm oil sustainably.</p>	Complied
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	<p>Certificate Holder has assigned chemical weeding team (<i>Tim Unit Semprot/TUS</i>) in each estate/unit to handling chemical weeding activity. The team member originated from own workers (for own estate) and local communities (for smallholder). They regularly attended training on pesticide handling that conducted by the pesticide supplier in collaboration with local pesticide committee.</p> <p>Based on document review and interview with random pesticide applicator known that they were attending the last training on pesticide handling on 24 May 2019. Some topic that discuss such as safety pesticide handling, national regulation related to pesticide, symbol and label awareness and emergency procedure if any contamination or poisonous.</p> <p>During the audit, auditor also interviewed some smallholder representatives and obtain information that the company has provide training session for them on how to be handling pesticide safely. For example, pesticide applicator shall use</p>	

		<p>appropriate PPE during application, no smoke, avoid the direction of wind blows and cleaned their body after application to reduce contamination.</p>	
<p>5.2.5</p>	<p>The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.</p>	<p>Annual review of progress of the smallholder support by Asian Agri's can be see and downloaded in Asian Agri's website <a href="https://www.asianagri.com/id/panel-keberlanjutan/laporan-keberlanjutan">https://www.asianagri.com/id/panel-keberlanjutan/laporan-keberlanjutan</a>. That document are publicly available.</p> <p>Plasma manager (KLU) also described that PT Inti Indosawit Subur also helped the smallholder based on monthly management review of smallholder performance as follows:</p> <ul style="list-style-type: none"> <li>• Assisted the KUD's to achieve the production and upkeep target. Until this audit, plasma area has been achieved 5% above the target.</li> <li>• Assisting the KUD's in replanting program. Until this audit, there is a record of approval by smallholder member in some KUD's. PT Inti Indosawit Subur as agreed to be bank guarantor for the financial scheme of replanting.</li> </ul> <p>Based on field visit and interview with smallholder representatives, each KUD's has been supported in IPM program. They equipped with beneficial plant and barn owl box (4 unit each plot). Certificate holder also conducted training in order to ensure the smallholder's competency. For example:</p> <ul style="list-style-type: none"> <li>• OHS (Basic Safety), conducted on 11 &amp; 15 August 2020, attended by 34 farmers.</li> <li>• First Aid Training, conducted on 25 November 2020, attended by 164 farmers.</li> <li>• Basic Fire, conducted on 10 October 2020, attended by 136 farmers.</li> <li>• Limited Pesticide Application, conducted on 25 November 2020, attended by 164 farmers.</li> <li>• Weed Control, conducted on 9 December 2020, by attended by 74 farmers.</li> <li>• Fertilizer Application, conducted on 9 December 2020, attended by 74 farmers.</li> <li>• Integrated Pest Management, conducted on 9 December 2020, attended</li> </ul>	<p>Complied</p>

		<p>by 74 farmers.</p> <ul style="list-style-type: none"> <li>Harvesting, conducted on 9 December 2020, attended by 74 farmers.</li> </ul>	
<p><b>Principle 6: respect workers’ rights and conditions</b>          Protect workers’ rights and ensure safe and decent working conditions.</p>			
<p><b>Criteria 6.1:</b> Any form of discrimination is prohibited.</p>			
6.1.1	<p><b>(C)</b> A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p>	<p>PT Inti Indosawit Subur – Ukui Group has established the Company Policy on Equal Opportunities as documented in “Kebijakan Perusahaan”, dated 1<sup>st</sup> December 2019: <i>“Memperlakukan seluruh karyawan secara adil, baik dalam hal penerimaan, penilaian kondisi dan lingkungan kerja, serta keterwakilan tanpa memandang suku, kasta, asal Negara, agama/ kepercayaan, cacat, gender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan atau umur”</i> - to treat all member of cooperative in fair manner, and respect human rights, and representative without any discrimination on tribe, race, caste, country of origin, religion/belief, disability, gender, sexual orientation, union affiliation, political affiliation or age.</p> <p>The policy has communicated to all workers in Soga Estate and Sei Lala Estate.</p> <p>Promotion and upgrade are based on employee appraisal conducted annually as outlined in the Employee Assessment Form signed by the employee concerned, approved by the line manager and checked by the General Manager. The form indicates that there is no indication of employment discrimination in terms of ethnicity, caste, religion, disability, gender, sexual orientation, union membership, political affiliation and/or age, for example:</p> <ul style="list-style-type: none"> <li>Workers promotion Soga Estate from temporary to permanent workers, based on Memorandum No. 061/HR-RO2/MEMO/SK/6/2020, dated 22 June 2020, on behalf of Mr. Indra M. Marpaung as Harvester.</li> <li>Workers Promotion Sei Lala Estate from temporary to permanent workers, based on Memorandum No. 045/HR-RO2/MEMO/SK/2/2020, dated 26 Februari 2020, on behalf of Mr. Afrizal as Harvester.</li> </ul> <p>Based on interviews with management and document verification, that there is no</p>	Complied



		<p>discrimination against employees in the recruitment process and also the promotion of positions or the appointment of employees as permanent employees.</p> <p><b>Scheme smallholders:</b>            Group Manager has established the ICS Policy under “Kebijakan Group Manager” dated 3<sup>rd</sup> January 2020, that was signed by Manajer Group ICS Ukui Group, in point 9 was mentoned “<i>Menghormati HAM, serta keterwakilan tanpa memandang suku, kasta, asal negara, agama/kepercayaan, cacat, jender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan atau umur</i>” – to treat all member of cooperative in fair manner, and respect human rights, and representative without any discrimination on tribe, race, caste, country of origin, religion/belief, disability, gender, sexual orientation, union affiliation, political affiliation or age.            The Policy has communicated to all smallholder member.            Based on field visit and interview with sample of smallholder member in KUD Karya Tani, they have understand of the ICS Policy.</p>	
6.1.2	<p><b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.</p>	<p>Based on interview during onsite audit year 2021, workers were aware if there any cases of discrimination, e.g. document review of salary payment month November and December 2020, there was not find any evidence of discrimination.            The workers and groups including local communities, women, and migrant workers have not been discriminated against</p>	Complied
6.1.3	<p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p>	<p>PT Inti Indosawit Subur – Ukui Group has demonstrated the commitment that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness, such as:</p> <ul style="list-style-type: none"> <li>- The company has prepared a procedure for hiring workers, regulated that hiring and promotion of workers based on skill, work experiences, and job evaluation.</li> <li>- In the recruitment process, the company has set the standard of competence that inferred in the Position Description and Job Profile. Recruitment selection, hiring and promotion has based on skills, capabilities, qualities, and medical</li> </ul>	Complied

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		<p>fitness.</p> <ul style="list-style-type: none"> <li>- Job opportunities were communicated and given to surrounding villagers at first priority where no discrimination found observed during interview and related records of workers being employed. All workers has treated equally in accordance with company regulation including rights of worker as well. The compliance in accordance with national laws has evaluated by the organisation as described in criterion 2.1. Annuals performance evaluation result of worker has shown.</li> <li>- All discrimination has prohibited for all area in estate and mill. PKB also mentioned ban of discrimination for all workers in the organization. Procedure for worker recruitment (SDM-A-001-00) and procedure for employee assessment (HRD C- 002-00) was available and mentioned there was no discrimination treatment during recruitment and promotion process. Promotion of worker will be done base on work period, annual evaluation result, and availability of position.</li> </ul> <p>Promotion and upgrade are based on employee appraisal conducted annually as outlined in the Employee Assessment Form signed by the employee concerned, approved by the line manager and checked by the General Manager. The form indicates that there is no indication of employment discrimination in terms of ethnicity, caste, religion, disability, gender, sexual orientation, union membership, political affiliation and/or age, for example:</p> <ul style="list-style-type: none"> <li>• Workers promotion Soga Estate from temporary to permanent workers, based on Memorandum No. 061/HR-RO2/MEMO/SK/6/2020, dated 22 June 2020, on behalf of Mr. Indra M. Marpaung as Harvester.</li> <li>• Workers Promotion Sei Lala Estate from temporary to permanent workers, based on Memorandum No. 045/HR-RO2/MEMO/SK/2/2020, dated 26 Februari 2020, on behalf of Mr. Afrizal as Harvester.</li> </ul>	
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated.	PT Inti Indosawit Subur – Ukui Group prohibits pregnant or breast-feeding women to perform chemical spraying. In order to mitigate, estate performed monthly pregnancy test.	Complied

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	<p>Alternative equivalent employment is offered for pregnant women.</p>	<p>PT Inti Indosawit Subur – Ukui Group has kept the record that spraying is not conducted by pregnant or breast-feeding women. The company has been conducting PP Test (pregnant test) every month.</p> <p>The last of pregnancy test conducted on 3 October 2020, 7 November 2020 and 5 December 2020. All the female sprayer in well condition and not being pregnant nor breast feeding. E.g: Employee code: Mrs Ingati Laoli and Sudaryati.</p>	
<p>6.1.5</p>	<p><b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p>	<p>A gender committee was available in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>PT Inti Indosawit Subur – Ukui Group has implemented the policy related to protection reproductive right; such as not hiring female for work activity with high risk; monthly pregnancy test for sprayer and fertilizer applicator; 6-monthly check up for sprayer and fertilizer applicator.</p> <p>Implemented policy on prevention of sexual harassment and violence against women, the policy is prominently displayed on notice boards at Ukui II POM, Sei Lala Estate and Soga Estate.</p> <p>Based on interviews of female staff, workers and union representatives confirmed that the company implemented the sexual harassment policy.</p> <p>The program of Gender Committee of PT Inti Indosawit Subur - Ukui Group year 2020, these included:</p> <p>a. Special activities:</p> <ul style="list-style-type: none"> <li>• women-do clean Friday – pembersihan pada hari Jumat</li> <li>• Posyandu activities (integrated services post for toddlers)</li> <li>• Healthy activities for employees mothers</li> <li>• Socialization related to sexual harassment and violence against the women</li> </ul> <p>b. Communication with the management related company employees complaints (especially female employees):</p> <ul style="list-style-type: none"> <li>• Routine meetings at least 1 times a year</li> </ul>	<p>Complied</p>

		<ul style="list-style-type: none"> <li>• Socialization</li> </ul> <p><u>Scheme Smallholders:</u>            Plasma Ukui Group has demonstrated the policy to prevent sexual harassment and violence against women in "Kebijakan ICS Group Manager" issued dated 3<sup>rd</sup> January 2020, in chapter 11 was stated "Mencegah pelecehan sexual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya (prevent sexual harassment and violence as well as protect reproductive rights for women)". The policy has communicated to all scheme smallholders member and displayed in publication board in each (KUD Usaha Tani, KUD Karya Tani, KUD Tani Bahagia). Based on interview with management, there is no issues raised related gender, discrimination and/or harassment since year 2020.</p>	
6.1.6	There is evidence of equal pay for the same work scope.	<p>Company has had state about the wages for workers base on Decree of Keputusan Gubernur Riau No. Kpts. 61198/XI/2019", dated 21/11/2019 for Upah Minimum Kabupaten/Kota in Province of Riau is IDR 3,002,383.89/month. The company composes the structure and scale of the 2020 wage period based on Permenaker No. 1 of 2017. This wage scale structure is a determination of the amount of wages for permanent workers (SKU-B) based on class, rank/position.</p> <p>The Company has already set wage standard based on wages set by the government recorded on Memorandum no. ###/HR-R01/MEMO/04/ 2020, dated 12 January 2020; regarding: "Kenaikan Upah Pekerja Golongan SKUB" and also the determination of the daily wage for BHL (Daily workers) and PKWT employees (certain time workers). On this memorandum is also determine regarding structure of wage for each level worker (SKU-H and AKU-B). The company is also gives a scripts/slip salary to employees before salary is given, salary slip also contains basic salary, allowances, premium, labor health coverage (BPJS Ketenagakerjaan and Kesehatan) and deduction as well.</p>	Complied

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		<p>Taken sample of salary slip for period Mei - June 2020. Based on sample salary slip, confirmed that the company has paid wages employees salary according to the working days and it is applied in a fair to all employees.</p>	
<p><b>Criteria 6.2:</b> Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
<p>6.2.1</p>	<p><b>(C)</b> Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.</p>	<p>The Company already has Collective Work Agreement (PKB) period 2018-2020 which has been approved by the Director General of Industrial Relations and Social Security of Workers through Decision Letter no. B.319/PHIJSK/X/2018 dated 26 October 2018 concerning Registration of "PKB Badan Kerjasama Perusahaan Perkebunan Sumatera (BKS-PPS)" with Central Board of Federasi Serikat Pekerja Pertanian dan Perkebunan - SPSI. PKB is binding for all SKU-H and SKU-B levels. The PKB is valid for 2 years and build in Indonesian language.</p> <p>The PKB document regulates provisions regarding working time, wage system, assistance for sick days, absenteeism, tour of external services, overtime work, and payment of allowances while in the hold of state equipment. PKB is also provisions regarding premiums, payment of holiday allowances and bonuses, guarantees Social and Social Assistance, Work Equipment and Occupational Safety, Acceptance, Transfer of Promotions and Layoffs, Provisions for motorized vehicles for workers and educators, Company and Worker Obligations, Manpower Settlement Methods and the Termination of Company Regulations.</p> <p>Article V (Wages) regulates:</p> <ul style="list-style-type: none"> <li>▪ Wages</li> <li>▪ Rice / Natura Supply Allowances</li> <li>▪ Provisions concerning who is entitled to receive a rice supply, and</li> <li>▪ Dependents of workers.</li> </ul> <p>The company determines minimum wages based on the Government regulation annually, the minimum wages in 2020 as regulated in Surat Keputusan Gubernur Riau No. Kpts. 61198/XI/2019", dated 21/11/2019 for Upah Minimum</p>	<p>Complied</p>

		<p>Kabupaten/Kota in Province of Riau is IDR 3,002,383.89/month. Based on review of payments slip, there is no worker paid below minimum wages.</p> <p>As for the period of 2021 wage determination has not changed from 2020, namely based on the Decree of the Governor of Riau Year 2021 No. Kpts.1581/XI/2020 dated November 20, 2020. The amount of basic wage based on the decision letter for Pelalawan Regency amounted to IDR 3,002,383.89 per month.</p>	
<p>6.2.2</p>	<p><b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.</p>	<p>The PKB document regulates provisions regarding working time, wage system, assistance for sick days, absenteeism, tour of external services, overtime work, and payment of allowances while in the hold of state equipment. PKB is also provisions regarding premiums, payment of holiday allowances and bonuses, guarantees Social and Social Assistance, Work Equipment and Occupational Safety, Acceptance, Transfer of Promotions and Layoffs, Provisions for motorized vehicles for workers and educators, Company and Worker Obligations, Manpower Settlement Methods and the Termination of Company Regulations.</p> <p>Based on verification of documents and interviews with workers stated that each worker has a Work Agreement with companies made in Indonesian as a language understood by all ethnic groups in PT IIS -UKUI Group. The Work Agreement Letter regulates Position, validity period and expiration of employment agreement, Obligations of workers, Placement/Transfer/Transfer, Payroll, Treatment, Annual leave, Worker Guarantee, Termination of employment, termination of employment and others.</p> <p>The local government, through the decree of the Governor of Riau No. Kpts. 1198/XI/2019 dated November 21, 2019 regarding the Minimum Wage regency/city in Riau Province in 2020 amounted to IDR 3,002,383.89 per month.</p> <p>The employment contract has explained the related period of agreement, wages and payment (IDR. 120,800 per day in accordance with the Governor's Decree on Wages in 2020), allowances (holidays and others), attachments related to disgraceful acts/actions; which explains related to discrimination, child labor, workers' code of ethics, sexual harassment and coercion or force labor, for example:</p> <ul style="list-style-type: none"> <li>- Employment Contract - Perjanjian Kerja Harian Lepas (PHL) no.</li> </ul>	<p>Complied</p>

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##/PKHL/KSL/VI/2020, dated 6 June 2020 on behalf of Muh. Agus Fadila for position upkeep, until there is a change in the agreement (or the work has been completed).

- Employment Contract - Perjanjian Kerja Harian Lepas (PHL) no. ##/PKHL/KSL/VI/2020, dated 6 June 2020 on behalf of Dian Syahputra for position FFB sortation/grading, until there is a change in the agreement (or the work has been completed).

Sampled list of employee wages/pays slips for October 2020 period:

Pay slip period May 2020		Pay slip period May 2020	
<b>PMKS Ukui 2</b>		<b>PMKS Ukui 2</b>	
Nama	: Muh. Syahputra	Nama	: Dwi Ninda Wahyuni
HK	10	HK	20
Upah Pokok	Rp 1.208.000	Upah Pokok	Rp 2.416.000
Premi Proses/Lembur	Rp 785.550	Premi Proses/Lembur	
Premi Giling		Premi Giling	
<b>Sub Total</b>	<b>Rp 1.993.550</b>	<b>Sub Total</b>	<b>Rp 2.516.000</b>
Potongan		Potongan	
BPJS - Tek (Jamsostek)	Rp 60.400	BPJS - Tek (Jamsostek)	Rp 60.400
BPJS - Kesehatan		BPJS - Kesehatan	
Others		Others	
<b>Sub Total</b>	<b>Rp 60.400</b>	<b>Sub Total</b>	<b>Rp 60.400</b>
<b>Take Home Pay</b>	<b>Rp 1.933.150</b>	<b>Take Home Pay</b>	<b>Rp 2.455.600</b>

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		<p><b>Scheme Smallholder:</b></p> <p>Farmer members of Kebun Plasma Ukui were not directly conducted the spraying work and handle the pesticide/herbicide. Spraying works and pesticide handling was performed by PT Inti Indosawit Subur, hence the chemical was stored by PT Inti Indosawit Subur in Agrochemical storage. Noted that, no outbreak of pest at all the sample farmers' area. Spraying works performed by TUS team which provided by PT Inti Indosawit Subur according to:</p> <ul style="list-style-type: none"> <li>- Letter of Cooperation Agreement for Procurement of TUS Plasma Ukui - Surat Perjanjian Kerjasama Pengadaan TUS Plasma Ukui No. 02/SPK-TUS/KLU/I/2020 dated 6 January 2020 between KUD Tani Bahagia and PT Inti Indosawit Subur valid until 31 December 2020.</li> <li>- Letter of Cooperation Agreement for Procurement of TUS Plasma Ukui - Surat Perjanjian Kerjasama Pengadaan TUS Plasma Ukui No. 02/SPK-TUS/KLU/I/2019 dated 6 January 2020 between KUD Karya Tani and PT Inti Indosawit Subur valid until 31 December 2020.</li> </ul>																																																																		



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		<ul style="list-style-type: none"> <li>- Fertilizer Work Agreement - Surat Kesepakatan Pekerja Pupuk no. 01 / Dok.Usaha tani/SK/XII/2019 dated 14 Desember 2019 on behalf of all KUD Usaha Tani plasma fertilizer order and its applications (List type of fertilizers attached – MOP, ZA and RP to the contract as many as 50 people). The work agreement contract contains fertilizer wages of IDR 10,000 per sack, allowances and bonuses for using PPE. There is even a statement about child labor (Article 8): "the use of child labor is only allowed on family plantations" (not in accordance with Ukui Plasma policy 1).</li> <li>- Harvest Work Agreement - Surat Kesepakatan Kerja Panen, no. 02/Doc.Karya Tani/SK/XII/2019 dated 14 December 2019 on behalf of harvester of KUD Karya Tani as many 50 harvester with provisions for a wage of IDR 150 per Kg.</li> <li>- Harvest Work Agreement - Surat Kesepakatan Kerja Panen, no. 02/Doc.Tani bahagia/SK/XII/2019 dated 14 December 2019 on behalf of harvester of KUD Tani Bahagia as many 55 harvester with provisions for a wage of IDR 150 per Kg.</li> <li>- Receipt of harvesters' wages; on behalf of the Muhjidi (KT 274 harvester) at KUD Karya Tani; on period November 2020 FFB harvest of 3,388 kg, with a wage of IDR 150 per Kg, earners of IRD 508,144.</li> <li>- Receipt of harvesters' wages; on behalf of the Agus Supriyanto (KT 223 harvester) at KUD Tani Bahagia; on period November 2020 FFB harvest of 3,147 kg, with a wage of IDR 150 per Kg, earners of IRD 472,071.</li> </ul>	
6.2.3	<p><b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p>	<p><b>Ukui II POM and Estate:</b></p> <p>The Joint working Agreement (PKB 2018-2020 period) and the daily labour contract of the wage was presented in Bahasa Indonesia, so all employees can understand it and this PHL work agreement is handed over to the workers concerned after being described by the management (through KTU), so that employees who can not read the writing can understood.</p> <p>The company has set employment provisions in accordance with the rules and legal requirement. It is stated on employment contract off daily labour on article 1 about the types of work, working hours (maximum 40 hours per week and working from</p>	Complied

		<p>Monday to Saturday) and the wages has provides is based on waging regulation (Decree of Governor of Riau) in effect at January 2020. Statements about wages, stated in PKB in Article V concerning Wages-Upah; stated: <i>"Pekerja harian Tetap dan Pekerja Bulanan diberi upah berupa uang yang ditetapkan berdasarkan kesepakatan bersama dengan BKS-PPS dengan PD.FSP.PP-SPSi Propinsi yang bersangkutan sesuai dengan peraturan perundangan Otonomi Daerah yang berlaku, yaitu upah uang ditambah beras pekerja senilai/sejumlah 15 Kg (Upah BKS-PPS), dengan mengingat situasi ekonomi dan kemampuan perusahaan"</i>.</p> <p>Determination of wages (including benefits and other benefit/premium), working hours (including hours and overtime pay) and working days have been regulated in the PKB Period 2018-2020 in Article V; <i>Upah - Wages</i>, which explains:</p> <ul style="list-style-type: none"> <li>a) Permanent workers are given wages, the value of which is determined by the employer on the condition that it is not lower than government regulations.</li> <li>b) Certain permanent workers are given wages (Basic Salary and Rice) in accordance with the status of the group/level whose value is determined by the employer with provisions not lower than government regulations</li> <li>c) Permanent workers receive additional wages (UMP/UMSK) and / or attendance incentives as stipulated further in separate provisions.</li> </ul> <p>Rice allowance is: 9 kg and each anal (maximum 3 children) is given 7.5 kg per month, which consists of the basic salary and rice allowance. Rice supply is given once a month. Rice supply is intended to be of good quality and is considered appropriate for the health of the Worker and the gift is linked to attendance.</p> <p>Provisions on holidays and leave (both maternity leave and menstruation leave) have been regulated in Article VIII regarding Non-working Days; including: absenteeism, rest days of the week, official holidays, annual leave, maternity leave and others.</p> <p><u>Data Verified:</u> Payroll on June 2020 period <u>Ukui II Mill:</u></p>	
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		<p>1. Mr. Muh. Ik***n (BHL-Daily worker);  Day of Work: 20 days  - Basic salary IDR 2,416,000;  - Process premium IDR 3,438,960;  - Deductions: IDR 102,424; (including Payment of BPJS Kese and Ketenagakerjaan  - Total take home pay: IDR 5,752,536.</p> <p>2. Mr. A. Ak**r (BHL- Daily worker)  Day of Work: 19 days  - Basic salary IDR 2,295,200;  - Over Time IDR 1,702,022;  - Deductions: IDR 102,424; (including Payment of BPJS Kese and Ketenagakerjaan  - Total take home pay: IDR 3,894,798.</p> <p><u>Ukui II Estate:</u></p> <p>3. Mr. Gu****n (BHL-Daily worker);  Day of Work: 20 days  - Basic salary IDR 2,416,000;  - Premium IDR 1,043,564;  - Deductions: IDR 102,424; (including Payment of BPJS Kese and Ketenagakerjaan  - Total take home pay: IDR 3,357,140.</p> <p>4. Mr. Su****o (BHL-Daily worker);  Day of Work: 16 days  - Basic salary IDR 1,932,800;  - Premium IDR 2,194,046;</p>	
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		<ul style="list-style-type: none"> <li>- Deductions: IDR 102,424; (including Payment of BPJS Kese and Ketenagakerjaan</li> <li>- Total take home pay: IDR 4,024,422.</li> </ul> <p><b>Scheme Smallholder</b></p> <p><u>Ukui II Plasma:</u></p> <p>5. Mr. E. Su***d (SKUH-Fixed worker);          Day of Work: 25 days</p> <ul style="list-style-type: none"> <li>- Basic salary IDR 2,397,925;</li> <li>- Fringe Benefits IDR 479,925;</li> <li>- Premium IDR 400,000;</li> <li>- Deductions: IDR 120,677; (including Payment of BPJS Kese and Ketenagakerjaan</li> <li>- Total take home pay: IDR 3,156,833.</li> </ul> <p>The application of employee harvest and fertilizer wages in Plasma Ukui II is based on Decree of Gubernur Riau SK no. KPTS 599/III/2020, dated 18 March 2020; regarding: "Penetapan Upah Minimum Sektor Perkebunan Provinsi Riau Tahun 2020" amount of Rp 3,020,000 and also state on working agreement letter - "Surat Perjanjian Kerjasama", i.e: Working Agreement Letter on behalf of Mr. Budi (as Harvester) at Jaya Makmur Cooperative dated 2 December 2019. Determining of wages, state on Article 2; Upah Atau Imbalan: The Wages/benefits is given monthly are calculated based on Rp/kg of FFB harvested per rotation, amounting to IDR 150 per kg of FFB, working for 5-6 hours per day (starting at 07.00 - 14.00).</p> <p>Sedangkan untuk ekerjaan tabor pupuk, ditetapkan dalam perjanjian kerja sebesar IDR 250 per Kg Pupuk kecuali untuk pupuk jenis Borate sebesar IDR 12,500 per sak. Whereas for fertilizer application, determine in a work agreement is IDR 250 per kg fertilizer except for Borate fertilizer IDR 12,500 per sack/bag.</p> <p>Payment of harvest wages is done hand over payment in the form of payment</p>	
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		<p>receipts from farmers (Farmer Groups) directly to the harvesters, i.e:</p> <p><u>Data Verified:</u></p> <p>Harvesters on behalf of Rustamari for the harvest period March 2020, for harvesting FFB: rotation 1: 1250 kg FFB, rotation 2: 1460 kg FFB and rotation 3: 1700 kg FFB with wages of IDR 150 per kg, total wages of IDR 661.5500</p> <p>Fertilizer wages in Jaya Makmur Cooperative on behalf of Rustamari for the period March 2020, the type of Dolomite fertilizer is 513 kg, so the amount of wages received is IDR 128,250.</p> <p>Based on verification of the data above, that the company has applied wages to its employees in accordance with Decree of Gubernur Riau SK no. KPTS 599/III/2020, dated 18 March 2020; regarding: "Penetapan Upah Minimum Sektor Perkebunan Provinsi Riau Tahun 2020" amount of Rp 3,020,000.</p>	
6.2.4	<p><b>(C)</b> The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p>	<p>The company has prepared facilities for the workers, including the basic need such as electricity and water. Detail of company facilities for employees are as follows:</p> <ul style="list-style-type: none"> <li>- Ukui I Mill Housing, consist of Type B (2 units), type C (5 units), type D (14 units), Type E (86 units),</li> <li>- Ukui Estate Housing, consist of Type B (3 units), Type C 22 units), typ D (26 units), type E (454 units)</li> <li>- Polyclinic (1 unit),</li> <li>- Mosque (1 units),</li> <li>- Church (1 unit),</li> <li>- Community hall (1 unit),</li> <li>- Kindergarden (1 units)</li> <li>- Elementary School (2 units)</li> <li>- Sport Centre (1 unit)</li> <li>- School bus (2 units),</li> </ul>	Complied

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		- The water supply is clean. Water quality is being checked and monitored on regular basis.	
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	<p>Company is able to demonstrate effort in providing access to adequate, sufficient and affordable food: provision of rice allowance – aside from monthly salary to all eligible workers, cooperative organization for employee providing basic food necessities (Waserda Koperasi Karya Bersama). Company is also accommodating weekly market for each estate; Sunday for Ukui Estate.</p> <p><b>Ukui Smallholder:</b> The farmer member villages are a developed Transmigration Village. Provision of food can be obtained from existing markets in the village. Based on the results of field visits to the sample villages indicate that in the village was available weekly markets and stalls that provide basic necessities.</p>	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>The company determines minimum wages based on the Governor of Riau No. Kpts. 1198/XI/2019 dated November 21, 2019 regarding the Minimum Wage regency/city in Riau Province in 2020 amounted to IDR 3,002,383.89 per month. Based on review of payments slip, there is no worker paid below minimum wages.</p> <p>As for the period of 2021 wage determination has not changed from 2020, namely based on the Decree of the Governor of Riau Year 2021 No. Kpts.1581/XI/2020 dated November 20, 2020. The amount of basic wage based on the decision letter for Pelalawan Regency amounted to IDR 3,002,383.89 per month.</p> <p>In general, the UKUI Group including smallholders have calculated the Decent Living Needs using the calculation method as set out in the "RSPO Guidance for Implementing a Decent Living Wage", June 1, 2019. The company has conducted an account of the DLW for the 2020 period with data drawn from each Estate and POM.</p> <p>Based on the verification of documents the results of the 2020 DLW calculation shows that:</p>	Complied

PREVAILING WAGES PT IIS-UKUI			
In Kind Benefits	SKU	PHL	Total Kebun
Housing (Cost of Building :30 years)+(Annual Maintenance:Number of houses):12 Months	281.634	281.634	281.634
Electricity & Water (Annual Cost of Water & Electricity ÷ Number of Houses) ÷ 12 months	96.005	96.005	96.005
Education [(total costs not including teacher and non teacher labour costs + school transport + school building maintenance + food for children ÷Number of Workers) ÷ 12 months	45.731	45.731	45.731
Creche Facilities (TPA) (building maintenance + food for children +supplies+ Caretaker costs) ÷ Number of Workers	10.736	10.736	10.736
Healthcare (Kesehatan) (maintenance of clinic, medicines & medical materials, ambulance transport costs + Cost of Healthcare Workers) ÷ Number of Workers	970	970	970
Transport			
Clothing			
Food	252.750	-	121.666
Sport & Recreation Fac.	3.059	3.059	3.059
<b>Total Cost of In Kind Benefits</b>	<b>690.885</b>	<b>438.135</b>	<b>559.801</b>
<b>Average Monthly Take Home Salary per Worker</b>	<b>3.363.559</b>	<b>1.996.813</b>	<b>2.654.724</b>
<b>Total Value of Prevailing Wage</b>	<b>4.054.444</b>	<b>2.434.948</b>	<b>3.214.525</b>

**Scheme Smallholder:**  
 Calculation of DLW Cooperative employees period 2020, DLW Calculation of Family Workers (K-3) KUD:

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No.	Type of Cost	Value (IDR)	Remarks
1	Food Cost	Rp 2.107.875,00	
2	Housing Cost	Rp 1.371.014,00	
3	Non Food Non Housing Cost	Rp 2.381.458,00	
	<b>Sub Total</b>	<b>Rp 5.860.347,00</b>	
5	Total Living Basket	Rp 6.253.365,00	> 5%
6	FTE	Rp 1,04	
7	Net Living Wage	Rp 5.916.697,00	
8	Mandatory deduction	Rp 279.363,00	
	<b>Gross DLW</b>	<b>Rp 6.196.061,04</b>	

Piece rate/quotas calculation has been calculated based on the achievement of 7 working hours in accordance with applicable regulations (UU No. 13/2003), for example:

Calculation of labor harvest in Plasma:

- Ability to harvest power for 7 hours per day: 3,000 kg
- Harvest area: 4 hectares
- Job performance in 1 hour 429 kg / hour
- Basic wages Based on the provisions of Prov. Riau: IDR. 120,800 per day
- Price of harvest: IDR. 40 / kg
- Price per hectare: IDR. 30,200 per Ha
- Actual Harvest Costs (currently in effect): IDR 150 / Kg
- There is a gap of: 273% positive.

Calculation of fertilizer labor piece rate:

- The ability to sow fertilizer for 7: 600 kg
- Tonnage per hour: 86 Kg / hour
- Basic wages Based on the provisions of Prov. Riau: IDR. 120,800 per day



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		<ul style="list-style-type: none"> <li>- Fertilizer wages: IDR. 201 / Kg</li> <li>- Actual fertilization wages (valid now): IDR. 200 / kg</li> <li>- There is a gap of: 0.66% positive.</li> </ul>																												
<p><b>PROCEDURAL NOTE:</b></p> <p>The RSPO has published guidelines on the calculation of Decent Living Wage (DLW) in June 2019. Since Indonesia does not have DLW benchmark yet, the RSPO Secretariat will conduct a DLW benchmark study in accordance with the Global Living Wage Coalition (GLWC) and Indonesian laws and regulations.</p> <p>In the meantime, until DLW benchmark for Indonesia is endorsed by the RSPO, the unit of certification carries out interim measures that was published by RSPO (dated 11 November 2019), including:</p> <ol style="list-style-type: none"> <li>1. Payment of minimum wages in accordance with applicable regulations</li> <li>2. Assessment of wages paid (prevailing wages) and in-kind benefits.</li> </ol> <p>Once the DLW benchmark is available, this procedural note is no longer applicable.</p>																														
6.2.7	<p>Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p>	<p>Based on the verification of employee data documents for the period of February 2021, that: PT IIS – Ukui Group has permanent and non-permanent employees (daily workers), until February 2021 employee data is as follows:</p> <p><u>Soga Estate:</u></p> <table border="1" data-bbox="981 954 1529 1189"> <thead> <tr> <th>Status</th> <th>Number of Workers</th> <th>Percent</th> </tr> </thead> <tbody> <tr> <td>SKUH</td> <td>140</td> <td>35%</td> </tr> <tr> <td>SKUB</td> <td>20</td> <td>5%</td> </tr> <tr> <td>BHL</td> <td>223</td> <td>55%</td> </tr> <tr> <td>PKWT</td> <td>20</td> <td>5%</td> </tr> <tr> <td><b>Total</b></td> <td><b>403</b></td> <td><b>100%</b></td> </tr> </tbody> </table> <p><u>Sei Lala Estate:</u></p> <table border="1" data-bbox="981 1241 1529 1367"> <thead> <tr> <th>Status</th> <th>Number of Workers</th> <th>Percent</th> </tr> </thead> <tbody> <tr> <td>SKUH</td> <td>134</td> <td>28%</td> </tr> <tr> <td>SKUB</td> <td>24</td> <td>5%</td> </tr> </tbody> </table>	Status	Number of Workers	Percent	SKUH	140	35%	SKUB	20	5%	BHL	223	55%	PKWT	20	5%	<b>Total</b>	<b>403</b>	<b>100%</b>	Status	Number of Workers	Percent	SKUH	134	28%	SKUB	24	5%	<p>Non-compliance</p>
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SKUB	20	5%																												
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		<table border="1"> <tr> <td>BHL</td> <td>294</td> <td>67%</td> </tr> <tr> <td>PKWT</td> <td>5</td> <td></td> </tr> <tr> <td><b>Total</b></td> <td><b>457</b></td> <td><b>100%</b></td> </tr> </table> <p>Ukui II POM:</p> <table border="1"> <thead> <tr> <th>Status</th> <th>Number of Workers</th> <th>Percent</th> </tr> </thead> <tbody> <tr> <td>SKUH</td> <td>55</td> <td>53%</td> </tr> <tr> <td>SKUB</td> <td>33</td> <td>32%</td> </tr> <tr> <td>BHL</td> <td>16</td> <td>15%</td> </tr> <tr> <td><b>Total</b></td> <td><b>104</b></td> <td><b>100%</b></td> </tr> </tbody> </table> <p>The company has identified that it is related to the main work in oil palm plantations Based on Circular Letter from GAPKI No. 073/GAPKI/II/2013 dated 8 February 2013 concerning Circular for the Flow of Work Implementation Process Activities in the Oil Palm Plantation Business Sector, stating that; only 2 (two) jobs that are the main activities in the Oil Palm Plantation industry, namely <b>harvesting and product processing activities.</b></p> <p>Based on document of employee’s master period February 2020 verification, as follow;</p> <p><u>Soga Estate:</u></p> <p>In detail the list of harvesters in Soga Estate as follows:</p> <ul style="list-style-type: none"> <li>- PHL : 72 harvesters</li> <li>- PKWT : 18 harvesters</li> </ul> <p><b>Total : 90 harvester</b></p>	BHL	294	67%	PKWT	5		<b>Total</b>	<b>457</b>	<b>100%</b>	Status	Number of Workers	Percent	SKUH	55	53%	SKUB	33	32%	BHL	16	15%	<b>Total</b>	<b>104</b>	<b>100%</b>	
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		<p>As of February 2021, the company has proposed the promotion of PHL harvest employees to SKU as many 16 harvester, based on 070/MI-KSA/MEMO/02/21 dated February 5, 2021.</p> <p><u>Sei Lala Estate:</u></p> <p>In detail the list of harvesters in Soga Estate as follows:</p> <ul style="list-style-type: none"> <li>- PHL : 90 harvesters</li> <li>- PKWT : 5 harvesters</li> </ul> <p><b>Total : 95 harvester</b></p> <p>As per March 2021 Sei Lala Estate has applied for the promotion of 12 harvesters through Memorandum Estate Manager No. 045/ES-KSL/MEMO/03/21 dated March 12, 2021.</p> <p><u>Ukui Dua POM:</u></p> <p>In detail the list of Ukui II POM workers there are 13 workers of temporary workers.</p> <p><b>Non Conformity - Escalated to Major:</b></p> <p>During audit temporary workers remain employed as a core work (harvesting and mill process), program to promote casual workers as permanent workers was not run accordingly.</p> <ul style="list-style-type: none"> <li>- Sei Lala Estate:</li> </ul> <p>PHL workers promotion program has been determined to promote 15 casual (PHL) workers to become permanent workers in a year, however the actual promotion is only 12 casual workers. In addition during 2021 there was a new recruitment of 32 casual workers. Based on database there are remain 83 casual workers for harvesting.</p> <ul style="list-style-type: none"> <li>- Soga Estate</li> </ul> <p>PHL promotion program has been determined to promote 10 casual (PHL) workers to become permanent workers in a year, however in 2021 there was a new</p>	
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		<p>recruitment of 13 casual workers for harvesting. Based on database there was still 74 of casual workers for harvesting</p> <ul style="list-style-type: none"> <li>- Ukui II POM</li> </ul> <p>Based on database there was still 13 of casual workers for mill processing that has not been promote to become permanent workers.</p>	
<p><b>Criteria 6.3:</b> The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
<p>6.3.1</p>	<p><b>(C)</b> A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p>	<p>PT Inti Indosawit Subur – Ukui Group has company policy signed by Managing Director on 01 December 2019. The policy stated company guarantee freedom of association or be part of worker union as well as collective bargaining.</p> <p>There is a worker union for Ukui Estate and Ukui II POM named “<i>Pengurus Unit Kerja (PUK) Serikat Pekerja Pertanian dan Perkebunan-Serikat Pekerja Seluruh Indonesia (PUK-SPPP-SPSI) PT Inti Indosawit Subur Kebun Ukui dan Pabrik Ukui Satu</i>” as per “Surat Keputusan Pengurus Cabang Federasi SPPP-SPSI Kabupaten Pelalawan No.Kep. 17-A/PC-FSP.PP/K-SPSI/PLLW/10/2017” dated 15 October 2017 and valid for 5 years.</p> <p>Organization Structure of Pengurus Unit Kerja (PUK) Serikat Pekerja Pertanian dan Perkebunan (SPPP)- Serikat Pekerja Seluruh Indonesia (SPSI) PT Inti Indosawit Subur Kebun Ukui is as follows:</p> <ul style="list-style-type: none"> <li>- Chairman : Zainal A. Bangun</li> <li>- Vice Chairman : Rahmad : Sumardi</li> <li>- Secretary : M. Yunus</li> <li>- Vice Secretary : Watri Efendi</li> </ul> <p>PT IIS-Ukui Group workers union has been registered in Dinas Tenaga Kerja (Manpower Agency) of Pelalawan Regency on 7 December 2006 as mentioned in</p>	<p>Complied</p>

		<p>"Tanda Bukti Pencatatan Serikat Pekerja" No. 004/Disnaker/PEN/SPPP-SPSI/2006 named PUK-SPPP-SPSI PT Inti Indosawit Subur Kebun Ukui.</p> <p><b>Scheme Smallholder:</b></p> <p>Ukui scheme smallholder has had organization's policy: "<i>Kebijakan Manajer Group ICS</i>" dated 11 August 2020. Related the freedom of association, it has mentioned on point 12: "<i>Menghormati setiap karyawan KUD atau petani untuk membentuk atau menjadi anggota serikat pekerja serta berkumpul dan berserikat atau berorganisas!</i>". This policy is made in Bahasa Indonesia, this is in order to facilitate understanding by all farmers.</p> <p>Its policy has been disseminated to all head of farmer group and farmer on 11 Augusts 2020 and attended by 83 farmers.</p>	
6.3.2	Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.	<p>SPSI meeting with management, including:</p> <ol style="list-style-type: none"> <li>5. The meeting between SPSI and the Management of PT IIS on 2 July 2019, there were several discussions, including: <ul style="list-style-type: none"> <li>- Transparency of harvest quality assessment</li> <li>- Yet consistent SIM-making budget help</li> <li>- Residential Hygiene and housing fogging schedule</li> </ul> </li> <li>6. Minutes of the meeting for the meeting on 7 February 2019, a meeting to discuss related: <ul style="list-style-type: none"> <li>- Work equipment for workers (created rules related to employee work tools).</li> <li>- Socialization regarding employee bonuses.</li> </ul> </li> <li>7. Socialization of sanitation and handling of waste in housing.</li> </ol>	Complied
6.3.3	Management does not interfere with the formation or operation of registered labour organizations/unions, or other	PT Inti Indosawit Subur – Ukui Group has company policy signed by Managing Director on 01/12/2014. The policy stated company guarantee freedom of association or be part of worker union as well as collective bargaining.	Complied

	<p>freely elected representatives for all workers, including migrant and contract workers.</p>	<p>Based on the interview with the manager of the parent trade union as well as Estate and POM Coordinator (Mr. Teuku Mursalin and Mr. Abert Butar Butar and Gadang Widyawan), the management does not intervene in the formation/the establishment of a union manager, but the facility/office is indeed provided. Management also provides allowance to the workers ' Union officers to hold events related to the unions organization e.g. permission to hold board meetings, electing admins etc. PT IIS-UKUI Group has been established bipartite Cooperation Institute (LKS) and meeting with management once a month.</p>	
<p><b>Criteria 6.4:</b> Children are not employed or exploited.</p>			
<p>6.4.1</p>	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p>	<p>PT Inti Indosawit Subur – Ukui II POM has established a formal policy for the protection of children, including prohibition of child labour and remediation as per “<i>Kebijakan Perusahaan</i>”, was signed by management on 01 December 2019, in point 14 was stated: It is not allowed all children to work in each activities in operational.</p> <p>Verification of Ukui Estate employee data period November 2019 shows that no indication of worker with age below 18 years old during recruitment or at the present time.</p> <p>Sample verified:</p> <ol style="list-style-type: none"> <li>1. Yudha Paksyu H. (PHL – Soga Estate), birthdate 31 March 2000 and joined on 1 January 2019 or at age 18 years and 9 months.</li> <li>2. Adianta (PHL – Soga Estate), birthdate 8 March 2001 and joined on 14 August 2019 or at age 18 years and 5 months.</li> </ol> <p><b>Scheme Smallholders:</b></p> <p>Group Manager has established the formal policy for the protection of children, including prohibition of child labour and remediation as per Cooperative Policy – “<i>Kebijakan Koperasi</i>” date 11 August 2020, in point 10 was stated “<i>Melarang anak-anak bekerja dalam setiap kegiatan operasional kebun</i>” – prohibit the children to works in operational smallholders.</p>	<p>Complied</p>

		<p>Based on document verification has shown that no indication of using child labour or worker under 18 years old. The youngest workers namely Mr Aris (harvester at KUD Karya Tani date of birth 17 April 1989 (dated of joined 1 January 2015), 25 years old and 8 months.</p> <p>Mr. Erwin as harvester at KUD Tani Bahagia, date of birth on 6 December 1990 and date of joined on 1 January 2015, 24 years and 1 month.</p>	
6.4.2	<p><b>(C)</b> Documented evidence on the fulfilment of worker’s minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.</p>	<p><b>Ukui II POM and Estate:</b></p> <p>PT Inti Indosawit Subur has established Company Policy dated 1 December 2019, that stated there is not allowed all children to work in every activities/processes in company.</p> <p>Data seen:</p> <ul style="list-style-type: none"> <li>- Yudha Paksyu H. (PHL – Soga Estate), birthdate 31 March 2000 and joined on 1 January 2019 or at age 18 years and 9 months.</li> <li>- Adianta (PHL – Soga Estate), birthdate 8 March 2001 and joined on 14 August 2019 or at age 18 years and 5 months.</li> </ul> <p>Based on verification of employees register and payroll period February 2021, it was no found workers hired under 18 years.</p> <p><b>Scheme Smallholder:</b></p> <p>Based on document verification has shown that no indication of using child labour or worker under 18 years old. The youngest workers namely Mr Aris (harvester at KUD Karya Tani date of birth 17 April 1989 (dated of joined 1 January 2015), 25 years old and 8 months.</p> <p>Mr. Erwin as harvester at KUD Tani Bahagia, date of birth on 6 December 1990 and date of joined on 1 January 2015, 24 years and 1 month.</p>	Complied
6.4.3	<p><b>(C)</b> Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.</p>	<p><b>Ukui II POM and Estate:</b></p>	Complied

		<p>PT Inti Indosawit Subur has established Company Policy dated 1 December 2019, that stated there is not allowed all children to work in every activities/processes in company.</p> <p>Data seen:</p> <ul style="list-style-type: none"> <li>- Yudha Paksyu H. (PHL – Soga Estate), birthdate 31 March 2000 and joined on 1 January 2019 or at age 18 years and 9 months.</li> <li>- Adianta (PHL – Soga Estate), birthdate 8 March 2001 and joined on 14 August 2019 or at age 18 years and 5 months.</li> </ul> <p>Based on verification of employees register and payroll period February 2021, it was no found workers hired under 18 years.</p> <p><b>Scheme Smallholder:</b></p> <p>Based on document verification has shown that no indication of using child labour or worker under 18 years old.</p> <p>The youngest workers namely Mr Aris (harvester at KUD Karya Tani date of birth 17 April 1989 (dated of joined 1 January 2015), 25 years old and 8 months.</p> <p>Mr. Erwin as harvester at KUD Tani Bahagia, date of birth on 6 December 1990 and date of joined on 1 January 2015, 24 years and 1 month.</p>	
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p>	<p><b>Ukui II POM, Estate and smallholder:</b></p> <p>Based on interviews with contractors, officers of unions, the farmers group as well as officers in the field indicates that they have understood management policy to prohibit the use of the child labor in all types of the company's operations activities.</p> <p>Based on the verification document shows that the management have done socialization ban on the use of child labor policy through:</p> <ol style="list-style-type: none"> <li>1. Put up the policy in the bulletin board in every office/mill estate</li> <li>2. Do direct socialization to workers especially vulnerable types of workers who are utilizing "informal worker" who are children like at the harvesting</li> </ol>	Complied



		<p>(harvesting) that is prohibited include the sons of workers to help her parents work (picing the lose fruit).</p> <p>3. Lists the prohibition clause on each contract with contractors power the use of child documents.</p>	
<p><b>Criteria 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
<p>6.5.1</p>	<p><b>(C)</b> A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.</p>	<p>PT Inti Indosawit Subur – Ukui Group has established a policy to protect the reproductive rights as it is found in Company Policy that’s signed by Managing Director, dated 01st December 2019 and on one part of the policies stated that: “<i>Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya</i> (To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights)”. This policy was dissemination on 10 February 2020 to all workers and all level.</p> <p>There is a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention.</p> <p>Implemented policy on prevention of sexual harassment and violence against women, the policy is prominently displayed on notice boards at the Mills and the Estates muster areas.</p> <p><b>Scheme Smallholders:</b></p> <p>Plasma Ukui Group has demonstrated the policy to prevent sexual harassment and violence against women in “<i>Kebijakan ICS Group Manager</i>” issued dated 11 August 2020, in chapter 11 was stated “<i>Mencegah pelecehan sexual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak hak reproduksinya (prevent sexual harassment and violence as well as protect reproductive rights for women)</i>”.</p> <p>The policy has communicated to all scheme smallholders member on 11 Auguts 2020 (attended by 83 participants/farmers) and displayed in publication board in each KUDs office.</p>	<p>Complied</p>

<p>6.5.2</p>	<p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.</p>	<p>PT Inti Indosawit Subur – Ukui Group has established a policy to protect the reproductive rights as it is found in Company Policy that’s signed by Managing Director, dated 01st December 2019 and on one part of the policies stated that: “<i>Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya</i> (To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights)”. There is a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention.</p> <p>Implemented policy on prevention of sexual harassment and violence against women, the policy is prominently displayed on notice boards at the Mills and the Estates muster areas. Interviews of female staff, workers and union representatives confirmed that the company implemented the sexual harassment policy.</p> <p>The company is regularly perform monitoring of pregnancy in monthly bases, for period January – October 2020, there were reported no workers in pregnant condition (negative detection) as many 38 female workers, e.g: Mrs. Juniarti Hutaaruk, Mrs. Darsini, Mrs. Suwarni, Mrs. Murni, Mrs. Painem, Mrs. Idawati, Mrs. Kamilahetc.</p> <p><b>Scheme Smallholders:</b></p> <p>Plasma Ukui 1 has demonstrated the policy to prevent sexual harassment and violence against women in “<i>Kebijakan ICS Group Manager</i>” issued dated 11 August 2020, in chapter 11 was stated “<i>Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak hak reproduksinya</i> (prevent sexual harassment and violence as well as protect reproductive rights for women)”. The policy has communicated to all scheme smallholders member and displayed in publication board in each KUDs office.</p> <p>Socialisation of policy has performed on 11 August 2020 and attended by spaying team (Team TUS), e.g: Mrs. Eni Maria, Mrs. Suranti, Mrs. Yuliani, Mrs. Harmiyati, Mrs. Nurlaila, Mrs. Sunaliyah, Mrs. Tumirah, etc.</p>	<p>Complied</p>
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6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.	For breastfeeding mothers and had children under 5 years, the company has provided child care (TPA) which is located in each division/Afdeling. In landfill space as well as the company provides a special space and time for 1 hour for breastfeeding mothers in need time to nursing his baby.	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.	<p>PT Inti Indosawit Subur – Ukui Group has prepared procedure on a specific grievance mechanism which respects anonymity of complainants under Standard Operating Procedure, No. SOP:-HR-308.5-RO; Revision:0, 11/12/2009: Employees complaints: Submission and settlement.</p> <p>Mechanism for complaints management where it needs to protect its confidentiality for complaint submitter was found in company policy's draft as in one of points of this policies stated that: "to provide appropriate information for those who inquiry it and to proted its confidentiality for whistleblower cases in accordance to law regarding environmental and social issue, food safety, health and safety work, so that it enables them to more participate to the decision making processes for improving company's performance.</p> <p>Record of complaint/specific grievance has demonstrated under "Buku Keluhan Karyawan", e.g: in Afdeling III Sei Lala Estate there were 10 complaints/grievances recorded and each recommendation responses has been followed up, for example:</p> <ul style="list-style-type: none"> <li>- Complaint on 10 October 2019 from employee namely Hadirat Zega, related damage to the door and window glass, this complaint has followed up on 15 October 2019.</li> <li>- Complaint on 24 October 2019 from employee namely Patut Harahap, related damage to kitchen doors, this complaint has followed up on 18 November 2019.</li> <li>- Complaint on 12 December 2019 from employee namely Fatimano, related damage to the zinc roof, this complaint has followed up on 14 December 2019.</li> </ul> <p><b>Scheme Smallholders:</b></p>	Complied

		<p>The scheme smallholders have mechanism of consultation and communication in "Mekanisme komunikasi, konsultasi dan keluhan Kebun Plasma Ukui Group", dated 16th January 2018.</p> <p>Based on log book of record in the form of "Penerimaan Keluhan dan Tanggapan". On 2020 period, there was no grievance reported, all of complaints has been followed and recorded.</p>	
<b>Criteria 6.6:</b> No forms of forced or trafficked labour are used.			
6.6.1	<p><b>(C)</b> All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports;</li> <li>• Payment of recruitment fees;</li> <li>• Contract substitution without worker's consent</li> <li>• Involuntary overtime;</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul>	<p><b>Ukui Estate, POM and Scheme Smallholder:</b></p> <p>Based on the interview with KTU as well as the document of recruitment that there was no indication companies both of Inti and smallholder at Ukui 1 Group to do practices:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports</li> <li>• Payment of recruitment fees</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>Based on verification of employee appointment documents for the period of 2020, it is not identified that there is a process that is carried out related to the anchoring of identity cards, the granting of fees in the recruitment process, accidental overtime, giving jobs due to debts and withering wages. The company also provides freedom in relation to termination of work without any fines.</p>	Complied
6.6.2	<p><b>(C)</b> Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a</p>	<p>According the list of employees on period October 2020, Ukui Group is still using contract workers (PKWT) and temporary workers (PHL) status as many as 393 people, i.e: PKWT as much as 7 and PHL as much as 386 people.</p>	Complied

	<p>specific labour policy and procedures are established and evidence of implementation is available.</p>	<p>PT IIS – Ukui Group PT Inti Indosawit Subur has issued Memorandum No. 085/EXT-PUS/08/2020 dated 12 August 2020 concerning Policy for the acceptance and appointment of employees of PT Inti Indosawit Subur – Ukui Group; where in the memorandum explained related to the acceptance of employees with PHL status, while workers who are directly related to production (harvesting, FFB loader, CPO and PK processing operators) are declared with PKWT status and will be evaluated and if feasible will be promoted to become permanent workers.</p>	
<p><b>Criteria 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
<p>6.7.1</p>	<p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	<p>PT Inti Indosawit Subur – Ukui Group has appointed a person who responsible on OHS implementation and monitoring. The safety commite has defined in all estate and POM under P2K3 (Panitia Pembina Keselamatan dan Kesehatan Kerja).  Sample seen:</p> <ul style="list-style-type: none"> <li>- “Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Provinsi Riau No.KEP.344/Disnakertrans-PK/SK-P2K3/XI/2020 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) PT. Inti Indosawit Subur, PMKS Ukui-2” dated 16 November 2020.</li> <li>- The person who responsible on OHS expert (AK3- Umum) as safety officer and have been trained and certified, such as: <ul style="list-style-type: none"> <li>- “Sertifikat Pembinaan Pengawasan Norma Keselamatan dan Kesehatan Kerja Ahli Keselamatan dan Kesehatan Kerja atas nama Boyke R.P Silitonga Nomor 5/2148/as.092.04/II/2020” dated 28 February 2020. License “Kartu Tanda Kewenangan Ahli K3 No.Reg.83824/PK3/AJ/52/2020/P0 atas nama Boyke P. Silitonga” valid until 28 Februari 2023.</li> <li>- “Keputusan Menteri Ketenagakerjaan RI Nomor 5/1962/as.02.04/II/2020 tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum atas nama Boyke R.P Silitonga” dated 28 February 2020, valid for 3 years.</li> </ul> </li> <li>- Record of monthly meeting (P2K3), sample seen: MoM 17<sup>th</sup> January 2021, agenda meeting: review on previous OHS meeting, review of inspection of PPE usage, review on accidents report.</li> </ul>	<p>Complied</p>

		<ul style="list-style-type: none"> <li>- Three months report on OHS performance for period October – December 2020 was sent to Manpower Agency in Riau</li> </ul> <p><b>Scheme smallholders:</b>  Each KUD has established a team who has been responsible on implementation and implementation the OHS program, e.g: in KUD Usaha Tani and KUD Tani Bahagia has shown the structure of emergency response.</p>	
6.7.2	<p>Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p>	<p>PT Inti Indosawit Subur – Ukui Group POM has defined the procedure for emergency response under Standar Operatonal Procedure – Environmental Field Procedure, such as:</p> <ul style="list-style-type: none"> <li>- Nomor AA-KL-11-EFP tentang Penanganan Tumpahan di Laboratorium</li> <li>- Nomor AA-KL-14-EFP tentang Pengendalian Kebakaran Lahan</li> <li>- Nomor AA-KL-16-EFP tentang Pengendalian Tumpahan B3 dan Limbah B3</li> <li>- Nomor AA-KL-17-EFP tentang Pengendalian Ledakan Boiler, Tabung Gas dan Lainnya</li> <li>- Nomor AA-KL-18-EFP tentang Pengendalian Gempa Bumi, Banjir dan Tanah Longsor</li> <li>- Nomor AA-KL-19-EFP tentang Tanggap Darurat Kabut Asap</li> </ul> <p>PT Inti Indosawit Subur – Ukui Group POM has also pepared the procedure on work accident under “Standard Operasioanl Prosedur – Investigasi Kecelakaan Kerja nomor AA-SMK3-18001.02-R0”, revision 0 dated 1<sup>st</sup> April 2018.</p> <p>Data verified – during onsite 2021:</p> <ul style="list-style-type: none"> <li>- The company has also appointed the person who has attended first aid training, namely Ms Supriani (license number on first aider 566/DTKT-WAS/LC/P3K/100</li> <li>- Emergency response team has defined as in “Struktur Organisasi Tanggap Darurat” year 2021.</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>- List of first aid kit (include portable first aid) as in "List Kebutuhan Obat-Obatan P3K updated in February 2021</li> </ul>	
<p>6.7.3</p>	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>PT Inti Indosawit Subur – Ukui II POM has demonstrated the record of realization the OHS program 2020 including 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, such as:</p> <ul style="list-style-type: none"> <li>• Report of MCU for all workers in Ukui II POM was conducted by "Klinik Asian Agri Sehat", periode second semester 2020, ik Soga Estate was attended by 59 workers, in Sei Lala Estate was conducted by 37 worker and in Ukui II POM was attended by 16 worker. The MCU was covered urine test, HSAg and fisical test.</li> <li>• Monitoring of emergency response and peparedeness facilities, i.e: fire hydrant. Based on field visit in Ukui II POM, the performance of hydrant no 5 was well.</li> <li>• Report of OHS inspection report, location in Ukui II dated 23<sup>rd</sup> January 2021 – reported OK for PPE usage, and OHS facilities (fire hydrant and fire extinguisher)</li> <li>• Ukui II POM – PPE Provision for all workers at mill are demonstrated as per "Bukti Serah Terima Alat Pelindung Diri Pabrik Ukui II". Sample seen:               <ul style="list-style-type: none"> <li>- Bukti Serah Terima APD Safety Shoes for Mill process workers as much as 54 unit, dated 14 April 2020.</li> <li>- Bukti Serah Terima APD safety shoes for Maintenance workers on dated 14 April 2020 as much as 20 unit.</li> </ul> </li> <li>• Estates - PPE provision for all workers at Soga Estate and Sei Lala Estate are demonstrated as per "Bukti Serah Terima Alat Pelindung Diri". Sample seen:               <ul style="list-style-type: none"> <li>- PPE AP Shoes provision for fertilizer workers Soga on April 2020, received by 11 workers</li> <li>- PPE Hand Gloves provision for fertilizer workers on 15 August 2020 received by 11 workers</li> </ul> </li> </ul>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>- PPE Apron provision for fertilizer workers on 13 August 2020 received by 11 workers</li> <li>- PPE provision for spraying workers Soga Estate: Apron, Uniform shirt, masker on February – August 2020.</li> <li>• Based on field visit during onsite audit in march 2021, in KUD Karya Tani and KUD Usaha Tani; there was found the harvester has used in PPE as required in HIRADC.</li> </ul>	
6.7.4	<p>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.</p>	<p>PT Inti Indosawit Subur – Ukui Group has provided all normative rights for employee, such as salary as lined out in minimum wage for province level, leave entitlement, employees registered with social insurance for worker (BPJS), benefit for religious festival, provision of facilities (housing, electricity, clean water, medical clinic, school/school bus, worship house, personal protective equipment and working tools.</p> <p>PT Inti Indosawit Subur – Ukui Group has provided regular medical check-up for workers in high risk such as sprayer team, fertilizer applicator, workshop worker and mill operators.</p> <p>Data verified:</p> <ul style="list-style-type: none"> <li>• Soga Estate: Record for payment of works insurance (BPJS Ketenagakerjaan). Billing statement dated 8<sup>th</sup> January 2021, number of employee is 534 workers, amount IDR *9,465,000. status PAID.</li> <li>• Ukui II POM: Record for payment of works insurance (BPJS Ketenagakerjaan). Billing statement dated 10<sup>th</sup> February 2021, number of employee is 96 workers, amount IDR *,108,060 status PAID.</li> </ul> <p><b>Scheme smallholders:</b></p> <p>The government covers medical insurance for smallholders and it is optional. Based on interview with smallholders at KUD Usha Tani, KUD Karya Tani and KUD Tani Bahagia, most of farmers/smallholders has had insurance (BPJS Kesehatan Mandiri).</p>	Complied



		Data verified: Evidence of payment period for BPJS TK and BPJS KS (medical insurance) month January 2021.	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	PT Inti Indosawit Subur – Ukui II POM has been kept the record of occupational injuries using LTA metrics under “Data Laporan Kecelakaan Kerja” year 2020. Data seen: – The occupational injuries reported 17 cases . Lost time injuries is 27 man-days – All the accident has carried out the investigation. The followed up on recommendation on result of investigation available as evidents.  <b>Scheme Smallholders:</b> The record of injuries has shown under document of “Monitoring Kecelakaan Kerja 2020”, since 2018 to 2020 there were no injuries cases (Nill) in KUD Usaha Tani, KUD Karya Tani and KUS Tani Bahagia	Complied
<b>Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.</b>			
<b>Criteria 7.1:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	<b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.	<b>Soga &amp; Sei Lala Estate:</b> According to the Agricultural Policy Manual SOP AA-APM-OP-1100.10. R6 <i>Pengendalian Hama dan Penyakit</i> (Pests & Disease Control), certificate holder has plan to implement integrated pest management. Based on document verification of Soga and Sei Lala Estate obtain information that management has had a schedule to regularly monitored pest attack (census) as follows: <ul style="list-style-type: none"> <li>• Census of caterpillar/bag worm by monthly basis.</li> <li>• Census of <i>Ganoderma</i> annually.</li> <li>• Census rat infestation by recap the record of sortation in loading ramp.</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>Census of Barn Owl Box occupation in three monthly bases.</li> </ul> <p>The last census in Soga and Sei Lala Estate has been conducted in second week of November 2020. Result of census shows that pest attack still under control (below the economic threshold) which is limit 5%.</p> <p>During the field visit in own estate (Soga Estate block C98g Afdeling 3) and smallholder's area (KUD Tani Bahagia, KUD Usaha Tani and Karya Tani), visually there was no issues related to the outbreak or infestation. However, there were a usage of natural predator (<i>Tyto alba</i>) to reduce a rat infestation.</p> <p><b>Scheme Smallholder:</b></p> <p>According to document verification, pest monitoring and control sighted pest management plan to conduct caterpillar/bag worm census in by monthly and barn owl box monitored in three monthly bases. Census was conducted by field supervisor that help by person that assign by board of KUD.</p>	
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 company only uses natural predators namely <i>Tyto alba</i> and <i>Sycanus dichotomus</i> in pest control efforts. Both predators are not recorded in invasive species according to the information listed on the website <a href="http://www.cabi.org">www.cabi.org</a> on in global invasive species database <a href="http://www.iucngisd.org/gisd/search.php">http://www.iucngisd.org/gisd/search.php</a> .	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	Based on document verification, interview and field observation obtained information that there is no record use of fire for pest control.	Complied
<b>Criteria 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.	Justification of pesticide used is explained under company procedure of weed control - "SOP Pengendalian Gulma No. AA-APM-OP-11100.08- R1" dated 1 November 2008. Chapter IV explains the weed control program for woody, grass, fern, caladium, wild banana ( <i>Musa spp</i> ), <i>Asystasia</i> , etc. It does explain active ingredients use to control such weed, dosage per application, type of nozzle used and volume of spraying per application. Chapter V explains selection of pesticide	Complied

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and its active ingredients content, nature of the pesticide and target species. Chapter VII describes calculation of actual area implemented per hectare plantation (spray factor), spraying rotation and spraying output.

Spraying works were conducted by selected spraying on specific target, for example weeds spraying on circle, path and TPH (collecting point). Other areas beside specific area were not applied. Riparian area along the river are prohibits to be performed spraying to minimize and reduce the negative environmental impact to the river and ecosystem. Pesticide and herbicide used by company was registered in the book of pesticides - "Komisi Pesticida" and has permit from government.

Type of pesticide use by Soga & Sei Lala Estate and its weeds target are as follow:

Agrochemical	Active ingredients	Register No.	Weeds target
Kenlon 480 EC	Trikolpir Bitoksi Etil Ester 480 g/l	RI.01030120062433 Valid until: 31 Dec 2021	Wood
Elang 480 SL	Isopropil Amina Glifosat 480 g/l	RI.01030119941170 Valid until: 21 Dec 2021	Narrow leaf weed, <i>Asystasia</i> , <i>Imperata cylindrical</i>
Kenrane 288 EC	Floroksipir 1-MHE : 288 g/l	RI.01010120103759 Valid until: 20 Dec 2020	<i>Legume</i> , <i>Asystasia</i>
Basta 150 SL	Amonium Glufosinat 150 g/l	RI.01030119921113 Valid until 22 Jan 2024	Wide leaf ( <i>Ageratum conyzoides</i> ); narrow leaf ( <i>Axonophus compressus</i> , <i>Imperata cylindrical</i> , <i>Ischaemum timorense</i> , <i>Ottochloa nodosa</i> , <i>Setaria palmifolia</i> ).
Karmex 80 WP	Diuron 80%	RI.01030120113958	broadleaf weeds ( <i>Borreria latifolia</i> , <i>Asystasia intrusa</i> , <i>Clidemia hirta</i> , <i>Mikania micrantha</i> ) and narrow leaf weeds ( <i>Imperata cylindrical</i> ,

					<p><i>Cyperus rotundus, Cyclosorus aridus)</i></p>	
<p>Based on the document verification and interview with management, obtain information that there is only pesticide usage for chemical weeding and pest control (if needed). Recommendation of pesticide used are refer to SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (weed control) where explain the weeds type, weeding control methods and eradication, pesticide characteristic, and procedures of application (spraying volume, calibration, chemical weeding interval, target and sprayer maintenance).</p> <p>During the audit, found some pesticide list that usually used with active ingredients such as <i>isopropyl amine glyphosate, fluoroksifir, methyl metsulfuron, triklofir, diuron, diuron, lamda sihalotrin and 2,4-D dimetil amina, bacillus thuringiensis berliner, ammonium glufosinat, acephate, copper oxide and mancozeb</i>. Certificate holder no longer using paraquat since 15 November 2019, according to the circular letter of Deputy Managing Director No. 008/DMD/MEMO/OCT/19 dated 22 October 2019.</p> <p>According to the national regulation, all pesticide used by the management unit has registered in agricultural ministry of Indonesia. It can be check in <a href="http://pestisida.id/simpes_app/index.php">http://pestisida.id/simpes_app/index.php</a>.</p> <p><b>Scheme Smallholder:</b></p> <p>During the audit, sighted the list of pesticide recommendation (by active ingredients) that can used by smallholder such as <i>isopropyl amine glyphosate, fluoroksifir, methyl metsulfuron and triklofir</i>. During January 2020 – February 2021, the smallholders used pesticide with active ingredients <i>isopropyl amine glyphosate, fluoroksifir and methyl metsulfuron</i>. There is no record of <i>parakuat diklorida</i> usage.</p>						

7.2.2	<p><b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided.</p>	<p>Certificate holder has showed the record of LD50 calculation in each unit based on amount of pesticide used. For example, Sei Lala and Soga Estate has calculated the LD50 of each pesticide in a monthly basis.</p> <p>For example, Kebun Luar Ukui has calculated the LD50 based on amount of active ingredients applied per Ha and number of applications. Through the calculation of pesticide usage during January – December 2020 known that LD50 of isopropyl amina glifosat was 0.2841 mg/Ha.</p>	Complied
7.2.3	<p><b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p>	<p>Until this recertification audit obtain information that there is no pesticide use for control pest attack. All of pesticide only using for weeding (herbicide).</p> <p>Based on interview with IPM supervisor and smallholder representatives known that no outbreak that causes pesticide usage.</p>	Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.</p>	<p>There was some pesticide usage especially in nursery and immature area to prevent pest infestation. For example, there was a record of pesticide (active ingredients Lamda sihalotrin) to prevent <i>Spodoptera litura</i> infestation. This prophylactic usage has followed the national guidelines such as dosage, interval and infestation rate. Also, in accordance to Asian Agri’s Research and Development guidelines.</p>	Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:            7.2.5a Judgment of the threat and verify why this is a major threat.</p>	<p>Based on goods in and goods out data in pesticide store, obtained information that the certificate holder used some kind of pesticide (different active ingredients). There is only <i>paraquat diklorida</i> that listed as WHO Class II (Moderately Hazardous). As described in this indicator, the company no longer using <i>paraquat diklorida</i> since November 2019.</p> <p>There is no use of other pesticide class 1A and 1B until the audit.</p> <p>Based on the document verification and interview with management, obtain information that there is only pesticide usage for chemical weeding and pest control (if needed). Recommendation of pesticide used are refer to SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed control) where explain the weeds type, weeding control methods and eradication, pesticide characteristic, and procedures of application (spraying volume, calibration, chemical weeding interval, target and sprayer maintenance).</p>	Complied

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		<p>During the audit, found some pesticide list that usually used with active ingredients such as <i>isopropyl amine glyphosate, fluoroksifir, methyl metsulfuron, triklofir, diuron, diuron, lamda sihalotrin and 2,4-D dimetil amina, bacillus thuringiensis berliner, ammonium glufosinat, acephate, copper oxide and mancozeb</i>. Certificate holder no longer using paraquat since 15 November 2019, according to the circular letter of Deputy Managing Director No. 008/DMD/MEMO/OCT/19 dated 22 October 2019.</p> <p>To reduce the human and environmental risk, there is some continuous action that has been implemented as follows:</p> <ul style="list-style-type: none"> <li>• Set up the pesticide rotation. For example, chemical weeding rotation is 4 times a year where the rotation in immature and early mature more often than mature and old palm.</li> <li>• Using the ultralow volume nozzle to minimize water consumption and reduce the risk for environment. During the field visit to the pesticide store sighted the micron herby system knapsack as example.</li> <li>• Conducted regularly training for pesticide applicator and equipped them with appropriate PPE's.</li> <li>• Delaying the pesticide if weed or pest is under control. According to the interview with estate manager obtain information that the pesticide rotation can be delayed or reduced especially in mature or old palm where weeds/pest population are under control.</li> <li>• Minimalize contamination for pesticide applicator and their families by ensuring them to clean themselves before back home.</li> </ul>	
	<p>7.2.5b Why there is no other alternative which can be used.</p>	<p>According to IPM procedures, certificate holder always using biological approach in order to monitoring pest attack. For example, estate using <i>Tyto alba</i> to monitor rat infestation than using rodenticide.</p> <p>To maintain ground condition especially weeding control, certificate holder has had a procedures SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian</i></p>	

		<i>Gulma</i> (Weed Control). This procedure has set the specific pesticide in with minimum risk in accordance with the target.	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	Certificate holder through Asian Agri’s Research and Development Department has examined some pesticide in specific target. The result of examination and pesticide recommendation written in the SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control).	
	7.2.5d Process to limit the negative impacts of the application.	SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control) has set some procedures to reduce negative impact of the application as follows: <ul style="list-style-type: none"> <li>• Pesticide/herbicide selection to ensuring the application is effective.</li> <li>• Set up the appropriate nozzle in chemical weeding activity based on weed type, topography and availability of water.</li> <li>• Regularly spraying calibration to ensuring the application is effective and efficient.</li> <li>• Calculate pesticide/herbicide usage based on target (hectarage and weed type). Spraying technic.</li> </ul>	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	Certificate holder did not use pesticide to eradicated pest without the outbreak. If any census result shows the pest attack almost reach the economical threshold, they usually conducted campaign test using pesticide if needed.  Chemical weeding activity has regularly set by management. For example, normally circle, path and collecting point weeding conducted 4 times a year in immature and mature area. Its rotation can be reduced in line with the palm ages.	
7.2.6	<b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel	PT Inti Indosawit Subur – Ukui Group has assigned chemical weeding team ( <i>Tim Unit Semprot/TUS</i> ) in each estate/unit to handling chemical weeding activity. The team member originated from own workers (for own estate) and local communities (for smallholder). They regularly attended training on pesticide handling that conducted by the pesticide supplier in collaboration with local pesticide committee.	Complied

	<p>applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.</p>	<p>Based on document review and interview with random pesticide applicator known that they were attending the last training on pesticide handling on February 2020. Some topic that discuss such as safety pesticide handling, national regulation related to pesticide, symbol and label awareness and emergency procedure if any contamination or poisonous. The worker can describe purpose of PPE usage, attending regularly medical check and safety working procedures.</p> <p>Workers that perform herbicide spraying in Sei Lala Estate and Soga Estate also perform spraying activity in smallholder plantation. Spraying team has been trained with pesticide handling training, agrochemical application training and limited pesticide training. Spraying team only handles herbicide to control the weed. Sprayers understood the type of chemical for each weed type, the hazard, the application and appropriate PPE use.</p> <p>During onsite audit year 2021, auditor team has also interviewed sample of smallholder representatives in KUD Tani Bahagia, KUD Karya Tani and obtain information that the company has provide training session for them on how to be handling pesticide safely. For example, pesticide applicator shall use appropriate PPE during application, no smoke, avoid the direction of wind blows and cleaned their body after application to reduce contamination.</p>	
7.2.7	<p><b>(C)</b> Storage of all pesticides in accordance with recognized best practices.</p>	<p>Location the pesticides storage in Soga Estate and Sei Lala Estate.</p> <p>Pesticides are always applied in accordance with the product label and storage instruction. Agrochemicals storage was locked in areas with limited access. The storage was ventilated. MSDS and hazard symbol label were provided nearby of agrochemicals. Emergency shower and eyewash were also provided to anticipate in case of an emergency of agrochemical handling. The possible spillage was managed. Secondary containment was provided around the chemical storage area. Spill kit was also provided in the area. Interview with spraying workers demonstrated that all of them have a good knowledge regarding pesticide usage and its material usage and toxicity. PPE for handling of chemicals were provided including boots, apron, safety glass, respiratory mask and hand gloves. PPE used was appropriate according to recommendations in any risk assessments. PPE</p>	Complied



		<p>provided and used can be easily replaced if damaged. All precautions attached to the products properly observed, applied, and understood by workers.</p> <p>Based on a field visit to the Pesticides Storage dated 23<sup>rd</sup> March 2021, there was found that:</p> <ul style="list-style-type: none"> <li>- Permanent Buildings,</li> <li>- A good ventilation,</li> <li>- Permanent floor is cemented, the floor of the mixing of pesticides using ceramics, and equipped with a "spillage trap",</li> <li>- Eye wash shower, first aid box, PPE and Fire extinguisher are provided.</li> <li>- PPE room</li> <li>- Operation control: MSDS are available for all types of existing pesticides and he pesticide management and safety instructions are available</li> <li>- A package management/ used pesticide package is available</li> <li>- Water wash of pesticides containers collected in "spillage trap"</li> <li>- The flow of waste water is channeled and stored so that it is not discharged into the environment. The water used is used for its dilution.</li> </ul> <p>All waste products has been identified and documented under the "Evaluasi Aspek-Dampak Lingkungan" (Environmental Aspect impacts). Domestic waste is the main concern to be manage. Both Mill and Estate, has periodically schedule to manage the domestic waste.</p>	
7.2.8	All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.	<p>All chemicals and empty containers collected and stored at permitted hazardous waste storage (Tempat Penyimpanan Sementara Limbah B3) as per Indnoesia regulation, location in Soga Estate and Sei Lala Estate.</p> <p><b>Scheme smallholders:</b></p> <p>Group manager has a policy and mechanism to manage the waste from ex fertilizer sack according to procedure of "Prosedur Pemusnahan Wadah Bekas Bahan Kimia dan Diagram Alur Pembuangan Wadah Bekas Agrokimia". The ex fertilizer sack</p>	Complied

		<p>must be handled by triple rinse and use as loosefruit sack, the innerbag of fertilizer was delivered to collector.</p> <p>During field visit and interview with sample smallholder in KUD Usaha Tani dated 25<sup>th</sup> March 2021, they were well aware of the to manage the waste from ex fertilizer sack and empty chemical.</p>	
7.2.9	<p><b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p>	<p>Up to onsite audit – 2021, there is no aerial application of pesticide throughout the company plantation and scheme smallholders.</p>	Not Applicable
7.2.10	<p><b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p>	<p>Annual medical check-up was conducted for all workers handling with chemical, such as pesticide, herbicide and fertilizer.</p> <p>Data verified during onsite audit – 2021:</p> <ul style="list-style-type: none"> <li>Report of MCU for all workers in Ukui II POM was conducted by “Klinik Asian Agri Sehat”, periode second semester 2020, ik Soga Estate was attended by 59 workers, in Sei Lala Estate was conducted by 37 worker and in Ukui II POM was attended by 16 worker. The MCU was covered urine test, HSaAg and fisical test.</li> </ul> <p><b>Scheme smallholders:</b></p> <p>Medical examination for smallholder’s pesticide operator are include with Estate, because those chemical/spraying operators are work at Estate and Smallholders area. Sample: KUD Sumber Rejeki and KUD Jaya Makmur.</p>	Complied
7.2.11	<p><b>(C)</b> No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives.</p>	<p>PT Inti Indosawit Subur – Ukui Group prohibits pregnant or breast-feeding women to perform chemical spraying. In order to mitigate, estate performed monthly pregnancy test.</p>	Complied

		<p>PT Inti Indosawit Subur – Ukui Group has kept the record that spraying is not conducted by pregnant or breast-feeding women. The company has been conducting PP Test (pregnant test) every month.</p> <p>Monitoring of emergency response and preparedness facilities, i.e: fire hydrant.</p> <p>Based on field visit in Ukui II POM, the performance of hydrant no 5 was well.</p>	
<p><b>Note For 7.2.11</b></p> <p>Referring to Act No. 13 of 2003 concerning Manpower, Act No. 35 of 2014 concerning Child Protection, and taking into account the risks of hazards on palm oil plantations and mills on the development and physical, mental and social health of children, the national interpretation mandates that the unit of certifications does not employ people under the age of 18 for pesticide spraying. For this reason, the provisions of young workers under 18 years in indicator 7.2.11 are irrelevant.</p>			
<p><b>Criteria 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
<p>7.3.1</p>	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.</p>	<p>PT Inti Indosawit Subur – Ukui Group and Estate collects all hazardous waste from estates and mill into temporary hazardous waste storage in central workshop compound.</p> <p>PT Inti Indosawit Subur – – Ukui Group has prepared a procedure to handle hazardous waste titled “Prosedur Penanganan Limbah B3” No.AA-KL-06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third party transporter</p> <p>PT Inti Indosawit Subur – – Ukui Group has been stored the hazardous waste in temporary storage with permit. The temporary hazardous waste storage has a valid permit based on “Surat Keputusan Badan Penanaman Modal dan Pelayanan Perijinan Terpadu nomor: KPTS-503/DPMTSP-LB3/2020/33, dated 29 December 2020, the license valid until 5 year 2021.The hazardous waste is sent to the registered collector/transporter which approved by Environmental Ministry.</p> <p>A documented waste management plan to avoid or reduce pollution and its implementation available under document of Environmental Aspect-Impacts (Evaluasi Aspek-Dampak Lingkungan) year 2020. The document covered all operation in mill, estate and its smallholders.</p>	<p>Complied</p>

7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	<p>PT Inti Indosawit Subur – Ukui Group has a waste management plan, identifying type and source of waste and the disposal plan. PT Inti Indosawit Subur prepared a procedure to handle hazardous waste titled “Prosedur Penanganan Limbah B3” No.AA-KL-06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third party transporter.</p> <p>The company store hazardous waste in temporary storage with permit, The hazardous waste is sent to the registered collector/transporter which approved by Environmental Ministry, namely PT Indostar Cargo.</p> <p>Based on interview with workers who are handling of pesticides that they understood of disposed empty containers pesticides, such as: Empty chemical containers re-used only for mixing purposes, unusable are triple rinsed, punctured and disposed to the approval collector.</p>	Non-compliance
7.3.3	The unit of certification does not use open fire for waste disposal.	<p>All waste products has been identified and documented under the “Evaluasi Aspek-Dampak Lingkungan” (Environmental Aspect impacts). Domestic waste is the main concern to be manage. Both Mill and Estate, has periodically schedule to manage the domestic waste. The document of “Jadwal Pengangkutan Sampah 2020 untuk Karyawan Sei Lala and Soga Estate, update 16<sup>th</sup> February 2020”. Regulation of domestic waste management refer to “UU No. 18 Tahun 2008 tentang Pengelolaan Sampah”.</p> <p><b>Scheme Smallholder:</b></p> <p>Group Manager of Plasma Ukui Group has defined the procedure “Pengelolaan Kemasan Ex (Bekas) Pupuk di Kebun” No. 035/DOK/SOP/PT.IIS KLB-AA/2016 dated 2 December 2016. All ex fertilizer sack was prohibit to dispose in plantation and housing area. All the ex fertilizer sack usage must be identified and reported to Group Manager.</p>	Complied
<b>Criteria 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.	<p><b>Soga &amp; Sei Lala Estate:</b></p> <p>Both own estate and smallholder has had the procedure related to manage soil fertility (see detail in indicator 3.3.1). The implementation of manuring is based on</p>	Complied

		<p>fertilizer recommendation that set by Asian Agri’s Research and Development Department. Fertilizer dosage has set according to the soil needed refer to SSU/LSU.</p> <p><b>Scheme Smallholder:</b>  Based on interview with plasma manager obtain information that the fertilizer recommendation set by Asian Agri’s Research and Development Department. No fertilizer applied in riparian area to minimize environmental impact.</p>	
7.4.2	<p>Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.</p>	<p>According to the Asian Agri’s agricultural policy, soil sampling conducted every 5 years while leaf sampling conducted annually. Based on document verification sighted the report of soil and leaf sampling in own estate and smallholders as follows:</p> <ul style="list-style-type: none"> <li>• The last soil sampling conducted on June 2016. Parameter that tested is N, C, K, Ca, Mg and pH.</li> <li>• The last leaf sampling conducted on April 2020. Parameter that tested is major element (Ash, N, P, K Mg, Ca) dan Minor element (B, Cu, Zn, Mn, Fe).</li> </ul> <p>Those reports are converted to be fertilizer recommendation by Asian Agri’s Research and Development Department.</p>	Complied
7.4.3	<p>A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p>	<p><b>Soga &amp; Sei Lala Estate:</b>  According to the Agricultural Policy Manual, certificate holder has had a guidance in organic fertilizers such as Empty Fruit Bunch (EFB) and Palm Oil Mill Effluent (POME). Certificate holder has implemented EFB application in estate with dosage 30 – 50 ton/Ha in normal soil and POME with dosage 750 m3/Ha only Sei Lala Estate which is near the Ukui II mill.</p> <p>During this visit, auditor has observed the application of organic and inorganic fertilizers. For example: there is application of HGFB fertilizer with dosage 7.5 gr/palm in Sei Lala Estate and application of EFB in block C98g Afdeling 3 Soga Estate. Both applications have followed the recommendation stipulated by Asian Agri Research and Development Department.</p>	Complied

		<p><b>Scheme Smallholder:</b></p> <p>According to the interview with smallholder representatives, there is no longer EFB application at this time since their area include in replanting plan on 2021.</p> <p>According to the interview with smallholder representatives, only KUD Bukit Potalo that still applied the fertilizer according to fertilizer recommendations for their whole areas. Whilst the KUD Sumber Makmur and Bakti was not applied the fertilizer for their whole areas due to replanting plan in the next two year.</p>	
7.4.4	Records of fertilizer inputs are maintained.	<p>Record of fertilizer application in each estate day by day and month by month are in places. For example,</p> <ul style="list-style-type: none"> <li>• There is a record of Muriate of Phosphate (MOP) application in Soga Estate period September 2020 as follows: <ul style="list-style-type: none"> <li>➢ Afdeling 1: 36,677 ton</li> <li>➢ Afdeling 2: 76,752 ton</li> <li>➢ Afdeling 3: 81,221 ton</li> <li>➢ Afdeling 4: 39,915 ton</li> </ul> </li> </ul> <p>Total of MOP application in Soga Estate period of September 2020 was <b>234,656 ton.</b></p> <ul style="list-style-type: none"> <li>• There was a record of fertilizer application in each KUD in progress report of smallholder owners book.</li> </ul> <p>During the field visit, auditor also observed the fertilizer application process in estate as follows:</p> <ul style="list-style-type: none"> <li>• Fertilizer application Block 15 Afdeling 1 Sei Lala Estate According to fertilizer recommendation, Sei Lala Estate conducted fertilizer application using HGFB with dosage 7.5 gr/palm. The fertilizer applicator can demonstrate the application and safety working procedure.</li> <li>• EFB application Block C89g Afdeling 3 Soga Estate.</li> </ul>	Complied

		Unit management using EFB in immature palm to enrich the soil fertility, maintain soil moisture and reducing weeding especially in circle. EFB placing in each palm circle with dosage 27 ton/Ha or equal to 200 – 250 kg/palm.	
<b>Criteria 7.5:</b> Practices minimise and control erosion and degradation of soils.			
7.5.1	<b>(C)</b> Maps that identify marginal and fragile soils, including steep sloped land are available.	<p><b>Own Estates</b></p> <p>Asian Agri’s Research and Development Department has conducted soil survey semi detail in PT Inti Indosawit Subur (Ukui Estate) on 2010. Based on the report found the soil taxonomy refer to USDA 2006 as follows:</p> <ul style="list-style-type: none"> <li>• Typic Dystrudepts (72.1% from the total area)</li> <li>• Typic Endoaquepts (24.5% from the total area)</li> <li>• Typic Placaquods (2.5% from the total area)</li> <li>• Typic Haplosaprist (0.9% from the total area)</li> </ul> <p>Topography:</p> <ul style="list-style-type: none"> <li>• Flat – undulating (0 – 8%) → 15.15% from the total area</li> <li>• Rolling (8 – 15%) → 36.29% from the total area</li> <li>• Rolling - Hilly (15 – 30%) → 45.68% from the total area</li> <li>• Steep (&gt;30%) → 2.88% from the total area</li> </ul> <p>Based on field visit in Ukui Estate sighted ground management in steep area as follows:</p> <ul style="list-style-type: none"> <li>• Terracing in contour area.</li> <li>• Frond stacking alongside the contour.</li> <li>• No chemical in <i>Neprolephis bisserata</i>.</li> <li>• EFB application.</li> </ul> <p><b>Scheme Smallholder:</b></p>	Complied

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		<p>Asian Agri’s Research and Development Department has conducted soil survey semi detail in Smallholder Area of PT Inti Indosawit Subur on 2010. Based on the report found the soil taxonomy refer to USDA 2006 as follows:</p> <ul style="list-style-type: none"> <li>• Typic Dystrudepts (49.26% from the total area)</li> <li>• Typic Endoaquepts (46.71 % from the total area)</li> <li>• Typic Haplosaprist (4.03% from the total area)</li> </ul> <p>Soil topography:</p> <ul style="list-style-type: none"> <li>• Flat – undulating (0 – 8%) → 58.83% from the total area</li> <li>• Rolling (8 – 15%) → 7.06% from the total area</li> <li>• Rolling - Hilly (15 – 30%) → 34.11% from the total area</li> </ul> <p>These maps are available in each unit.</p>	
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.	Based and document verification and field observation, there is no extensive replanting activity in steep terrain both own estate and smallholder area.	Not Applicable
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.	There is no new palm oil planting in Sei Lala and Soga Estate.	Not Applicable
<b>Criteria 7.6:</b> Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	<b>(C)</b> Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations.	<p>Certificate holder through Agri Agri’s Research and Development Department has conducted soil mapping 2010. They also had SOP AA-APM-OP-1100.05-R3 dated 23 November 2016: <i>Konservasi Tanah dan Air</i> (Soil &amp; Water Conservation) as guidance for soil conservation in each topography</p> <p>During this audit, auditor has been confirmed that there is no new planting (land extension) of PT Inti Indosawit Subur or plasma area. It is only replanting activity that conducted in 2017.</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.	During this audit, auditor has been confirmed that there is no new planting (land extension) of PT Inti Indosawit Subur or plasma area. It is only replanting activity	Not Applicable





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		that conducted in 2017. Replanting activity in steep area using a terrace contour for soil conservation.	
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	During this audit, auditor has been confirmed that there is no new planting (land extension) of PT Inti Indosawit Subur or plasma area. It is only replanting activity that conducted in 2017. Replanting activity in steep area using a terrace contour for soil conservation.	Not Applicable
<b>Criteria 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<b>(C)</b> No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas.	According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Soga Estate, Sei Lala Estate and Ukui Plasma. There are 4 types of soil in Soga & Sei Lala Estate and Plasma Ukui area, namely: 1. Typic Dystrudepts 2. Typic Endoaquepts 3. Typic Haplosaprists 4. Typic Placaquods Therefore, this indicator is not applicable.	Not Applicable
7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).	According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Soga Estate, Sei Lala Estate and Ukui Plasma. Therefore, this indicator is not applicable.	Not Applicable
<b>PROCEDURAL NOTE:</b> Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).			
7.7.3	<b>(C)</b> Subsidence of peat is monitored, documented and minimised.	According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Soga Estate, Sei Lala Estate and Ukui Plasma. Therefore, this indicator is not applicable.	Complied

7.7.4	<b>(C)</b> Availability of implementation evidence of the water and land cover management program.	According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Soga Estate, Sei Lala Estate and Ukui Plasma. Therefore, this indicator is not applicable.	Complied
7.7.5	<b>(C)</b> Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation.	According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Soga Estate, Sei Lala Estate and Ukui Plasma. Therefore, this indicator is not applicable.	Complied
<p><b>PROCEDURAL NOTE:</b> For 7.7.5: Detailed information on the RSPO Drainability Assessment Guide along with related concepts and detailed actions is contained in the Guidelines currently being adjusted / tested by the RSPO Working Group on Peatlands (Peatland Working Group / PLWG). The final version must obtain PLWG approval in January 2019 and will include additional Guide on the steps to be followed after deciding not to replant and the consequences for other stakeholders, farmers, local communities, and the unit of certification concerned. It is recommended that the trial methodology period is proposed to be extended for 12 months for all relevant management units (ie management units that have plantations on peat) to utilize the methodology and provide input to PLWG so that existing procedures can be further refined as needed before January 2020. The unit of certification has the option to delay replanting until the issuance of the revised Guidelines for the guidelines. Additional guidance for alternative commodity crops and rehabilitation of natural vegetation will be regulated by the PLWG.</p>			
7.7.6	<b>(C)</b> All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are	According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Soga Estate, Sei Lala Estate and Ukui Plasma.	Not Applicable

	already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).	Therefore, this indicator is not applicable.	
7.7.7	<b>(C)</b> All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non-corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines.	According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Soga Estate, Sei Lala Estate and Ukui Plasma. Therefore, this indicator is not applicable.	Not Applicable

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

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

7.8.1	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	PT Inti Indosawit Subur - Ukui Group has prepared the plan of water management plan as in "Program Manajemen Lingkungan 2020" consist of management water supply for domestic, water consumption and measurement of water quality. Water	Complied
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	<p>catchment. The plan referred to contains the following matters:          7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.</p>	<p>Management Plan, indicating the water need, permit and licensing, monitoring of water quality, infrastructure maintenance and conservation. The company has conducted measurement of water quality regularly (each semester) and consistent, the result of analysis second semester year 2020 shown that water quality is complies with national regulation.</p> <p>All of KUD has program on water management as in "Rencana dan Realisasi Penyusunan Pelapah Letter "U", frond stacking."Rencana dan Realisasi Perawatan Teresan sebagai Sarana Konservasi Tanah dan Air serta Upaya Pencegahan Erosi"</p> <p>PT Inti Indosawit Subur – Ukui II POM has establish management plan to protect water courses and wetlands, including securing and maintaining appropriate riparian.</p> <ul style="list-style-type: none"> <li>- Riparian restoration with forest vegetation plant/tree.</li> <li>- Establish zone for zero chemical. No spraying and fertilizing along riparian zone. Based on visit in riparian zone (Sempadan Sungai Laniago) in block BA90</li> <li>- Conserve natural vegetation in riparian zone</li> <li>- Restricted to conduct replanting palm oil in riparian area.</li> </ul> <p>PT Inti Indosawit Subur – Ukui II POM has also prepared the procedure on protection of water courses under "SOP Pengendalian Riaprian" number AA-APM-OP-1100.21-R2, dated 25<sup>th</sup> February 2016.</p> <p>Ukui II POM has permit for surface water usage from "Kementerian Pekerjaan Umum dan Perumahan Rakyat" as per "Keputusan Menteri Pekerjaan Umum dan Perumahan Rakyat nomor 14/KPTS/M/2018 tentang Pemberian izin Pengusahaan Sumber Daya Air kepada PT Inti Indosawit Subur untuk Usaha Industri di Sungai Laniago, Kabupaten Pelalawan dan Kabupaten Siak", dated 5<sup>th</sup> January 2018.</p> <p>Ukui II POM also paid the water retribution each month to "UPT Pengelolaan Pendapatan, Badan Pendapatan daerah Pemerintah Provinsi Riau". Sample: SPPD (Surat Setoran Pajak Daerah) untuk Pajak Pengambilan dan Pemanfaatan Air Permukaan untuk period January – March 2020, dated 28th April 2020, IDR XX.578.100</p>	
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	<p>7.8.1b Workers have adequate access to clean water.</p>	<p>PT Inti Indosawit Subur - Ukui II POM has prepared the plan of water management plan as in "Program Manajemen Lingkungan 2020" consist of management water supply for domestic, water consumption and measurement of water quality. Water Management Plan, indicating the water need, permit and licensing, monitoring of water quality, infrastructure maintenance and conservation</p> <p>The result of moniting or testing the clean water / water consumption conducted by "Unit Pelaksana Teknisi Laboratorium Bahan Konstruksi", Pekanbaru. Certificate of Analysis for Domestic Water (by cooking treatment), location in Ukui II POM – Report of Analysis No: MT.1/01.06.45.39, dated 29 May 2020, the reference of analysis report is based on PERMENKES NO 492/MENKES/PER/IV/2010</p>	
<p>7.8.2</p>	<p><b>(C)</b> Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).</p>	<p>PT Inti Indosawit Subur – Ukui II POM has establish management plan to protect water courses and wetlands, including securing and maintaining appropriate riparian.</p> <ul style="list-style-type: none"> <li>– Riparian restoration with forest vegetation plant/tree.</li> <li>– Establish zone for zero chemical. No spraying and fertilizing along riparian zone. Based on visit in riparian zone (Sempadan Sungai Laniago) in block BA90</li> <li>– Conserve natural vegetation in riparian zone</li> <li>– Restricted to conduct replanting palm oil in riparian area</li> </ul>	<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>Ukui II POM:</p> <p>There were 11 ponds in effluent treatment system (WWTP), which consists of Colling Pond, Primary Anaerobic pond, Secondary Anaerobic pond, Acidification pond, and Buffering pond. Procedure of WWTP operation available in Mill Policy Manual (MPM) dated February 1, 2013, chapter AA-MPM-OP-1400.13-R1.</p> <p>Ukui II POM is undergoing Biogas power plant construction since April 2015 to generate electrical power by using waste water treatment. The biogas system has Anaerobic MBR system thorough digester Thermophilic fermentation, and anaerobic membrane tank.</p>	<p>Complied</p>

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According to effluent monitoring data, all produced mill effluent used for land application. Mill holds permit to discharge waste water into land application from local authority through Decree number KTPS.660/BLH/780/2014, issued on 10th September 2014 valid for 5 years. Total area of land application covers 679 hectares at Block B and C.

As required by LA permit, Mill conducts monthly check on discharged effluent in cooperation with accredited Laboratory (UPT Pengujian Material, Dinas Bina Marga Provinsi Riau). According to recent testing result, BOD level of applied effluent has met the applicable threshold of KepmenLH No.28/2003 regarding BOD limits of effluent discharge for land application. The level is maintained consistently less than 5,000 mg/L and debit <600 m3 per day.

Sample seen:

Month	BOD (mg/l) – standard of quality 5,000	pH – standard of quality 6-9
January	3,200	7.1
February	2,114	7.7
March	3,900	7.2
April	2,114	7.3
May	3,900	7.2
June	3,650	7.6
July	3,620	8.1
August	3,126	7.6
September	3,100	7.7
October	2,400	7.6
November	3,450	7.5
December	3,670	7.7

Based on result of monitoring January – December 2020 shown comply with legal requirement "PermenLHK No P.68/Setjen/Kum1/8/2016".

7.8.4	Mill water use per tonne of FFB is monitored and recorded.	<p>Ukui II has recorded the mill water use per tonne FFB, includes monitoring of water usage for mill processing and domestic usage. Result of water usage monitoring is recorded under "Mill Operation Summary" year 2020, updated in May 2020.</p> <p>Budget in 2020 is 1.00 M3/Ton FFB, record in January – May 2020 has shown:</p> <table border="1" data-bbox="981 515 1469 954"> <thead> <tr> <th>Month</th> <th>Water use per ton FFB</th> </tr> </thead> <tbody> <tr><td>January</td><td>0.90</td></tr> <tr><td>February</td><td>0.86</td></tr> <tr><td>March</td><td>0.88</td></tr> <tr><td>April</td><td>0.87</td></tr> <tr><td>May</td><td>0.89</td></tr> <tr><td>June</td><td>0.90</td></tr> <tr><td>July</td><td>0.83</td></tr> <tr><td>August</td><td>0.84</td></tr> <tr><td>September</td><td>0.88</td></tr> <tr><td>October</td><td>0.87</td></tr> <tr><td>November</td><td>0.91</td></tr> <tr><td>YTD</td><td>(budget YTD 1.00)</td></tr> </tbody> </table>	Month	Water use per ton FFB	January	0.90	February	0.86	March	0.88	April	0.87	May	0.89	June	0.90	July	0.83	August	0.84	September	0.88	October	0.87	November	0.91	YTD	(budget YTD 1.00)	Complied
Month	Water use per ton FFB																												
January	0.90																												
February	0.86																												
March	0.88																												
April	0.87																												
May	0.89																												
June	0.90																												
July	0.83																												
August	0.84																												
September	0.88																												
October	0.87																												
November	0.91																												
YTD	(budget YTD 1.00)																												
<b>Criteria 7.9:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised																													
7.9.1	Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented	<p>PT Inti Indosawit Subur – Ukui II POM has prepared the program for improving efficiency of the use of fossil fuels and to optimize renewable energy under "Rencana Manajemen Lingkungan" year 2020. In point 2 stated to improving efficiency of the use of fossil fuels such monitoring on use of fossil fuels</p> <p>Fossil fuel records was maintenance and the trends shown. Energy use records include accurate measurements of renewable energy use per ton of FFB processed. All the shell and fiber are consumed internally as boiler fuel. Fossil fuel usage is recorded for operational purpose, including the efficiency analysis.</p> <p>Data verified:</p> <p>Trend of fossil fuels used year 2020, in Sei Lala Estate:</p>	Complied																										

		Program	Unit	2019 (km/liter)		
		Preventive maintenance (services of starter of dynamo)	Dum truck 08	5.1 km/liter		
			Dum truck 12	3.3 km/iter		
			Dum truck 14	3.3 km/liter		
			Dum truck 20	4.3 km/liter		
			Dum truck 37	3.3 km/liter		
		FIP Calibration	Dum truck 12	2.9 km/liter		
		Enginee OH	Dum truck 12	2.8 km/liter		
<p><b>Criteria 7.10:</b> Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>						
7.10.1	<p><b>(C)</b> GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p>	<p>PT Inti Indosawit Subur – Ukui II POM has identified the emission sources and pollution under document of “Environmental Aspect-Impacts (Evaluasi Aspek-Dampak Lingkungan) year 2020”.</p> <p>Identification of greenhouse gas (GHG) emissions sources both of Mill, Estate and Smallholders consist of emission from boiler and generator, effluent from mill wastewater, particulate from boiler stack, noise, fertilizer application, fossil fuels usage, transport of FFB</p> <p>The assessment of pollution activities was documented in “Mitigasi Has Rumah Kaca”. All the activities of mill and estate as well as the waste generated has been well documented, for examples the operational activities from generator is generates air emissions, the company conducts periodic generator maintenance and perform quality measurement of exhaust emissions each semester to ensure air quality is comply with standard regulation.</p>				Complied



		<p><b>Scheme Smallholder:</b></p> <p>Manager of Kebun Plasma Ukui Group has prepared the list significant pollutants and identify sources of emissions, presented in "Identifikasi Sumber Polusi di Perkebunan Petani Kebun Plasma Ukui Group PT Inti Indosawit Subur 2020". List of significant pollutant such as emission from FFB transportation, water pollutant from fertilizing and spraying activity, emission from generator usage.</p>	
7.10.2	<p><b>(C)</b> Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Sei Lala and Soga Estate and Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.</p>	Not Applicable
7.10.3	<p><b>(C)</b> Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.</p>	<p>PT Inti Indosawit Subur – Ukui II POM has identified the significant pollutants and greenhouse gas (GHG) emissions.</p> <p>Significant pollutants and GHG such as: Emission, particulate, noise from boiler and generator, effluent from mill wastewater, fertilizer application, chemical applicator and transport of FFB.</p> <p>Monitoring of air emissions and ambient air quality conducted every semester. Emissions test conducted testing by Accreditation Laboratory. The results of the analysis have been demonstrated and reported to Environmental Agency every six months.</p>	Complied
<p><b>Criteria 7.11:</b> Fire is not used for preparing land and is prevented in the managed area.</p>			
7.11.1	<p><b>(C)</b> Land for new planting or replanting is not prepared by burning.</p>	<p>PT Inti Indosawit Subur – Ukui II POM has developed an early warning system, to monitor the risk of fire. The system "Sistem Peringkat Bahaya Kebakaran 1 &amp; 2". The monitoring system calculating the field condition, ignition risk, potential drought and smoke, fire handling, fire fighting difficulty and weather index. Patrol report indicating any fire incident.</p>	Complied

		<p>Based on field visit in block Sei Lala Estate, the land preparation is using mechanical method. No any open burning was noted for land preparation. It can also demonstrated in the agreement contract between company and subcontractor that all activity of replanting is performed manual and mechanically.</p> <p><b>Scheme Smallholder:</b>          There was no any open burning was noted for land preparation and any activity in Usaha Tani, Karya Tani, Tani Bahagia. Replanting plan has been drawn up in the near future. The replanting plan was available under "S Pelaksanaan Replanting Kebun Plasma Ukui Group".</p> <p>During field visit in Usaha Tani, Karya Tani, Tani Bahagia, there was a replanting and no burning activity. The land preparation is using mechanical method.</p>	
7.11.2	<p>The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Ukui Group and Ukui Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.</p> <p>Replanting has been done mechanically, consist of: falling tree, chipping by excavator, terracing by excavator, digging, road construction, ditch/waterways construction, planting LCC and planting oil palm. Company has established "Ketentuan Replanting areal Mineral" tahun 2016. In the mechanism explained that replanting must be conducted mechanically without burning.</p> <p>Based on field visit in block Sei Lala Estate, the land preparation is using mechanical method. No any open burning was noted for land preparation. It can also demonstrated in the agreement contract between company and subcontractor that all activity of replanting is performed manual and mechanically.</p> <p><b>Scheme Smallholder:</b>          There was no any open burning was noted for land preparation and any activity in Usaha Tani, Karya Tani, Tani Bahagia. Replanting plan has been drawn up in the</p>	Complied

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		<p>near future. The replanting plan was available under "S Pelaksanaan Replanting Kebun Plasma Ukui Group".</p> <p>During field visit in Usaha Tani, Karya Tani, Tani Bahagia, there was a replanting and no burning activity. The land preparation is using mechanical method.</p>	
7.11.3	The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.	<p>The policy has communicated to all smallholder remember and local community to engages stakeholders in adjacent locations for fire prevention and control measures, e.g: Record of refreshment socialization in Bukit Potalo, was conducted on 15<sup>th</sup> April 2020</p> <p>Replanting has been done mechanically, consist of: falling tree, chipping by excavator, terracing by excavator, digging, road construction, ditch/waterways construction, planting LCC and planting oil palm. Company has established "Ketentuan Replanting areal Mineral" tahun 2016. In the mechanism explained that replanting must be conducted mechanically without burning.</p>	Complied

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

**PROCEDURAL NOTE for 7.12:**

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

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

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

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

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

<p>7.12.1</p>	<p><b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests.</p> <p>Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).</p>	<p>PT Inti Indosawit Subur – Ukui Group Certification unit and supply bases (including smallholder) did not carry out any new plantings after November 2005. The planting year started in 1987, 1988, 1989, and the company has starts replanting in 2015 – present. Currently during audit sighted that Sei Lala Estate was doing replanting for ± 495 ha.</p> <p>Therefore, the requirement of this indicator is not applicable.</p>	<p>Not Applicable</p>																					
<p>7.12.2</p>	<p><b>(C)</b> HCV and HCS forests, and other conservation areas are identified as follows:</p> <p>7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.</p>	<p>PT Inti Indosawit Subur – Ukui Group is in cooperation with Faculty of Forestry, Bogor Agriculture University in preparing HCV Identification “Dokumen Identifikasi dan Analisis Keberadaan Nilai Konservasi Tinggi (NKT) di Areal Perkebunan Kelapa Sawit di Kebun Ukui dan Soga pada tahun 2010”. Guidance use is HCV Toolkit 2008. The document has put into consideration the landscape condition, including Teso Nilo National Park near the plantation. HCV assessment was including plasma/scheme smallholder area.</p> <p>The assessment team comprise of Ir.Nyoto Santoso, MS as lead assessor HCV RN registered lead assessor, Ir.Heru B Pulunggono, MSc (hydrology and soil conservation), Handian Purwawangsa, S.Hut, MSI, (social), Iing Nasihin S.Hut, MSi (flora and GIS), Tutut Sunarminto, MSi, (social and cultural), Yanti Apriyanti, S.Pi (social and cultural), Rizki Ratna Ayu Paramita Sari, S.Hut (social and cultural). The HCV assessment identified the presence of HCV 1.1, HCV 1.2, HCV 1.3, HCV 2.3, HCV 4.1 and HCV 6 with total (under PT Inti Indosawit Subur – Ukui Group/Ukui Estate and Soga Estate) of 234.458 Ha.</p> <p>HCV in Soga &amp; Sei Lala Estate</p> <table border="1" data-bbox="981 1161 1966 1396"> <thead> <tr> <th>HCV</th> <th>Status</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>River/Sungai Napuh</td> <td>1.1, 1.2, 4.1</td> <td>27.770</td> </tr> <tr> <td>Tributary/Anak Sungai Napuh</td> <td>1.1, 1.2, 4.1</td> <td>5.985</td> </tr> <tr> <td>Tributary/Anak-Anak Sungai Napuh</td> <td>1.1, 1.2, 4.1</td> <td>0.800</td> </tr> <tr> <td>River/Hulu Sungai Air Hitam Kiri</td> <td>1.1, 4.1</td> <td>31.005</td> </tr> <tr> <td>River/Hulu Sungai Air Hitam Kanan</td> <td>1.1, 4.1</td> <td>19.656</td> </tr> <tr> <td>Waste water pond/Kolam Limbah</td> <td>1.1, 4.1</td> <td>2.057</td> </tr> </tbody> </table>	HCV	Status	Ha	River/Sungai Napuh	1.1, 1.2, 4.1	27.770	Tributary/Anak Sungai Napuh	1.1, 1.2, 4.1	5.985	Tributary/Anak-Anak Sungai Napuh	1.1, 1.2, 4.1	0.800	River/Hulu Sungai Air Hitam Kiri	1.1, 4.1	31.005	River/Hulu Sungai Air Hitam Kanan	1.1, 4.1	19.656	Waste water pond/Kolam Limbah	1.1, 4.1	2.057	<p>Complied</p>
HCV	Status	Ha																						
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<b>Total</b>		<b>92.290</b>																			
	<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>PT Inti Indosawit Subur – Ukui Group Certification unit and supply bases (including smallholder) did not carry out any new plantings after November 2005. The planting year started in 1987, 1988, 1989, and the company has starts replanting in 2015 – present.</p> <p>Therefore, the requirement of this indicator is not applicable.</p>																			
<p>7.12.3</p>	<p><b>(C)</b> In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration</p>	<p>Based on HCV assessment report and field observation confirmed that there is no High Forest Cover Landscapes (HFCLs) within area of PT Inti Indosawit Subur Ukui Estate and Soga Estate.</p>	<p>Complied</p>																		

	<p>regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p>	<p>of PT Inti Indosawit Subur Ukui Estate and Soga Estate was located in another purpose area and not in forest area.          This indicator not applicable.</p>	
<p><b>PROCEDURAL NOTE for 7.12.3:</b>          Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.</p>			
<p>7.12.4</p>	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p>	<p>PT Inti Indosawit Subur – Ukui Group Certification unit and supply bases (including smallholder) did not carry out any new plantings after November 2005. The planting year started in 1987, 1988, 1989, and the company has starts replanting in 2015 – present.          Therefore, the requirement of this indicator is not applicable.          According to HCV assessment 2010, there is no High Forest Cover Landscapes (HFCLs) identified. Most of the HCV identified, located within the existing plantation.          Conservation management plan Soga &amp; Sei Lala Estate update on January 2021, consist of:</p> <ul style="list-style-type: none"> <li>- Area demarcation and maintenance the boundary markers</li> <li>- Socialization of HCV area and protection to employee and surrounding community</li> <li>- Riparian restoration</li> <li>- Prohibiting chemical application in riparian zone/river border</li> </ul> <p>Evidence Continous monitoring documentation and report regarding the status of RTE species and HCV presented in “Laporan Monitoring tumbuhan dan Satwaliar PT Inti Indosawit Subur, Kebun Buatan” Periode January – June 2020 and Juli – December 2020”.</p> <p>Monitoring documentation such as: “Daftar Temuan Satwa liar di Areal kebun” contain information regarding result of wildlife and RTE species monitoring, “Tabel Monitoring Kerusakan Kawasan Lindung” contain information regarding result of HCV area monitoring and HCV condition monitoring such as illegal hunting, HCV area disturbance, and HCV condition. Latest monitoring both RTE species and HCV</p>	<p>Not Applicable</p>

		<p>area conducted on December 2020. Sample seen: Wildlife monitoring in Block F89b period December 2018, found presence of animal such as: Bucerotidae, Orthotmus sp, Prinia familiaris, Macaca fascicularis, Tupaia tana. Monthly monitoring of HCV area condition and animal species also performed by Foreman HCV (Adi Surya P) and each Foreman Afdeling, animal presence recorded in "Daftar Temuan Satwa Liar.</p> <p><b>Scheme Smallholder:</b> Conservation management plan Plasma ukui (Scheme Smallholder) update on 2 January 2021, consist of:</p> <ol style="list-style-type: none"> <li>1. Biodiversity monitoring</li> <li>2. Signboard maintenance</li> <li>3. Socialization of HCV area</li> <li>4. Riparian protection</li> <li>5. Prohibiting chemical application in riparian zone/river border</li> </ol> <p>Each KUD has appointed person in charge to monitor the RTE species presence in smallholder plantation area:</p> <ul style="list-style-type: none"> <li>- KUD Tani Bahagia: Surat Keputusan Pengurus KUD Tani Bahagia Nomor: 001/KUD-TB/SK/KJ/I/2018 dated 17 January 2018 Tentang Penunjukan/Pengangkatan Pengurus HCV dan Perlindungan Satwa Liar KUD Tani Bahagia. appointed person: Salijan.</li> <li>- KUD Usaha Tani: Surat Keputusan Pengurus KUD Usaha Tani Nomor: 001/KUD-UT/SK/AP/I/2018 dated 17 January 2018 Tentang Penunjukan/Pengangkatan Pengurus HCV dan Perlindungan Satwa Liar KUD Usaha Tani. appointed person: Jumari.</li> <li>- KUD Karya Tani: Surat Keputusan Pengurus KUD Karya Tani Nomor: 001/KUD-KT/SK/SBB/I/2018 dated 17 January 2018 Tentang Penunjukan/Pengangkatan Pengurus HCV dan Perlindungan Satwa Liar KUD Karya Tani. appointed person: Herman.</li> </ul>	
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		<p>HCV training and socialization to smallholder member has been conducted on 11 August 2020 to all smallholder group and KUD. Minutes of socialization and attendance list are available.</p> <p>Monitoring for RTE species performed each month by PIC. Result of monitoring presented in "Formulir Daftar Temuan Satwa Liar Tahun 2020". During January – December 2020, shown that in KUD Tani Bahagia, KUD Usaha Tani and KUD Karya Tani there were presence of animal such as: Tupai (<i>Tupaia glis</i>), Musang (<i>Paradoxurus hermaphroditus</i>) Sanca Bodo (<i>Python bivittatus</i>), Kucing hutan (<i>Prionailurus bengalensis</i>), Biawak (<i>Varanus salvator</i>), Elang Tikus (<i>Elanus caeruleus</i>), Burung Madu (<i>Nectarinia jugularis</i>) and Cekakak Belukar (<i>Halcyon smyrnensis</i>).</p>	
7.12.5	Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	<p>PT Inti Indosawit Subur – Ukui Group Certification unit and supply bases (including smallholder) did not carry out any new plantings after November 2005. The planting year started in 1987, 1988, 1989, and the company has starts replanting in 2015 – present.</p> <p>Therefore, the requirement of this indicator is not applicable.</p>	Not Applicable
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	<p>The HCV assessment identified the presence of HCV 1.1, HCV 1.2, HCV 1.3, HCV 2.3, HCV 4.1 and HCV 6 with total in Soga and Sei Lala Estate was 92.290 Ha. A number of fauna identified in the plantation area: Mammals such as "Kucing kuwuk" (<i>Felis bengalensis</i>), "Kancil" (<i>Tragulus javanicus</i>), "Kijang" (<i>Muntiacus muntjak</i>), "Trenggiling" (<i>Manis javanica</i>), Monkey (<i>Macaca fascicularis</i>), "Beruk" (<i>Macaca nemestrina</i>), "Musang" (<i>Paradoxurus hermaphroditus</i>). Birds such as "Raja udang meninting" (<i>Alcedo meninting</i>), "Burung madu" (<i>Aethopyga siparaja</i> and <i>Nectarinia jugularis</i>), "Elang tikus" (<i>Elanus caeruleus</i>), "Elang ular bido" (<i>Spilomis cheela</i>), "Cekakak belukar" (<i>Halcyon smymensis</i>), "Kipasan belang" (<i>Rhipidura javanica</i>). Reptile such as "Ular Piton" (<i>Phyton molurus</i>), Biawak (<i>Varanus salvator</i>). Identified also protected plants such as "Meranti batu" (<i>Shorea leprosula</i>), "Meranti bunga" (<i>Shorea teysmaniana</i>).</p>	Complied



		<p>PT Inti Indosawit Subur – Ukui II POM has prepared a procedure for protection of flora and fauna, explained in Environmental Management System: Biodiversity (AA-432-002e-LT), IUCN redlist (AA-432-006-LT), CITES list (AA-432-07-LT).</p> <p>Estate has established the management plan to maintain and/or enhance High conservation value area. HCV management and monitoring plan described measures taken for each HCV and its monitoring. Relevant laws were taken into account for determining appropriate measure including UU #5/1990 about Natural resources conservation, PP#7/1999 about List of protected plan and wildlife, Kepres #32/1990, and PP #26/2008.</p> <p>Conservation management plan Soga &amp; Sei Lala Estate update on 7 January 2020, consist of:</p> <ol style="list-style-type: none"> <li>1. Area demarcation and maintenance the boundary markers</li> <li>2. Socialization of HCV area and protection to employee and surrounding community</li> <li>3. Riparian restoration</li> <li>4. Prohibiting chemical application in riparian zone/river border</li> </ol> <p>Monitoring for the HCVs are carried out as per Conservation Management Plan. The conservation management plan covers area enhancement, socialization to workers and local communities, prohibition of chemical regime near the area and river buffer zone restoration. Plan for monitoring and patrol has been incorporated into the management and monitoring plan. Another effort planned was to have HCV sign board and “no-hunting” sign boards placed near identified HCV areas – on progress.</p> <p>PT Inti Indosawit Subur – Ukui Group is also having procedure to monitor the protected/conservation area as per “SOP Pemantauan Areal Lindung” No.AA-PL-08-EFP – describing procedure for vegetation monitoring, wildlife monitoring (path and rapid method), conservation area inspection procedure, vegetation enhancement procedure and data analysis procedure.</p> <p><b>Scheme Smallholder:</b></p>	
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		<p>Conservation management plan Plasma ukui (Scheme Smallholder) update on 2 January 2021, consist of:</p> <ol style="list-style-type: none"> <li>1. Biodiversity monitoring</li> <li>2. Signboard maintenance</li> <li>3. Socialization of HCV area</li> <li>4. Riparian protection</li> </ol> <p>Prohibiting chemical application in riparian zone/river border</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p>	<p>HCV and wildlife/animal monitoring continuously conducted in a regular basis. Secondary monitoring conducted each month and primary monitoring conducted twice a year.</p> <p>Monitoring of animal/wildlife performed by HCV/Sustainability officer and field workers, result of monitoring presented in "laporan pemantauan Jenis satwa/tumbuhan".</p> <p>Report of Management and Monitoring for HCV and RTEs is reported every 6 months and review is conducted regularly to ensure that monitoring is effective. Reports period semester I &amp; II year 2020 can be demonstrated. Results of monitoring was evaluated using trend evaluation. Monitoring RTE species in January – December 2020 observed type of mammal and two species was protected by law such as Macan akar (<i>Felis bengalensis</i>); 42 species of Aves (bird) and 7 species was protected such as Alap-alap kawah (<i>Falco feregrinus</i>), Burung madu kelapa (<i>Anthreptes malaccensis</i>), Kipasan belang (<i>Rhipidura javanica</i>), Cekakak sungai (<i>Tordirhampus chloris</i>); 6 species of Herpetofauna such as Biawak (<i>varanus salvator</i>), Kodok buduk (<i>Bufo asper</i>).</p> <p>Result of monitoring gives the feedback into the management plan improvement. The results from monitoring of wildlife, environmental, and socio-cultural services gives feedback advice and recommendations to the management plan.</p>	Not Applicable
7.12.8	<p><b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-</p>	<p>PT Inti Indosawit Subur – Ukui Group Certification unit and supply bases (including smallholder) did not carry out any new plantings after November 2005. The planting</p>	Not Applicable

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	HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.	year started in 1987, 1988, 1989, and the company has starts replanting in 2015 – 2018. Therefore, the requirement of this indicator is not applicable.	
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**Appendix B: Approved Time Bound Plan**

PT INTI INDOSAWIT SUBUR  
 RSPO Membership Number : 1-0022-08-000-00  
 Latest Update : 1 July 2021

Name of Mill	Mill Address	Name of Supply Base Plantation	Estate Address	Time bound for certification	Status
Buatan I Mill	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Buatan Estate	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		Certified on 16 September 2010 Re-Certified on 16 September 2015
		Buatan (Plasma)	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		
Buatan II Mill	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Simpang Perak Estate*	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		Certified on 16 September 2010 Re-Certified on 16 September 2015  *Split From Buatan Estate Since 1 January 2019
		Buatan (Plasma)	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		
Ukui I Mill	Ukui Village, Ukui District, Pelalawan Regency, Riau	Ukui Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau		Certified on 1 March 2011 Re-Certified on 1 March 2016  *Split From Ukui & Soga Estate Since 1 January 2019
		Sei Lala Estate*	Ukui Village, Ukui District, Pelalawan Regency, Riau		
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau		
Ukui II Mill	Ukui Village, Ukui District, Pelalawan Regency, Riau	Soga Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau		Certified on 1 March 2011 Re-Certified on 1 March 2016
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau		
Tungkal Ulu Mill	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Tungkal Ulu Estate	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi		Certified on 15 August 2012 Re-Certification on August 2017
		Tungkal Ulu (Plasma)	Renah Mendalo, Merlung, Muara Papalik District, Tanjung Jabung Barat Regency, Jambi		
Muara Bulian Mill	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pelayung District, Batang Hari Regency,	Muara Bulian Estate	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pelayung District, Batang Hari Regency, Jambi		Certified on 28 August 2012 Re-Certification on August 2017

Representative : Ivan Novrizaldie

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PT INTI INDOSAWIT SUBUR  
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 Latest Update : 1 July 2021

Name of Mill	Mill Address	Name of Supply Base Plantation	Estate Address	Time bound for certification	Status
	Jambi	Muara Bulian (Plasma)	Maro Sebo Ilir District, Batanghari Regency, Jambi		Certified on 12 July 2013 Re-Certification on August 2017
Topaz Mill	Petapahan Village, Tapung District, Kampar Regency, Riau	Topaz Estate	Petapahan Village, Tapung District, Kampar Regency, Riau		Certified on 30 March 2015
Taman Raja Mill	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Taman Raja, Badang & Bernai Estate*	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi		Certified on 20 February 2015 *Bernai Estate Split From Taman Raja & Badang Estate Since 1 January 2019
Segati Mill	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	Segati Estate	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	Main Audit in 2014	NPP & RaCP is still in Progress Re-Audit 2022 (Waiting for Concept Note)
		Gondai Estate	Pangkalan Sarik / Baru Village, Langgam / Siak Hulu District, Pelalawan / Kampar Regency, Riau	Main Audit in 2014	NPP & RaCP is still in Progress Re-Audit 2022 (Waiting for Concept Note)
Penarikan Mill	Penarikan Village, Langgam District, Pelalawan Regency, Riau	Penarikan Estate*	Penarikan / Tambak Village, Langgam District, Pelalawan Regency, Riau	*Main Audit in 2014	NPP & RaCP is still in Progress Re-Audit 2022 (Waiting for Concept Note)
Tanah Datar Mill	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	Tanah Datar Estate	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera		Certified on 18 May 2015
		Bahilang Estate	Bahilang Village, Tebing Tinggi District, Serdang Bedagai Regency, North Sumatera	2022	*Bahilang Estate On Process RaCP (Recertification 2020)
Aek Nabara Mill	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera	Aek Nabara Estate	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera		Certified on 6 March 2015
Teluk Panjie Mill	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera	Teluk Panjie Estate (3,885 Ha)	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera		Certified on 21 April 2015
		Teluk Panjie Estate (801 Ha)		2022	HGU is still in Process
Peranap Mill	Simelinyang / Pauh Ranap / Sengkilo	Peranap Estate	Simelinyang / Pauh Ranap / Sengkilo		Certified on 7 January 2015

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Name of Mill	Mill Address	Name of Supply Base Plantation	Estate Address	Time bound for certification	Status
	Village, Peranap District, Indragiri Hulu Regency, Riau		Village, Peranap District, Indragiri Hulu Regency, Riau		
		Peranap (Plasma)	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau		Certified on 18 August 2016
Bungo Tebo Mill	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	Bungo Tebo Estate	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi		Certified on 3 December 2015
		Bungo Tebo (Plasma)	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi		Certified on 7 February 2017
Tanjung Selamat Mill	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Tanjung Selamat	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra		Certified on 26 May 2015
		Pangkalan	Sennah Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra		Certified on 26 May 2015
Gunung Melayu I	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	Pulau Maria Estate	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra		Certified on 7 September 2015
Gunung Melayu II	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatra	Aek Tarum & Batu Anam Estate	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatra		Certified on 8 July 2015
		Sentral Estate	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatra	2022	*Sentral Estate On Process RaCP (Recertification 2020)
Negri Lama II	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Negri Lama	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra		- Certified on 23 December 2016 as Independent Mill
		Aek Kuo (2,088 Ha)	Aek Korsik Village, Aek Natas District, Labuhan Batu Regency, North Sumatra		- Audit in 2016 as Mill and Supply Base
		Aek Kuo (501 Ha)			HGU Complete Audit at ASA 3 (2018)
Negri Lama I	Negri Lama Seberang Village, Bilah Hilir District,	*3 <sup>rd</sup> party which is excluded from scope of	Negri Lama Seberang Village, Bilah Hilir District, Labuhan		- Certified on 8 April 2015 - Audit in 2016

Representative : Ivan Novrizaldie

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 Latest Update : 1 July 2021

Name of Mill	Mill Address	Name of Supply Base Plantation	Estate Address	Time bound for certification	Status
	Labuhan Batu Regency, North Sumatra	certification	Batu Regency, North Sumatra		as Independent Mill

**Appendix C: GHG Reporting Executive Summary**

The GHG emissions that were produced in **2020** for **Ukui II Palm Oil Mill** and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2020** for **Ukui II Palm Oil Mill** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	0.58
PKO	0.58

Extraction	%
OER	21.26
KER	5.59

Production	t/yr
FFB Process	283,440
CPO Produced	60,267
PKO Produced	15,841

Land Use	Ha
OP Planted Area	11,698
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	92.29
<b>Total</b>	

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CO <sub>2</sub> Emission from fertilizer	1,813.79	0.01	1,862.16	0.33	0.00	0.00	3,675.95	
NO <sub>2</sub> Emission from fertilizer	2,689.85	0.02	3,041.68	0.02	0.00	0.00	5,731.52	
Fuel Consumption	1,095.34	0.01	841.31	0.01	0.00	0.00	1,936.65	
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Sink</b>								
Crop Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00



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Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>5,598.98</b>	<b>0.04</b>	<b>5,745.14</b>	<b>0.04</b>	<b>0.00</b>	<b>0.00</b>	<b>11,344.12</b>	

*\*Note: Includes both estates and smallholders*

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	46,182.36	0.16
Fuel Consumption	336.82	0.00
Grid Electricity Utilization	152.27	0.00
<b>Credit</b>		
Export of Grid Electricity	-164.97	0.00
Sales of PKS	-13,453	-0.05
Sales of EFB	0.00	0.11
<b>Total</b>	<b>33,053.47</b>	<b>0.11</b>

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

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

\*This mill has no kernel crusher operation.

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

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

**Appendix D: Supply Chain Declaration**

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply bases (mt)</b>	<b>Volume of FFB from uncertified supply bases (mt)</b>	<b>Total FFB/Month (mt)</b>
1	Dec 2019	21,624.49	0	21,624.49
2	Jan 2020	20,277.17	0	20,277.17
3	Feb 2020	19,940.68	0	19,940.68
4	Mar 2020	19,473.13	0	19,473.13
5	Apr 2020	21,060.48	0	21,060.48
6	May 2020	22,618.43	0	22,618.43
7	Jun 2020	24,011.59	0	24,011.59
8	Jul 2020	23,757.44	0	23,757.44
9	Aug 2020	27,164.52	0	27,164.52
10	Sept 2020	26,555.26	0	26,555.26
11	Oct 2020	21,773.32	0	21,773.32
12	Nov 2020	25,461.50	0	25,461.50
13	Dec 2020	22,851.78	0	22,851.78
14	Jan 2021	21,787.39	0	21,787.39
15	Feb 2021	16,943.24	0	16,943.24
<b>Total</b>		<b>335,300.42</b>		<b>335,300.42</b>

**Note:** Ukui II POM Implementing Supply Chain Models IP

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (mt)</b>	<b>Certified PK (mt)</b>
1	Dec 2019	4,633.55	1,230.04
2	Jan 2020	4,336.54	1,135.86
3	Feb 2020	4,302.07	1,119.38
4	Mar 2020	4,212.37	1,091.81
5	Apr 2020	4,461.51	1,098.39
6	May 2020	4,771.07	1,246.11
7	Jun 2020	5,034.97	1,270.50
8	Jul 2020	5,006.27	1,223.58
9	Aug 2020	5,718.91	1,438.31

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10	Sept 2020	5,410.68	1,451.20
11	Oct 2020	4,609.32	1,214.15
12	Nov 2020	5,419.24	1,422.42
13	Dec 2020	4,885.22	1,286.25
14	Jan 2021	4,423.58	1,213.40
15	Feb 2021	3,622.13	946.01
<b>Total</b>		<b>70,847.43</b>	<b>18,387.41</b>
<b>Note:</b>			

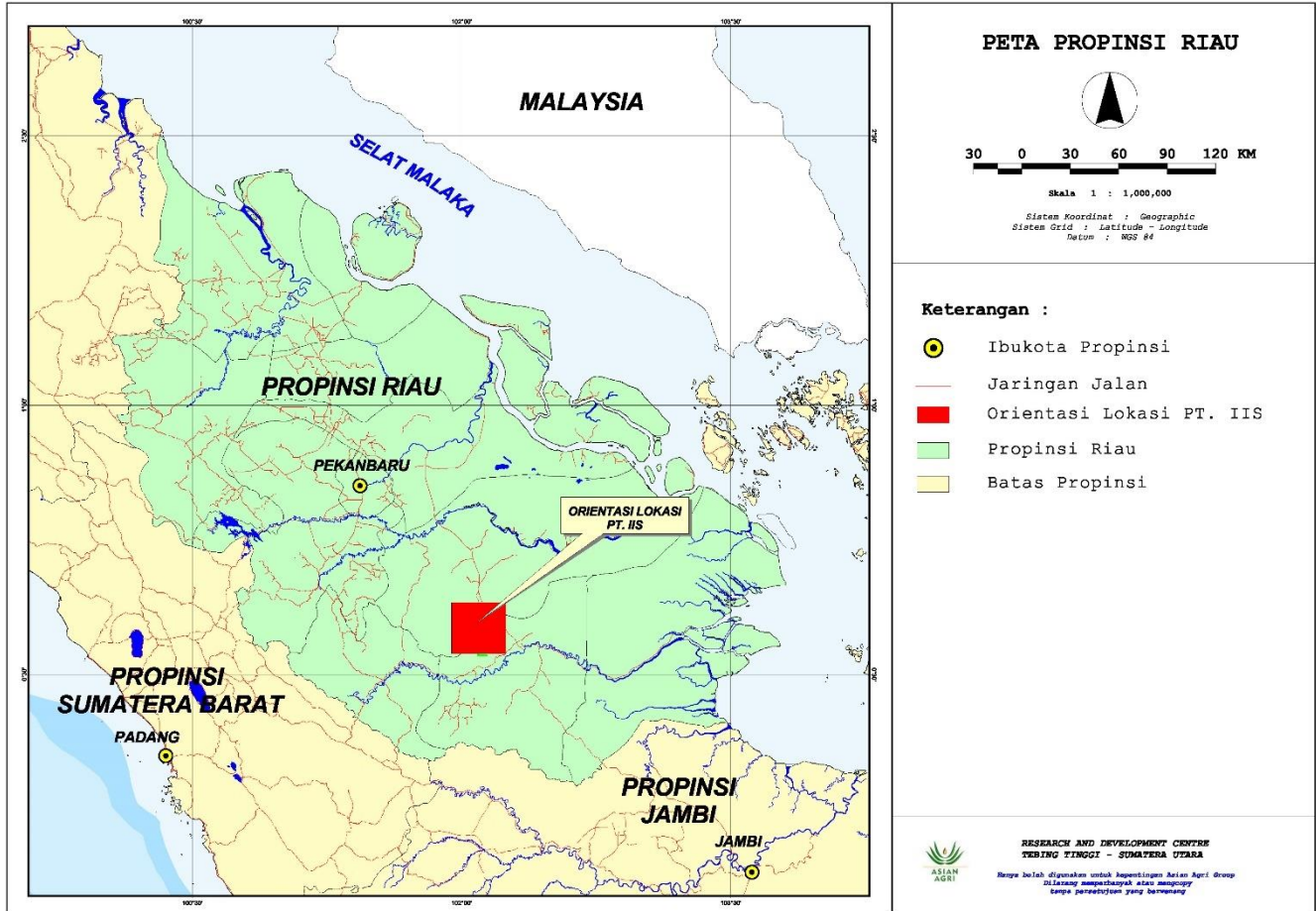
<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace since the last audit (if any)</b>				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	PT SDS	RSPO_PO1000006430	69,936.57	-
2	PT IIS – Ukui I KCP	RSPO_PO1000002491	-	18,325.84
<b>Total</b>			<b>69,936.57</b>	<b>18,325.84</b>
<b>Note:</b>				

<b>D. Records of CPO &amp; PK Sold under other schemes since the last audit (if any)</b>				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
	Nil	Nil	Nil	Nil
<b>Note:</b>				

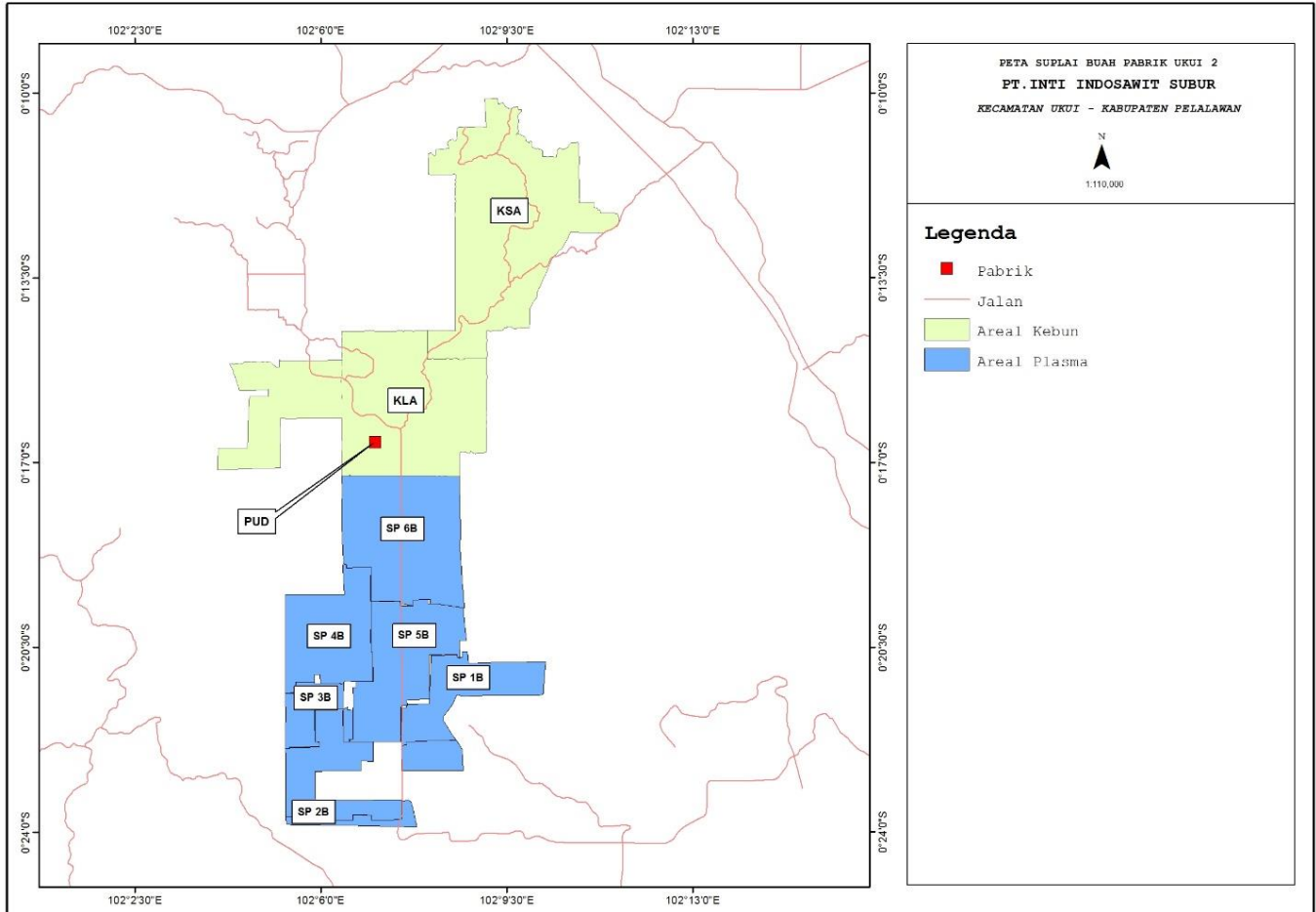
<b>E. Records of CPO &amp; PK Sold as conventional since the last audit (if any)</b>			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
	Nil	Nil	Nil
<b>Note:</b>			

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

**Appendix E: Location Map of Certification Unit and Supply bases**



**Appendix F: Estate Field Map**



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**Appendix G: List of Smallholder Sampled**

Name of KUD	Location	Smallholder Name	ID number	Certified area/Planted area (ha)	Date of Joining
KUD Usaha Tani	Air Putih Village, Lubuk Batu Jaya Sub-district, Indragiri Hulu Regency, Riau Province	Cari/Keri	2848	2.00	1989
		Darwin Gurusinga	2847	2.00	1989
		Basir	2845	2.00	1989
		Yusuf Gurusinga	2837	2.00	1989
		Junedi/Dini Yulianti	2834	2.00	1989
		Sarta	3352	2.00	1989
		Kodir	3353	2.00	1989
		Marzuki	3350	2.00	1989
		Supardi	3351	2.00	1989
		Supryo	3349	2.00	1989
		Prasetio Budi	2849	2.00	1989
		Samuri	2850	2.00	1989
		Anshori	2851	2.00	1989
		Zajup	2905	2.00	1989
		Santoso	3384	2.00	1989
		Batari	3431	2.00	1989
		Sapei	3387	2.00	1989
		Salam	3383	2.00	1989
Ujum	3385	2.00	1989		
Amar	3386	2.00	1989		
KUD Karya Tani	Sei Beras-Beras Village, Lubuk Batu Jaya Sub-District, Indragiri Hulu Regency, Riau Province.	Bingan	5995	2.00	1991
		Rakimun	5996	2.00	1991
		Suyanto	6006	2.00	1991
		Warigo	5994	2.00	1991
		Ariyanto	6008	2.00	1991
		Paiman	6009	2.00	1991
		Saikun	5992	2.00	1991

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		Tuino	6007	2.00	1991
		Kromo Utomo	6018	2.00	1991
		Riyanto	5982	2.00	1991
		Sriyono	5983	2.00	1991
		Supandi	5937	2.00	1991
		Dalmin	5979	2.00	1991
		Dwi Priyanto	5980	2.00	1991
		Richa Novais	6021	2.00	1991
		Sutaryo	5938	2.00	1991
KUD Tani Bahagia	Kulim Jaya Village, Lubuk Batu Jaya Sub District, Indragiri Hulu regency, Riau Province	Atang.T	4366	2.00	1990
		Subariadi	4365	2.00	1990
		Bambang	4364	2.00	1990
		Sarimin	4386	2.00	1990
		Senen	4387	2.00	1990
		Rohman	4382	2.00	1989
		Suratmin	4383	2.00	1989
		Kosasih	4384	2.00	1989
		Adeh Mahli	4385	2.00	1989
		Daroji	4628	2.00	1990
		Parno	4629	2.00	1990
		Mukhlash	4634	2.00	1990
		Rahwat	4635	2.00	1990
		Parno	4416	2.00	1990
		Parsan	4414	2.00	1990
		Arifin	4446	2.00	1990
Samsu	4447	2.00	1990		
Parwoto	4448	2.00	1990		

**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
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
KUD	Koperasi Unit Desa (Village Unit Cooperative)
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
PT IIS	PT Inti Indosawit Subur
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