

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (ASA1_3 & 1_4)
- Recertification Assessment (Choose an item.)
- Extension of Scope

Client Company name (Parent Company): PT Inti Indosawit Subur
Client company Address: Jl. MH. Thamrin No 31 Jakarta 10230, Indonesia
Certification Unit: PT Inti Indosawit Subur – Muara Bulian Palm Oil Mill Location of Certification Unit: Singoan Village, Bukit Sari Village, Bulian Jaya Village, Maro Sebo Ilir District, Batanghari Regency, Jambi Province, Indonesia
Date of Final Report: 10/03/2022

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Section 1: Scope of the Certification Assessment

1. Company Details			
Parent Company	PT. Inti Indosawit Subur		
RSPO Membership Number	1-0022-06-000-00	Membership Approval Date	6/02/2006
Address	Jl. MH. Thamrin No 31 Jakarta 10230, Indonesia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT Inti Indosawit Subur – Muara Bulian Palm Oil Mill		
Location / Address	Singoan Village, Bukit Sari Village, Bulian Jaya Village, Maro Sebo Ilir District, Batanghari Regency, Jambi Province, Indonesia		
Website	www.asianagri.com		
Management Representative	Mr. Putu Ghrayte Yonata Aksa	E-mail	Putu_Aksa@asianagri.com
Telephone	021 2301119	Facsimile	021 2301120

2. Certification Information			
Certificate Number	RSPO 594418	Date of First Certification	28/08/2012
		Certificate Start Date	28/08/2017
		Certificate Expiry Date	27/08/2022
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	<ul style="list-style-type: none"> To conduct onsite audit as a continuation of previous remote audit for Surveillance assessment. The audit is a combined ASA1_3 and ASA1_4 with increased 50% in sampling. Determination of the conformity and consistency of Muara Bulian POM and its supply bases with RSPO Principle and Criteria. Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input type="checkbox"/> Recertification Assessment (Choose an item.) <input checked="" type="checkbox"/> Annual Surveillance Assessment (RA 1 ; ASA3 & ASA 4) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 202 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		

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Supply Chain Module	<input type="checkbox"/> Identity Preserved <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	60 MT/Hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
ID05/65250	ISO 14001:2015	SGS	10 June 2023
EU-ISCC-Cert-DE100-01647121	ISCC	SGS	31 Aug 2022
SGS-ID-ISPO-0032	ISPO	SGS	20 Mar 2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Muara Bulian POM	Bulian Jaya Village, Maro Sebo Ilir District, Batang Hari Regency, Jambi Province - Indonesia	1° 35' 9.65" S	103° 12' 9.76" E
Muara Bulian Estate	Bulian Jaya Village, Maro Sebo Ilir District, Batang Hari Regency, Jambi Province - Indonesia	1° 34' 49" S	103° 11' 43" E
KUD Barokah (Smallholder Scheme) (615 members)	Karya Mukti Village, Maro Sebo Ilir District, Batang Hari Regency, Jambi Province - Indonesia	1° 32' 12" S	103° 11' 20" E
KUD Subur Makmur (560 members)	Tidar Kuranji Village, Maro Sebo Ilir District, Batang Hari Regency, Jambi Province - Indonesia	1° 34' 41" S	103° 7' 26" E
KUD Budi Sari (445 members)	Bukit Sari Village, Maro Sebo Ilir District, Batang Hari Regency, Jambi Province - Indonesia	1° 32' 43" S	103° 12' 37" E
KUD Makmur Rejeki (360 members)	Bulian Jaya Village, Maro Sebo Ilir District, Batang Hari Regency, Jambi Province - Indonesia	1° 35' 20" S	103° 12' 06" E
KUD Karya Lestari (350 members)	Kehidupan Baru Village, Maro Sebo Ilir District, Batang Hari Regency, Jambi Province – Indonesia	1° 37' 2" S	103° 6' 24" E
KUD Tuah Sakato (1001 members)	Danau Embat Village, Maro Sebo Ilir District, Batang Hari Regency, Jambi Province - Indonesia	1° 40' 11" S	103° 9' 15" E
Note:			

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate/ Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Muara Bulian Estate	1,643	104.18	108.82	1,856	88.53
KUD Barokah	1,240	-	-	1,240	100
KUD Subur Makmur	1,130	-	-	1,130	100
KUD Budi Sari	900	-	-	900	100
KUD Makmur Rejeki	730	-	-	730	100
KUD Karya Lestari	710	-	-	710	100
KUD Buah Sakato	2,248	-	-	2,248	100
Total	8,601	104.18	108.82	8,814	97.58
Note:					

6. Plantings & Cycle							
Estate/ Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Muara Bulian Estate	1,341	302	-	-	-	302	1,341
KUD Barokah	-	-	-	1,240	-	1,240	-
KUD Subur Makmur	-	-	-	1,130	-	1,130	-
KUD Budi Sari	-	-	-	900	-	900	-
KUD Makmur Rejeki	-	-	-	182	548	730	-
KUD Karya Lestari	-	-	-	710	-	710	-
KUD Buah Sakato	-	-	2,248	-	-	2,248	-
Total (ha)	1,341	302	2,248	4,162	548	7,260	1,341
Note:							

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7. Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage / year			
	Estimated (mt) (August 2019 – January 2022)	Actual (mt) (May 2019 - August 2021)		Forecast (mt) (Aug 2021-July 2022)
		Previous license period (May 2019 – July 2020) 15 months	Current license period (Aug 2020 – Aug 2021) 12 months	
Muara Bulian Estate	12,453	11,761	24,793	33,468
KUD Barokah	22,008	20,696	12,944	12,372
KUD Subur Makmur	24,600	26,377	26,648	22,341
KUD Budi Sari	13,250	11,283	6,112	6,659
KUD Makmur Rejeki	6,806	10,639	8,971	9,045
KUD Karya Lestari	14,521	13,498	11,773	12,754
KUD Buah Sakato	35,642	34,938	35,889	36,181
Sub Total	129,280	256,321		132,820
Extension volume	136,795			
Total	266,075			
Note:				

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage / year			
	Estimated (mt) (August 2019 – Jan 2022)	Actual (mt) (May 2019 - Aug 2021)		Forecast (mt) (Aug 2021-July 2022)
		Previous license period (May 2019 – July 2020)	Current license period (Aug 2020 – Aug 2021)	
		Nil		
Total		N/A		
Note:				

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9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage / year			
	Estimated (mt) (August 2019 – Jan 2022)	Actual (mt) (May 2019 - Aug 2021)		Forecast (mt) (Aug 2021-July 2022)
		Previous license period (May 2019 – July 2020)	Current license period (Aug 2020 – Aug 2021)	
Third party supplier	-	137,359	189,021	-
Total	N/A	326,380		N/A

Note:

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
2019				
1	May	9,929.09	6,389.00	16,318.09
2	Jun	8,734.29	7,334.82	16,069.10
3	Jul	9,840.27	9,875.94	19,716.20
4	Augu	9,303.22	9,371.70	18,674.91
5	Sept	10,045.81	10,110.73	20,156.54
6	Oct	10,528.71	11,582.61	22,111.32
7	Nov	10,448.75	11,190.00	21,638.75
8	Dec	8,788.64	9,996.66	18,785.30
2020				
9	Jan	8,496.65	9,281.39	17,778.04
10	Feb	7,657.23	8,940.61	16,597.85
11	Mar	7,190.36	9,177.59	16,367.95
12	Apr	8,164.80	9,414.10	17,578.90
13	May	8,004.10	8,726.39	16,730.49
14	Jun	8,631.98	8,610.25	17,242.23
15	Jul	3,428.08	7,356.80	10,784.88
16	Aug	5,251.82	10,379.70	15,631.51
17	Sep	9,797.76	17,140.43	26,938.19
18	Oct	11,796.43	18,966.39	30,762.82
19	Nov	11,452.99	17,310.22	28,763.20

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20	Dec	10,751.50	17,353.45	28,104.95
2021				
21	Jan	8,916.14	14,553.60	23,469.74
22	Feb	8,492.96	12,994.55	21,487.50
23	Mar	9,868.89	14,305.11	24,173.99
24	Apr	10,193.93	14,355.73	24,549.66
25	May	9,228.67	13,566.91	22,795.58
16	Jun	10,390.62	13,529.50	23,920.12
27	Jul	10,137.01	12,677.64	22,814.65
28	Aug	10,850.30	11,888.23	22,738.53
TOTAL		256,321.00	326,380.05	582,700.99
Note:				

10. Summary of Certified Tonnage (not applicable for ISS)			
Estimated (mt) (August 2019 – Jan 2022)	Actual (mt) (May 2019 - Aug 2021)		Forecast (mt) (Aug 2021-July 2022)
	<i>Previous license period</i> (May 2019 – July 2020)	<i>Current license period</i> (Aug 2020 – Aug 2021)	
FFB	FFB		FFB
266,075.10*	129,192	127,129	132,820
	256,321		
CPO (OER: 20.49%)	CPO (OER: 20.48%)		CPO (OER: 19.95%)
54,526*	27,181	25,321	26,496
	52,502		
PK (KER: 5.38%)	PK (KER: 5.33%)		PK (KER: 5.30%)
14,320*	7,095	6,580	7,039
	13,675		
Note:			
* includes 136,795mt FFB volume extension; 27,533mt CPO volume extension; 7,299mt PK volume extension			

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
2019			
1	May	2,043.64	543.90

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2	Jun	1,771.61	459.87
3	Jul	2,018.97	516.33
4	August	1,948.24	489.47
5	Sept	2,111.12	542.01
6	Oct	2,217.46	588.75
7	Nov	2,241.78	581.48
8	Dec	1,949.20	473.68
2020			
9	Jan	1,874.41	466.56
10	Feb	1,680.97	438.55
11	Mar	1,546.09	421.24
12	Apr	1,693.43	471.51
13	May	1,646.23	442.79
14	Jun	1,759.79	476.05
15	Jul	678.39	182.43
16	Aug	1,024.09	277.13
17	Sep	1,918.88	505.33
18	Oct	2,338.75	616.18
19	Nov	2,281.06	602.79
20	Dec	2,156.55	563.70
2021			
21	Jan	1,752.76	463.25
22	Feb	1,704.59	426.39
23	Mar	1,969.15	532.97
24	Apr	2,039.98	548.12
25	May	1,805.06	451.46
26	Jun	2,114.08	483.58
27	Jul	1,974.84	533.33
28	Aug	2,240.90	576.17
TOTAL		52,502	13,675
Note:			

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11. Summary of Actual Volume sold					
Current License period (Aug 2020 – Aug 2021)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	23,765.97	1,802.67	0	0	25,568.64
PK (MT)	6,324.71	0	0	0	6,324.71
Credits	-	-	-	-	-
Previous License period (May 2019 – July 2020)					
CPO (MT)	0	26,770.47	0	0	26,770.47
PK (MT)	7,320.79	0	0	0	7,320.79
Credits	-	-	-	-	-

Note: Conventional is RSPO certified material but sold as non-RSPO.

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	PT Inti Indosawit Subur – KCP Tungkal Ulu		-	4,535.35
2	PT Dasa Anugrah Sejati – KCP Taman Raja		-	9,110.15
3	PT Sari Dumai Sejati		22,775.86	-
4	AAA Oils & Fats Pte Ltd		990.11	-
TOTAL			23,765.97	13,645.50

Note:

11B. Records of CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	PT Sari Dumai Sejati	ISCC	28,573.14	-
TOTAL			28,573.14	

Note:

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

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

12. Independent Smallholders Certified Tonnage / Volume									
Phase	Estimated last year (N/A)			Actual (N/A)			Forecast (N/A)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	

13. Independent Smallholders Actual Sold Tonnage / Volume						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
Current License period (N/A)						
Credits				N/A	N/A	N/A
Physical	N/A	N/A	N/A			

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
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BSI is a leading global provider of management systems assessment and certification, with more than 84,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **30 August – 7 September 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 24th March 2020. The remote audit was conducted on **8-10 July 2020**. The audit is a combined ASA1.3 and ASA1.4 with increased 50% in sampling.

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

The Critical NC close out assessment was conducted on 4 December 2021. The audit programs are included in Section 2.3.

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

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

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

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

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of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (RAV)	Year 2 (ASA1_1)	Year 3 (ASA1_2)	Year 4 (ASA1_3)	Year 5 (ASA1_4)
Muara Bulian POM	√	√	√	√	√
Muara Bulian Estate	√	√	√	√	√
KUD Barokah		√		√	
KUD Subur Makmur	√		√		√
KUD Budi Sari		√		√	
KUD Makmur Rejeki	√		√		√
KUD Karya Lestari		√		√	
KUD Tuah Sakato	√		√		√

Tentative Date of Next Visit: August 8, 2022 - August 16, 2022

Total No. of Mandays: 29

2.2 BSI Assessment Team:

Name	Role	Competency
Mujinius Jalaraya	Team Leader	<p>Education: Holds a Bachelor Degree from Bogor Agricultural University (IPB), Majoring in Forest Resources Conservation and Ecotourism.</p> <p>Work Experience: 6 years working experience in palm oil plantations as SHE Assistant at PT. Astra Agro Lestari Tbk and Sustainability Supervisor at Teladan Prima Group. 8 years working experience as RSPO Auditor / Lead Auditor.</p> <p>Training attended: Completed ISO 9001 Lead Auditor course, ISPO Lead Auditor course, RSPO endorsed RSPO P&C Lead Auditor course, RSPO endorsed RSPO SCCS Lead Auditor course, HCV Identification and management, ISO 14001 Internal Auditor Training, ISO 45001 Lead Auditor course, OHS Expert Training, SMETA Requirements Training</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of HCV management and monitoring, supply chain for mill, partial certification and timebound plan.</p> <p>Language proficiency: He is fluent in English and Bahasa Indonesia.</p>
Andi Pratama Pasaribu	Team member	<p>Education: Holds a Bachelor Degree from Universitas Jember, majoring Social Economy.</p> <p>Work Experience: 5 years working experience as Field Agronomy Assisstant. 8 years working experience as RSPO Auditor / Lead Auditor.</p> <p>Training attended: Completed Indonesian Sustainable Palm Oil (ISPO) Lead Auditor training, RSPO endorsed RSPO P&C Lead Auditor course, High Conservation Value (HCV) Training, ISO 9001:2008 Lead Auditor course, ISO 14001:2005 Lead Auditor course , auditor OHSAS, RSPO endorsed RSPO SCCS Lead Auditor course, SMETA requirements training</p> <p>Aspect covered in this audit: During this audit, he verify legal aspect and best management practices aspect for mill and estate.</p> <p>Language proficiency: He is fluent in English and Bahasa Indonesia.</p>
Imam Fachrurozi	Team member	<p>Education: Holds a Bachelor Degree from Gadjah Mada University majoring in Agriculture Technology.</p> <p>Work Experience: 2 years working experience oil palm industry, as a sustainability and HSE officer. 7 years working experience as RSPO Auditor / Lead Auditor</p> <p>Training attended: Completed ISO 9001:2008 Lead Auditor Course, 14001:2004 Lead Auditor Course, SMK3 Lead Auditor Course, RSPO endorsed RSPO P&C Lead auditor course, ISO 45001:2018 Lead Auditor Course, SMETA requirements training, High Conservation Value (HCV) Training</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of OHS and Environmental management and monitoring.</p> <p>Language proficiency: He is fluent in English and Bahasa Indonesia.</p>
Nanang Mualib	Team member	<p>Education: Holds a Bachelor Degree of Forestry from Bogor Agricultural University (IPB)</p>

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		<p>Work Experience: 4 years working experience with Forestry Department, 2 years working experience with WWF for sustainable forest management and 17 years working experience as RSPO auditor.</p> <p>Training attended: Completed the ISO 9001 Lead Auditor Course, Technical Training of HCV Assessment; ISPO Lead Auditor endorsed Course, RSPO endorsed RSPO P&C Lead auditor course, SMETA Requirements training</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of social and stakeholder consultation.</p> <p>Language proficiency: He is fluent in English and Bahasa Indonesia.</p>
Nanang Rusmana	Team member	<p>Education: Holds a Bachelor Degree of Forestry from Bogor Agricultural University (IPB)</p> <p>Work Experience: 5 years working experience in palm oil industry as SHE Assistant at PT. Astra Agro Lestari Tbk. 3 years working experience in mining industry as Environment Coordinator and SHE Coordinator with PT. Kapuas Prima Coal Group. 6 years working experience as RSPO/ISPO auditor</p> <p>Training attended: Completed ISO 9001:2015 Lead Auditor Course, ISPO Auditor Course, ISO 14001:2015 Lead Auditor Course, ISO 45001:2018 Lead Auditor Course, RSPO endorsed RSPO P&C Lead Auditor Course, RSPO endorsed RSPO Supply Chain Certification Lead Auditor Course, SMK3 Auditor Course, HCV Assessor Course, General OHS Expert Course, SMETA Requirements training.</p> <p>Aspect covered in this audit: During this assessment he assessed on the aspects of transparency, company policy, social and labor.</p> <p>Language proficiency: He is fluent in English and Bahasa Indonesia.</p>
Yudwi Wisnu Rahmanto	Team Leader (Remote Audit)	<p>Education: Holds a Bachelor of Forestry with Silviculture background.</p> <p>Work Experience: 7 months working experience in palm oil industry as Agronomy Field Assistant. 11 years working experience as sustainability auditor covering Sustainable Forest Management by FSC FM/COC Scheme, RSPO, ISPO, Coffee And Farmer Equity (C.A.F.E Practices) Starbucks, Organic Standard (EU, NOP, JAS) for Coffee Farmers and Organic Exchange for Textile</p> <p>Training attended: Completed RSPO Endorsed RSPO P&C Lead Auditor Training Course, RSPO NEXT, ISPO Auditor/Lead Auditor Course, SMETA Requirements Training, ISO 9001:2008 Auditor/Lead Auditor Course, GIS-Basic Mapping and Spatial Analysis, Timber Legality Assurance System (SVLK), Verification Organization Training C.A.F.E Practices (Starbucks), UTZ Programme, High Conservation Value (HCV) Training</p> <p>Aspect covered in this audit: During remote audit assessment (ASA1_3), he verify aspects of Legal, Social, Dispute and Policies.</p> <p>Language proficiency: He is fluent in English and Bahasa Indonesia.</p>
Edy Widodo	Team member (Remote Audit)	<p>Education: Holds a Bachelor Degree from University of Padjadjaran, Bandung majoring Agricultural Technology.</p> <p>Work Experience: 8 years working experience in palm oil industry as Agronomist and Assistant Manager in various companies. 9 year working experience as RSPO/ISPO auditor.</p>

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		<p>Training attended: Completed ISO 9001: 2008 Lead Auditor Course, ISPO endorsed auditor course, Understanding ISO 14001: 2004 training, Auditing ISO 14001: 2004 training, RSPO Endorsed RSPO Supply Chain Certification Lead Auditor Course, RSPO Endorsed RSPO P&C Lead Auditor Course, SMETA Requirements Training, High Conservation Value (HCV) Training</p> <p>Aspect covered in this audit: During remote audit assessment (ASA1_3), he assessed on the aspects of transparency, company policy, social and labor.</p> <p>Language proficiency: He is fluent in English and Bahasa Indonesia.</p>
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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:

Date	Time	Subjects	YR	AP	MJ	EW	ICT Planned
Wednesday, 08/07/2020	08.00 – 08.30	Opening meeting <ul style="list-style-type: none"> Opening Presentation by Audit Team Leader Confirmation of assessment scope, term and condition, document access and finalize of audit plan 	√	√	√	√	Video conference meeting using Zoom link.
	08.30 – 12.00	Verification on related documents and records; Interview with Auditee for Muara Bulian Estate and POM. <ul style="list-style-type: none"> Legal & Land Rights Social and Transparency Environmental, Waste Management & HCV Occupational Health & Safety Best Management Practices Worker Welfare Review of previous assessment findings. 	√	√	√	√	Video conference meeting using Zoom link. Document review using appropriate sharing application Google Drive, agreed by auditor and auditee.
	12.00 – 14.00	Lunch Break	√	√	√	√	
	14.00 – 17.00	Verification on related documents and records; Interview with Auditee for Muara Bulian Estate and POM. (Continued)	√	√	√	√	Video conference meeting using Zoom link. Document review using appropriate sharing application Google Drive, agreed by auditor and auditee.

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Date	Time	Subjects	YR	AP	MJ	EW	ICT Planned
Thursday, 09/07/2020	08.00 – 12.00	Verification on related documents and records; Interview with Auditee for smallholder sample: KUD Barokah; KUD Budi Sari and KUD Karya Lestari. 1. Legal & Land Rights 2. Social and Transparency 3. Environmental, Waste Management & HCV 4. Occupational Health & Safety 5. Best Management Practices 6. Worker Welfare 7. Review of previous assessment findings.	√	√	√	√	Video conference meeting using Zoom link. Document review using appropriate sharing application Google Drive, agreed by auditor and auditee.
	12.00 – 14.00	Break	√	√	√	√	
	14.00 – 17.00	Verification on related documents and records; Interview with Auditee for smallholder sample: KUD Barokah; KUD Budi Sari and KUD Karya Lestari. (Continued)	√	√	√	√	Video conference meeting using Zoom link.
Friday, 10/07/2020	08.00 – 12.00	Verification on related documents and records; Interview with Auditee for smallholder sample: KUD Barokah; KUD Budi Sari and KUD Karya Lestari. (Continued)	√	√	√	√	Video conference meeting using Zoom link.
	12.00 – 14.00	Break	√	√	√	√	
	14.00 – 15.00	Verification on related documents and records; Interview with Auditee for smallholder sample: KUD Barokah; KUD Budi Sari and KUD Karya Lestari. (Continued)	√	√	√	√	Video conference meeting using Zoom link.
	15.00 – 16.00	Preparation for Closing Meeting (Auditor Team)	√	√	√	√	Video conference meeting using Zoom link.
	16.00 – 17.00	Closing Meeting	√	√	√	√	Video conference meeting using Zoom link.

Onsite Assessment Plan:

Date	Time	Subjects	MJ	NR	IF	AP	NM
Monday 30/08/2021	07.00 – 08.20	Flight Jakarta – Jambi	√	√	√	√	
	08.20 – 10.00	Travel from Jakarta – Audit Location	√	√	√	√	
	10.00 – 10.30	Opening Meeting Presentation by PT. IIS – Muara Bulian POM, Estate and Smallholder Presentation by BSI Indonesia	√	√	√	√	
	10.30 – 12.00	Document Review Muara Bulian POM & Estate:	√	√	√	√	

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		<ul style="list-style-type: none"> - Occupational Health and Safety, HCV, Environment Aspect, time bound plan. - Social Aspect and workers welfare, worker consultation, Stakeholder Consultation, impact assessments, policies. - Best Management Practice for Mill and supply chain for mill. - Operation Procedure, organization commitments, Legal compliance, continous improvement, long term business plan. 					
	12.00 – 14.00	Break	√	√	√	√	
	14.00 – 17.00	Continue Document Review for Muara Bulian POM and Estate	√	√	√	√	
Tuesday 31/08/2021	08.00 – 12.00	Document review for Muara Bulian POM & Estate	√	√	√	√	
		Audit RSPO Supply Chain for Muara Bulian POM	√				
	12.00 – 14.00	Break	√	√	√	√	
	14.00 – 17.00	Document review for Muara Bulian POM & Estate Document Review for Scheme Smallholder Cooperative (KUD) document review, management of smallholder, Group Manager, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc.	√	√	√	√	
Wednesday 01/09/2021	08.00 – 12.00	Document Review for Scheme Smallholder: KUD Barokah, KUD Budi Sari Cooperative (KUD) document review, management of smallholder, Group Manager, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc.	√	√	√	√	
	08.00 – 12.00	Stakeholder consultation: Local government of Pelalawan Regency (DLH, Disbun, Dinsakertrans & BPN), Village head, surrounding community, NGO.		√			
	12.00 – 14.00	Break	√	√	√	√	
	12.00 – 17.00	Document Review for Scheme Smallholder: KUD Karya Lestari, KUD Tuah Sakato, KUD Subur Makmur Cooperative (KUD) document review, management of smallholder, Group Manager, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc.	√	√	√	√	
Thursday 02/09/2021	08.00 – 12.00	Continue Document Review for Scheme Smallholder	√	√	√	√	
	12.00 – 14.00	Break	√	√	√	√	
	14.00 – 17.00	Field Visit to Muara Bulian POM: <ul style="list-style-type: none"> - Occupational Health and Safety, Environment Aspect. - Social Aspect and workers welfare, workers interview - Best Management Practice for Mill and supply chain for mill. - Field implementation for Operation Procedure. 	√	√	√	√	
Friday, 03/09/2021	08.00 – 12.00	Field Visit to Scheme Smallholder: KUD Barokah 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. (20 sample)	√	√	√	√	

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	12.00 – 14.00	Break	√	√	√	√	
	14.00 – 17.00	Field Visit to Scheme Smallholder: KUD Budi Sari 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. (20 sample)	√	√	√	√	
Saturday, 04/09/2021	08.00 – 12.00	Field Visit to Scheme Smallholder: KUD Karya Lestari Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. (20 sample)	√	√	√	√	
	12.00 – 14.00	Break	√	√	√	√	
	14.00 – 17.00	Off	√	√	√	√	
Sunday, 05/09/2021		Holiday	√	√	√	√	
Monday, 06/09/2021	08.00 – 12.00	Field Visit to Scheme Smallholder: KUD Tuah Sakato 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. (24 sample)	√	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√	√
	14.00 – 17.00	Field Visit to Scheme Smallholder: KUD Subur Makmur Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. (22 sample)	√	√	√	√	√
Tuesday, 07/09/2021	08.00 – 12.00	Audit continue for Document Review	√	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√	√
	14.00 – 17.00	Audit continue for Document Review	√	√	√	√	√
Wednesday, 08/09/2021	08.00 – 12.00	Audit continue for Document Review	√	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√	√
	14.00 – 15.00	Report preparation	√	√	√	√	√
	15.00 – 17.00	Closing Meeting	√	√	√	√	√

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NCR Closure Assessment Plan

Date	Time	Subjects	MJ
Saturday, 04/12/2021	13.00 – 13.30	Opening meeting	√
	13.30 – 17.00	NCR Follow up Verification	√
	17.00 – 17.30	Closing Meeting	√

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	PT Inti Indosawit Subur has explained the certification plan for all of its subsidiaries; indicating all palm oil mills, company-owned estates and scheme smallholder as the supply base.	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	<p>There is remaining mill and estate that has not certified as below:</p> <ol style="list-style-type: none"> 1. PT Mitra Unggul Pusaka - Segati Palm Oil and its supply bases: Segati Estate & 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 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. 2. Bahilang Estate (PT Nusa Pusaka Kencana/NPK). RaCP still under Process. Certification audit will be planed on 2022. According to email correspondence with 	Complied

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	<p>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>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.</p> <p>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.</p>	
<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"> 1. PT Mitra Unggul Pusaka - Segati Palm Oil and its supply bases: Segati Estate & Gondai Estate; Penarikan Palm Oil Mill and its supply bases: Penarikan Estate located in Pelalawan, Riau. RaCP still under process of concept note review by RSPO. Certification audit will be planned on 2022 2. Bahilang Estate (PT). RaCP still under Process. Certification audit will be planned on 2022. 3. Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planned on 2022. 4. Teluk Panji Estate. HGU has not been obtained and still under process on government side. Certification audit will be planned on 2022. 	<p>Complied</p>

<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>There is 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 Major 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>Un-Certified Units or Holdings</p>		
<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.</p>	<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>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 planned on 2022. Latest updated July 2021, HGU still under process in Badan Pertanahan Nasional.</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall</p>	<p>PT Mitra Unggul Pusaka – Segati Mill, PT NPK Bahilang Estate and Sentral Estate RaCP and</p>	<p>Complied</p>

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<p>comply with the RSPO New Plantings Procedure.</p>	<p>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 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>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>	<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>	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p>	<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>	<p>Complied</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<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 (Indonesian Sustainable Palm Oil) since December 2016.</p>	<p>Complied</p>
<p>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.</p>	<p>PT Mitra Unggul Pusaka – Segati Mill conduct the internal audit each year. Latest internal audit on December 2020. Report of internal audit are available.</p> <p>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.</p> <p>In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p>	<p>Complied</p>

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<p>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?</p>	<p>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.</p>	<p>Complied</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>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.</p>	<p>Complied</p>

3.2 Progress of scheme smallholders and/or outgrowers

<p>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</p>		
<p>Requirement</p>	<p>Remarks</p>	<p>Compliance</p>
<p>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.</p>	<p>Yes, PT Inti Indosawit Subur Group has including 100% the scheme smallholder in their certification.</p>	<p>Complied</p>

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	
		Sei Lala Estate*	Ukui Village, Ukui District, Pelalawan Regency, Riau			*Split From Ukui & Soga Estate Since 1 January 2019
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau			Certified on 1 March 2011 Re-Certified on 1 March 2016
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			Certified on 1 March 2011 Re-Certified on 1 March 2016
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			Certified on 11 July 2013 Re-Certification on August 2017
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
 RSPO Membership Number : 1-0022-06-000-00
 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

Representative : Ivan Novrizaldie

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PT INTI INDOSAWIT SUBUR
 RSP0 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
	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	Sannah 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 rd 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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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
	Labuhan Batu Regency, North Sumatra	certification	Batu Regency, North Sumatra		as Independent Mill

3.3 Details of Nonconformities

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

During remote audit raised 2 Critical nonconformities and during onsite assessment there were 1 Critical nonconformities and 2 Minor nonconformities raised. The PT Inti Indosawit Subur – Muara Bulian 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.

Non-conformity			
NCR Ref #	1928364-202007-M1	Date Issued	10 July 2020
Due Date	9 October 2020	Date of nonconformity Closure	11 September 2020
Clause & Category (Critical / Minor)	RSPO INA NI 2020, Clause 3.4.3 Critical		
Statement of Nonconformity:	Review and updating upon result of analysis surface water quality of Singoan river, related BOD value between Upstream and Downstream did not conducted.		
Requirement Reference:	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.		
Objective Evidence:	Based on Environmental Management and Monitoring Report (Laporan RKL-RPL) period Semester 1-2019 stated "result of monitoring on Singoan river still comply with required threshold". According to Result of Water Quality Analysis by accredited laboratory Sucofindo dated 22 November 2018, BOD result: Upstream: 7.56 mg/L; Downstream: 6.08 mg/L. Result of Water Quality Analysis by accredited laboratory Sucofindo dated 7 June 2019, BOD result: Upstream: 5.05 mg/L; Downstream: 5.30 mg/L. Threshold reference: PP No. 82 Tahun 2001 (BOD River Class 1: 3 mg/L).		
Corrections:	Make a revision to environmental monitoring report on part of analysis against the result of water quality threshold.		
Root Cause Analysis:	<ul style="list-style-type: none"> - Result of environmental monitoring as well as threshold of current environment situation are not inserted on management review agenda. - Conduct the training and awareness to relevant officer concerning to add an excellence analysis within the environmental report and its review. 		
Corrective Actions:	<ul style="list-style-type: none"> - Conduct the training and awareness to relevant officer concerning to add an excellence analysis within the environmental report and its review. - Conduct the monitoring and review on environmental report prior to submit to relevant agency. 		
Assessment Conclusion:	14 August 2020: Corrective action plan from Unit of Certification Muara Bulian POM has been received by auditor team.		

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	<p>11 September 2020</p> <p>During the NCR Close out remote audit, auditor seen the evidence of revision on environmental monitoring report (Laporan Pelaksanaan RKL-RPL Semester 2 Tahun 2019 and Semester 1 Tahun 2020) has been submitted to Environmental Agency of Batanghari Regency on 10 August 2020.</p> <p>Auditor seen that analysis of water quality threshold in the Environmental Monitoring Report has been sufficient. Reference of the water quality during environmental baseline assessment already added as comparison of the current result.</p> <p>According to the corrective action plan made by the client and evidence of correction and clearly explanation provided during NC Close Out remote audit on 11 September 2020, the auditor team decides to Close out this Major NC satisfactorily.</p>
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Non-conformity			
NCR Ref #	1928364-202007-M2	Date Issued	10 July 2020
Due Date	9 October 2020	Date of nonconformity Closure	11 September 2020
Clause & Category (Critical (Major) / Minor)	RSPO INA NI 2020, Clause 6.6.2 Critical		
Statement of Nonconformity:	Unit of Certification (Muara Bulian POM and its supply bases) unable to provide the company procedure and policy related temporary worker (PHL)		
Requirement Reference:	(C) Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.		
Objective Evidence:	<p>Unit of Certification employed temporary workers (Free Labour/PHL and Specified Time Work Agreement/PKWT) on their operation (Mill and Estate). Based on employee database period May 2020, there are 172 temporary worker at Muara Bulian Estate; 23 temporary worker at Muara Bulian Mill and 23 temporary worker at Muara Bulian Smallholders.</p> <p>Unit of Certification has had Procedure of New Employment (SOP No. AA-HR-305.2-R0, dated 1 Feb 2009). This procedure is for receiving new employee in generally. However, specific related for temporary worker as required by P&C RSPO.</p>		
Corrections:	Making coordination with Asian Agri HR team regarding addition of specific mechanism on Employees Recruitment and Appointment procedure, particularly on Specified Time Work Agreement/PKWT. This additional information as supporting annexes of existing procedure (SOP-AA-HR-305-2-RO).		
Root Cause Analysis:	Sustainability Department and HR Department have not coordinated upon the new RSPO P&C 2020 Standard related employment procedure, therefore no evidence can be provided during Re-Certification audit.		

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Corrective Actions:	<ul style="list-style-type: none"> - Will conduct regularly training and awareness regarding the new standard of RSPO P&C 2020 to relevant Department. - Updating several procedure periodically as per necessity.
Assessment Conclusion:	<p>14 August 2020: Corrective action plan from Unit of Certification Muara Bulian POM has been received by auditor team.</p> <p>11 September 2020 Memorandum #14a/ES-KMB/INT/07/2020, dated 1 July 2020 which is signed by Senior Manager, concerning Guidance for Employees Recruitment and Appointment or "Pedoman untuk Penerimaan dan Pengangkatan Karyawan PT. Inti Indosawit Subur - Muara Bulian Group".</p> <p>This memorandum is part of supporting attachment of SOP-AA-HR-305-2-RO, that specific describes on Specified Time Work Agreement/PKWT and Free Labour/PHL. On 25 August 2020, through Internal Memorandum No. 022/ESKMB/ INT/08/2020, Unit of Certification conducting Awareness related to Guidance on Employees Recruitment to all employees Mill, Estate and Smallholders. The Awareness has been conducted on 3 September 2020 and attended by 20 employees.</p> <p>Thereafter, Unit of Certification made evaluation to all employees that planned for appointment as permanently. There are several parameter to be evaluated, such as presence to work, output or work performance, etc. As many of 44 employees are potentially to be appointed as permanent through the HR program. Submission to HR Department will planned on next period (January - April 2021).</p> <p>According to the corrective action plan made by the client and evidence of correction and clearly explanation provided during NC Close Out remote audit on 11 September 2020, the auditor team decides to Closed out this Major NC satisfactorily.</p>

Non-conformity			
NCR Ref #	2108332-202109-M1	Date Issued	8 September 2021
Due Date	7 December 2021	Date of nonconformity Closure	4 December 2021
Clause & Category (Critical (Major) / Minor)	RSPO INA NI 2020, Clause 6.7.3 minor (Escalated to Major NC)		
Statement of Nonconformity:	Based on field visit sampled, the organization has not been able to demonstrate the consistency of PPE usage to cover all potentially hazardous operations.		
Requirement Reference:	(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		
Objective Evidence:	PT Inti Indosawit Subur – Muara Bulian has prepared the procedure of PPE - "SOP Alat Pelindung Diri' No: AA-SOP-OP- 101.3. The procedure stated that the company		

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	<p>has provided adequate and appropriate protective equipment for all workers at place of works, in line with the risk assessment.</p> <p>During field visit to smallholder block at Hamparan 32 – Kavling/Block 31 KUD Tuah Sakato and Hamparan 51 KUD Subur Makmur, auditor team found the FFB transporter who carried out FFB loading activity was not wearing appropriate PPE (safety boot) as per risk assessment.</p>
<p>Corrections:</p>	<ul style="list-style-type: none"> - Provide understanding or awareness again to all KUDs and FFB loaders and transporter regarding the importance of using PPE - Provide PPE shoes to loaders who don't have PPE - Make a joint commitment to plasma/Smallholder FFB loaders and transport drivers to comply with the use of PPE when working
<p>Root Cause Analysis:</p>	<p>Lack of awareness from the FFB loaders and transporter on the importance of using PPE for occupational safety and health, in addition lack of monitoring and supervision by mandor in the field.</p>
<p>Corrective Actions:</p>	<ul style="list-style-type: none"> - Provide understanding or awareness again to all KUDs and loaders about the importance of using PPE - Make a joint commitment to plasma/Smallholder FFB loaders and transport drivers to comply with the use of PPE when working - Monitoring and supervision by mandor in the field during FFB transport
<p>Assessment Conclusion:</p>	<p>During NCR close out verification, sighted the evidence of correction and corrective action plan implementation:</p> <ul style="list-style-type: none"> - Company has conducting socialisation for understanding and awareness to all KUD and FFB loaders and transporter regarding the importance of using PPE on 27 - 28 September 2021. Socialization were attended by KUD official and FFB transporter and loader. Evidence of socialization can be shown during audit such as attendance list. Sample seen for socialization at KUD Budi Sari, KUD Barokah, KUD Makmur Rezeki and Koperasi Tuah Sakato. Interview with sample FFB transporter/loader during audit confirmed that they have socialized regarding the importance of PPE usage during working and their responsible to use PPE accordingly during working. - Company has provide the PPE (Safety helmet and AP Boots Shoes) for FFB transporter and FFB loader. PPE provide during socialisation on 27 – 28 September 2021. Evidence of PPE provision can be demonstrated during audit. Sample of PPE provision can be sighted for KUD Budi Sari, KUD Barokah, KUD Makmur Rezeki and Koperasi Tuah Sakato. - KUD official and head of KUD/Koperasi together with all FFB transporter and loader has made the commitment to comply with the use of PPE during working. The commitment signed by head of KUD, Transporter representative and representative of PT Inti Indosawit Subur – Muara Bulian. Commitment letter are documented in "Berita Acara". Evidence of commitment sighted during verification audit: <ul style="list-style-type: none"> ✓ Berita Acara No. 50/Kop-TS-TS/IX/2021 dated 24 September 2021, Koperasi Tuah Sakato ✓ Berita Acara dated 27/09/2021, KUD Barokah ✓ Berita Acara dated 27/09/2021, KUD Budi Sari

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	<ul style="list-style-type: none"> ✓ Berita Acara No. 10/KUD/MR/IX/2021 dated 24 September 2021, KUD Makmur Rezeki ✓ Berita Acara No. /KUD/SM/IX/2021 dated 24 September 2021, KUD Subur Makmur ✓ Berita Acara No. 17/KUD/KL/IX/2021 dated 24 September 2021, KUD Karya Lestari - KUD/Koperasi with PT Inti Indosawit Subur (through field mandor and head of Kelompok Tani) has program to monitor the PPE usage during working in the field in particular during FFB transport and loading to ensure that PPE use appropriately and accordingly. Monitoring of PPE usage documentation record in "Monitoring Penggunaan APD". Sample seen for PPE usage monitoring implementation: <ul style="list-style-type: none"> ✓ Monitoring Penggunaan APD Koperasi Tuah Sakato: Kelompok Tani 21; dated 21/11/2021; vehicle number BH 8436 BU; driver Amir; FFB loader: Asnawi, Deni; PPE use during working: AP Boot (Ok), Safety helmet (ok); monitor by Head of Kelompok Tani 21 (Koni) ✓ Monitoring Penggunaan APD KUD Barokah: Kelompok Tani 82, dated 02/12/2021; vehicle number: BH 8216 BL, B 9410 TYX, BH 8038 BU; driver Jamal, Amin, Roki; FFB loader: Budi/Adi, Oman/Sudar, Roki/Sudar; PPE use during working: AP Boot (Ok), Safety helmet (ok), monitor by Head of Kelompok Tani 82 (Kuswaji) ✓ Monitoring Penggunaan APD KUD Karya Lestari: Kelompok Tani 65, dated 29/11/2021; vehicle number: BH 8637 AV, BH 8040 BJ, BH 8184 YX; driver Tukiyyat, Agus, Bowo; FFB loader: Hengki/Adi, Yanto/Sobri, Galih; PPE use during working: AP Boot (Ok), Safety helmet (ok), monitor by Head of Kelompok Tani 65. <p>Based on above evidence and information auditor conclude that the correction and corrective action has been satisfactory implemented. The NC has been closed on 4 December 2021.</p>
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Non-conformity			
NCR Ref #	2108332-202109-N1	Date Issued	8 September 2021
Due Date	Next Assessment	Date of nonconformity Closure	-
Clause & Category (Critical (Major) / Minor)	RSPO INA NI 2020, Clause 3.3.2		
Statement of Nonconformity:	Unit of certification has not been able to prove the consistency of procedures implementation.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	<p>According to the VE Report that held on 5 – 12 July 2021, there was a finding related to low evacuation of EFB in mill (finding no 14). According to the action plan of VE visit the mill has evacuated the EFB stacking.</p> <p>During the field visit, auditor found that the EFB station is full and spill over to the ground.</p>		

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Corrections:	Creating a good freight transportation system so that EFB transportation runs smoothly
Root Cause Analysis:	The lack of smooth transportation for FB transportation due to limited transportation units
Corrective Actions:	<ul style="list-style-type: none"> - FFB transport truck is required to transport EFB after unloading FFB at the Mill - Carrying out EFB transportation on Sundays and giving premiums to drivers - Give the premium/compensation to FFB truck from CSV and Plasma/Smallholder truck who carrying EFB
Assessment Conclusion:	The effectiveness of correction and corrective action will be verified in the next assessment.

Non-conformity			
NCR Ref #	2108332-202109-N2	Date Issued	8 September 2021
Due Date	Next Assessment	Date of nonconformity Closure	-
Clause & Category (Critical (Major) / Minor)	RSPO INA NI 2020, Clause 7.3.2		
Statement of Nonconformity:	Certificate holders has not consistent on implementation proper disposal of waste material, according to procedures		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	<p>PT Inti Indosawit Subur – Muara Bulian POM has prepared a procedure to handle hazardous waste titled “Prosedur Penanganan Limbah B3” No. AA-KL06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third-party transporter.</p> <p>However, during field visit at Muara Bulian Estate, the auditor team found some (5 /or 6) used oil drums behind the material warehouse were not placed at temporary storage of hazardous waste.</p>		
Corrections:	<ul style="list-style-type: none"> - Immediately evacuate the used oil drums behind the material warehouse to the temporary licenced hazardous storage - Recording in the hazardous Waste logbook for further transportation according to the period 		
Root Cause Analysis:	Lack of awareness and understanding from warehouse staff and workshop employees regarding hazardous waste management		
Corrective Actions:	<ul style="list-style-type: none"> - Giving back understanding to warehouse staff and workshop employees regarding hazardous Waste management. - Monitoring of hazardous waste management 		
Assessment Conclusion:	The effectiveness of correction and corrective action will be verified in the next assessment.		

Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description
PF 1	Nil

3.3.1 Status of Nonconformities Previously Identified and Observations

Nonconformity			
NCR Ref #	1782771-201905-M1	Date Issued	27 May 2019
Due Date	26 August 2019	Date of nonconformity Closure	8 August 2019
Clause & Category (Major / Minor)	RSPO P&C 2013, INA-NI September 2016, Indicator 1.2.1 Major		
Statement of Nonconformity:	Based on verification documents and interview, it found that determination of type of documents that are publicly accessible is not in accordance with the requirement of P & C RSPO 1.2.1		
Requirement Reference:	Publicly available documents shall include, but are not necessarily limited to: a) Land titles/user rights (Criterion 2.2) b) Occupational health and safety plans (Criterion 4.7) c) Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8) d) HCV documentation (Criteria 5.2 and 7.3) e) Pollution prevention and reduction plans (Criterion 5.6) f) Details of complaints and grievances (Criterion 6.3) g) Negotiation procedures (Criterion 6.4) h) Continual improvement plans (Criterion 8.1) i) Public summary of certification assessment report j) Human Rights Policy (Criterion 6.13).		
Objective Evidence:	Based on document verification "Daftar Dokumen dan Informasi Untuk Diakses Publik PT Into Indosawit Subur January 2019", some type of documents are not publicly available, such as : - Amdal - Land titles/user rights - Identification of HCV and Reporting document		

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	<ul style="list-style-type: none"> - Conservation management plan document - Details of complaints and grievances - Etc.
<p>Corrections:</p>	<p>Management PT IIS – Muara Bulian has made revision of “Daftar Dokumen dan Informasi Untuk Diakses Publik PT Inti Indosawit Subur” dated 15 July 2019. List of document publicly available (government, NGO, society/community, KUD) among others:</p> <ul style="list-style-type: none"> - Land titles/user rights (HGU, Izin lokasi, Izin prinsip, IPKH) - Occupational health and safety plans (Laporan Pelaksanaan P2K3 dan program K3) - Plans and impact assessments relating to environmental and social impacts (AMDAL and SIA) - HCV documentation (Laporan identifikasi HCV) - Pollution prevention and reduction plans (Program Manajemen Lingkungan) - Details of complaints and grievances (Detail Logbook Keluhan Karyawan dan Pelanggan) - Negotiation procedures (SOP Penanganan Informasi Keluhan, Konflik lahan dll) - Continual improvement plans (Continuous Improvement Program) - Public summary of certification assessment report (Public Summary Report RSPO) - Human Rights Policy (Kebijakan Perusahaan) <p>Sustainability team has deliver the training on 2 August 2019 regarding minimum requirement of document publicly available according to RSPO P & C indicator 1.2.1. Training record were available and can be demonstrated during verification audit.</p>
<p>Root Cause Analysis:</p>	<p>Humas (Public relation) as a PIC whose made a list of documents that are publicly accessible by stakeholder has not aware the minimum requirement of P & C RSPO indicator 1.2.1; Humas determined the list of document publicly available based on social needs and impact.</p>
<p>Corrective Actions:</p>	<p>Monitoring the compliance of RSPO P & C requirement through internal audit. Internal audit program has been made for 2019 with frequency 2 times a year. In 2019 internal audit performed on February 2019 and August 2019.</p>
<p>Assessment Conclusion:</p>	<p>Auditor conclude that company has effectively addressed the issue of non conformity and the NC has been CLOSED on 8 August 2019.</p> <p>During remote assessment ASA1_3 and onsite assessment ASA1_4 confirmed that company remain consistent to provide the publicly available documents according to RSPO requirement. Public Relation was the PIC to monitor the availability of document for public. Monitoring of compliance to RSPO P&C requirement has been implemented by internal audit, latest audit on 1 – 5 June 2020.</p> <p>This Major NC remain closed.</p>

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Nonconformity			
NCR Ref #	1782771-201905-M2	Date Issued	27 May 2019
Due Date	26 August 2019	Date of nonconformity Closure	8 August 2019
Clause & Category (Major / Minor)	RSPO P&C 2013, INA-NI September 2016, Indicator 4.6.7 minor Escalated to Major		
Statement of Nonconformity:	Muara Bulian Smallholder cannot demonstrate practice to minimize risk and negative impact on application of pesticides.		
Requirement Reference:	Principle 4 - Use of appropriate best practice by growers and millers Indicator 4.6.7 Application of pesticides shall be by proven methods that minimize risk and negative impacts.		
Objective Evidence:	<p>During field Visit at Koperasi Buah Sakato Hamparan 33 Kavling 103, Kavling 102, Kav. 107, Kav 106, and Hamparan 22 Kavling 547, 548 Auditor found that the weeds control were not effectively implemented by TUS team and the weeds condition well ground over the plots.</p> <p>During field visit at Koperasi Buah Sakato Hamparan 26 Kavling 528 auditor found that weeds control performed by blanket spraying (not comply with the best practice of weeds control) and it was not checked by Foreman/Plasma management.</p> <p>It was indicated that the internal inspection for smallholders plot using checklist "BMP Plasma" were not effectively implemented.</p>		
Corrections:	<ul style="list-style-type: none"> - Management Plasma Muara Bulian has taken action by performing weeds control in the area of smallholder plots which uncontrol. Weeds control performed by TUS team on 15 July 2019 at Koperasi Buah Sakato Hamparan 33 Kavling 103, Kavling 102, Kav. 107, Kav 106, and Hamparan 22 Kavling 547, 548. Evidence of weeds control can be demonstrated during verification audit and record of weeds control in realization of "Rencana kerja Harian (RKH) Tim Unit Semprot Kebun Plasma Muara Bulian. Weeds control found effectively implemented. - To address the financial problem of smallholder member to follow the TUS program, Management Plasma Muara Bulian has made Bank account and collective cash for smallholder member and manage by each KUD (cooperatives), Bank Account No. 3553**** on behalf "Tabungan Team Unit Semprot Koperasi". The Bank Account purpose to collect the cost saving from each smallholder member each month before they receive the FFB payment with saving as much as IDR 100,000/month. The saving amount has been agreed by all KUD and member through "Surat Kesepakatan Bersama" which stated that KUD and its member are willing to saving their FFB earn each month as much as IDR 100,000 for weeds control cost. - Management Plasma Muara Bulian has issued the Memorandum No. 071/KLM-INT/VII/2019 dated 15 July 2019 to Field Foreman which stated Plasma Muara Bulian are prohibited the Blanket spraying and will give the skorsing/punishment to Field Foreman whose let the TUS team performing blanket spraying. Management Plasma Muara Bulian also give the socialization and awareness to the smallholder member regarding the standar of weeds control according to the best management practice agronomy and procedure. Socialization conducted to KUD Buah Sakato on 20 July 2019 and 6 August 2019, evidence 		

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	<p>of socialization can be demonstrated (attendant list, socialization content and photo documentation). During field audit and interview with smallholder member Koperasi Buah Sakato Hamparan 26 Kavling 528, he aware and understand regarding the standard of weeds control according to the best management practice and he realize that blanket spraying was prohibited.</p> <ul style="list-style-type: none"> - Management of Plasma Muara Bulian reaffirms and re-emphasizes the plasma plot inspection program conducted by the foreman and assistant so that the inspection is carried out correctly according to inspection standards and a follow-up to the results of the field inspection is carried out.
Root Cause Analysis:	<ul style="list-style-type: none"> - Smallholder member cannot provide the cost for weeds control by TUS/has a financial problem so that they didn't follow the TUS program. - Smallholder member unsatisfied with TUS team performance, because smallholder member deemed that the effective weeds control is blanket spraying while TUS team only selected spraying in the circle and path. Smallholder member ask team TUS to performed blanket spraying. - Inspection program has been made by Management plasma, however there is no follow up action regarding the finding and inspection result in smallholder kavling
Corrective Actions:	<p>Performing the regular inspection to smallholder kavling accordingly as per inspection program and conduct the evaluation and follow up action as per inspection result. Sample seen in latest inspection at KUD Buah Sakato on 11 and 12 July 2019 at Hamparan 22 and 33. It was found several plots need to control immediately by TUS team. Evaluation and action to follow up the inspection result has been made as record in "Notulen Evaluasi Inspeksi Internal Kavling Petani Plasma" dated 22 July 2019.</p>
Assessment Conclusion:	<p>Auditor conclude that company has effectively addressed the issue of non conformity and the NC has been CLOSED on 8 August 2019.</p> <p>During remote assessment ASA1_3 and onsite assessment ASA1_4 confirmed that smallholder plots and the pesticide usage are managed by PT Inti Indosawit Subur – Muara Bulian. Plantation upkeeping conducted by TUS team (Tim Unit Semprot – Spraying workers team) of PT Inti Indosawit Subur – Muara Bulian. Inspection program to smallholder plots by company has been implemented accordingly.</p> <p>This Major NC remain closed.</p>

Nonconformity			
NCR Ref #	1782771-201905-M3	Date Issued	27 May 2019
Due Date	26 August 2019	Date of nonconformity Closure	8 August 2019
Clause & Category (Major / Minor)	RSPO P&C 2013, INA-NI September 2016, Indicator 4.8.2 Minor Escalated to Major		
Statement of Nonconformity:	Lack of evidence the records of training for each spraying operator in Muara Bulian Smallholder's has been maintained		
Requirement Reference:	Records of training for each employee shall be maintained		

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Objective Evidence:	<p>Group Manager has shown the list of "Tim Unit Semprot (TUS)", there is 29 workers who have conducted the spraying application in Smallholder.</p> <p>However, record training for each applicator has not shown for the training period which was carried out before 2018 (last audit ASA-1.1) –there just shown the record for training related to handing of "limited pesticides" has carried out on 8th May 2018 that was attended by 19 workers from plasma Muara Bulian.</p>
Corrections:	<p>Plasma Muara Bulian management has taken action by performing the training of pesticide/herbicide handling to all spraying workers. Training deliver by Manukar Purba (Asisten Pembina plasma) and Rico Santoso Pakpahan (Asisten Sustainability) on 1 August 2019, attend by 29 spraying workers and 2 field foreman. Evidence of training can be demonstrated (attendant list, minutes of training, photo documentation). Interview with spraying workers Tunirah, Tohiro and Sutiarni indicated that they have understanding on herbicide/pesticide handling. Record of personal training also can be demonstrated for each spraying workers.</p>
Root Cause Analysis:	<p>There was a new employee recruitment (10 workers) of TUS team Plasma Muara Bulian after May 2018. In addition Plasma Muara Bulian has not been trained the 10 new spraying workers regarding pesticide/herbicide handling.</p>
Corrective Actions:	<p>Prepare the work instruction particularly for new spraying workers recruitment in "Work instruction Peningkatan Kompetensi Tenaga Semprot Plasma Kebun Plasma Muara Bulian, dated 11 July 2019". Work instruction determined that training of herbicide handling for spraying workers shall be performed in time of new employee hiring (minimum one day before they work/perform their job) and training once a year of refreshment for all TUS team.</p>
Assessment Conclusion:	<p>Auditor conclude that company has effectively addressed the issue of non conformity and the NC has been CLOSED on 8 August 2019.</p> <p>During remote assessment ASA1_3 and onsite assessment ASA1_4 confirmed that smallholder record training are well maintained including the record of spraying workers training. Sample seen spraying training held on Mach to May 2021.</p> <p>This Major NC remain closed.</p>

Nonconformity			
NCR Ref #	1782771-201905-M4	Date Issued	27 May 2019
Due Date	26 August 2019	Date of nonconformity Closure	8 August 2019
Clause & Category (Major / Minor)	RSPO SCCS, June 2017 - General Chain of Custody Requirement-Clause 5.3.2		
Statement of Nonconformity:	Internal audit RSPO SCCS in PT. Inti Indosawit Subur – Muara Bulian POM was not effectively carried out, as per organization's own procedure.		
Requirement Reference:	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <p>i. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p>		

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	ii. Effectively implements and maintains the standard requirements within its organization.
Objective Evidence:	Internal audit RSPO SCCS for year 2018 only carried out once dated 2-5 July 2018, while SOP Traceability stipulated internal audit to be carried out twice per year.
Corrections:	Coordination with manager internal audit sustainability to made the audit program for RSPO SCC twice a year as per procedure. PT IIS Muara Bulian has made the audit programe for sustainability in "Rencana dan Realisasi Interlal Audit Pre and Post 2019", In the schedule Internal audit RSPO SCCS 2019 scheduled in February and July 2019. First internal audit RSPO SCCS for Muara Bulian POM audit has been conducted on 15 – 16 February 2019 and the second internal conducted on 23 – 24 July 2019. Latest internal audit on July 2019, there were 3 non conformities raised and Muara Bulian POM has taken action by correction and corrective action and the NC has been Closed. Evidence of Non conformity closing can be demonstrated. Internal audit report can be demonstrated and following the standard RSPO SCCS 2017.
Root Cause Analysis:	Internal audit RSPO SCCS was conducted integrated with other system (RSPO P & C, SMK3) which conducted once a year by internal auditor and not refer to Procedure "SOP Traceability AA-MPM-OP-1400.17-R6 dated 1 September 2017" that require twice a year.
Corrective Actions:	Maintain the schedule of internal audit RSPO SCCS twice a year and regularly review the internal audit report.
Assessment Conclusion:	Auditor conclude that company has effectively addressed the issue of non conformity and the NC has been CLOSED on 8 August 2019. During remote assessment ASA1_3 and onsite assessment ASA1_4 confirmed that Internal audit RSPO SCCS has been conducted accordingly as per Procedure of "AA-SOP-ES-6001-R5 dated 1 August 2020". According to internal audit procedure, internal audit conducted once a year considering the critical area. The latest internal audit conducted on 16 – 22 February 2020. Internal audit report were evident, there is no issue and nonconformity raised during internal audit. Internal audit result was review and discuss in the Management review. This Major NC remain closed.

Nonconformity			
NCR Ref #	1782771-201905-M5	Date Issued	27 May 2019
Due Date	26 August 2019	Date of nonconformity Closure	8 August 2019
Clause & Category (Major / Minor)	RSPO SCCS, June 2017 - General Chain of Custody Requirement-Clause 5.5.2		
Statement of Nonconformity:	PT. Inti Indosawit Subur-Muara Bulian POM cannot demonstrate there is control over outsourced transporter.		
Requirement Reference:	Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:		

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	<p>a) The site 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 site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>i. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p>
<p>Objective Evidence:</p>	<p>PT. Inti Indosawit Subur cannot demonstrate there is control upon outsourcing transporter:</p> <p>a) PT. Inti Indosawit Subur cannot demonstrate 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 site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>b) PT. Inti Indosawit Subur cannot demonstrate control system and communicated the outsourced transport contractor.</p>
<p>Corrections:</p>	<ul style="list-style-type: none"> - PT IIS Muara Bulian has made the new agreement contract with transporter "PT Mitra Abadi Damai" dated 2 August 2019. The contract agreement has covered: <ul style="list-style-type: none"> ✓ Outsourced process with transporter including right and responsibility between two parties ✓ Transporter is committed to comply with RSPO SCCS standard and following the regulation ✓ Transporter is willing to be audited by Certification Body as necessary concerning on RSPO SCCS. <p>Agreement contract has been signed by two parties both PT IIS – Muara Bulian POM (on behalf PT Inti Indosawit Subur Group) and PT Mitra Damai Abadi.</p> <ul style="list-style-type: none"> - PT IIS Muara Bulian has a procedure to control the outsourced transporter through "SOP Traceability AA-MPM-OP-1400.17-R6 dated 1 September 2017" The procedure has been communicated to outsourced transporter. <p>Internal control for CPO and PK delivery by contractor has made as well by:</p> <ul style="list-style-type: none"> ✓ Surat Izin Muat CPO dan Kernel, contain information of Driver name, Identity number, Car/Truck Number, CPO/PK Dispatch time, netto, incoming and outgoing time ✓ Delivery Order Slip from Transporter, contain information of sales contract number, Truck number, destination, driver name, port destination. ✓ Daftar Periksa Kesiapan Pengiriman CPO/Kernel contain information of Truck number, driver name, date of inspection, item inspection including: driver identity and completeness of vehicle legality, completeness of physical standard of vehicle, number of segel. ✓ Recapitulation of CPO and PK incoming from PT Sari Dumai Sejati, contain information of CPO/PK incoming date to PT SDS, Vehicle Number, origin of CPO and PK, Volume of CPO and PK deliver by Tungkal Ulu POM and receive by PT SDS, variant of volume, percentage of variant, quality of CPO and PK (FFA and moisture) deliver by Tungkal Ulu POM and receive by PT SDS (Bulking station). In addition, PT Sari Dumai Sejati has implementing the

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	<p>certification of RSPO SCCS and has been certified by Control Union with RSPO Certificate Number CU-RSPO SCC-821960 valid until 29/08/2022. It is indicated that PT SDS has internal control to ensure and monitor the compliance of CPO/PK delivery by transporter.</p> <p>In addition transporter PT Mitra Abadi Damai has signed the Commitment letter No. 05/MAD-JBI/7/2018 that state to commit to comply with RSPO SCCS requirement.</p>
Root Cause Analysis:	PT IIS Muara Bulian POM deemed that "Surat Perintah Kerja (SPK)" for transporter is the contract, however SPK is not covering the agreement between two parties and not signed by transporter and only by PT IIS – Muara Bulian.
Corrective Actions:	Conduct the internal audit regularly and include the transporter/outsourced process in the internal audit checklist. PT IIS Muara Bulian has made the audit program for sustainability in "Rencana dan Realisasi Internal Audit Pre and Post 2019", In the schedule Internal audit RSPO SCCS 2019 scheduled in February and July 2019.
Assessment Conclusion:	<p>Auditor conclude that company has effectively addressed the issue of non conformity and the NC has been CLOSED on 8 August 2019.</p> <p>During remote assessment ASA1_3 and onsite assessment ASA1_4 confirmed that Transporter of CPO and PK has been included in the internal audit of RSPO SCCS. Latest internal audit conducted on 16 – 22 February 2020. Internal audit report were evident, there is no issue and nonconformity raised during internal audit. Internal audit result was reviewed and discussed in the Management review.</p> <p>This Major NC remain closed.</p>

Nonconformity			
NCR Ref #	1782771-201905-N1	Date Issued	27 May 2019
Due Date	Next Surveillance	Date of nonconformity Closure	9 July 2020
Clause & Category (Major / Minor)	RSPO P&C 2013, INA-NI September 2016, Indicator 2.1.2 minor		
Statement of Nonconformity:	<p>PT. IIS – Muara Bulian have not maintained written information on legal requirements.</p> <p>Based on verification documents and interview, it found that some recent legal documents have not been evaluated according to procedure SOP; AA-GL-5001.1-RO "Pemenuhan Peraturan Perundang-undangan dan Perubahannya".</p>		
Requirement Reference:	A documented system, which includes written information on legal requirements, shall be maintained.		
Objective Evidence:	<p>PT. IIS – Muara Bulian have prepared the list of relevant laws and regulations. However, the certificate holder unable to demonstrate a complete and applicable regulation.</p> <p>Based on document verification it found that there are some recent regulations that have not been evaluated, for example:</p> <ul style="list-style-type: none"> • Permenaker No. 05 Th 2018 concerning K3 Lingkungan kerja • PermenLHK No 21 Th 2018 concerning perubahan atas peraturan menteri lingkungan hidup Nomor 5 th 2014 Tentang baku mutu air limbah 		

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	<ul style="list-style-type: none"> • PermenLHK No 23 th 2018 concerning perubahan izin lingkungan • PermenLHK No 24 th 2018 concerning AMDAL • PermenLHK No 25 Th 2018 concerning UKL-UPL • PermenLHK No P.5/MENLHK/SETJEN/KUM.1/2/2018 concerning Standar dan sertifikasi Kompetensi Penanggung jawab operasional pengolahan air limbah dan penanggung jawab pengendalian pencemaran
Corrections:	<ul style="list-style-type: none"> - Give awareness to the PIC (Humas) By Sustainability Team regarding the mechanism of regulation updating and ensure the PIC performing the regulation updating once a year as per procedure. - Updating the newest relevant regulation accordingly.
Root Cause Analysis:	<ul style="list-style-type: none"> - PIC (Humas) to conduct regular update of relevant regulation are not aware regarding how to update and get the new regulation. - Internal audit RSPO has not cover and ensure the newest regulation has been updated.
Corrective Actions:	To conducted regular internal audit RSPO covering the checking of updating the newest regulation and ensure the evaluation has been performed and updated.
Assessment Conclusion:	<p>Verification during remote audit on 6-8 July 2020.</p> <ul style="list-style-type: none"> - Unit of Certification has an updated list of relevant regulation as required within P&C INA-NI 2020 Annex 3 for International Laws and Convention Applicable to the Production of Palm Oil and Indonesia Rules and Regulations Reference. - Evaluation of Compliance with Law and Regulation namely "Evaluasi Kepatuhan Hukum Kebun/Pabrik Tungkal Ulu" dated 1st April 2019. <p>According to this corrective action made, auditor conclude this Minor NC is Closed satisfactorily.</p> <p>During onsite assessment on 30 August – 7 September 2021 the NC minor are remain closed and no recurrent of non conformity.</p>

Nonconformity			
NCR Ref #	1782771-201905-N2	Date Issued	27 May 2019
Due Date	Next Surveillance	Date of nonconformity Closure	9 July 2020
Clause & Category (Major / Minor)	RSPO P&C 2013, INA-NI September 2016, Indicator 4.6.4 minor		
Statement of Nonconformity:	The Certificate Holder has no commitment and effort to minimizing and eliminating of Paraquat used.		
Requirement Reference:	A documented system, which includes written information on legal requirements, shall be maintained.		
Objective Evidence:	Record of paraquat use in Muara Bulian Estate was sight on "Monitoring Penggunaan Paraquat". History of paraquat uses in Muara Bulian Estate are as follows: Year Paraquat uses (liters)		

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	<p>2014 291.00 2015 407.75 2016 1,175.44 2017 985.56 2018 1,395.60 2019*) 340.90</p> <p>Based on review of monitoring pesticides uses in Muara Bulian Estate (2014 – 2019), the use of Paraquat in Muara Bulian Estate are increasing in period 2015 to 2016 and period 2017 to 2018. Not enough evidence that the organization has plan to eliminate the use of Paraquat.</p>
Corrections:	Find the new alternative formula/material to substitute the paraquat usage and stop the paraquat usage after November 2019.
Root Cause Analysis:	Based on best management practice agronomy and internal policy of Asian Agri Group, paraquat remain use as a herbicide for particular use such as hard weeds and nursery and currently company has not been determined and found the best substitution formula to change the paraquat usage.
Corrective Actions:	Ensure the company not use the paraquat after November 2019
Assessment Conclusion:	<p>Based on document verification during remote audit on 8 - 10 July 2020 obtain:</p> <ol style="list-style-type: none"> 1. According to Memorandum of Deputy Managing Director dated 22 October 2019 related to paraquat substitution obtained information that Asian Agri's no longer used paraquat since 15 November 2019. Those active ingredients substituted with isopropyl amine glyphosate and metal metsulfuron or both combinations. 2. Record of pesticide usage shown that there is no paraquat usage after 15 November 2019. <p>According on that fact, this nonconformity has been closed</p>

Nonconformity			
NCR Ref #	1782771-201905-N3	Date Issued	27 May 2019
Due Date	Next Surveillance	Date of nonconformity Closure	9 July 2020
Clause & Category (Major / Minor)	RSPO P&C 2013, INA-NI September 2016, Indicator 5.2.4 minor		
Statement of Nonconformity:	Company has not consistently implementing conservation management plan accordingly and SOP of Riparian management.		
Requirement Reference:	Once the management plan is prepared, continuous monitoring documentation and report regarding the status of the RTE and HCVs are affected by the operations of the plantation and palm oil mill shall be available, and the results of monitoring are to be used to follow-up on the improvement of the management plan.		

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Objective Evidence:	<p>PT Inti Indosawit Subur has set the Conservation Management plan 2018/2019, the management plan including riparian conservation such as; Boundary marking with pole in each 200 m of riparian area</p> <p>However during field visit to riparian of Sengoan river at Block river Block B17f and B18a Division II Muara Bulian Estate there was no boundary marker found or install in riparian area.</p> <p>In addition, PT IIS – Muara Bulian has a procedure “SOP Pengelolaan Riparian AA-APM-OP-1100.21-R2 dated 7 December 2015” which stated that in riparian area shall be marked by permanent pole in each 200 m and mark the palm oil plant with red paint.</p>
Corrections:	<p>Assign the new PIC to monitor the HCV area and riparian area.</p> <p>Identify the boundary marker and replacement the boundary marker in each 200 m of riparian area.</p>
Root Cause Analysis:	<p>PIC HCV (Field Foreman) on behalf Nova Adi Suwarso has been resigned and there is no other PIC to monitor the HCV area. Boundary marker has been lost.</p>
Corrective Actions:	<p>Regularly monitoring the HCV area and its completeness attribute.</p>
Assessment Conclusion:	<p>Verification during remote audit 8-10 July 2020:</p> <p>PT IIS – Muara Bulian has assigned new PIC to monitor HCV area on behalf Nova Adi Suwarso based on “Memorandum No: /IIS/KMB/MEMO/6/19 dated 29 June 2019”. PIC HCV responsible to monitor the HCV area and reporting if any disturbance at HCV area.</p> <p>PT IIS Muara Bulian also has Identify the boundary marker and placement the boundary marker in each 200 m of riparian area. Evidence of HCV boundary marking can be demonstrated during audit, sample seen at Riparian Singoan River Block B17f and B18a. Monitoring program of HCV boundary marker has been set and carried out each 3 month by PIC HCV. Latest monitoring on June 2020, according to record of monitoring as per “Monitoring Patok HCV dan Cat Merah pada Pokok” shown that all HCV boundary marker are well maintained.</p> <p>PT IIS Muara Bulian has establish the monitoring program of HCV boundary marker. Monitoring carried out in each 3 month by PIC HCV. Latest monitoring performed on June 2020, according to record of monitoring as per “Monitoring Patok HCV dan Cat Merah pada Pokok” shown that all HCV boundary marker are well maintained. Verification through document review, interview and photograph confirmed that monitoring of HCV area and its boundary markers has well implemented by PT IIS – Muara Bulian.</p> <p>According to this corrective action made, auditor conclude this Minor NC is Closed satisfactorily.</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1782771-201905-M1	Major	1.2.1	27/05/2019	Closed on 8/08/2019

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1782771-201905-M2	Major	4.6.7	27/05/2019	Closed on 8/08/2019
1782771-201905-M3	Major	4.8.8	27/05/2019	Closed on 8/08/2019
1782771-201905-M4	Major	SCC 5.3.2	27/05/2019	Closed on 8/08/2019
1782771-201905-M5	Major	SCC 5.5.2	27/05/2019	Closed on 8/08/2019
1782771-201905-N1	Minor	2.1.2	27/05/2019	Closed on 09/07/2020
1782771-201905-N2	Minor	4.6.4	27/05/2019	Closed on 09/07/2020
1782771-201905-N3	Minor	5.2.4	27/05/2019	Closed on 09/07/2020
1928364-202007-M1	Critical	3.4.3	10/07/2020	Closed on 11/09/2020
1928364-202007-M2	Critical	6.6.2	10/07/2020	Closed on 11/09/2020
2108332-202109-M1	Minor escalated to Critical	6.7.3	08/09/2021	Closed on 04/12/2021
2108332-202109-N1	Minor	3.3.2	08/09/2021	Open
2108332-202109-N2	Minor	7.3.2	08/09/2021	Open

3.4 Stakeholders and previous land owner / user consultation

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

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Internal Stakeholders	Gender Committee: Ibu Natariva Sembiring (Head of Gender Committee of Muara Bulian Estate)	Consultation was conducted by phone to prevent the covid-19 outbreak and follow the social distancing policy.

	Workers of PT Inti Indosawit Subur – Muara Bulian POM and Supply Bases	
Government Departments	<ul style="list-style-type: none"> ▪ Badan Pertanahan Nasional – National Land Body of Batanghari Regency Bpk. Suroso ▪ Dinas Tenaga Kerja – Manpower Office of Batanghari Regency Bpk. Taher ▪ Dinas Pertanian – Agriculture Agency of Batanghari Regency Bpk. Jumri ▪ Dinas Lingkungan Hidup – Environmental Agency of Batanghari Regency Bpk. Dodi 	Consultation was conducted by phone to prevent the covid-19 outbreak and follow the social distancing policy.
Labor Union	Labour Union: Janto Siburian (Chairman of Worker Union)	Consultation was conducted by phone to prevent the covid-19 outbreak and follow the social distancing policy.
Communities representative	<p>Head of Danau Embat Village Bpk. Zaharudin</p> <p>Head of Terusan Village Bpk. Hardoni</p> <p>Head of Bulian Jaya Village Bpk. Iriawan</p> <p>Head of Kehidupan Baru Village Bpk. Hilal</p>	Consultation was conducted by phone to prevent the covid-19 outbreak and follow the social distancing policy.
NGO	Media Jambi Independent Bpk. Riza	Consultation was conducted by phone to prevent the covid-19 outbreak and follow the social distancing policy.

Stakeholders comment	
1.	<p>Feedbacks:</p> <p>Dinas Lingkungan Hidup – Environmental Agency of Batanghari Regency Bpk. Dodi</p> <ul style="list-style-type: none"> ▪ PT. IIS - Muara Bulian has met obligation for environmental permits and licenses, including temporary hazardous waste storage, land application, domestic wastewater. ▪ Companies reporting routinely the environmental parameters: air emission, ambient air, POME quality, soil quality, water quality, as per timeline requirement.

	<ul style="list-style-type: none"> ▪ In general, the analysis and test result upon environmental parameters meet requirements and standard threshold. ▪ There was no report/complaint from community related to environmental pollution. ▪ Company has proactive approach with participation from community for environmental conservation. <p>Audit Team verification and response: Audit team found that PT IIS Muara Bulian POM and Supply bases has implemented environmental management and monitoring according to RKL-RPL document which approved by related government body. Report of environmental management and monitoring are reported wach semester to Environmental Agency of Batanghari Regency. The implementation of environmental management and monitoring plan please refer to indicator 3.41 – 3.4.3 on this report.</p>
<p>2.</p>	<p>Feedbacks: Dinas Pertanian – Agriculture Agency of Batanghari Regency Bpk. Jumri</p> <ul style="list-style-type: none"> ▪ PT. IIS Muara Bulian has plantation business permit and valid. ▪ The plantation business assessment carried out and the result “Kelas II – Baik”. ▪ The palm oil mill of PT. IIS Muara Bulian buys the FFB from communities and farmers in accordance to FFB purchase price determination. ▪ Plantation Business Report and Fire Report submitted to Agriculture Service in timely manner. No fire reported from area of PT. IIS Muara Bulian. ▪ There is no complaint related to land addressed to PT. IIS Muara Bulian. ▪ Company and their CSR is good to assisst communities. ▪ Input from Agriculture Service is to improve the development of partnered “KUD” to identify the smallholder issues, such as: FFB grading criteria at Mill, plant pests and diseases, knowledge of sustainable palm oil practise, etc. <p>Audit Team verification and response: Company has obtained the plantation business permit and has run the business accordingly. PT IIS – Muara Bulian also has provide the CSR programme for surrounding community. Plantation Business Report has reported each semester as per “Laporan perkembangan usaha perkebunan”.</p> <p>PT IIS – Muara Bulian has a programme to support smallholder and include the smallholder in RSPO certification. Another smallholder outside the scope of certification also supported by company to manage and enhance their agronomy best management practices and sustainable palm oil practices through CSV programme.</p> <p>Please refer to indicator 5.1.8 for the support independent smallholder.</p>
<p>3.</p>	<p>Feedbacks: Dinas Tenaga Kerja Kabupaten Batanghari – Manpower Office of Batanghari Regency Bpk. Taher – Bidang Ketenagakerjaan</p> <ul style="list-style-type: none"> • PT. IIS – Muara Bulian has provide normative rights to their workers, salary, overtime, housing facilities and social amenities. • PT. IIS – Muara Bulian supports and committed to health and safety in company operation. Safety committee and safety officer has been appointed. Safety committee’s report submitted regularly. Health and safety training implemented for operator’s license, routine machinery inspection performed – however due to COVID-19 pandemic, sometimes delayed. • Accident report submitted regularly.

	<ul style="list-style-type: none"> • PT. IIS – Muara Bulian demonstrate commitment to minimize COVID-19 spread during pandemic condition: provides masker, disinfection sprays, temperature check, health screening, vaccination program for workers. • Annual health check carried out by companies. • There was no dispute between company and the worker union. • For pension fund shall comply to regulation as normative rights for workers, however company discretion/consideration is advised. • Communication has gone well between company and manpower services. • There is no industrial relation dispute in these companies. • Based on monitoring to companies, no practice of use child labor. • Based on monitoring to companies, no practice of forced labor or human trafficking. Companies paid the workers in accordance to UMSK and registering to <i>BPJS Ketenagakerjaan</i> and <i>BPJS Kesehatan</i>. • Based on monitoring to companies and communication with bipartite member, communication between company and worker union is good. <p>Audit Team verification and response: PT Inti Indosawit Subur has commitment to health and safety. PT Inti Indosawit Subur – Muara Bulian has prepared and documented the OHS Plan as in “Program Management K3 Tahun 2020”. Please refer to indicator 3.6.1 for the implementation. During audit confirmed that there is no practices of child labour usage, forced labour and discrimination of labour. There is also labour union formed in PT Inti Indosawit Subur – Muara Bulian. PT Inti Indosawit Subur – Muara Bulian has had Labor Union has registered in DISNAKERTRANS under Decree of Head of Social, Manpower and Transmigration Agency in Batang Hari Regency no. 568/506/DSKT on: Registration of PUK SPPP.SPSI PT Inti Indo Sawit Subur with registration number: no. 568/041/DSKT/2011, dated April 18, 2011 chaired by Mr. Janto Siburian.</p>
<p>4.</p>	<p>Feedbacks: Badan Pertanahan Nasional – National Lands Body of Batanghari Regency Bpk. Suroso – Bagian Penetapan Hak</p> <ul style="list-style-type: none"> • The legal ownership of the land; <ul style="list-style-type: none"> – HGU Certificate No. 1 (22 Dec 2003); Reference: SK Kepala BPN No. 14/HGU/1992 (15 Sep 1992) area 1,256.18 Ha. Expired: 31 Dec 2027. – HGU Certificate No. 4 (6 Oct 2003) reference SK HGU No: 51/HGU/BPN RI/2003 (10 Sep 2003), area 523.42 Ha. Expired: 6 Oct 2038. – HGU Certificate No. 2 (13 Aug 2003) reference SK HGU No: 03.540.1-06-2003 (10 Jul 2003), area 324,800 m2 (32.48 Ha). Expired: 13 Aug 2038. – HGU Certificate No. 1 (13 Aug 2003) reference SK HGU No: 01.540.1-06-2003 (10 Jul 2003), area 272,700 M2 (27.27 Ha). Expired: 13 Aug 2038. – HGU Certificate No. 3 (13 Aug 2003) reference SK HGU No: 02.540.1-06-2003 (10 Jul 2003), area 170,900 M2 (17.09 Ha). Expired: 13 Aug 2038. • For all the HGU pegs installed on lands with HGU, it is the responsibility of rights holder to guard and maintains as per regulation. • There is no official report submitted to <i>Kantor Pertanahan Kabupaten Batanghari</i> related to land dispute with any party for this HGU. <p>Audit Team verification and response: According to the national regulation, land title (HGU) holder shall maintain the condition of boundary</p>

	<p>poles. Based on field visit concluded that the boundary poles area well maintained. The boundary poles recorded in document "Laporan Pemeriksaan dan Perawatan Patok Batas PT Inti Indosawit Subur – Kebun Muara Bulian dated 18 June 2021". 47 boundary poles already identified and checked, completed with GPS coordinates (degree, minutes, second). All poles reported in good condition.</p> <p>There is no land conflict occurred since last audit.</p>
<p>5.</p>	<p>Feedbacks: Media Jambi Independent - NGO Bpk. Riza</p> <ul style="list-style-type: none"> - Media Jambi Independent is a daily newspaper in Indonesia, this newspaper circulates every morning in Jambi and surrounding area. - There is no land dispute, social cases, environmental case at PT. IIS Muara Bulian. <hr/> <p>Audit Team verification and response: There is no land dispute and land conflict occurred since last audit. Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main estate roads.</p>
<p>6.</p>	<p>Feedbacks: Zaharudin – Head of Danau Embat Village</p> <ul style="list-style-type: none"> • There is no land conflict between PT IIS Muara Bulian and community. • There is no issue regarding social issue and environmental issue. • The company has provided assistances to the community, such as: religious assistances, road maintenance, clean water assistances. • Communication between company and community has gone well. • The existence of the company has a positive impact regarding of the job opportunities for community who need work at estate and mill. <p>Hardoni – Head of Terusan Village</p> <ul style="list-style-type: none"> • There is no land conflict, no social issue, no environmental issue during for year 2020, and 2021. • Company has provided assistances to the community related road maintenance, clean water assistances. • Communication has gone well between company and community. • Company has provided the unit of transportation for the spraying workers from village to estate every day. • Company has provided CSR program, such as: religious assistances, educational assistances, road maintenance, clean water assistance. • Input for company from Terusan Village, that company can increase the road maintenance assistance. <p>Budi Iriawan - Head of Bulian Jaya</p> <ul style="list-style-type: none"> • There is no land conflict, no social issue, no environmental issue during for year 2020, and 2021. • Company has provided assistances to the community related road maintenance, clean water assistances. • Communication has gone well between company and community.

	<ul style="list-style-type: none"> • Company has provided CSR program, such as: religious assistances, educational assistances, road maintenance, covid-19 assistances. For 2021, the company has provided rolling cattle program namely laying ducks managed by the community. <p>Hilal – Head of Kehidupan Baru Village</p> <ul style="list-style-type: none"> • There is no land conflict, no social issue, no environmental issue during for year 2020, and 2021. • Company has provided assistances to the community related road maintenance, clean water assistances. • Communication has gone well between company and community. • Company has provided the unit of transportation for the spraying workers from village to estate every day. • Company has provided CSR program, such as: religious assistances, educational assistances, road maintenance. For 2021, the company has provided rolling cattle program namely laying ducks managed by the community. • Input for company from Kehidupan Baru Village, that company can support a program namely “Sawit Desa Lestari”, proposal regarding that program has been submitted to the company. “Sawit Desa Lestari” is a program related development of the oil palm plantations on village land, so that in the future, village head hope this program will become a pilot/comparative study. <p>Audit Team verification and response:</p> <p>There is no land dispute and land conflict occurred since last audit. Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main estate roads.</p> <p>In 2020 and 2021 period, the company has established CSR program is recorded on CSR Project Tracking 2020 and 2021, 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.</p>
<p>7.</p>	<p>Feedbacks:</p> <p>Natariva Sembiring – Head of Gender Committee of Muara Bulian Estate</p> <ul style="list-style-type: none"> • There is no issue regarding the gender, discrimination and/or sexual harassment in period 2019, 2020 and 2021 at Mills and Estates. • Gender Committee has understood regarding the grievance mechanism as well as the protection of the identity of the complainants/whistle-blower. • The company has implemented the sexual harassment policy. • Unit of Certification has provided pregnancy test to spraying workers and fertilization workers every month. • Due to pandemic Covid-19, some gender committee activities in 2020 and 2021 has been postponed until the situation returns to normal. <p>Audit Team verification and response:</p> <p>PT Inti Indosawit Subur – Muara Bulian has formed a Gender Committee at Muara Bulian Estate and Mill which is chaired by Ms. Natariva Sembiring, based on the Gender Committee Organizational Structure was stated on 15 February 2020. Gender committees consisting of representatives of all units in the Muara Bulian Group play a role in: addressing issues related to women's rights and counselling for women workers who experience acts of violence and sexual harassment and other issues related to women workers.</p>

	<p>Coordinators are assigned at Muara Bulian Estate by Ms. Rimma S, at Muara Bulian Plasma is responsible for Ms. Nova Novrianti and at Muara Bulian Mill is responsible for Rita Anggraini.</p> <p>In 2021 Gender Committee Work Program has been established including the issues that will be discussed at the meeting.</p>
<p>8.</p>	<p>Feedbacks:</p> <p>Janto Siburian – Worker Union</p> <ul style="list-style-type: none"> • The company has realized employee normative rights such as remuneration in accordance with applicable regulations, allowances/THR and BPJS Program. • Communication has gone well with the company. • Legally union member is a labor consist of Permanent Workers (SKU-H & SKU-B), however operationally union also consider the problems that occur at the level of daily workers. • Daily workers have had a Work Agreement (SPK) with the company. • There is no indication that organisation conducted discrimination against to the workers. • Organisation has provided PPE for all workers. • The company has provided the workers amenities, such as; housing, clean water, electricity, toilets, sanitation, clinics, day care, place of worship, etc. • The company has registered all workers in BPJS program (Accident and Health Insurance) including daily workers. • There’s never been demonstration to the company management in 2020 and 2021. • The company has provided wages in accordance with the regulations. • There is no indication of the company has violated of Human Rights. • There is no indication of forced labor or coercive labor practice of work. • There is a difference in the calculation of the retirement period with the issuance of UU 11/2020 junto PP 35/2021 compared to the BKSPPS Agreement. The calculation based on UU 11/2020 junto PP 35/2021 is smaller. However, company and worker union (PUK-SPSI) has made an agreement on 03 August 2021 about the calculation of retirement period due to judicial review process in the Constitutional Court (Mahkamah Konstitusi), agreed that per February 2021 the calculation of retirement period is based on PP 35/2021 until the judicial review is completed. The company will follow the results of judicial review process. <p>Audit Team verification and response:</p> <p>PT Inti Indosawit Subur – Muara Bulian has had Labor Union has registered in DISNAKERTRANS under Decree of Head of Social, Manpower and Transmigration Agency in Batang Hari Regency no. 568/506/DSKT on: Registration of PUK SPPP.SPSI PT Inti Indo Sawit Subur with registration number: no. 568/041/DSKT/2011, dated April 18, 2011 chaired by Mr. Janto Siburian.</p> <p>During audit confirmed that there is no practices of child labour usage, forced labour and discrimination of labour.</p> <p>Company has paid the wages according to Decree of Governor of Jambi SK No. 883/KEP.GUB/DISNAKERTRANS-3.3/2020 dated 2 November 2020 regarding "<i>Penetapan Upah Minimum Propinsi Jambi Tahun 2021</i>" amount of IDR 2,630,162.13.</p> <p>PT Inti Indosawit Subur – Muara Bulian has provided adequate housing with electrical and clean water supply, medical clinic, sport facilities, religious facilities, education facilities and other amenities. Based on field inspection, the facilities found to be in good condition.</p>
<p>9.</p>	<p>Feedbacks:</p> <p>Rahayu Pertiwi –Cooperation “Koperasi Muara Bulian”</p>

	<ul style="list-style-type: none"> The total members of "Koperasi Muara Bulian" is 200 members. The Koperasi business includes provision of basic goods. The Annual Member Meeting (RAT) for period 2020 has conducted in April 2021. The members of Koperasi is Permanent Workers (SKU). Daily workers can receive Koperasi services based on Letter Agreement from Mandor/Supervisor. Company has provided assistance to the Koperasi such as provide building, clean water and electricity. Koperasi has assisted employees in accessing basic goods, because access to the marketplace is quite far 10 Km or 1 hour by motorcycle. <p>Audit Team verification and response: Company provide the facility for workers in the form of "Koperasi Muara Bulian". The koperasi has function to provide the basic needs and goods for workers with affordable prices. Company has provided assistance to the Koperasi such as provide building, clean water and electricity, it was confirmed during field visit to Muara Bulian Estate.</p>
<p>10.</p>	<p>Feedbacks: Muhammad Nurul Alfian – EFB Transporter</p> <ul style="list-style-type: none"> The contractors have an agreement in providing the dump truck units to transport of EFB. The communication has gone well with the company. Payment process has gone well. Contractors has understood against of Company Policy and Grievance Mechanism. The contractors have registered the driver to the Accident Insurance (BPJS Ketenagakerjaan) and has provided PPE (helmet, mask and boot). The wage of driver is more than IDR 3,000,000 per month. <p>Audit Team verification and response: Company has cooperated with local contractor for EFB transporter. This also the programme to enhance the livelihood and local economical. The contractor are manage and comply to the relevant regulation regarding the manpower regulation, minimum wages and OHS requirement.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Nil					

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

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



3.5 Impartiality and conflict of interest

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

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Formal Signing-off of Assessment Conclusion and Recommendation

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 – Muara Bulian 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 – Muara Bulian POM is continued.

Report prepared by	Acceptance of Assessment Conclusion
Name: Mujinius Jalaraya	Name: Putu Ghryate Yonata Aksa
Company Name: BSI Services Malaysia Sdn. Bhd	Company Name: PT Inti Indosawit Subur
Title: Lead Auditor	Title: Sustainability Coordinator
Signature: 	Signature:  <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i>
Date: 15 December 2021	Date: 27 December 2021

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
<p>Principle 1: Behave ethically and transparently</p>			
<p>Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p>Criteria 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p>			
<p>1.1.1</p>	<p>(C) Management documents that are specified in the RSPO P&C are made publicly available.</p>	<p>Company has a list for document publicly available. As per "<i>Daftar Dokumen dan Informasi Untuk Diakses Publik PT. Inti Indosawit Subur</i>", dated 21 January 2020, these documents are: Environmental documents (EIA, Monitoring & Management Plan, Environmental Report, HCV Report, Land Use Right Permits.</p> <p>Smallholders: Copy of landownership (SHM), Smallholders Plantation Registration (STD-B), Environmental Commitment (SPPL), Cooperative Legal Document, Cooperative Policies, Procedures and Flowchart, Cooperative Report, Management and Monitoring Member Report.</p>	<p>Complied</p>
<p>1.1.2</p>	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p>	<p>Company has a set of publicly available document in form of "<i>Daftar Dokumen yang dapat diakses oleh Stakeholders</i>" as per Memorandum No. 12/GM-GME/Int/V/2021", updated on 17 May 2021. The provision of publicly available document segregates based on stakeholder category.</p> <p>PT Inti Indosawit Subur – Muara Bulian POM and smallholder was provided an information in appropriate languages (Bahasa Indonesia) it can be understood and accessible by relevant stakeholders.</p> <p>Based on interview with surroundings stakeholder (e.g. Head of Village, community group and contractor of transport FFB can be understood of that list.</p>	<p>Complied</p>

1.1.3	(C) Records of requests for information and responses are maintained.	<p>Muara Bulian Estate and Mill</p> <p>Request Information and response from Stakeholder has been documented into a log book "Surat Masuk" and the response is documented in "Log Book Stakeholders – Out". There were xxx information request noted from stakeholder in Y2020 and for 2021 there were xx information, sample seen:</p> <ul style="list-style-type: none"> • Letter No. 050/160/Disnakertrans dated 14 May 2020 from Manpower Agency of Batang Hari Regency, request information regarding the supervision from Manpower Agency of Batang Hari has responded on 15 May 2020. • Letter No. 900/48/DinasLH/2021 dated 16 April 2021 from Environment Agency of Batang Hari Regency related the inspection of Temporary Storage of Hazardous Waste from Environment Agency of Batang Hari has responded on 18 April 2021. • Letter No. 510/SPT/Disnakertrans-31/2021 dated 04 June 2021 from Manpower Agency of Batang Hari Regency, request information the socialization of wages from Manpower Agency of Jambi Province has responded on 9 June 2021. • Letter No. 090/Eko/Bapeda/2021 dated 8 July 2021 from Bapeda Batang Hari Regency related the monitoring of CSR Program has responded on 9 July 2021. <p>Smallholder</p> <ul style="list-style-type: none"> ▪ KUD Barokah, KUD Budi Sari, KUD Karya Lestari, KUD Tuah Sakato and KUD Subur Makmur: According to "Buku Surat Masuk – Surat Keluar" period 2020 and 2021, there is no request of information from stakeholders. 	Complied
1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.	<p>Muara Bulian POM & Estate:</p> <p>Consultation and communication procedures which owned by Unit of Certification consist of several procedure, as below:</p> <ul style="list-style-type: none"> • Penanganan Permintaan Informasi Stakeholder (SOP AA-GL- 5008.1-R1, dated 	Complied

		<p>22 Aug 2011).</p> <ul style="list-style-type: none"> • Penyampaian dan Penyelesaian Keluhan Karyawan (internal) SOP AA-HR-308.5-R1, dated 1 December 2019. Ensuring the anonymity profile. • Penanganan Keluhan Masyarakat (SOP AA-GL-510.1-R0, dated 1 Jan 2013. <p>PIC communication and consultation for Muara Bulian Group (Mill, Estate and Smallholders) is Mr. Ardy Arto as nominated management official with letter Ref. No. 011/ES-KMB/INT/01/2020, dated 2 January 2020.</p> <p>Smallholders:</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> <p>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.</p>	
1.1.5	An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.	<p>List of stakeholders updated on 14 January 2021, there were 3 types of stakeholders i.e.: government (agency office in Jambi Province, Batang Hari Regency, Kapolsesk Maro Sebo Ilir, Camat Maro Sebo Ilir, head of village), Head of KUD and NGO (WALHI). 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</p> <p>The list of stakeholders has updated annually by Public Relation. The list of stakeholders as follows:</p> <ul style="list-style-type: none"> - Government institution consist of Surrounding villages, District Head, and 	Complied

		<p>related agency of Pelalawan Regency (Dinas Lingkungan Hidup, Dinas, Perkebunan, Dinas Tenaga Kerja, BPN).</p> <ul style="list-style-type: none"> - Chairman of Koperasi Unit Desa (KUD) which under company scheme smallholder. - Informal institution around the company, e.g. FK-KPPS, GWKAK, Worker Union and WKAK. - NGO around the company i.e.: WALHI, LPPTK, etc. ` <p>Muara Bulian Smallholder: KUD Barokah: "Daftar Nama Stakeholder KUD Barokah Tahun 2020", updated on January 2020. Stakeholder listed consist of:</p> <ul style="list-style-type: none"> a. Relevant Government Agencies: Cooperative Agency, Regional Cooperative Council, Plantation Agency, Animal Husbandry Agency. b. Local communities: Sub-District Office, national bank (BRI & Mandiri). c. Local NGO: Lembaga Pemantauan Perlindungan Tenaga Kerja (LPPTK), WALHI. 	
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>Unit of Certification has had Company Policy dated 1 December 2019.</p> <p>Statement for ethical conduct in all business defined on point number 2 within the policy.</p> <p>2. <i>"Berkomitmen berperilaku etis dalam berbisnis pada seluruh transaksi dan operasi bisnis, pelarangan seluruh bentuk korupsi, penyuapan dan panipuan dalam penggunaan dana dan sumber daya."</i></p>	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	<p>System to monitor compliance and implementation of its policy applied through poster which distribute in all units. Poster with title <i>"Bantu Perusahaan Kita Tetap Bersih/Keep Our Company Clean"</i> is publicly accessible. If there is any violation or</p>	Complied

		<p>illegal action within the company, is available through hotline (call) and email to whistleblow@rgei.com.</p> <p>In the event of changes or additions to the company's policy, the company will promptly deliver it, including updates to employment contracts and PKB and local employment contract documents. Also, during interview with responsible person at UoC (Administration Head), when UoC select supplier/vendor the system using open tender to all relevant suppliers. Choosing vendor/supplier is selected by company requirements.</p> <p>Based on the interview with some employees and stakeholders, that they have understood linked to the company's policy.</p>	
<p>Principle 2: Operate legally and respect rights Implement legal requirements as the basic principles of operation in any jurisdiction.</p>			
<p>Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
<p>2.1.1</p>	<p>(C) The unit of certification complies to relevant regulations.</p>	<p>Certificate holder has implemented mechanism for ensuring compliance with applicable legal requirement. It was stated on "<i>Prosedur Pemenuhan Peraturan Perundang - undangan dan Perubahannya</i>" (SOP AA-GL-5001.1-R0), dated 5 December 2009. Evidence of implementation of legal requirements compliance evaluation is documented in "Daftar Regulasi Implementasi Sustainability di Perkebunan Kelapa Sawit & Pengolahan Kelapa Sawit". The evaluation was performed on annual basis conducted by sustainability officer. Latest evaluation was conducted on August 2021.</p> <p>Document of "Evaluasi Kepatuhan Hukum" is the system used for tracking any changes in laws and regulations. Evaluation of compliance with the regulation has updated on January 2020. Updating, for example:</p> <p>PT. Inti Indosawit Subur – Muara Bulian as Unit of Certification has complied with relevant regulations, i.a:</p> <ol style="list-style-type: none"> Nomor Induk Berusaha (NIB): 8120007822674, tanggal 27 Agustus 2018. 	<p>Complied</p>

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		<ol style="list-style-type: none"> 2. NPWP: 01.062.129.0-092.000. 3. Land Use Right or "Hak Guna Usaha (HGU)": HGU Certificate No. 1 (22 Dec 2003); Reference: SK Kepala BPN No. 14/HGU/1992 (15 Sep 1992) area 1,256.18 Ha. Expired: 31 Dec 2027 HGU Certificate No. 4 (6 Oct 2003) reference SK HGU No: 51/HGU/BPN RI/2003 (10 Sep 2003), area 523.42 Ha. Expired: 6 Oct 2038. HGU Certificate No. 2 (13 Aug 2003) reference SK HGU No: 03.540.1-06-2003 (10 Jul 2003), area 324,800 m² (32.48 Ha). Expired: 13 Aug 2038. HGU Certificate No. 1 (13 Aug 2003) reference SK HGU No: 01.540.1-06-2003 (10 Jul 2003), area 272,700 M² (27.27 Ha). Expired: 13 Aug 2038. HGU Certificate No. 3 (13 Aug 2003) reference SK HGU No: 02.540.1-06-2003 (10 Jul 2003), area 170,900 M² (17.09 Ha). Expired: 13 Aug 2038. 4. Surat Pendaftaran Usaha Perkebunan (SPUP) No: 187/Mentanhut/VII/2000, dated 3 November 2000. Area: 4,759.20 Ha (Tungkal Ulu 3,503.02 Ha) dan (Muara Bulian 1,256.18 Ha) and Mill capacity 60 Ton FFB/hr. 5. Persetujuan Ka. Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Prop. Jambi Nomor: 68/KEP/KA.DPM-PTSP/5.2/XI/2017, tanggal 1 Nov 2017 tentang Persetujuan Perubahan Luas Lahan PT. Inti Indosawit Subur. Bertambah luasan sesuai 4 HGU tambahan yaitu 600.26 Ha. 6. Akta Perubahan Data Terakhir Perseroan Terbatas: Akta Notaris No. 43 Tanggal 20 November 2017, Oleh Notaris Linda Herawati, SH. Pengesahan dari KEMENKUMHAM No: AHU-AH.01.03-0194564, dated 24 November 2017. 7. Keputusan Kepala BLHD Prov. Jambi Nomor: 474/BLHD/2010 tentang Persetujuan Revisi RKL-RPL PT. IIS Kegiatan Perkebunan Kelapa Sawit seluas 9.188 Ha (Inti dan Plasma) dan Pabrik Minyak Kelapa Sawit Kapasitas 60 Ton/Jam di Kec. Maro Sebo Ilir, aKab. Batanghari. Dated 10 Aug 2010. 	
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		<p>Environmental License for smallholders is under scope of EIA/AMDAL PT. Inti Indosawit Subur.</p> <p>Plantation permit refer to Keputusan Menteri Kehutanan Nomor: 494/Kpts-II/1991, tanggal 7 Aug 1991 tentang Pelepasan Areal Hutan seluas 17,500 Ha di Kab. Tanjung Jabung dan 9,356 Ha di Kab. Batanghari Untuk Usaha Budidaya Perkebunan Dengan Pola PIR TRANS Atas Nama PT. Inti Indosawit Subur.</p> <p>Whereby, all smallholders has had Land Ownership Certificate (SHM) as land tenure.</p> <p>Sample taken of Smallholders Land Certificates each Cooperative as follow:</p> <p>KUD Barokah: 7 individual smallholders.</p> <ol style="list-style-type: none"> 1) Mr. DULLAH B.; SHM Certificate No. 272, dated 3 Mar 1999; SK. Kakanwil BPN Prop. Jambi No. 229/HM.1/PIR/BPN/1999, dated 22 Mar 1999; Covers Area: 19,960 m² (1.9 Ha). Farmer Group/KT: Mekar Jaya. Plot Number: 2206. Hampanan 82. 2) Mr. PONADI; SHM Certificate No. 418, dated 3 Feb 1998; SK. Kakanwil BPN Prop. Jambi No. 180/HM.1/PIR/BPN/1997, dated 1 Oct 1997; Covers Area: 21,663 m² (2.1 Ha). Farmer Group/KT: Mekar Jaya. Plot Number: 2174. Hampanan 82. 3) Mr. RAHMAT; SHM Certificate No. 579, dated 3 Mar 1999; SK. Kakanwil BPN Prop. Jambi No. 229/HM.1/PIR/BPN/1999, dated 22 Mar 1999; Covers Area: 19,960 m² (1.9 Ha). Farmer Group/KT: Guyur Makmur. Plot Number: 1845. Hampanan 78. 4) Mr. SAPUAN; SHM Certificate No. 240, dated 3 Mar 1999; SK. Kakanwil BPN Prop. Jambi No. 229/HM.1/PIR/BPN/1999, dated 22 Mar 1999; Covers Area: 19,050 m² (1.9 Ha). Farmer Group/KT: Guyur Makmur. Plot Number: 1933. Hampanan 78. 5) Mr. SUKARYADI; SHM Certificate No. 436, dated 3 Feb 1998; SK. Kakanwil BPN Prop. Jambi No. 180/HM.1/PIR/BPN/1997, dated 1 Oct 1997; Covers Area: 	
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		<p>19,470 m² (1.9 Ha). Farmer Group/KT: Mekar Jaya. Plot Number: 2232. Hamparan 82.</p> <p>6) Mr. SUPARMAN; SHM Certificate No. 271, dated 3 Mar 1999; SK. Kakanwil BPN Prop. Jambi No. 229/HM.1/PIR/BPN/1999, dated 22 Mar 1999; Covers Area: 19,960 m² (1.9 Ha). Farmer Group/KT: Mekar Jaya. Plot Number: 2191. Hamparan 82.</p> <p>7) Mr. TOMI; SHM Certificate No. 604, dated 3 Mar 1999; SK. Kakanwil BPN Prop. Jambi No. 229/HM.1/PIR/BPN/1999, dated 22 Mar 1999; Covers Area: 19,960 m² (1.9 Ha). Farmer Group/KT: Guyur Makmur. Plot Number: 1909. Hamparan 78.</p> <p>KUD Budi Sari: 7 individual smallholders.</p> <p>1) Mr. ALWI; SHM Certificate No. 453, dated 4 Jun 1996; SK. Kakanwil BPN Prop. Jambi No. 67/HM.1/PIR/BPN/1996, dated 11 May 1996; Covers Area: 20,563 m² (2.0 Ha). Farmer Group/KT: Bunga Harapan. Plot Number: 954. Hamparan 17.</p> <p>2) Mr. HAMDI; SHM Certificate No. 533, dated 4 Jun 1996; SK. Kakanwil BPN Prop. Jambi No. 67/HM.1/PIR/BPN/1996, dated 11 May 1996; Covers Area: 20,010 m² (2.0 Ha). Farmer Group/KT: Bunga Harapan. Plot Number: 969. Hamparan 17.</p> <p>3) Mr. HASIM; SHM Certificate No. 728, dated 4 Jun 1996; SK. Kakanwil BPN Prop. Jambi No. 67/HM.1/PIR/BPN/1996, dated 11 May 1996; Covers Area: 21,038 m² (2.1 Ha). Farmer Group/KT: Sido Dadi. Plot Number: 924. Hamparan 19.</p> <p>4) Mr. IMRON P; SHM Certificate No. 515, dated 4 Jun 1996; SK. Kakanwil BPN Prop. Jambi No. 67/HM.1/PIR/BPN/1996, dated 11 May 1996; Covers Area: 20,138 m² (2.0 Ha). Farmer Group/KT: Bunga Harapan. Plot Number: 952. Hamparan 17.</p> <p>5) Mr. NGATIJAN; SHM Certificate No. 381, dated 4 Jun 1996; SK. Kakanwil BPN Prop. Jambi No. 67/HM.1/PIR/BPN/1996, dated 11 May 1996; Covers Area:</p>	
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		<p>20,600 m² (2.0 Ha). Farmer Group/KT: Harapan Kita. Plot Number: 600. Hampan 32.</p> <p>6) Mr. PURYANTO; SHM Certificate No. 709, dated 4 Jun 1996; SK. Kakanwil BPN Prop. Jambi No. 67/HM.1/PIR/BPN/1996, dated 11 May 1996; Covers Area: 21,012 m² (2.1 Ha). Farmer Group/KT: Sido Dadi. Plot Number: 919. Hampan 19.</p> <p>7) Mr. SUWARDI; SHM Certificate No. 731, dated 4 Jun 1996; SK. Kakanwil BPN Prop. Jambi No. 67/HM.1/PIR/BPN/1996, dated 11 May 1996; Covers Area: 20,106 m² (2.0 Ha). Farmer Group/KT: Sido Dadi. Plot Number: 918. Hampan 19.</p> <p>KUD Karya Lestari: 7 individual smallholders.</p> <p>1) Mr. AHMAD FADLI; SHM Certificate No. 398, dated 3 Feb 1998; SK. Kakanwil BPN Prop. Jambi No. 182/HM.1/PIR/BPN/1997, dated 1 Nov 1997; Covers Area: 20,260 m² (2.0 Ha). Farmer Group/KT: Sumber Mulia. Plot Number: 1481. Hampan 71.</p> <p>2) Mr. DARMAJI; SHM Certificate No. 542, dated 3 Feb 1998; SK. Kakanwil BPN Prop. Jambi No. 182/HM.1/PIR/BPN/1997, dated 1 Nov 1997; Covers Area: 19,691 m² (1.9 Ha). Farmer Group/KT: Tani Maju. Plot Number: 1351. Hampan 68.</p> <p>3) Mr. HAJAR WIDODO; SHM Certificate No. 559, dated 3 Feb 1998; SK. Kakanwil BPN Prop. Jambi No. 182/HM.1/PIR/BPN/1997, dated 1 Nov 1997; Covers Area: 19,688 m² (1.9 Ha). Farmer Group/KT: Tani Maju. Plot Number: 1360. Hampan 68.</p> <p>4) Mr. JAIS; SHM Certificate No. 626, dated 3 Feb 1998; SK. Kakanwil BPN Prop. Jambi No. 182/HM.1/PIR/BPN/1997, dated 1 Nov 1997; Covers Area: 22,230 m² (2.2 Ha). Farmer Group/KT: Tani Maju. Plot Number: 1358. Hampan 68.</p> <p>5) Mr. M. YUSUF; SHM Certificate No. 435, dated 3 Feb 1998; SK. Kakanwil BPN Prop. Jambi No. 182/HM.1/PIR/BPN/1997, dated 1 Nov 1997; Covers Area:</p>	
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		<p>19,847 m² (1.9 Ha). Farmer Group/KT: Sumber Mulia. Plot Number: 1484. Hamparan 71.</p> <p>6) Mr. MUHAMMAD ABDULLAH; SHM Certificate No. 556, dated 3 Feb 1998; SK. Kakanwil BPN Prop. Jambi No. 182/HM.1/PIR/BPN/1997, dated 1 Nov 1997; Covers Area: 20,555 m² (2.0 Ha). Farmer Group/KT: Tani Maju. Plot Number: 1232. Hamparan 68.</p> <p>7) Mr. PONAWEI; SHM Certificate No. 540, dated 3 Feb 1998; SK. Kakanwil BPN Prop. Jambi No. 182/HM.1/PIR/BPN/1997, dated 1 Nov 1997; Covers Area: 19,691 m² (1.9 Ha). Farmer Group/KT: Tani Maju. Plot Number: 1369. Hamparan 68.</p> <p>Until this onsite audit, there is no new updating of the license. PT Inti Indosawit Subur – Muara Bulian POM and estate has fulfilled the requirement such as land title, environmental permit and plantation permit.</p> <p>Based on the document verification, the legal register (updated per December 2021) are in place. For example: <i>Undang – Undang Cipta Kerja No. 11/2020</i> and its clauses, <i>Permentan 38/2020</i> related to Indonesian Sustainable Palm Oil (ISPO).</p> <p>During this audit, sample taken are from KUD Barokah, Budi Sari, Karya Lestari, Tuah Sakato and KUD Makmur. From random smallholder sampling obtained information that all KUD’s member has had personal land title certificate, plantation permit and environmental permit.</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.</p>	<p>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).</p>	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> <table border="1" data-bbox="981 510 1774 766"> <thead> <tr> <th>ID HGU pole</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td>BPN 25</td> <td>Block C19M, boundary with Bulian Jaya Village</td> </tr> <tr> <td>BM 25</td> <td>Block C19L, boundary with Bulian Jaya Village</td> </tr> <tr> <td>BM 26</td> <td>Block C19L, boundary with Bulian Jaya Village</td> </tr> <tr> <td>BM 27</td> <td>Block C19L, boundary with Bulian Jaya Village</td> </tr> </tbody> </table> <p>The boundary poles recorded in document "Laporan Pemeriksaan dan Perawatan Patok Batas PT Inti Indosawit Subur – Kebun Muara Bulian dated 18 June 2021". 47 boundary poles already identified and checked, completed with GPS coordinates (degree, minutes, second). All poles reported in good condition.</p>	ID HGU pole	Location	BPN 25	Block C19M, boundary with Bulian Jaya Village	BM 25	Block C19L, boundary with Bulian Jaya Village	BM 26	Block C19L, boundary with Bulian Jaya Village	BM 27	Block C19L, boundary with Bulian Jaya Village	Complied				
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Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.																	
2.2.1	A list of contracted parties is available.	<p>Certificate holder has listed the contracted parties. The list of third parties as per August 2021 as follows:</p> <table border="1" data-bbox="981 1045 1944 1388"> <thead> <tr> <th>Unit</th> <th>Contractors name</th> <th>Address</th> <th>Contact person</th> <th>Contract status</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Estate</td> <td>EFB and Decanter Cake Transporter</td> <td>Terusan Village</td> <td>Halasan Sianipar</td> <td>Active until 31 December 2021</td> </tr> <tr> <td>EFB and Decanter Cake Transporter</td> <td>Karya Mukti Village</td> <td>Mustangin</td> <td>Active until 31</td> </tr> </tbody> </table>	Unit	Contractors name	Address	Contact person	Contract status	Estate	EFB and Decanter Cake Transporter	Terusan Village	Halasan Sianipar	Active until 31 December 2021	EFB and Decanter Cake Transporter	Karya Mukti Village	Mustangin	Active until 31	Complied
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	EFB and Decanter Cake Transporter	Karya Mukti Village	Mustangin	Active until 31													

						December 2021		
		Mill	CV Trans Jaya (CPO Transporter)	Jambi	Nanda	Active		
			CV Pelita (CPO Transporter)	Jambi	Fitri	Active		
			PT Mitra Abadi Damai	Jambi	Andi Wijaya	Active		
		Based on interview with general manager and head clerk obtained information that the list of third parties updated in a monthly basis.						
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.	<p>Based on sample of contract, specific clause related compliance on legal requirement are described within Article 7:</p> <p><i>f. comply with the applicable regulations in Rep. Indonesia and is not involved in forced labor and human trafficking. "(mematuhi peraturan yang berlaku di Rep. Indonesia serta tidak terlibat dalam praktik kerja paksa dan perdagangan manusia)".</i></p> <p>Based on document verification of third party contract (EFB and decanter cake transporter) on behalf of Halasan Sianipar obtained information that the contract contain specific clause as follows:</p> <ul style="list-style-type: none"> • Name and personal address both parties, date and kind of agreement. • Scope of agreement • Requirement • Duration • Detail of agreement • Price 					Complied	

		<ul style="list-style-type: none"> • Payment method • Measurement • Responsibilities • Contractor Guarantee (covering statement to follow company procedure, registered their workers in worker insurance program, PPE usage, no child labour and other environmental procedures) • Sanction • End of agreement terms • Force majeure • Manipulation and bribery • Addendum • Court settlement • Signed both parties 	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.	<p>Based on document verification of third party contract (EFB and decanter cake transporter) on behalf of Halasan Sianipar obtained information that the contract contain specific clause as follows:</p> <ul style="list-style-type: none"> • Name and personal address both parties, date and kind of agreement. • Scope of agreement • Requirement • Duration • Detail of agreement • Price • Payment method • Measurement 	Complied

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Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> • Information regarding the geolocation of FFB origins; • Proof of ownership status, right/claim of the land by grower/smallholder; • If relevant, valid planting/operational/trading licence, or is part of a cooperative which allows the buying and selling of FFB. 	<p>As stated in sustainability reports of Asian Agri 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>Muara Bulian POM receives FFB from its own estate, smallholders scheme, out grower and assisted independent smallholders. Muara Bulian POM has collect the information regarding the geolocation, proof of ownership status, trading licence</p>	Complied

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		<p>and other relevant information including contract. Below are the sample information of directly source FFB:</p> <table border="1"> <thead> <tr> <th rowspan="2">FFB Sources</th> <th colspan="2">Coordinate Geolocation</th> <th rowspan="2">Trading licence</th> <th rowspan="2">Hectare (ha)</th> <th rowspan="2">Land Certificate</th> </tr> <tr> <th>Longitude</th> <th>Latitude</th> </tr> </thead> <tbody> <tr> <td>KUD Barokah</td> <td>E 103° 11' 39,1"</td> <td>S 01° 34' 49.2"</td> <td>503/338/2018</td> <td>1,240</td> <td>SHM</td> </tr> <tr> <td>KUD Budi Sari</td> <td>E 103° 12' 37,9"</td> <td>S 01° 32' 43,1"</td> <td>8120019162898</td> <td>1,130</td> <td>SHM</td> </tr> <tr> <td>KUD Karya Lestari</td> <td>E 103° 05' 47.8"</td> <td>S 01° 35' 3,6"</td> <td>05.06.2.01.36</td> <td>710</td> <td>SHM</td> </tr> <tr> <td>KUD Tuah Sakato</td> <td>E 103° 05' 47.8"</td> <td>S 01° 39' 42"</td> <td>229/05-06/XII/2016</td> <td>2,248</td> <td>SHM</td> </tr> <tr> <td>KUD Subur Makmur</td> <td>E 103° 05' 47.8"</td> <td>S 01° 34' 24.8"</td> <td>05.06.3.46.147</td> <td>900</td> <td>SHM</td> </tr> <tr> <td>PT Indo Kebun Unggul</td> <td>E 103° 14' 42.66"</td> <td>S 1° 37' 17.25"</td> <td>09.03.1.46.93341</td> <td>300</td> <td>HGU</td> </tr> <tr> <td>CSV Dua Putra</td> <td>E 103° 10' 43.93"</td> <td>S 1° 32' 8.484"</td> <td>AHU-0016521.AH.01.07 TAHUN 2017</td> <td>2,010</td> <td>SHM/SKT</td> </tr> <tr> <td>CSV Mekar Sari</td> <td>E 103° 12' 29.26"</td> <td>S 1° 32' 40.27"</td> <td>AHU-0016521.AH.01.07 TAHUN 2017</td> <td>462,2</td> <td>SHM/SKT</td> </tr> <tr> <td>CSH Harapan Kita</td> <td>E 103° 12' 29.26"</td> <td>S 1° 32' 40.27"</td> <td>AHU-0016521.AH.01.07 TAHUN 2017</td> <td>253</td> <td>SHM/SKT</td> </tr> </tbody> </table>	FFB Sources	Coordinate Geolocation		Trading licence	Hectare (ha)	Land Certificate	Longitude	Latitude	KUD Barokah	E 103° 11' 39,1"	S 01° 34' 49.2"	503/338/2018	1,240	SHM	KUD Budi Sari	E 103° 12' 37,9"	S 01° 32' 43,1"	8120019162898	1,130	SHM	KUD Karya Lestari	E 103° 05' 47.8"	S 01° 35' 3,6"	05.06.2.01.36	710	SHM	KUD Tuah Sakato	E 103° 05' 47.8"	S 01° 39' 42"	229/05-06/XII/2016	2,248	SHM	KUD Subur Makmur	E 103° 05' 47.8"	S 01° 34' 24.8"	05.06.3.46.147	900	SHM	PT Indo Kebun Unggul	E 103° 14' 42.66"	S 1° 37' 17.25"	09.03.1.46.93341	300	HGU	CSV Dua Putra	E 103° 10' 43.93"	S 1° 32' 8.484"	AHU-0016521.AH.01.07 TAHUN 2017	2,010	SHM/SKT	CSV Mekar Sari	E 103° 12' 29.26"	S 1° 32' 40.27"	AHU-0016521.AH.01.07 TAHUN 2017	462,2	SHM/SKT	CSH Harapan Kita	E 103° 12' 29.26"	S 1° 32' 40.27"	AHU-0016521.AH.01.07 TAHUN 2017	253	SHM/SKT	
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2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1.</p>	<p>Muara Bulian POM receives FFB from its own estate, smallholders scheme, out grower and assisted independent smallholders. Muara Bulian POM has collect the information regarding the geolocation, proof of ownership status, trading licence and other relevant information including contract. Below are the sample information of Indirectly source FFB:</p> <table border="1"> <thead> <tr> <th>FFB Sources</th> <th>Coordinate Geolocation</th> <th>Trading licence</th> <th></th> <th></th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	FFB Sources	Coordinate Geolocation	Trading licence								Complied																																																				
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	Longitude	Latitude		Hectare (ha)	Land Certificate
PT Pacific Global Sejahtera	102° 51' 49.58" E	1° 34' 55.31" S	530-1314-BPMPPT-15.71.03.1001-2016	2,837 Ha	SHM/SKT
Edy Susanto	103° 17' 8.76" E	1° 55' 3.25"	N/A	80 Ha	SHM/SKT
Kebun Tani Mandiri	103° 6' 46.79" E	1° 34' 3.29" S	N/A	72 Ha	SHM/SKT
Farizal	103° 6' 33.69" E	1° 32' 23.35" S	N/A	170 Ha	SHM/SKT
Helena	103° 9' 6.90" E	1° 30' 18.29" S	N/A	128 Ha	SHM/SKT

Principle 3: Optimise productivity, efficiency, positive impact and resilience

Implement plans, procedures and systems for continuous improvement.

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

3.1.1	<p>(C) A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.</p>	<p>The Certificate Holder has had three years' management plan covering Own Estate, Mill and Smallholder's scheme updated 6th July 2020, as follow:</p> <ol style="list-style-type: none"> Planting Material. MARIHAT: YoP 1991, 1992, 1993, 1994, 1996, 1997. TOPAZ: Year of Planting 2016, 2017, 2018 and 2019 (only for own estate). Yield (Ton FFB/Ha) <table border="1" data-bbox="974 1069 1937 1356"> <thead> <tr> <th>KUD / Smallholder's Cooperative</th> <th>Size (Ha)</th> <th>Act (Jan-Jun 20)</th> <th>Budget 2020</th> <th>Target 2021</th> <th>Target 2022</th> <th>Target 2023</th> </tr> </thead> <tbody> <tr> <td>Barokah (SP1)</td> <td>1,240</td> <td>7.37</td> <td>21.80</td> <td>21.80</td> <td>21.80</td> <td>20.10</td> </tr> <tr> <td>Subur Makmur (SP2)</td> <td>1,130</td> <td>9.15</td> <td>21.90</td> <td>21.90</td> <td>21.90</td> <td>20.10</td> </tr> <tr> <td>Budi Sari (SP3)</td> <td>900</td> <td>7.23</td> <td>20.30</td> <td>20.30</td> <td>20.30</td> <td>19.50</td> </tr> <tr> <td>Makmur Rejeki (SP4)</td> <td>730</td> <td>5.80</td> <td>20.00</td> <td>20.00</td> <td>20.00</td> <td>19.20</td> </tr> <tr> <td>Karya Lestari (SP5)</td> <td>710</td> <td>7.66</td> <td>21.80</td> <td>21.80</td> <td>21.80</td> <td>20.10</td> </tr> </tbody> </table>	KUD / Smallholder's Cooperative	Size (Ha)	Act (Jan-Jun 20)	Budget 2020	Target 2021	Target 2022	Target 2023	Barokah (SP1)	1,240	7.37	21.80	21.80	21.80	20.10	Subur Makmur (SP2)	1,130	9.15	21.90	21.90	21.90	20.10	Budi Sari (SP3)	900	7.23	20.30	20.30	20.30	19.50	Makmur Rejeki (SP4)	730	5.80	20.00	20.00	20.00	19.20	Karya Lestari (SP5)	710	7.66	21.80	21.80	21.80	20.10	Complied
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Tuah Sakato (Danau Embat)	1,500	6.74	19.50	19.50	19.50	20.00
Tuah Sakato (Rantau Kapas)	244	4.94	19.00	19.00	19.00	20.00
Tuah Sakato (Terusan)	504	7.93	17.50	17.50	17.50	21.00
Total	6,958	7.33	20.47	20.47	20.47	19.97

3. OER dan KER

Extract Ratio	Act (Jan-Jun 20)	Budget 2020	Target 2021	Target 2022	Target 2023
OER	20.64	22.10	21.55	21.55	21.55
KER	5.37	5.70	5.70	5.70	5.70

4. Production cost (IDR/MT CPO)

Cost Unit	Act (Jan-Jun 20)	Budget 2020	Target 2021	Target 2022	Target 2023
Estate	2,606,644	2,217,457	2,439,203	2,461,377	2,463,595
Mill	329,143	302,159	299,461	299,191	299,164
Total	2,935,787	2,519,616	2,738,664	2,760,568	2,762,759

Certificate holder has provided longterm management plan in document *Rencana Jangka Panjang periode 2020 – 2024*. This document described the five-year business projection of PT Inti Indosawit Subur – Muara Bulian POM and estate.

Longterm management plant of PT Inti Indosawit Subur – Muara Bulian has documented in *Rencana Jangka Panjang periode 2021 – 2026*. The longterm management plan covered parameter as follows:

- Planting material (Topaz)

		<ul style="list-style-type: none"> • Hectare statement of mature and immature area • Estimation of production (Tonnes) • Estimation of FFB purchase (for Mass Balance Mill) • Extraction projected (%) • Cost estimation (IDR/Kg) • Estimation of price (IDR/Tonnes) • Estimation of profit (IDR) <p>Through the document, the production of Muara Bulian POM was projected to increased. According to the end of December 2020 report, Muara Bulian POM has had average extraction for CPO (19.42%) and KER (5.40%) in 2020. Annual achievement always evaluated by top management.</p> <p>PT Inti Indosawit Subur has demonstrates financial report for fiscal year ends 31 December 202. The financial report prepared by independent auditor Imelda & Partners report No. 00143/2.1265/AU.1/01/1089-1/1/IV/2021 dated 14 April 2021. The auditor stated:</p> <p><i>"In our opinion, the accompanying consolidated financial statements present fairly, in all material respect, the financial position of PT Inti Indosawit Subur and its subsidiaries as of December 31, 2020, and their financial performance and cash flows for the year then ended, in accordance with Indonesian Financial Account Standards".</i></p> <p>In addition, the company also shows evidence of its financial ability in paying taxes. One of them, proof of payment of "Pajak Bumi dan Bangunan" (land and building tax) period of 2020 via bank transfer on 11 November 2020.</p> <p>Based on interview with head clerk and sustainability staff, PT Inti Indosawit Subur has had engagement with 7 existing scheme smallholders and independent smallholder named Create Share Value (CSV) near the Inti Indosawit Subur's concession since a couple year ago and renewed annually. According to the latest record of CSV obtain information that 10 CSV contract existing as follows:</p>	
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		<ol style="list-style-type: none"> 1. Dua Putra 2. Mekar Sari 3. Harapan Kita 4. Herman Tamsil 5. Forum Cahaya Buana 6. PT Pratama Sawit Mandiri 7. Sinar Danau Embat 8. Asosiasi Putra Tunggal 9. Gapoktan Mutiara Terusan 10. Gapoktan Swadaya Cahaya Buana <p>The cooperation agreement with CSV includes assistance to farmers in best management practices, capacity building and other assistance agreements in producing sustainable palm oil.</p>	
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	<p>Replanting program 2020-2025 for Own estate is demonstrated and available. Where for smallholders, replanting program was not started yet.</p> <p>Based on hectare statement data, there is no replanting program in own estate in the next five year. Replanting activity has been done on 2019. Current planting year is 2016, 2017, 2018 and 2019.</p> <p>Smallholder has had the replanting program for period 2020 – 2031 as follows:</p> <ul style="list-style-type: none"> • 2020: 380 Ha • 2021: 460 Ha • 2022: 1,408 Ha • 2023: 1,306 Ha • 2024: 872 Ha • 2025: 1,406 Ha 	Complied

		<ul style="list-style-type: none"> • 2026: 720 Ha • 2031: 388 Ha <p>During field visit to the respective sampling found that several replanting activities has been done on 2020. There was no fire usage during that process.</p>	
3.1.3	The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.	<p>UoC conducting management review annually. The latest management review at Muara Bulian POM was conducted on 6 December 2019 and attended by 7 persons. During the onsite audit, auditor team also verifying the record of internal audit/visit. Sighted the record of visit in each unit as follows:</p> <ul style="list-style-type: none"> • Visit Agronomy Muara Bulian Estate: Report No. VA/KMB/SEP/FULL/01-2020 Full Report, date of visit 21 – 24 September 2020 by Goh Sudi Wunsen. There were no main issues in this estate, however current issues and recommendation of immature area related to weeding control in circles/path and interrow, manuring, pest & disease, castration, supplying and consolidation, pruning, trenches, road/bridge and harvesting. • Visit Engineering Muara Bulian POM: Report No. VE-PMB-JUL-FULL-01-2021-Full Report, date of visit 5 – 13 July 2021. There were no pending issues in this mill. However, there were a key issue related to FFB cages condition in loading ramp and poor collection of EFB due to low evacuation by estate. 	Complied
<p>Criteria 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p>			
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification.	<p>Continues improvement were developed by Unit of Certification is by following up the non-conformities of the internal audit and certification audit. Also, they have CI report annually to create improvements in their activities Mill and Estate. The CI report already demonstrated during remote audit.</p> <p>Unit of certification has had annual improvement on operational activity. For example, there was a record of continuous improvement by the workshop staff in facilitating the transportation of FFB from the circle to the gathering point through</p>	Complied

		modification of the wheelbarrow. This improvement has been implemented on 2021.	
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.	<p>Until this surveillance assessment conducted, RSPO metrics template was not available. Therefore, Unit of Certification only send ACOP as progress report annually by the RSPO member.</p> <p>The RSPO metric template has been submitted by unit of certification before the onsite audit. The information covering as follows:</p> <ul style="list-style-type: none"> • Member details such as certification details, contact, information of unit certification, biodiversity and peatlands. • Annual mill such as mill capacity, production, productivity of scheme smallholders, productivity of out growers, demographics in mill and smallholders, training, operational record, Lost Time Injury Frequency Rate (LTIFR) and grievances. • Annual estate such as name and number of estates, production, demographics of estates and smallholders, training, operational record (pesticide usage), Lost Time Injury Frequency Rate (LTIFR) and grievances. <p>All the blank form has been filled and verified by auditor teams. The record RSPO Metric Template will be submitted to the RSPO secretariat.</p>	Complied
Criteria 3.3: Operating procedures are appropriately documented, consistently implemented and monitored.			
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	<p>There is no changes on the SOP's for Mill and Estate. The procedures for estates is covering Nursery (SOP AA-APM-OP-1100.01-R4 dated 5 September 2016) upto Replanting (SOP AA-APM-OP-1100.20-R6). While, procedures on Mill are from FFB Receiving (SOP AA-MPM-OP-1400.02.R2) upto Storage of CPO and PK (SOP AA-MPM-OP-1400.14-R2).</p> <p>Own Estate:</p> <p>Estate has had Standard Operational Procedures (SOP) that covering entire operational activity as follows:</p>	Complied

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		<ul style="list-style-type: none"> • SOP AA-APM-OP-1100.01-R4 dated 5 September 2016: <i>Pembibitan</i> (Nursery). • SOP AA-APM-OP-1100.02-R3 dated 10 June 2015: <i>Penanaman Areal Baru</i> (New Planting). • SOP AA-APM-OP-1100.03-R2 dated 24 July 2015: <i>Pembuatan dan Perawatan Jalan dan Jembatan</i> (Road and Bridge construction and maintenance); • SOP AA-APM-OP-1100.04-R3 dated 7 Decmeber 2015: <i>Pembuatan dan Pemeliharaan Parit</i> (Drainage Construction and Maintenance). • SOP AA-APM-OP-1100.05-R3 dated 23 November 2016: <i>Konservasi Tanah dan Air</i> (Soil & Water Conservation). • SOP AA-APM-OP-1100.06-R6 dated 16 February 2017: <i>Menanam kacang</i> (Planting cover crops). • SOP AA-APM-OP-1100.07-R6 dated 16 February 2017: <i>Menanam Kelapa Sawit</i> (Planting Oil Palms). • SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed control). • SOP AA-APM-OP-1100.09. R5 dated 26 December 2018: <i>Pemupukan</i> (Fertilizer application). • SOP AA-APM-OP-1100.10. R6 dated 23 November 2016: <i>Pengendalian Hama dan Penyakit</i> (Pests & Disease Control). • SOP AA-APM-OP-1100.11. R1 dated 1 February 2009: <i>Pestisida dan Pengendaliannya</i> (Pesticide Handling). • SOP AA-APM-OP-1100.12. R3 dated 23 November 2016: <i>Kastrasi</i> (Palm castration) explain cutting all generative product (mal flower, female flower, all fruit, to support vegetative growth) – done 5-6 months before being harvested. • SOP AA-APM-OP-1100.13. R3 dated 4 March 2016: <i>Tunas Pokok</i> (Pruning). • SOP AA-APM-OP-1100.14. R3 dated 16 February 2017: <i>Sensus dan</i> 	
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		<p><i>Identifikasi Pokok</i> (Census and Palm Identification).</p> <ul style="list-style-type: none"> • SOP AA-APM-OP-1100.15. R2 dated 1 October 2010: <i>Sensus Produksi</i> (Production Census). • SOP AA-APM-OP-1100.16. R1 dated 1 February 2009: <i>Konsolidasi Pohon Tumbang</i> (Provision of Support to Fallen Palm). • SOP AA-APM-OP-1100.17. R1 dated 23 October 2014: <i>Pengelolaan Air</i> (Water Management). • SOP AA-APM-OP-1100.18.R3 dated 20 April 2015: <i>Potong Buah</i> (Harvesting). • SOP AA-APM-OP-1100.19.R1 dated 1 February 2009: <i>Pengelolaan Transport</i> (FFB Transport). • SOP AA-APM-OP-1100.20-R6 dated 1 May 2019: <i>Peremajaan</i> (Replanting). <p>Muara Bulian POM has documented and implemented procedure related to process of FFB to become CPO and PK, starts from FFB receiving to dispatch of CPO and PK:</p> <ol style="list-style-type: none"> 1. SOP AA-MPM-OP-1400.02.R2 dated 1 September 2011: <i>Stasiun Penerimaan</i> for FFB Receiving Station; 2. SOP AA-MPM-OP-1400.03.R1 dated 1 February 2009: <i>Stasiun Rebusan</i> for Sterilizer; 3. SOP AA-MPM-OP-1400.04.R1 dated 1 February 2009: <i>Stasiun Pemisahan Berondolan</i> for Loose Fruit Separation; 4. SOP AA-MPM-OP-1400.05-R1 dated 1 February 2009: <i>Stasiun Pengadukan dan Pengempaan</i> for Pressing Station; 5. SOP AA-MPM-OP-1400.06-R1 dated 1 February 2009: <i>Stasiun Pemurnian</i> for Clarification; 6. SOP AA-MPM-OP-1400.07-R1 dated 1 February 2009: <i>Stasiun Pemisahan Nut dan Fiber</i> for Nut and Fiber Separation; 7. SOP AA-MPM-OP-1400.08-R1 dated 1 February 2009: <i>Stasiun Kernel</i> for Kernel 	
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		<p>Station;</p> <ol style="list-style-type: none"> 8. SOP AA-MPM-OP-1400.09-R1 dated 1 February 2009: <i>Stasiun</i> Boiler; 9. SOP AA-MPM-OP-1400.10-R1 dated 1 February 2009: <i>Stasiun</i> Engine Room; 10. SOP AA-MPM-OP-1400.11-R1 dated 1 February 2009: <i>Stasiun</i> Water Treatment; 11. SOP AA-MPM-OP-1400.12-R1 dated 1 February 2009: Laboratorium; 12. SOP AA-MPM-OP-1400.13-R1 dated 1 February 2009: <i>Stasiun Pengelolaan Limbah</i> for Palm Oil Mill Effluent Treatment; 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; 14. SOP AA-MPM-OP-1400.15-R1 dated 1 February 2009: <i>Perawatan</i> for Preventive Maintenance; 15. SOP AA-MPM-OP-1400.19.R2 dated 1 September 2011: <i>Manajemen dan Metode Menghitung Emisi Gas Rumah Kaca</i> (GHG) 16. SOP AA-MPM-OP-1400.18-R4 Book Keeping 17. AA-MPM-OP-1400.17-R6 Traceability <p>Those documents above are available in each unit.</p> <p>Scheme Smallholder: Scheme smallholder has had best management practices procedure as follows:</p> <ul style="list-style-type: none"> • AA-PLASMA-PP-KS-01 <i>Pembibitan</i> (Nursery) • AA-APM-OP-1100.09-R3 <i>Pemupukan</i> (Manuring) dated 20 April 2015 • AA-PLASMA-PP-KS-04 <i>Potong Buah</i> (Harvesting) • AA-PLASMA-PP-KS-05 <i>Pengangkutan TBS</i> (FFB Transport) • AA-APM-OP-1100.10-R5 <i>Pengendalian Hama dan Penyakit</i> (Pest and Disease Control) dated 11 January 2016 	
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		<ul style="list-style-type: none"> • AA-APM-OP-1100.20-R5 <i>Peremajaan</i> (Replanting) dated 4 March 2016 • AA-MM-508-1-RO <i>Penerimaan TBS Plasma</i> (FFB Plasma Receiving) 1 September 2015 • AA-MM-508-2-RO <i>Penentuan Taksasi TBS Plasma</i> (FFB Plasma Estimation) • AA-APM-OP-1100.8-R5 <i>Pengendalian Gulma</i> (Weed Control) • AA-FA-220-2-RO <i>Stempel</i> (Stamp) • AA-MPM-OP-1400-17-R6 <i>Ketertelusuran</i> (Traceability) dated 1 September 2017 • AA-APM-OP-1100.02-R3 <i>Penanaman Area Baru</i> (New Planting) • AA-SOP-ES-6001-R4 <i>Audit Internal Sustainability</i> (Internal Audit Sustainability) • AA-KL-12-EFP <i>Restorasi Riparian dan Areal di Sekitar Danau/Waduk dan Mata Air Lainnya</i> (Restoration of Riparian Area or Near Area of Lake/Damp or Water Sources) dated 1 August 2010 • AA-HR-305.2-RO <i>Rekrutmen dan Seleksi Karyawan</i> (Recruitment and Selection of Employee). • Procedure of Internal Communication Group Certification (007/DOK/SOP/AA2016); • Procedure of Assessment and Inspection Member Group Plantation (013/DOK/SOP/AA/2016); • FFB sale Mechanism (020/DOK/SOP/AA/2016). <p>During onsite audit, auditor has conducted field visit to the Muara Bulian Estate as follows:</p> <ul style="list-style-type: none"> • Harvesting in Block A15a Afdeling 1. The implementation was good, the harvester can demonstrate the best management practices for harvesting and also safety working procedure. • Chemical weeding, Block A16c Afdeling 1 	
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		<p>Circle and path, using micron herbi (Very Low Volume of sprayer) with pesticide Isopropyl amina glifosat and metil metsulfuron.</p> <ul style="list-style-type: none"> Fertilizer application Block A16d Afdeling 1 <p>According to fertilizer recommendation, Muara Bulian Estate conducted fertilizer application using Amonium Clorida with dosage 2.20 kg/palm. The fertilizer applicator can demonstrate the application and safety working procedure.</p>	
3.3.2	A mechanism to check consistent implementation of procedures is in place.	<p>During the onsite audit, auditor team also verifying the record of internal audit/visit. Sighted the record of visit in each unit as follows:</p> <ul style="list-style-type: none"> Visit Agronomy Muara Bulian Estate: Report No. VA/KMB/SEP/FULL/01-2020 Full Report, date of visit 21 – 24 September 2020 by Goh Sudi Wunsen. There were no main issues in this estate, however current issues and recommendation of immature area related to weeding control in circles/path and interrow, manuring, pest & disease, castration, supplying and consolidation, pruning, trenches, road/bridge and harvesting. Visit Engineering Muara Bulian POM: Report No. VE-PMB-JUL-FULL-01-2021-Full Report, date of visit 5 – 13 July 2021. There were no pending issues in this mill. However, there were a key issue related to FFB cages condition in loading ramp and poor collection of EFB due to low evacuation by estate. According to the action plan of VE visit the mill has evacuated the EFB stacking. <p>During the field visit, auditor found that the EFB station is full and spill over to the ground. It raised as Non-compliance.</p>	Non-compliance
3.3.3	Records of monitoring and any actions taken are maintained and available.	<p>PT Inti Indosawit Subur follows procedure for internal audit under Standard Operating Procedures AA-SOP-ES-6001-R1 dated 1 March 2013. The procedure stating internal audit of minimum once a year. If there is finding, unit management shall prepare review on audit finding and prepare root cause analysis, prepare corrective action – with person in charge and completion target. The latest RSPO internal audit was done in 1 – 5 June 2020.</p> <p>Smallholders:</p>	Complied

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		<p>Regular field inspection to monitor the SOP implementation has been carried out by Muara Bulian Smallholder management. Record monitoring verified for example:</p> <ul style="list-style-type: none"> - Agronomy Visit Report (11 Oct 2019) - Grading FFB, sample taken on 4 Jun 2020 for KUD Karya Lestari. - Smallholders FFB’s quality checking, sample record on 14 May 2020. - Internal audit for smallholders, dated 19-20 August 2019. <p>During the onsite audit, auditor team also verifying the record of internal audit/visit. Sighted the record of visit in each unit as follows:</p> <ul style="list-style-type: none"> • Visit Agronomy Muara Bulian Estate: Report No. VA/KMB/SEP/FULL/01-2020 Full Report, date of visit 21 – 24 September 2020 by Goh Sudi Wunsen. There were no main issues in this estate, however current issues and recommendation of immature area related to weeding control in circles/path and interrow, manuring, pest & disease, castration, supplying and consolidation, pruning, trenches, road/bridge and harvesting. • Visit Engineering Muara Bulian POM: Report No. VE-PMB-JUL-FULL-01-2021-Full Report, date of visit 5 – 13 July 2021. There were no pending issues in this mill. However, there were a key issue related to FFB cages condition in loading ramp and poor collection of EFB due to low evacuation by estate. <p>The advisory visit scheduled annually. Generally conducted on July.</p>	
<p>Criteria 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
3.4.1	<p>(C) SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.</p>	<p>Environmental document: PT Inti Indosawit Subur – Muara Bulian has demonstrated the document of Analisis Mengenai Dampak Lingkungan (AMDAL) consist of document ANDAL, RKL and RPL as approved through “Persetujuan Komisi Amdal Departemen Pertanian No.014/Andal/RKL-RPL/BA/V/1995 tentang Persetujuan ANDAL dan RKL-RPL perkebunan Kelapa Sawit dan Pabrik Minyak Kelapa Sawit PT Inti Indosawit Subur”</p>	Complied

		<p>dated 3rd May 1995. The document covers scope of area of 32,000 Ha consist of Kuala Tungkal Estate 20,000 Ha and Muara Bulian Estate 12,000 Ha and palm oil mill capacity 90 Tonnes FFB/hour for Kuala Tungkal and 30 Tonnes FFB/hour for Muara Bulian.</p> <p>Revision on AMDAL document is available for PT Inti Indosawit Subur - Muara Bulian through "Surat Persetujuan Kepala Badan Lingkungan Hidup Provinsi Jambi No. 474/BLHD/2010 tentang Persetujuan Revisi Rencana Pengelolaan Lingkungan Hidup (RKL) dan Rencana Pemantauan Lingkungan Hidup (RPL) PT Inti Indosawit Subur seluas 9.188 Ha dan Pabrik Minyak Kelapa Sawit Kapasitas 60 Ton/Jam di Kecamatan Maro Sebo Ilir, Kabupaten Batanghari, Provinsi Jambi" dated 10th August 2010. The revision occurs due to changes in mill capacity from 30 Tonnes FFB/hour into 60 Tonnes FFB/hour, land application separation from Muara Bulian Group and social dynamics back in 2010.</p> <p>PT Inti Indosawit Subur – Muara Bulian has also prepared Evaluation of Environmental Impact-Aspects (Environmental management system – EMS-431-003-LT) each year, latest assessment conducted on 12 April 2021 for activities of Mill and estate including replanting activities which currently being undertaken by the company. Those utilized as tool to evaluate the implementation of environmental management and monitoring tools.</p> <p>Social impact assessment: PT Inti Indosawit Subur – Muara Bulian has had social impact assessment with scope in Estate, Mill and Plasma/Smallholder in the same report. Social Impact Assessment was conducted as documented in "Social Impact Assessment PT Inti Indosawit Subur Kebun Muara Bulian including Scheme Smallholder" in 2011 by Fakultas Kehutanan Institut Pertanian Bogor. This social impact assessment is also done with a direct approach with affected communities by FGD method conducted on 5 to 10 March 2011.</p> <p>The social risk has been identified for some aspect:</p>	
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		<ul style="list-style-type: none"> a. Tenurial aspect b. social aspect related infrastructure c. employment, industrial relation, and workforce absorption aspect d. environmental aspect <p>Smallholders:</p> <p>Environmental Impact Assessment and HCV of the Plasma Muara Bulian has identified the significant potential environmental impacts deriving from operational activities such as: fertilizing, weeds control, pest, and disease control, harvesting, FFB transportation, road and bridge maintenance, ditch maintenance, chemical storage and hazardous waste storage, office. Group Manager has provided the document of Evaluation of impact on the environment as per "Evaluasi Aspek Dampak Lingkungan Kebun Plasma Muara Bulian" updated on 1 February 2018. During audit, sampled seen in KUD Barokah, KUD Budi Sari and KUD Karya lestari. KUD can be demonstrated the environmental aspect and impact and its control.</p> <p>All the members have attended the training for Environmental Risk which cover all the environmental impacts identified in the operations in their oil palm plantations. Interview with smallholder member showed that they can demonstrated that they have understanding on environmental aspect and impact in their operation such as: water pollution, soil pollution and biodiversity decreasing as well as social impact.</p> <p>The social impacts with the participation of internal and external stakeholders such as management, local communities, head of around village (Karya Mukti, Tidar Kuranji, Bulian Jaya, Kehidupan Baru, Danau Embat village etc.) farmers and workers and the government bodies relate. Evidence of participation with affected parties is to use a questionnaire conducted on June 20, 2011.</p> <p>Based on interview with farmers that generally farmers understood of the social risk of their operation. Interview with farmers at KUD Budi Sari, hamparan 86 (Kavling</p>	
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		<p>2483 and 2469), KUD Budi Sari, hamparan 25 (kavling 835 and 839) and KUD Karya Lestari on hamparan 72 (kavling 1536 and 1515).</p>	
<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>Environmental Management and Monitoring Plan are available within "<i>Matriks Pengelolaan dan Pemantauan Lingkungan</i>" document. Environmental and social management and monitoring also involves affected stakeholders by distributing questionnaires conducted on 2 January 2021.</p> <p>As per document, environment management plan to prevent negative impact such as:</p> <ul style="list-style-type: none"> • To prevent air quality decrease from POM operational and FFB transportation, company performed action: Reduce exhaust emissions from the engines by maintenance routine engine, dust bin installation in boiler stack and design the height of boiler stack as per regulation, planting the crops to reduce the pollutant/absorb the pollutant near POM, limiting the vehicle speed around POM • To prevent noise from machine and POM operation, company performed isolating the noise source and machine maintenance, planting the crops as a green belt in surrounding POM, regular noise measurement • To prevent water quality decrease, using Palm Oil Mill Effluent (POME) as organic fertilizer (land application), maintaining waste-water treatment plant (IPAL), maintain and monitoring land application; -> impact of Biogas development (Methane capture) • To prevent decreasing of biodiversity, company performed enhancing biodiversity in riparian by planting local species, placing signboard to prohibit illegal hunting in conservation area and around estate, awareness to employee and surrounding community to save the protected species. • To prevent social conflict, community perception and enhance the surrounding economic, company provide employment opportunities to the local community, the provision of supporting infrastructure for public economic activities, providing employment opportunities information to the public, optimizing the 	<p>Complied</p>

		<p>use of local labor, involving the local community as business partners.</p> <p>PT Inti Indosawit SUbur – Muara Bulian has appointed Estate and Mill Manager together with Sustainability team to control and ensure the implementation of environment plan.</p> <p>Evaluation on Environment Aspect – Impact already conducted prior to replanting activities. Documented evidence using Environmental Management System - ISO 14001 (EMS-431-003-LT). This document is periodically revised internally according to changes in replanting activities. The latest amendment on 12 May 2021.</p> <p>Based on Environmental Management and Monitoring Report (Laporan RKL-RPL) period Semester 1 year 2021 stated "result of monitoring on Singoan river still comply with required threshold".</p> <ul style="list-style-type: none"> • According to Result of Water Quality Analysis by accredited laboratory Sucofindo dated 22 November 2018, BOD result: Upstream: 7.56 mg/L; Downstream: 6.08 mg/L. • Result of Water Quality Analysis by accredited laboratory Sucofindo dated 7 June 2019, BOD result: Upstream: 5.05 mg/L; Downstream: 5.30 mg/L. • Threshold reference: PP No. 82 Tahun 2001 (BOD River Class 1: 3 mg/L). • Review and updating upon result of analysis surface water quality of Singoan river, related BOD value between Upstream and Downstream did not conducted. <p><u>Smallholder:</u></p> <p>Plasma Muara Bulian has set the Environmental aspect and impact assessment as per "<i>Evaluasi Aspek Dampak Lingkungan Kebun Plasma Muara Bulian</i>" in January 2020. The mitigation plan for environmental aspect and impact has been defined, e.g:</p> <ul style="list-style-type: none"> • Manuring/Fertilizing – monitoring ex fertilizer sack, appropriate fertilizing as recommendation 	
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		<ul style="list-style-type: none"> • Weeds control - Ex Herbicide container store in the hazardous waste storage. • Pest and disease handling: Ex pesticide container store in the hazardous waste storage • FFB transportation: optimizing FFB transportation by designed the TPH (FFB collecting place) in one way along collection road. <p>During site visit, Smallholder are well aware of the environmental impacts and the mitigation plan. For example, the ex fertilizer sack must be handled by collected in Cooperative office to reuse as loose fruit container.</p>	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p>	<p>PT Inti Indosawit SUbur – Muara Bulian has appointed Estate and Mill Manager together with Sustainability team to control and ensure the implementation of environment plan.</p> <p>Evaluation on Environment Aspect – Impact already conducted prior to replanting activities. Documented evidence using Environmental Management System - ISO 14001 (EMS-431-003-LT). This document is periodically revised internally according to changes in replanting activities. The latest amendment on 12 May 2021.</p> <p>Environmental Implementation Report document (RKL-RPL) is frequently report to authority bodies (Dinas Lingkungan Hidup) twice a year. According to document verification and evidence collected during surveillance, describe as follow:</p> <ul style="list-style-type: none"> • Document of “Laporan Pelaksanaan Izin Lingkungan” period Jan-June 2021PT Inti Indosawit Subur – Muara Bulian, report submitted on 12 August 2021. The report has been sent by delivery service to Batang Hari Regency. • Document of “Laporan Pelaksanaan Izin Lingkungan” period January-June 2019, report submitted on 8 August 2019. The report has been sent to Jambi Provincial Environment Agency and submitted through Environmental Information System (SIMPEL) application with ID: 1564752920-456, dated 2 August 2021. <p>The appointment of the PIC for those responsible for the Social Impact Assessment report is HUMAS-Public Relations, to conduct review of social impact assessment (SIA) bases 2 years.</p>	Complied

		<p>The Monitoring of its environmental and social management has been reported in the RKL-RPL Report for the January-June 2021, which includes:</p> <ul style="list-style-type: none"> • The issues related to land conflicts and the legality of land owned by plasma (farmers). There are still issues related to the process of managing STDB (Surat Tanda Daftar Budidaya) and SPPL (Surat Pernyataan Pengelolaan Lingkungan) as a requirement for replanting programs. • Increasing the empowerment of plasma farmers through: <ul style="list-style-type: none"> - Conduct counseling to the community, employees, and smallholders about the existence of water biota and river border conservation (Sempadan sungai). - Counseling to local communities about fish farming - Conduct counseling and training to smallholders and plantation staff on integrated crop maintenance. - Providing technical guidance both procedures and administrative to smallholders to be able to work in the company <p>Smallholder: Monitoring for the implementation to monitor the effectiveness of the mitigation measures available in document "Program Manajemen Lingkungan", updated in January 2021. All the members have attended the socialization for Environmental Risk that cover all the environmental impacts identified in the operations in the oil palm plantations.</p>	
<p>Criteria 3.5: A system for managing human resources is in place.</p>			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.</p>	<p>Unit of Certification has had procedure for recruitment, selection, hiring, promotion, retirement and termination.</p>	<p>Complied</p>

		<p>SOP CR. 01.01 about "<i>Penerimaan Karyawan Baru</i>" (Recruitment and Selection of Employee), the company will accept new employee based on their capabilities and qualifications.</p> <p>Smallholders:</p> <p>Whereas, smallholder has a policy relating employment and it is described in the "<i>Kebijakan Koperasi</i>" that was signed by Head of Cooperative.</p>	
3.5.2	Employment procedures are implemented and records are maintained.	<p>Company has a Procedure No. SOP AA-HR-305.2-RO regarding "<i>Rekrutmen dan Seleksi Karyawan</i>" and Procedure "<i>Mekanisme Penerimaan Karyawan</i>" at Plasma are based on skill, work experiences, and job evaluation. 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.</p> <p>The labor union and workers have understood these procedures and they also said that recruitment and promotion process has been done without any indication discrimination measures by company. Based on review several document recruitment and promotions which conducted during 2020 and 2021 in mill and estate shows that company only gave relevant requirements which needed to be fulfilled by candidate who recruited or promoted e.g. medical fitness, relevant experiences in similar position, good attitude during working (for promotions), achieved company target by candidate (for promotions).</p>	Complied
<p>Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p>			
3.6.1	(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.	<p>PT Inti Indosawit Subur – Muara Bulian has a procedure to identify and prepare a risk assessment register (HIRAC). The procedure of HIRADC (Hazard identification and risk analysis and determining control) as a guidance and standard to conduct the hazard and risk assessment as well as the determining control for risk and hazard. Procedure presented in SOP "Identifikasi bahaya, Penilaian Resiko dan Penentuan Pengendalian" AA-SMK3-02-R0 dated 3 August 2017.</p>	Complied

		<p>Risk assessment method used is quantitative and qualitative method which is the multiplication of severity with the level of possibility. The company has set matrix multiplication result, which is subsequently determined from the matrix level / quality risk is divided into five (5) categories: extreme, high, moderate, low and tolerance/permitted.</p> <p>Risk Assessment presented in document of HIRADC - last review in February 2021 covering for all activities both in Muara Bulian POM and Estate, such as: boiler operation, sterilizer operation, generator set operation, loading ramp activity, cleaning of CPO storage tank, chemical mixing, fertilizer warehouse, herbicide, and pesticide sprayer, harvesting, road maintenance, HCV Monitoring, Boundary Monitoring, land application maintenance</p> <p>Mitigation plan to eliminate the risk and control the risk has been determined in the HIRADC document. Such as: Pressure gauge installation and emergency stop button in sterilizer to mitigate the explosion risk, grease application and wheel maintenance regularly on Lori to mitigate the risk of lori crash.</p> <p>PT Inti Indosawti Subur – Muara Bulian has prepared and documented the OHS Plan as in "Program Management K3 Tahun 2020", such as:</p> <ul style="list-style-type: none"> • Training on emergency response and preparedness • Training on implementation OHS management system (SMK3) • Implementation of risk assessment • Zero Accident and consistent on using of PPE • Review of accident report • Medical checkup for workers and provision of first aid kit, • Safety committee meeting, • OHS inspection <p><u>Smallholder</u></p>	
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3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p>	<p>PT Inti Indosawit Subur – Muara Bulian and scheme smallholders has demonstrated the document of effectiveness of OHS program year 2021, such as:</p> <ul style="list-style-type: none"> • Refreshment training related to OHS, dated 16th March 2021, consisted of: understanding MSDS; handling empty pesticide containers; emergency response plan (for accident and spillage/contamination); prohibit use of agrochemical for pregnant and breastfeeding female worker; prohibit spraying in HCV and water body. • OHS safety meeting dated 5th July 2021 -> record of OHS meeting provided • Report of OHS inspection (monthly) -> last inspection was carried out on 21st July 2021 location in Gunung Melayu I POM were reported OK. • PPE Provision for all workers at mill are demonstrated as per "Bukti Serah Terima Alat Pelindung Diri Muara Bulian Estate". Sample seen; PPE AP Shoes provision for harvester as much as 21 unit, dated 11 February 2021. <p>Based on field visit during onsite audit for spraying workers in block and harvester the risk impact probability was irritated and eyes dieses, control by using appropriate PPE (eye wear/safety glasses, mask, and hand gloves) and regular training for sprayer workers.</p> <p>Discipline of PPE usage monitoring regularly conducted by Estate management to ensure all workers use the appropriate PPE during working. Monitoring record present in "Daftar Pemeriksaan Alat Pelindung Diri (APD)". Sample seen for PPE</p>	Complied

		<p>monitoring of fertilizer workers, spraying workers and harvester period January – July 2021.</p> <p>Based on interview with worker in pesticides application, method to minimizing risk and negative impact i.e: - Mixing of chemical conducted by trained person (Supervisor). There were aims to ensuring proper dosage, type of pesticide use. - Using of PPE while chemical mixing. Mixing of chemical located in mixing area, side by side with the chemical storage.</p>	
<p>Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p>			
<p>3.7.1</p>	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender-specific needs, and which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training.</p>	<p>PT Inti Indosawit Subur – Muara Bulian has its own training institution assigned to arrange its training programmes. Asian Agri Learning assessing all the training need for each personnel – based on job description. The training plan prepared annually. Competence evaluation carried out by line managers, to evaluate competence level of each worker for relevant position. The matrix training is updated by HRD Medan and AAA Learning Institute annually. Based on minimum training requirement, AAA Learning institute, detailing training program in type of training, participants, PIC, number of participants, training schedule.</p> <p>Training program has been developed by company both mill and estate as per “Kalender Pelatihan Tahun 2020-2021 Learning & Development”. Training program developed to enhance the hard skill and soft skill for employee and staff, such as:</p> <ul style="list-style-type: none"> • Refresh of SOP Handling of pests and diseases (Pengendalian hama dan Penyakit), planned in February to March 2021 • Spraying Training; will be held on March to May 2021, • Herbicide Application Training, March, June, and August 2021 with target of participants as much as 10 participants • Heavy equipment (Operational and Maintenance) planned in August 2021 • Sustainability awareness include traceability, mass balance and HCV, will be held on February, March, May, July, and September 2021. 	<p>Complied</p>

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		<ul style="list-style-type: none"> • Basic fire training and fire equipment and service will be held on February and May 2021 • Job safety analysis training, will be held on February 2021 • Accidents Inspection and observation training will be held on January – March 202 • First aider certification training will be held on September 2021 	
3.7.2	Records of training are maintained, where appropriate on an individual basis.	<p>PT Inti Indosawit Subur has its own training institution assigned to arrange its training programmes. Asian Agri Learning assessing all the training need for each personnel – based on job description. The training plan prepared annually.</p> <p>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 realization based on the Training calendar period 2020-2021, including:</p> <ul style="list-style-type: none"> • Training of refresh SOP for pest and disease control, implemented on 15 March 2021 was attended by 42 participants. • Basic Fire training conducted on 16 September 2020 and attended by 32 participants. • Traceability training and book-keeping for supply chains, conducted on 24 March 2021 and attended by 7 participants from Muara Bulian POM. • Socialization of Pandemic Covid-19 for all communities/employees of PTS from the housing held on March 26, 2020. • Basic fire training, conducted on 3 November 2020 and attended by 16 participants • First aiders training conducted on 23 March 2021 was attended by 19 participants. 	Complied

		<p>Some documents can be shown at the time of the audit as proof is: the Calendar Training document period 2020-2021, the list of participants attending the trainees, and some photographs of the activities at the time of training.</p> <p>Smallholders</p> <p>Record of training Program for each KUDs (KUD Budi Sari, KUD Karya Lestari, KUD Buah Sakato, KUD Subur Makmur) has shown under "Program Pelatihan dan Realisasi Pelatihan 2021", such as:</p> <ul style="list-style-type: none"> • Training for harvester / smallholders • Training related to OHS for smallholder members • Training related to HV for smallholder members • Notulen Pelatihan Tanggap Darurat dan Kebaran (Training on Emergency Response and Basic Fire), dated 15 April 2021 was attended by 23 smallholder members • Notulen Penyuluhan Panen/Potong Buah (Training for harvesters), dated 11 March 2021 was attended by 26 smallholder members 	
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 is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Latest training for RSPO SCCS concerning Traceability has been conducted on 24/04/2021. Training attend by Mill manager, KTU (head of administration), production clerk, internal audit, Weighbridge clerk, security, dispatch operator. Evidence of training are available (attendance list, training material).	Complied
<p>Criteria 3.8: Supply chain requirements for mills.</p> <p>Procedure note: all requirements are classified as Critical Indicators. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates</p>	PT. Inti Indosawit Subur – Muara Bulian POM uses Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which	Not Applicable

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	<p>that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>comprise of company-own estate (Muara Bulian Estate) and 6 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD).</p>	
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>PT. Inti Indosawit Subur – Muara Bulian POM holds current RSPO P&C Certificate No. RSPO 5894418, first certification start on 28 August 2012 and expired on 27 August 2022. In the current certificate, PT. Inti Indosawit Subur – Muara Bulian POM uses Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate (Muara Bulian Estate) and 6 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD). The proportion of non-certified FFB comes from third-party supplier (14 Supplier) comprise of: PT PGS, PT IKU, Plasma SP2 Farizal, Kebun Tani Mandiri, Plasma SP2 Helena, Edi Susanto, Dua Putra, Mekar Sari, Harapan Kita, Herman Tamsil, Forum CB, PT PSM, Sinar Danau Embat, Asosiasi Putra Tunggal, Gapoktan Mutiara Terusan, Gapoktan Swadaya Cahaya Buana. FFB Non certified approximately 60% from total FFB received by Muara Bulian POM.</p>	Complied
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of certified CPO and PK that could potentially produced by PT. Inti Indosawit Subur – Muara Bulian POM its recorded in RSPO Public Summary report, certificate and RSPO IT Paltform.</p> <p>The mill has met registration and reporting requirement as it registered in RSPO IT Platform (PalmTrace) with ID number RSPO_PO1000000345.</p> <p>Below are the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year 2019/2020:</p>	Complied

		<p>Forecast volume (August 2019 – July 2020)</p> <p>FFB : 129,280 MT</p> <p>CPO : 26,993 MT (OER: 20.88%)</p> <p>PK : 7,021 (KER: 5.43%)</p> <p>Actual production volume (August 2019 – July 2021)</p> <p>CPO: 22,687.68 MT</p> <p>PK: 5,968.84 MT</p> <p>Actual sold volume (July 2019 – June 2020)</p> <p>CPO: 0 MT (Sold as ISCC certified)</p> <p>PK: 5,908.40 MT</p>	
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>PT. Inti Indosawit Subur – Muara Bulian POM is subsidiary of PT. Inti Indosawit Subur, a member of RSPO, with RSPO membership No.1-0022-06-000-00 since 6 February 2006.</p> <p>PT Inti Indosawit Subur – Muara Bulian POM has meet all registration and reporting requirements.</p> <p>RSPO IT Platform/PalmTrace account RSPO_PO1000000279.</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 – Muara Bulian POM can demonstrate procedures as follow:</p> <ul style="list-style-type: none"> • Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R7) dated 1 Oktober 2019. The procedures cover traceability of CPO and PK, since FFB receiving from Tungkal Ulu Estate and Smallholder, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years. • Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4). The procedure explains method to check only certified product received. The book 	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>keeping mass balance stated every 3 months: January-March, April-June, July-September, and October-December each year. Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction.</p> <ul style="list-style-type: none"> • SOP for mill operation Mill Policy Manual: <ul style="list-style-type: none"> - SOP AA-MPM-OP-1400.02.R2 Stasiun Penerimaan for FFB receiving station; - SOP AA-SOP-OP-101.5-R0 Grading; - SOP AA-MPM-OP-1400.03.R1 Stasiun Rebusan for sterilizer; - SOP AA-MPM-OP-1400.04.R1 Stasiun Pemisahan Berondolan for loose fruit separation; - SOP AA-MPM-OP-1400.05-R1 Stasiun Pengadukan dan Pengempaan for pressing station; - SOP AA-MPM-OP-1400.06-R1 Stasiun Pemurnian for clarification; - SOP AA-MPM-OP-1400.07-R1 Stasiun Pemisahan Nut dan Fiber for nut and fiber separation; - SOP AA-MPM-OP-1400.08-R1 Stasiun Kernel for kernel station; - SOP AA-MPM-OP-1400.09-R1 Stasiun Boiler; - SOP AA-MPM-OP-1400.10-R1 Stasiun Engine Room; - SOP AA-MPM-OP-1400.11-R1 Stasiun Water Treatment; - SOP AA-MPM-OP-1400.12-R1 Laboratorium; - SOP AA-MPM-OP-1400.13-R1 Stasiun Pengelolaan Limbah for palm oil mill effluent treatment; - SOP AA-MPM-OP-1400.14-R2 Stasiun Penimbunan dan Pengiriman CPO dan Kernel for CPO and PK bulking and despatch operation; SOP AA-MPM-OP-1400.15-R1 Perawatan for preventive maintenance; 	
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		- SOP AA-MPM-OP-1400.18-R4 Book Keeping AA-MPM-OP-1400.17-R6 Traceability	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p> <p>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 – Muara Bulian POM has a procedure to conduct internal audit RSPO, including RSPO SCCS as per Procedure of “AA-SOP-ES-6001-R5 dated 1 August 2020”. According to internal audit procedure, internal audit conducted once a year considering the critical area.</p> <p>The latest internal audit conducted on 16 – 22 February 2020 by Mr. Hendrik K. Simanjuntak, Wahyu Mulia, Ridho Ilahi (Internal audit department). Internal audit conducted concurrent with another integrated sustainability.</p> <p>Internal audit report were evident, there is no issue and nonconformity raised during internal audit.</p> <p>Internal audit result was review and discuss in the Management review. The management review stipulated in the procedure “AA-SOP-ES-6001-R5 dated 1 August 2020”.</p> <p>Management unit conducted management review of: audit findings review, customer feedback, process performance and product conformance, preventive and corrective action, root cause analysis correction and corrective action timeline, follow up previous management review, recommendation for improvement. Latest management review conducted on 19 May 2021.</p>	Complied
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBS received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>PT Inti Indosawit Subur – Muara Bulian POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R7), chapter 5.1 indicates the Weighbridge Clerk has responsibility to input data and print weighbridge card based on “Surat Pengantar TBS”, covering information e.g. estate name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number.</p> <p>PT. Inti Indosawit Subur – Muara Bulian POM receive FFB from certified and non-certified source. Certified source consist of own estate (Muara Bulian Estate) and 6 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD). Non-certified</p>	Complied

		<p>FFB sourced from third party supplier (14 Supplier) comprise of: PT PGS, PT IKU, Plasma SP2 Farizal, Kebun Tani Mandiri, Plasma SP2 Helena, Edi Susanto, Dua Putra, Mekar Sari, Harapan Kita, Herman Tamsil, Forum CB, PT PSM, Sinar Danau Embat, Asosiasi Putra Tunggal, Gapoktan Mutiara Terusan, Gapoktan Swadaya Cahaya Buana. FFB Non certified approximately 60% from total FFB received by Muara Bulian POM. Document "Surat Pengantar TBS" (FFB Delivery Note) and Kartu Timbangan (Weighbridge Card) described identity and location of FFB source and other item required e.g.</p> <p>Certified FFB:</p> <ul style="list-style-type: none"> - FFB delivery "Surat Pengantar TBS Muara Bulian Estate No.003757" from Division I, block A17b dated 4 June 2020 – total 1,153 bunches. Weighbridge ticket "Tiket Timbangan No.PMBA120101097" dated 5 June 2020, for 1,153 FFB bunches; nett weight 4,760 kg; from Muara Bulian Estate, Division I, block A17b; vehicle BH8165AQ; RSPO certificate No.RSPO594418. - FFB delivery "Surat Pengantar TBS Muara Bulian Estate No.00384" from Division I, Blockj A17a with FFB: 1,207 bunches; dated 5 June 2020. Weighbridge ticket "Tiket Timbangan No.PMBA120101100" dated 5 June 2020, for 1,207 FFB bunches; nett weight 5,510 kg; from Muara Bulian Estate, Division I, block A17a; vehicle BH8265AQ; RSPO certificate No.RSPO594418. - FFB delivery note: "Surat Pengantar TBS KUD Barokah, Kelompok Tani Mekar Jaya Hamparan 97", Serial No. 00845 dated 5 June 2020. Vehicle Number BH8216BI, Driver: Hendy, FFB amount: 186 bunches. Weighbridge ticket "Tiket Timbangan No.PMBA220205647" dated 5 June 2020, FFB amount: 186 bunches, nett weight 4,651 kg, FFB source from Kebun Plasma (KUD Barokah – UP1-3-KT-097), ID KLM, Vehicle BH8216BI, Driver: Hendy, RSPO certificate No.RSPO594418. - FFB Delivery note: "Surat Pengantar TBS KUD Makmur Rezeki, Kelompok Tani 05 "Merpati", dated 24 Aug 2021. Vehicle Number BA 9043 GD, Driver: Indra, FFB amount 212 bunches. Weighbridge ticket "Tiket Timbangan 	
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		<p>No.PMBA221109133" dated 24 Aug 2021, amount: 212 FFB bunches, nett weight 4,456 kg, FFB source from KUD Makmur Rezeki, farmer group Merpati, vehicle BA 9043 GD, RSPO certificate No.RSPO594418.</p> <ul style="list-style-type: none"> - FFB Delivery note: "Surat Pengantar TBS KUD Budi Sari, Kelompok Tani Giat Tani, dated 24 Aug 2021. Vehicle Number BM 8572 BU, Driver: Sukadi, FFB amount 400 bunches. Weighbridge ticket "Tiket Timbangan No.PMBA221109131" dated 24 Aug 2021, amount: 212 FFB bunches, nett weight 4,456 kg, FFB source from KUD Budi Sari, farmer group Giat Tani, vehicle BM 8572 BU, RSPO certificate No.RSPO594418. - FFB Delivery note: "Surat Pengantar TBS KUD Barokah, Kelompok Tani Gerak Tani, dated 22 Aug 2021. Vehicle Number BH 8852 AU, Driver: Darno, FFB amount 224 bunches. Weighbridge ticket "Tiket Timbangan No.PMBA221109136" dated 24 Aug 2021, amount: 224 FFB bunches, nett weight 4,460 kg, FFB source from KUD Barokah, farmer group Gerak Tani, vehicle BM 8852 AU, RSPO certificate No.RSPO594418. - FFB Delivery note: "Surat Pengantar TBS Koperasi Buah Sakato, Kelompok Tani Bakal Sabu, dated 24 Aug 2021. Vehicle Number BH 8334 BN, Driver: Zulpan, FFB amount 439 bunches. Weighbridge ticket "Tiket Timbangan No.PMBA221109132" dated 24 Aug 2021, amount: 439 FFB bunches, nett weight 8,138 kg, FFB source from Koperasi Buah Sakato, farmer group Bakal Sabu, vehicle BH 8334 BN, RSPO certificate No.RSPO594418. <p>Non-certified FFB:</p> <ul style="list-style-type: none"> - FFB delivery note: "Surat Pengantar TBS Mekar Sari", No. 02945 dated 5 June 2020. Vehicle code BH8038BJ; driver Andi; carrying 428 bunches. Weighbridge ticket "Tiket Timbangan No.PMBA520106619" dated 5 June 2020, for 428 FFB bunches; nett weight 6,420kg; FFB source from non-certified third party FFB supplier Mekarsari ID ST00043; vehicle BH8038BJ. - FFB delivery note: "Surat Pengantar TBS Dua Putra", No. 005 dated 5 June 2020. 	
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		<p>Vehicle code BH8986BJ; drive: Putra; carrying 393 bunches. Weighbridge ticket "Tiket Timbangan No. PMBA520106618" dated 5 June 2020, for 393 bunches; nett weight 5,894 kg; FFB source from non-certified third party FFB supplier Dua Putra, ID ST00047; vehicle BH8986BJ.</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> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>Contract:</p> <ul style="list-style-type: none"> - "Kontrak Penjualan No.11013/CC10/13/19 antara PT. Inti Indosawit Subur dan PT. Dasa Anugrah Sejati" dated 19 November 2019 for sales of 150,000 kg commodity Inti Kelapa Sawit RSPO; Supply Chain Model Mass Balance; Certificate RSPO594418. Remarks: Loco PMKS Muara Bulian Jambi. - Delivery Order PT. Inti Indosawit Subur Muara Bulian No.11013/DC10/13/19 dated 19 November 2019, instruction to PT. Dasa Anugrah Sejati – KCP Taman Raja to deliver 150,000 kg commodity Inti Kelapa Sawit RSPO; Supply Chain Model Mass Balance; No.Ref. RSPO 594418. <p>The Delivery Order No.11013/DC10/13/19 was comprise of 5 Despatch slip. Sample despatch slip from Muara Bulian POM to customer based on DO No.11013/DC10/13/19, delivery period November – December 2020:</p> <ul style="list-style-type: none"> - Despatch slip Muara Bulian POM No.PMBC219100381 dated 22 November 2019. Destination PT. Dasa Anugrah Sejati. Commodity PK Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO594418. DO No.11013/DC10/13/19. Transporter Mitra Abadi Damai, No. SP 4/MAD/XI/19; Vehicle No.BH8289MW. Volume dispatched 30,040 kg. Batch No.RSPO 594418, Seal Number 4753632 - 4753641. - Despatch slip Muara Bulian POM No.PMBC219100399 dated 4 December 2019. Destination PT. Dasa Anugrah Sejati. Commodity PK Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO594418. DO No.11013/DC10/13/19. Transporter Mitra Abadi Damai, No. SP 02/MAD/XII/19; 	<p>Complied</p>

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		<p>Vehicle No.BH8284MW. Volume dispatched 29,870 kg. Batch No.RSPO 594418, Seal Number 1049335 - 1049344.</p> <ul style="list-style-type: none"> - Despatch slip Muara Bulian POM No.PMBC219100383 dated 24 November 2019. Destination PT. Dasa Anugrah Sejati. Commodity PK Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO594418. DO No.11013/DC10/13/19. Transporter Mitra Abadi Damai, No. SP 006/MAD/XI/19; Vehicle No.BH8531MV. Volume dispatched 29,310 kg. Batch No.RSPO 594418, Seal Number 4753552 - 4753561. <p>This transaction was recorded in PalmTrace as TR-c0b938de-d0dc, dated 15 January 2020 for CSPK Mass Balance, volume 411.31 MT. Seller PT. Inti Indosawit Subur – Muara Bulian. Buyer PT. Dasa Anugrah Sejati.</p> <ul style="list-style-type: none"> - Name and address of buyer: PT. Dasa Anugrah Sejati, Jl. M.H Thamrin No.31, RT 001, RW 001, Kebon melati, Tanah Abang, Jakarta Pusat, DKI Jakarta 10230. - Name and address of seller: PT. Inti Indosawit Subur, Jl. M.H Thamrin No.31, Lt. 2, Kebon melati, Tanah Abang, Jakarta Pusat, DKI Jakarta 10230. - The loading date: Soon. - The date on which the documents were issued: 19 November 2019. - A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Product Inti Kelapa Sawit RSPO (CSPK). Supply Chain Model Mass Balance (MB). - The quantity of the products delivered: 150 MT. - Any related transport documentation: Transporter: PT Mitra Abadi Damai Vehicle No. BH8284MW, BH8289MW, BH8531MV. 	
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		<p>- Supply chain certificate number of the seller: RSPO Certificate No.RSPO594418. A unique identification number: DO No.11013/DC10/13/19 dated 19 November 2019.</p>	
<p>3.8.9</p>	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations,</p>	<p>PT. Inti Indosawit Subur – Muara Bulian POM operate subcontractor for CPO and PK transporter. The appointed outsourced company are:</p> <ul style="list-style-type: none"> - CPO Transporter: CV Perintis Lintas Talang Duku, contract No: 06/VIII/PLT-IIS/2019 dated 2 August 2019. - PK transporter: PT Mitra Abadi Damai, contract No: 05/VIII/MDA-IIS/2019 dated 2 August 2019. <p>Contractual agreement are covering outsourced process with each contractor through a signed and enforceable agreement with the contractor. body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary as stipulated in the contract article 7 point m “Willing to meet the requirements of the Supply Chain Certification System when transporting raw materials and willing to be audited by a second party internal auditor and external party auditor from the certification body appointed by the second party if necessary ”</p> <p>PT. Inti Indosawit Subur – Muara Bulian POM has a procedure to control the outsourced transporter through “SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019”. The procedure has been disseminated and communicate to contractor</p> <p>Internal control for CPO and PK delivery by contractor has performed by Muara Bulian POM as follow:</p> <ul style="list-style-type: none"> ✓ Before dispatch and transport the CPO/PK, transporter need to complete with “Surat Izin Muat CPO dan Kernel”, contain information of Driver name, Identity number, Car/Truck Number, CPO/PK Dispatch time, netto, incoming and outgoing time. ✓ Delivery Order Slip from Transporter, contain information of sales contract number, Truck number, destination, driver name, port destination. 	<p>Complied</p>

	systems, and all information, when this is announced in advance.	Daftar Periksa Kesiapan Pengiriman CPO/Kernel contain information of Truck number, driver name, date of inspection, item inspection including: driver identity and completeness of vehicle legality, completeness of physical standard of vehicle, number of seal.																
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	<p>PT Inti Indosawit Subur – Muara Bulian POM has recorded name and contact detail of all contractors, as follows:</p> <table border="1"> <tr> <td>Name of Transporter</td> <td>CV Perintis Talang Duku</td> <td>PT. Mitra Abadi Damai</td> </tr> <tr> <td>Initial Name</td> <td>PTD</td> <td>MAD</td> </tr> <tr> <td>Address</td> <td>Jl. Serunai Malam III No. 88A RT003, Suka Karya Jambi 36127</td> <td>Jl. Sultan Syahril No.19 RT18, Kel. Talang Bakung, Jambi 36139</td> </tr> <tr> <td>Contact Person</td> <td>Subagio</td> <td>Andy Wijaya AS</td> </tr> <tr> <td>Telephone</td> <td>(0741)20845</td> <td>082323672019</td> </tr> </table>	Name of Transporter	CV Perintis Talang Duku	PT. Mitra Abadi Damai	Initial Name	PTD	MAD	Address	Jl. Serunai Malam III No. 88A RT003, Suka Karya Jambi 36127	Jl. Sultan Syahril No.19 RT18, Kel. Talang Bakung, Jambi 36139	Contact Person	Subagio	Andy Wijaya AS	Telephone	(0741)20845	082323672019	Complied
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Telephone	(0741)20845	082323672019																
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	<p>PT Inti Indosawit Subur – Muara Bulian POM aware to inform its CB regarding the name and contact detail of any new contractor prior to next assessment.</p> <p>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".</p>	Complied															
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant</p>	<p>The organization has maintained accurate, complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain requirements, as evident in:</p> <ul style="list-style-type: none"> - FFB delivery note - Weigbridge ticket for FFB receiving, CPO and PK delivery - Delivery Order - Sales contract 	Complied															

	<p>legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>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>	<ul style="list-style-type: none"> - Shipping Announcement - Mass balance report - Internal audit RSPO SCCS and Management review <p>The procedure of Traceability (AA-MPM-OP-1400.7.R7), requires that all records and reports related to traceability and book keeping are retained for a period of 10 years.</p> <p>All receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK are record and balance in a three-monthly basis, as evidence in "Mass Balance Report Muara Bulian POM" period 2019: January – March, April – June, July – September, October – December; Period 2020: January – March, April – June, July – August, September – October, November – December; Period 2021: January – March, April – June, July – ytd August.</p> <p>All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios/actual production of CPO and PK.</p> <p>According to Mass balance Report, Muara POM only deliver Mass Balance sales from a positive stock (based on actual production).</p>	
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The organization is able to provided estimate volume of CPO and PK in a year period as in Budget FY2020/2021 Production FFB, CPO and PK. The organization also keep an up to date record of the FFB volume received, CPO and PK produced over a period of twelve (12) month, as in Rekapitulasi Produksi TBS, CPO dan PK PT Inti Indosawit Subur – Muara Bulian POM.</p> <p>OER and KER are estimated based on associated inputs and upon past experience (previous year FFB, CPO and PK production).</p> <p>The site has set OER for budget 2020 as 19.42% and KER as 5.40% and budget 2021 as 19.50% and 5.30%.</p>	Complied

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 – Muara Bulian POM is able to demonstrate the work instruction for analysis of oil content.</p> <p>Based on Laporan Harian Produksi dated 31 July 2021, the sounding result and production report shows that actual conversion ratios from FFB into CPO are:</p> <ul style="list-style-type: none"> a. For FFB from Muara Bulian Estate: 20.02% b. For FFB from Muara Bulian Plasma: 20.59% c. For FFB from third-party: 19.27% <p>And actual conversion ratios from FFB into PK are:</p> <ul style="list-style-type: none"> a. For FFB from Muara Bulian Estate: 5.14% b. For FFB from Muara Bulian Plasma: 5.11% c. For FFB from third-party: 5.10% <p>Budget vs Actual conversion ratios year 2020 from FFB into CPO are:</p> <ul style="list-style-type: none"> a. For FFB from Muara Bulian Estate: budget 18.60%, actual 19.40% b. For FFB from Muara Bulian Plasma: budget 20.25%, actual 20.25% c. For FFB from third-party: budget 18.85%, actual 18.85% <p>And actual conversion ratios year 2020 from FFB into PK are:</p> <ul style="list-style-type: none"> a. For FFB from Muara Bulian Estate: budget 5.40%, actual 5.38% b. For FFB from Muara Bulian Plasma: budget 5.40%, actual 5.44% c. For FFB from third-party: budget 5.40%, actual 5.33% 	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated</p>	<p>PT. Inti Indosawit Subur – Muara Bulian POM uses Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate (Muara Bulian Estate) and 6 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD).</p>	Complied

	<p>from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>																																																																																																																				
<p>3.8.16</p>	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>PT. Inti Indosawit subur – Muara Bulian POM has made shipping announcement inside PalmTrace transaction, sample seen for period November 2019 – July 2021:</p> <table border="1" data-bbox="981 552 1935 1399"> <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-525c4caa-ef1b</td><td>PT DAS</td><td>CSPK</td><td>MB</td><td>471.35</td><td>Confirmed</td></tr> <tr><td>TR-15803f77-8ea4</td><td>PT DAS</td><td>CSPK</td><td>MB</td><td>359.89</td><td>Confirmed</td></tr> <tr><td>TR-ac0d560d-61ac</td><td>PT DAS</td><td>CSPK</td><td>MB</td><td>417.33</td><td>Confirmed</td></tr> <tr><td>TR-c9b13735-347e</td><td>KCP TU</td><td>CSPK</td><td>MB</td><td>201.63</td><td>Confirmed</td></tr> <tr><td>TR-b1e26b78-9a82</td><td>PT DAS</td><td>CSPK</td><td>MB</td><td>333.07</td><td>Confirmed</td></tr> <tr><td>TR-c0b938de-d0dc</td><td>PT DAS</td><td>CSPK</td><td>MB</td><td>411.31</td><td>Confirmed</td></tr> <tr><td>TR-e0ed92b2-d37b</td><td>PT DAS</td><td>CSPK</td><td>MB</td><td>543.12</td><td>Confirmed</td></tr> <tr><td>TR-1adc3e3d-40f4</td><td>PT DAS</td><td>CSPK</td><td>MB</td><td>491.13</td><td>Confirmed</td></tr> <tr><td>TR-b867bfcc-f8f5</td><td>PT DAS</td><td>CSPK</td><td>MB</td><td>458.43</td><td>Confirmed</td></tr> <tr><td>TR-e5c9854b-080d</td><td>PT DAS</td><td>CSPK</td><td>MB</td><td>524.19</td><td>Confirmed</td></tr> <tr><td>TR-57aef03f-37c6</td><td>PT DAS</td><td>CSPK</td><td>MB</td><td>243.26</td><td>Confirmed</td></tr> <tr><td>TR-0d1a92af-e0b6</td><td>KCP TU</td><td>CSPK</td><td>MB</td><td>206.07</td><td>Confirmed</td></tr> <tr><td>TR-bbbf7371-e068</td><td>KCP TU</td><td>CSPK</td><td>MB</td><td>87.67</td><td>Confirmed</td></tr> <tr><td>TR-92df5bd4-52d2</td><td>KCP TU</td><td>CSPK</td><td>MB</td><td>658.94</td><td>Confirmed</td></tr> <tr><td>TR-d84d88e4-c43b</td><td>KCP TU</td><td>CSPK</td><td>MB</td><td>154</td><td>Confirmed</td></tr> <tr><td>TR-dc4b6eaf-97a4</td><td>KCP TU</td><td>CSPK</td><td>MB</td><td>203.18</td><td>Confirmed</td></tr> <tr><td>TR-8eb2081a-e304</td><td>KCP TU</td><td>CSPK</td><td>MB</td><td>30.53</td><td>Confirmed</td></tr> <tr><td>TR-dafe0096-a42d</td><td>KCP TU</td><td>CSPK</td><td>MB</td><td>58.19</td><td>Confirmed</td></tr> </tbody> </table>	Transaction ID	Buyer	Product	Supply Chain Model	Volume*	Status	TR-525c4caa-ef1b	PT DAS	CSPK	MB	471.35	Confirmed	TR-15803f77-8ea4	PT DAS	CSPK	MB	359.89	Confirmed	TR-ac0d560d-61ac	PT DAS	CSPK	MB	417.33	Confirmed	TR-c9b13735-347e	KCP TU	CSPK	MB	201.63	Confirmed	TR-b1e26b78-9a82	PT DAS	CSPK	MB	333.07	Confirmed	TR-c0b938de-d0dc	PT DAS	CSPK	MB	411.31	Confirmed	TR-e0ed92b2-d37b	PT DAS	CSPK	MB	543.12	Confirmed	TR-1adc3e3d-40f4	PT DAS	CSPK	MB	491.13	Confirmed	TR-b867bfcc-f8f5	PT DAS	CSPK	MB	458.43	Confirmed	TR-e5c9854b-080d	PT DAS	CSPK	MB	524.19	Confirmed	TR-57aef03f-37c6	PT DAS	CSPK	MB	243.26	Confirmed	TR-0d1a92af-e0b6	KCP TU	CSPK	MB	206.07	Confirmed	TR-bbbf7371-e068	KCP TU	CSPK	MB	87.67	Confirmed	TR-92df5bd4-52d2	KCP TU	CSPK	MB	658.94	Confirmed	TR-d84d88e4-c43b	KCP TU	CSPK	MB	154	Confirmed	TR-dc4b6eaf-97a4	KCP TU	CSPK	MB	203.18	Confirmed	TR-8eb2081a-e304	KCP TU	CSPK	MB	30.53	Confirmed	TR-dafe0096-a42d	KCP TU	CSPK	MB	58.19	Confirmed	<p>Complied</p>
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Transaction ID	Buyer	Product	Supply Chain Model	Volume*	Status
TR-04e9c05b-dc00	PT SDS	CSPO	MB	1042.06	Confirmed
TR-6e653bd6-9fa3	PT SDS	CSPO	MB	405.7	Confirmed
TR-7326068b-6746	PT SDS	CSPO	MB	483.69	Confirmed
TR-5030acb3-a536	PT SDS	CSPO	MB	1445.85	Confirmed
TR-3cabdc62-aed8	PT SDS	CSPO	MB	971.54	Confirmed
TR-39f82d02-4744	PT SDS	CSPO	MB	5.4	Confirmed
TR-8428bf1e-ca92	PT SDS	CSPO	MB	26.32	Confirmed
TR-51240ddd-a647	PT SDS	CSPO	MB	1243.66	Confirmed
TR-0cb79973-ed8c	PT SDS	CSPO	MB	998.48	Confirmed
TR-dbdf6adf-da0b	PT SDS	CSPO	MB	38.78	Confirmed
TR-e42bbe28-f0b1	PT SDS	CSPO	MB	210.08	Confirmed
TR-b52c5208-b4c1	PT SDS	CSPO	MB	1542.55	Confirmed
TR-97cf6be5-d333	PT SDS	CSPO	MB	116	Confirmed
TR-c2d22212-6c69	PT SDS	CSPO	MB	268.05	Confirmed
TR-73cd11ea-1d98	PT SDS	CSPO	MB	2140.88	Confirmed
TR-55256acb-919b	AAA Oils & Fats Pte Ltd	CSPO	MB	990.11	Confirmed
TR-4561a8a9-406a	PT SDS	CSPO	MB	76.36	Confirmed
TR-2d656a03-c9eb	PT SDS	CSPO	MB	91.14	Confirmed

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		<table border="1"> <tr><td>TR-ec54e112-cacf</td><td>PT SDS</td><td>CSPO</td><td>MB</td><td>184.78</td><td>Confirmed</td></tr> <tr><td>TR-f00dc566-31cf</td><td>PT SDS</td><td>CSPO</td><td>MB</td><td>607.09</td><td>Confirmed</td></tr> <tr><td>TR-35ede7cb-9073</td><td>PT SDS</td><td>CSPO</td><td>MB</td><td>498.97</td><td>Confirmed</td></tr> <tr><td>TR-ef3d3340-0ece</td><td>PT SDS</td><td>CSPO</td><td>MB</td><td>479</td><td>Confirmed</td></tr> <tr><td>TR-8c24e742-1bae</td><td>PT SDS</td><td>CSPO</td><td>MB</td><td>6.5</td><td>Confirmed</td></tr> <tr><td>TR-d16d903b-7597</td><td>PT SDS</td><td>CSPO</td><td>MB</td><td>518.17</td><td>Confirmed</td></tr> <tr><td>TR-3cb3b010-9c86</td><td>PT SDS</td><td>CSPO</td><td>MB</td><td>1199.47</td><td>Confirmed</td></tr> <tr><td>TR-fd1fc314-253e</td><td>PT SDS</td><td>CSPO</td><td>MB</td><td>147.19</td><td>Confirmed</td></tr> <tr><td>TR-7da9c97a-c62e</td><td>PT SDS</td><td>CSPO</td><td>MB</td><td>20.42</td><td>Confirmed</td></tr> <tr><td>TR-a1eecb3b-c337</td><td>PT SDS</td><td>CSPO</td><td>MB</td><td>267.92</td><td>Confirmed</td></tr> <tr><td>TR-cb330d5a-1097</td><td>PT SDS</td><td>CSPO</td><td>MB</td><td>1756.44</td><td>Confirmed</td></tr> <tr><td>TR-44fd64d8-58f4</td><td>PT SDS</td><td>CSPO</td><td>MB</td><td>102.51</td><td>Confirmed</td></tr> <tr><td>TR-99ac9ea2-2074</td><td>PT SDS</td><td>CSPO</td><td>MB</td><td>736.81</td><td>Confirmed</td></tr> <tr><td>TR-d04c5dfa-1d02</td><td>PT SDS</td><td>CSPO</td><td>MB</td><td>157.89</td><td>Confirmed</td></tr> </table> <p>PT. Inti Indosawit Subur – Muara Bulian POM made remove RSPO certified CSPO from their PalmTrace account: Transaction ID: ST-TR-42b29a14-02be for removed 22,451.5 MT CSPO from certified stock, dated 06/07/2020; Stock removed for CSPO sold as ISCC certified. After July 2020 there is no CPO and PK RSPO certified sold as ISCC.</p>	TR-ec54e112-cacf	PT SDS	CSPO	MB	184.78	Confirmed	TR-f00dc566-31cf	PT SDS	CSPO	MB	607.09	Confirmed	TR-35ede7cb-9073	PT SDS	CSPO	MB	498.97	Confirmed	TR-ef3d3340-0ece	PT SDS	CSPO	MB	479	Confirmed	TR-8c24e742-1bae	PT SDS	CSPO	MB	6.5	Confirmed	TR-d16d903b-7597	PT SDS	CSPO	MB	518.17	Confirmed	TR-3cb3b010-9c86	PT SDS	CSPO	MB	1199.47	Confirmed	TR-fd1fc314-253e	PT SDS	CSPO	MB	147.19	Confirmed	TR-7da9c97a-c62e	PT SDS	CSPO	MB	20.42	Confirmed	TR-a1eecb3b-c337	PT SDS	CSPO	MB	267.92	Confirmed	TR-cb330d5a-1097	PT SDS	CSPO	MB	1756.44	Confirmed	TR-44fd64d8-58f4	PT SDS	CSPO	MB	102.51	Confirmed	TR-99ac9ea2-2074	PT SDS	CSPO	MB	736.81	Confirmed	TR-d04c5dfa-1d02	PT SDS	CSPO	MB	157.89	Confirmed	
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3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>PT. Inti Indosawit Subur – Muara Bulian POM has not made claims regarding the support of RSPO certified oil palm products. However the organization aware about the RSPO Rules on Market Communications and Claims.</p>	Complied																																																																																				
General corporate communications																																																																																							

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 Muara Bulian POM is highlighting its commitment to the principles of RSPO, and directly referring to RSPO website. The corporate communication can be found at http://www.asianagri.com .	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> • Display its RSPO membership status • Display the RSPO web address (www.rspo.org) • State that the member supports the work of the RSPO • State the member's history with regard to the RSPO. • Use the RSPO trademark to promote its membership of the RSPO. <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.</p>	<p>PT. Inti Indosawit Subur (with the brand Asian Agri), in its website:</p> <ol style="list-style-type: none"> Display its RSPO membership status: No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status. The CH only stated "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received our first RSPO certification for our estate in 2010." Display the RSPO web address: Not in direct manner. PT. Inti Indosawit Subur (with the brand Asian Agri), made a link to RSPO website. State the member supports the work of the RSPO: Not in direct manner. In the website, PT. Inti Indosawit Subur (with the brand Asian Agri), "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received our first RSPO certification for our estate in 2010." State the member's history with regards to the RSPO: Not in direct manner. In the website, PT. Inti Indosawit Subur (with the brand Asian Agri), "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received our first RSPO certification for our estate in 2010, and in 2012, the certification for our smallholder scheme." <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>It is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.</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. It is clear that the statement are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in the PT. Inti Indosawit Subur – Muara Bulian POM own products.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No, PT. Inti Indosawit Subur (with the brand Asian Agri) did not display its RSPO Corporate Logo in any document.	Not Applicable
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	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 – Muara Bulian POM and their buyers.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	When confirming the sale of certified oil palm products, PT. Inti Indosawit Subur – Tungkal Ulu POM followed the requirements of the RSPO SCCS. PT. Inti Indosawit Subur – Muara Bulian 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	PT. Inti Indosawit Subur – Muara Bulian POM is not a distributor and/or wholesaler. Not applicable.	Not Applicable

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

		Not applicable.	
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	PT. Inti Indosawit Subur – Muara Bulian POM is not using RSPO-certified on-pack claim. PT. Inti Indosawit Subur – Tungkal Ulu POM is producing and selling CSPO and CSPK; and not making a business to consumer communication. Not applicable.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant’s RSPO membership status.	PT. Inti Indosawit Subur – Muara Bulian POM is not making any claim related to their RSPO membership status. PT. Inti Indosawit Subur – Tungkal Ulu POM is producing and selling CSPO and CSPK; and not making a business to consumer communication. Not applicable.	Not Applicable
6.5	Members shall not communicate to consumers’ information about their suppliers’ RSPO membership status.	PT. Inti Indosawit Subur – Muara Bulian POM is not making any information about their supplier’s RSPO membership status. PT. Inti Indosawit Subur – Tungkal Ulu POM is producing and selling CSPO and CSPK; and not making a business to consumer communication. Not applicable.	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.	PT. Inti Indosawit Subur – Muara Bulian POM is not using RSPO trademark and/or RSPO label. Not applicable.	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.	PT. Inti Indosawit Subur – Muara Bulian POM is not using RSPO trademark and/or RSPO label. Not applicable.	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	PT. Inti Indosawit Subur – Muara Bulian POM is retailers or food service company. Not applicable.	Not Applicable

	<p>via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.</p>		
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
95% or above of the oil palm content must be RSPO MB-certified.	All CPO and PK product sold by Muara Bulian POM are contain 100% MB.	Complied	
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 non-certified volume must be covered by equivalent volume of RSPO Credits.	There is no percentage of non-certified oil palm within the product of CPO and PK Mass Balance.	Complied	
Labelling and trademark (MB)			
<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) 		Choose an item.	

<p>supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim.</p> <ul style="list-style-type: none"> • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the 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 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 		
<p>Messaging (MB)</p>		
<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. 	<p>PT Inti Indosawit Subur – Muara Bulian POM was not messaging in storytelling in product-related communications. It was verified during audit through sales contract, DO and dispatch slip (weighbridge card).</p>	<p>Complied</p>

<p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 			
<p>Principle 4: Respect community and human rights and deliver benefit</p>			
<p>Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p>			
<p>Criteria 4.1: The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p>	<p>The company has had a corporate policy on 1 December 2019 which has been ratified by the Managing Director (Kevin Tio). The policy relating to human rights, is explained in point 13, stating that: "<i>The company respects human rights by treating all employees fairly, both in terms of acceptance, valuation, conditions and working environment, as well as representation regardless of tribe, caste, national origin, religion/belief, disability, gender, sexual orientation, membership of trade union political affiliation and/or age</i>".</p> <p>The company's policy is also published to use posters at any strategic places in the plantations (estate and mill). Corporate policy has been dissemination to all levels of the workers on 16 January 2021, 24 March 2021 and 26 July 2021 (list of participants can be shown) and to stakeholders (including local contractors) on 13 January 2021 which was attended by 17 stakeholders.</p>	<p>Complied</p>
<p>4.1.2</p>	<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>There is no evidence that company is using mercenaries and or paramilitaries in operational activities of the company. Based on interview with stakeholders (i.e. government agency, head of village, workers & labor union) and also online search was revealed that company does not instigate violence or use any form of</p>	<p>Complied</p>

		harassment, including the use of mercenaries and paramilitaries in their operational activities.	
Criteria 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p>	<p>Muara Bulian Estate: 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-308.5-R0" 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 fails, any land dispute will be processed through legal/litigation mechanism. During the process, a complete record is maintained. Based on mechanism, public relation officer will receive information of any complaint, grievance and land dispute/claims and records under the logbook. There is no land dispute noted, based on stakeholder consultation.</p> <p>Smallholder Scheme: The Smallholder Manager has established mechanism for communication and consultation "Mekanisme Komunikasi dan Konsultasi" dated 16 January 2017, shaped flow Chart that describes the process of incoming information requests up to the responses provided. Each smallholder member has "Buku Panduan dan Catatan Petani Plasma", whereas explains the flow process of communication. Both of communication by written or verbal communication to group management are acceptable.</p>	Complied

		<p>Based on interview with sample of smallholders in KUD Barokah, KUD Budi Sari, KUD Karya Lestari, KUD Buah Sakato, KUD Subur makmur, there is no dispute raise to the company.</p>	
<p>4.2.2</p>	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p>	<p>Unit of Certification established mechanism to handle complaint and grievances, within the procedures:</p> <ul style="list-style-type: none"> • "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. • "SOP Penanganan Keluhan Masyarakat" No: AA-GL-510.1-R0, dated 1 January 2013. <p>4.1 Reporting Public Complaints</p> <p>4.1.1 General Scope: "Procedures ... for handling complaints from Concerned Parties including organizations, people, groups or institutions ...". In order for the Company to respond appropriately to the Parties' complaints in order to be identified, anonymous questions or complaints (without identity / cannot be traced by their identity) cannot be accepted. "</p> <p>4.2 Procedure for Handling / Resolving Community Complaints</p> <p>4.2.5 "This form identifies the person or organization that submitted the complaint, along with the basis of the complaint and the background of the acknowledgment (detailed description of the incident, name of the Party involved, the specific time when the event was the reason for the complaint and the basis of the complaint).</p> <p>4.2.12 "... The company will endeavour to resolve complaints within 15 working days".</p>	<p>Complied</p>

4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p>	<p>“Mekanisme Penanganan Keluhan” – complaint handling mechanism (No. SOP-AA-GL-5005-R0 01) is documented procedure to response complaint from external party. For internal, the mechanism described under “Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan” – Employee’ complaint and resolution mechanism (No. SOP-AAHR-3008-R0 05).</p> <p>PT Inti Indosawit Subur – Muara Bulian Mill has also prepared “Mekanisme Jaminan Pelapor dan Pengungkapan Kasus” prepared by Public Relation officer. The mechanism has explained policy to protect complainant/whistle blower anonymity – if requested. These mechanisms have been communicated to external parties and disseminated to all employees. Based on interview with local communities, Gender committee leader and worker union leader; they understood the procedure and mechanism to communicating complaint and/or grievance to company.</p> <p>PT Inti Indosawit Subur – Muara Bulian Mill is recording each complaint and response provided in the Logbook of “<i>Buku Keluhan Karyawan</i>”, where from complaint from external is documented in “<i>Buku Agenda Komplain</i>”.</p> <p>Mostly the employee’s complaints/grievances are about improvements in infrastructure and public facilities. All complaints/grievances have been resolved by the company. And for external stakeholders based on interview with the unit of management, relevant stakeholders and document review there is no grievance or conflict raised against unit of certification both company and smallholders.</p> <p>Based on interview with unit management audit and relevant stakeholders, there is no grievance or conflict raised against unit of certification both company and smallholders.</p>	Complied
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>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>	Complied

		<p>Based on interview with the unit of management and relevant stakeholders, there is no grievances or conflicts raised against unit of certification both company and smallholders.</p> <p>Based on interview with unit management audit and relevant stakeholders, there is no grievance or conflict raised against unit of certification both company and smallholders.</p>	
Criteria 4.3: The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local community are demonstrated.	<p>In 2020 and 2021 period, the company has established CSR program is recorded on CSR Project Tracking 2020 and 2021, 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 in 2020 and 2021 for example:</p> <ol style="list-style-type: none"> 1. Social aspects: <ul style="list-style-type: none"> - Assistance package for the poor at the surrounding community to Merlung, Lubuk Terap, Penyabungan, Rantau Badak, Pulau Pauh, Rantau Benar Village. - Religious day activity at Merlung, Lubuk Terap, Penyabungan, Rantau Badak, Pulau Pauh, Rantau Benar Village. - Art equipment Assistance at Merlung Village. 2. Economy aspects: <ul style="list-style-type: none"> - Cattle assistance for the poor at the surrounding community (lubuk Terap and Rantau Benar Village). - Motorcycle wash assistances at Lampisi Village. 3. Education aspects: 	Complied

		<ul style="list-style-type: none"> - Education assistances "Program Sawit Lestari" for SMKN 6 Tanjung Jabung Barat. <p>4. Health care aspects:</p> <ul style="list-style-type: none"> - Free health check at Rantau Benar and Pulau Pauh Village. <p>5. Infrastructure aspects:</p> <ul style="list-style-type: none"> - Bore well construction at Lubuk Terap Village. - Material assistance for Mosque "Jannatun Na'im", Mosque "Al Ijtihad", Mosque "Baitul Rahman" at Tanjung Benanak, Merlung and Lubuk Terap Village. - Material assistance for church at Pinang Gading and Lampisi Village. - Trees assistances for reforestation program at Merlung Village. <p>Realization of CSR Year 2020 and 2021 program:</p> <ul style="list-style-type: none"> - In April 2021, Material assistance for Mosque SDN 163 Bulian Jaya Village, IDR 3,000,000. - In May 2021, computer assistance for SMP 35 Batanghari at Bulian Jaya Village, IDR 5,000,000. - In May 2021, Community Economic empowerment Assistance (Karya Mukti, Tidar Kuranji, Bukit Sari, Bulian Jaya, Kehidupan Baru, Danau Embat, Kel Terusan, Desa Terusan, Rantau Kapas Tuo, Rantau Kapas Mudo, Pelayangan and Sialang Pungguk Village), IDR 26,400,000. - In July 2021, assistance package for the poor at the surrounding community affected by pandemic covid19 (Karya Mukti, Tidar Kuranji, Bukit Sari, Bulian Jaya, Kehidupan Baru, Danau Embat, Kel Terusan, Desa Terusan, Rantau Kapas Tuo, Rantau Kapas Mudo, Pelayangan and Sialang Pungguk Village), IDR 1,468,000. 	
<p>Criteria 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			

4.4.1	(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.	No customary land ownership upon the Unit of Certification area. Legal aspect of the Unit of Certification, please refer to indicator 2.1.1, including for smallholders.	Complied
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 provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p> <p>4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;</p> <p>4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities. Including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p>	<p>PT. Inti Indosawit Subur – Muara Bulian is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. The land status is clear, and no land disputes raised. Copies of documents evidencing agreement-making processes and negotiated agreement detailing the FPIC process are obsolete.</p> <p>PT. Inti Indosawit Subur – Muara Bulian is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. The land status is clear, and no land disputes raised. Copies of documents evidencing agreement-making processes and negotiated agreement detailing the FPIC process are obsolete.</p> <p>PT. Inti Indosawit Subur – Muara Bulian is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. The land status is clear, and no land disputes raised. Copies of documents evidencing agreement-making processes and negotiated agreement detailing the FPIC process are obsolete.</p>	Complied
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed	Use of the land for oil palm in PT Inti Indosawit Subur - Muara Bulian Estate and Mill based on land use title or HGU with total area is 8,814 Ha, which consist of 5	Complied

	<p>through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p>	<p>HGU certificate. All this area has mapped on "Peta Kebun PT IIS Muara Bulian Scale 1:30,000". FPIC mechanism and process is available in Land Dispute Resolution procedure (SOP AA-GL5003.1-R1 "<i>Penanganan Konflik Lahan</i>", dated 22 August 2011). FPIC mechanism is available on the flowchart and part of the process of conflict resolution.</p> <p>Scheme Smallholders:</p> <p>An appropriate map is available in all ownership certificates (SHM) of the farmers. There are 3,118 ownership rights certificates (SHM) and the map of their plot within. Both Muara Bulian Estate, Mill and Smallholders, there is no traditional use or customary right within the certified area.</p>	
<p>4.4.4</p>	<p>All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.</p>	<p>Estate:</p> <p>PT Inti Indosawit Subur – Muara Bulian is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on reviewed of the statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Scheme Smallholder:</p> <p>During field observation and interview with sample of smallholders at KUD Barokah, KUD Subur Makmur, KUD Budi Sari, KUD Makmur Rejeki, KUD Karya Lestari and UD Buah Sakato, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "<i>Transmigrasi</i>" in early 1980's, therefore all smallholders plots already have ownership certificates "SHM".</p>	<p>Complied</p>

4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	<p>Estate: PT Inti Indosawit Subur – Muara Bulian is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on reviewed of the statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Scheme Smallholder: During field observation and interview with sample of smallholders at KUD Barokah, KUD Subur Makmur, KUD Budi Sari, KUD Makmur Rejeki, KUD Karya Lestari and UD Buah Sakato, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have ownership certificates "SHM".</p>	Complied
4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.	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.	Complied
Criteria 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	<p>Muara Bulian Estate: Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the</p>	Not Applicable

		<p>main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Muara Bulian Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Smallholder Scheme:</p> <p>During field observation and interview with sample of smallholders at KUD Barokah, KUD Subur Makmur, KUD Budi Sari, KUD Makmur Rejeki, KUD Karya Lestari and UD Tuah Sakato, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "<i>Transmigrasi</i>" in early 1980's, therefore all smallholders plots already have legal use rights.</p> <p>There is no new planting occurred within this scope.</p>	
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions. All the relevant information and documents are made available, and community have option of resourced access to independent third-party advice through a documented, long-term and two-way process of consultation and negotiation.</p>	<p>Muara Bulian Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Muara Bulian Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Smallholder Scheme:</p>	Not Applicable

		<p>During field observation and interview with sample of smallholders at KUD Barokah, KUD Subur Makmur, KUD Budi Sari, KUD Makmur Rejeki, KUD Karya Lestari and UD Buah Sakato, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p> <p>There is no new planting occurred within this scope.</p>	
4.5.3	<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>Muara Bulian Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Muara Bulian Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Smallholder Scheme:</p> <p>During field observation and interview with sample of smallholders at KUD Barokah, KUD Subur Makmur, KUD Budi Sari, KUD Makmur Rejeki, KUD Karya Lestari and UD Buah Sakato, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p> <p>There is no new planting occurred within this scope.</p>	Not Applicable

<p>4.5.4</p>	<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>Muara Bulian Estate: Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Muara Bulian Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Smallholder Scheme: During field observation and interview with sample of smallholders at KUD Barokah, KUD Subur Makmur, KUD Budi Sari, KUD Makmur Rejeki, KUD Karya Lestari and UD Buah Sakato, 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. There is no new planting occurred within this scope.</p>	<p>Not Applicable</p>
<p>4.5.5</p>	<p>Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p>	<p>Muara Bulian Estate: Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Muara</p>	<p>Not Applicable</p>

		<p>Bulian Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Smallholder Scheme:</p> <p>During field observation and interview with sample of smallholders at KUD Barokah, KUD Subur Makmur, KUD Budi Sari, KUD Makmur Rejeki, KUD Karya Lestari and UD Buah Sakato, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "<i>Transmigrasi</i>" in early 1980's, therefore all smallholders plots already have legal use rights.</p> <p>There is no new planting occurred within this scope.</p>	
4.5.6	<p>Evidence is available that the communities or their representatives gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p>	<p>Muara Bulian Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Muara Bulian Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Smallholder Scheme:</p> <p>During field observation and interview with sample of smallholders at KUD Barokah, KUD Subur Makmur, KUD Budi Sari, KUD Makmur Rejeki, KUD Karya Lestari and UD Buah Sakato, there is no land dispute within smallholders area since the plantation</p>	Not Applicable

		<p>developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p> <p>There is no new planting occurred within this scope.</p>	
4.5.7	<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>Muara Bulian Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Muara Bulian Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Smallholder Scheme:</p> <p>During field observation and interview with sample of smallholders at KUD Barokah, KUD Subur Makmur, KUD Budi Sari, KUD Makmur Rejeki, KUD Karya Lestari and UD Buah Sakato, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p> <p>There is no new planting occurred within this scope.</p>	Not Applicable
4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p>	<p>Muara Bulian Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and</p>	Not Applicable

		<p>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 Muara Bulian Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Smallholder Scheme:</p> <p>During field observation and interview with sample of smallholders at KUD Barokah, KUD Subur Makmur, KUD Budi Sari, KUD Makmur Rejeki, KUD Karya Lestari and UD Buah Sakato, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p> <p>There is no new planting occurred within this scope.</p>	
<p>Criteria 4.6: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p>	<p>Muara Bulian Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Muara Bulian Estate area statement documents, interview with communities and</p>	Complied

		<p>stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Smallholder Scheme: During field observation and interview with sample of smallholders at KUD Barokah, KUD Subur Makmur, KUD Budi Sari, KUD Makmur Rejeki, KUD Karya Lestari and UD Buah Sakato, 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. There is no new planting occurred within this scope.</p>	
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p>	<p>Muara Bulian Estate: Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Muara Bulian Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Smallholder Scheme: During field observation and interview with sample of smallholders at KUD Barokah, KUD Subur Makmur, KUD Budi Sari, KUD Makmur Rejeki, KUD Karya Lestari and UD Buah Sakato, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program</p>	Complied

		<p>"<i>Transmigrasi</i>" in early 1980's, therefore all smallholders plots already have legal use rights.</p> <p>There is no new planting occurred within this scope.</p>	
4.6.3	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>Muara Bulian Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Muara Bulian Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Smallholder Scheme:</p> <p>During field observation and interview with sample of smallholders at KUD Barokah, KUD Subur Makmur, KUD Budi Sari, KUD Makmur Rejeki, KUD Karya Lestari and UD Buah Sakato, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "<i>Transmigrasi</i>" in early 1980's, therefore all smallholders plots already have legal use rights.</p> <p>There is no new planting occurred within this scope.</p>	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them.	<p>Muara Bulian Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil</p>	Complied

		<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 Muara Bulian Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Smallholder Scheme:</p> <p>During field observation and interview with sample of smallholders at KUD Barokah, KUD Subur Makmur, KUD Budi Sari, KUD Makmur Rejeki, KUD Karya Lestari and UD Buah Sakato, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "<i>Transmigrasi</i>" in early 1980's, therefore all smallholders plots already have legal use rights.</p> <p>There is no new planting occurred within this scope.</p>	
<p>Criteria 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p>	<p>Muara Bulian Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Muara Bulian Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p>	Complied

		<p>Smallholder Scheme:</p> <p>During field observation and interview with sample of smallholders at KUD Barokah, KUD Subur Makmur, KUD Budi Sari, KUD Makmur Rejeki, KUD Karya Lestari and UD Buah Sakato, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p> <p>There is no new planting occurred within this scope.</p>	
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p>	<p>Muara Bulian Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Muara Bulian Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Smallholder Scheme:</p> <p>During field observation and interview with sample of smallholders at KUD Barokah, KUD Subur Makmur, KUD Budi Sari, KUD Makmur Rejeki, KUD Karya Lestari and UD Buah Sakato, 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

		There is no new planting occurred within this scope.	
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	<p>Muara Bulian Estate: Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Muara Bulian Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Smallholder Scheme: During field observation and interview with sample of smallholders at KUD Barokah, KUD Subur Makmur, KUD Budi Sari, KUD Makmur Rejeki, KUD Karya Lestari and UD Buah Sakato, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p> <p>There is no new planting occurred within this scope.</p>	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	<p>Muara Bulian Estate: Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the</p>	Complied

	<p>compensation was accepted following a documented process of FPIC.</p>	<p>main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Muara Bulian Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Smallholder Scheme: During field observation and interview with sample of smallholders at KUD Barokah, KUD Subur Makmur, KUD Budi Sari, KUD Makmur Rejeki, KUD Karya Lestari and UD Buah Sakato, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "<i>Transmigrasi</i>" in early 1980's, therefore all smallholders plots already have legal use rights. There is no new planting occurred within this scope.</p>	
<p>4.8.2</p>	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p>	<p>Muara Bulian Estate: Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Muara Bulian Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Smallholder Scheme:</p>	<p>Complied</p>

		<p>During field observation and interview with sample of smallholders at KUD Barokah, KUD Subur Makmur, KUD Budi Sari, KUD Makmur Rejeki, KUD Karya Lestari and UD Buah Sakato, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p> <p>There is no new planting occurred within this scope.</p>	
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).</p>	<p>Muara Bulian Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Muara Bulian Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Smallholder Scheme:</p> <p>During field observation and interview with sample of smallholders at KUD Barokah, KUD Subur Makmur, KUD Budi Sari, KUD Makmur Rejeki, KUD Karya Lestari and UD Buah Sakato, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p> <p>There is no new planting occurred within this scope.</p>	Complied

4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).	<p>Muara Bulian Estate: Unit of Certification is long-established plantation with planting year since 1992, land use-rights already obtained since 1992. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Muara Bulian Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Smallholder Scheme: During field observation and interview with sample of smallholders at KUD Barokah, KUD Subur Makmur, KUD Budi Sari, KUD Makmur Rejeki, KUD Karya Lestari and UD Buah Sakato, 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. There is no new planting occurred within this scope.</p>	Complied
<p>Principle 5: Support smallholder inclusion</p>			
<p>Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p>			
<p>Criteria 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
5.1.1	Current and previous period prices for FFB are publicly available and accessible by smallholders.	Unit of Certification has demonstrate during remote audit the FFB prices which available in Mill. For Smallholders, the FFB price is following the price that issued by Plantation Agency.	Complied

		During the audit, Kebun Plasma Muara Bulian has showed the FFB payment receipt period July 2021 in accordance with official FFB price that issued by FFB Pricing Team of Jambi 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 Tuah Sakato and KUD Karya Lestari period July 2021. All payments have been complied with the pricing that stipulated.	
5.1.2	(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	Based on information gathered from the plasma manager and CSV staff obtained that the information of price directly informed by the purchasing department to the respective suppliers through the short message application such as Whatsapp. During the field visit to the respective KUD's informed that price updating by board of KUD's board in office. In addition, the price information for outgrowers or CSV also updated by purchasing department. There was no issues on this.	Complied
5.1.3	(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Management of PT Inti Indosawit Subur – Muara Bulian Plasma 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. During this audit obtained information that the premium sharing for Muara Bulian Plasma period 2020 has been handover on 10 December 2020. Muara Bulian Plasma has held the training for smallholders namely "Alternative Income during Replanting Training" on November 2019 and January 2020 located in Bogor – Indonesia. Those training objectives is to prepare the smallholder to facing their monthly income situation during the replanting period. 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.	Complied

5.1.4	(C) Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and re-payments through FFB price reductions for replanting and/or, other support mechanisms where applicable.	The smallholder's member of Muara Bulian Plasma originated from government transmigration program on 1990 – 1991. Mostly from East Java, West Java and local area (Jambi Province). Based on information obtained during the onsite audit known that some of smallholders' member were women. The annual meeting of KUD always invited all members which is some women. All the decision made was involved the smallholder members, including women members.	Complied
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	All smallholders which registered as supply bases to Muara Bulian POM have agreement with PT. Inti Indosawit Subur – Muara Bulian. The timeframe of the contract is 1 cycle period (25 years) since first planting.	Complied
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.	Smallholders received the daily and monthly report for FFB's that deliver to Muara Bulian POM. Price, weigh, deduction and amount paid are clearly described within the document. Payment to smallholders in monthly basis.	Complied
5.1.7	Weighing equipment is verified by an independent third party on a regular basis.	According to the Indonesian regulation, verification of weigh bridge conducted annually. Sighted the record of validation from Trade and Industry Agency of Jambi City as follows: <ul style="list-style-type: none"> • Validation Letter No: DG.02.03/742/DPP II/SKHP/2021 dated 28 June 2021 for weighbridge Avery Weight Tronix E1205 (capacity 50 MT), serial number 122350700. Validation renewal before June 2022. • Validation Letter No: DG.02.03/743/DPP II/SKHP/2021 dated 28 June 2021 for weighbridge Avery Weight Tronix ZM 510 (capacity 50 MT), serial number 182050099. Validation renewal before June 2022. 	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	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

	<p>(ICS), who holds the certificate, and who owns and sells certified materials.</p>	<p>For independent Smallholder, support is given in form of CSV (Create Share Value). Member of CSV which have cooperation with the company for example is Forum Cahaya Buana and Gapoktan Swadaya Cahaya Buana. Form of support is the company give coaching to the independent smallholder related good agriculture practices, organisation and administration. Those independent smallholders expected to be certified in next few years.</p>					
<p>5.1.9</p>	<p>(C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.</p>	<p>The company has established a mechanism to handle complaint from external party, as written in "Mekanisme Penanganan Keluhan" – complaint handling mechanism (Doc. No. SOP AA-GL-5005-RO-01 dated 22 August 2011) while complaint from internal regulated under "Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan" – Employee' complaint and resolution mechanism (Doc. No. SOP-AA-HR-3008-RO 05) and responded not more than 14 days. These mechanisms have communicated to external parties and disseminated to PT IIS employees.</p> <p>Certificate holder has had new procedure namely <i>SOP Penyampaian dan Penyelesaian Keluhan Karyawan</i> (SOP No: AA-HR-308.5-R1 effective dated 1 December 2019). This procedure also protected whistle blower anonymity. Referring to Asian Agri's website https://www.asianagri.com/id/panel-keberlanjutan/keluhan-engaduan.</p> <p><i>Asian Agri is committed to responding quickly and constructively to any grievance raised against any of our own operations or our suppliers, and to report them publicly. We develop a robust grievance procedure to resolve all verifiable complaints and conflicts with all related stakeholders such as land conflicts, social conflicts, human right issues, labor issues, etc.</i></p> <table border="1" data-bbox="981 1257 1955 1394"> <thead> <tr> <th data-bbox="981 1257 1514 1305">Internal Reporting:</th> <th data-bbox="1514 1257 1955 1305">Channel/Remarks</th> </tr> </thead> <tbody> <tr> <td data-bbox="981 1305 1514 1394"> <p><i>There are log books located in all estates and mills managed by Asian Agri's business</i></p> </td> <td data-bbox="1514 1305 1955 1394"> <p><i>Log Books:</i></p> <ul style="list-style-type: none"> • <i>Disruption</i> </td> </tr> </tbody> </table>	Internal Reporting:	Channel/Remarks	<p><i>There are log books located in all estates and mills managed by Asian Agri's business</i></p>	<p><i>Log Books:</i></p> <ul style="list-style-type: none"> • <i>Disruption</i> 	<p>Complied</p>
Internal Reporting:	Channel/Remarks						
<p><i>There are log books located in all estates and mills managed by Asian Agri's business</i></p>	<p><i>Log Books:</i></p> <ul style="list-style-type: none"> • <i>Disruption</i> 						

		<p><i>units. Employees are free to file concerns and reports in these log books, on matters related to Asian Agri's sustainability policy. Concerns on operation disruptions faced by employees may be documented in the Disruption Log Book. Issues pertaining to employee rights may be documented in the Complaint Log Book.</i></p>	<ul style="list-style-type: none"> • <i>Complaint</i> 	
		<p><i>Confidential reports may be submitted through email or telephone to protect the identity of the reporter.</i></p>	<p><i>Poster on Whistleblowing is placed in every office of Asian Agri.</i></p> <ul style="list-style-type: none"> • <i>Telephone: +62 811 910 7916</i> • <i>Email: attention@asianagri.com</i> 	
		<p><i>External Reporting:</i></p> <p><i>Stakeholders of Asian Agri including but not limited to Government, smallholders, suppliers, vendors, academicians, NGOs, media, etc), are provided different channels to report their concerns/findings. Reporters may share their concerns and information on business misconduct, corruption, harassment, criminal acts, environment, etc.</i></p> <p><i>All reports will be treated confidentially and if deemed appropriate, updates will be</i></p>	<p><i>Channel/Remarks</i></p> <ul style="list-style-type: none"> • <i>Email: grievance@asianagri.com</i> • <i>Address: Jl. MH Thamrin No. 31 Jakarta 10230 Indonesia</i> • <i>Fax: +62 21 230 1120 Attn.: Grievance Secretariat</i> 	

		<p><i>made publicly available as per our Grievance mechanism.</i></p>	<p><i>Grievance submissions should be made using the Grievance Submission Form.</i></p>	
<p><i>This procedure is also applied to scheme smallholder operational. The procedure provides guidelines on handling grievances related to sustainability practices across our supply chain as well governance matters in our operations.</i></p>				
<p>Scheme smallholders: The scheme smallholders have a mechanism of consultation and communication in “Mekanisme Komunikasi, Konsultasi dan Keluhan”, dated 3rd January 2011. The procedure has been communicated provided in flow chart and available in each KUD’s offices. Until this audit, there was no grievance from KUD’s member.</p>				
<p>Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>				
<p>5.2.1</p>	<p>The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p>	<p>PT IIS – Muara Bulian 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 without, among them:</p> <p>Record on socialization, training and preparing the implementation RSPO P&C on interested smallholders, was conducted on 8 April 2021, attended by 33 participants.</p> <p>The agenda such as:</p> <ul style="list-style-type: none"> - Awareness the steps of RSPO certification for P&C 2018. - Refreshment training. - Preparing the strategic, planning and due date to address the RSPO P&C requirements. 		<p>Complied</p>

<p>5.2.2</p>	<p>The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).</p>	<p>PT Inti Indosawit Subur – Muara Bulian 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> <p>Record on socialization, training and preparing the implementation RSPO P&C on interested smallholders, was conducted on 8 April 2021, attended by 33 participants.</p> <p>The agenda such as:</p> <ul style="list-style-type: none"> - Awareness the steps of RSPO certification for P&C 2018. - Refreshment training. - Preparing the strategic, planning and due date to address the RSPO P&C requirements. 	<p>Complied</p>
<p>5.2.3</p>	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p>	<p>Muara Bulian Mill supplied by own estates (Muara Bulian Estate), smallholder from 6 KUD's with total 8,814 Ha smallholders and more than 1,000 Ha third parties supplier. Based on interview with smallholder representatives from KUD Barokah, Bukit Sari, Karya Lestari, Tuah Sakato and Subur Makmur. Obtain information that entire land has been granted by government (private land title/SHM).</p> <p>According to the signboard in mill's gate, Muara Bulian mill does not accept FFB from illegal sources (forest area or crop stolen). All FFB from third parties shall comply with regulation. Mill's staff told that FFB Purchasing Department has set the procedures for their supplier as follows:</p> <ul style="list-style-type: none"> • New supplier shall propose their FFB purchased offer including submitted the name and land legality of each potential farmer. • FFB Purchasing Department verify the geolocation of potential farmer that submitted by the third parties. 	<p>Complied</p>

		<ul style="list-style-type: none"> • New supplier shall sign the agreement which stated to not send illegal FFB sources. This agreement will automatically be cancelled if any violation on this clause. • The FFB transporter shall signed the zero illegal FFB statement letter in security gate in each delivery note. <p>Based on interview with smallholder representatives from KUD Barokah, Bukit Sari, Karya Lestari, Tuah Sakato and Subur Makmur obtain information that entire land has been granted by government (private land title). Asian Agri's through his subsidiary PT. Inti Indosawit Subur fully supported their smallholder to be certified by ensuring all FFB come from legal sources and comply with national regulation. They also conducted good engagement to demonstrated best management practices in agronomy, environmental handling and safety procedures. For example, each plot received 4 unit barn owl box to help them control rat population.</p> <p>During the audit, auditor also obtain information that PT. Inti Indosawit Subur are now assisting the smallholders on replanting project in collaborated with local government. This aims to ensure that farmers produce palm oil sustainably.</p>	
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	<p>Certificate Holder has assigned chemical weeding team (Tim Unit Semprot/TUS) in each estate/unit to handling chemical weeding activity. The team member originated from own workers (for own estate) and local communities (for smallholder). They regularly attended training on 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 8 April 2021. 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>	

		appropriate PPE during application, no smoke, avoid the direction of wind blows and cleaned their body after application to reduce contamination.	
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	<p>Annual review of progress of the smallholder support by Asian Agri's can be see and downloaded in Asian Agri's website https://www.asianagri.com/id/panel-keberlanjutan/laporan-keberlanjutan. That document is publicly available.</p> <p>Plasma manager also described that PT Inti Indosawit Subur also helped the smallholder based on monthly management review of smallholder performance.</p> <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: sighted the integrated refreshment training related occupational health and safety, safety handling procedure of pesticide and environmental training on 8 April 2021 in entire KUD's. attended by board of KUD's and representatives' smallholders from each farmers group. Due to pandemic issues, during the 2020 – 2021, the smallholders meeting is not allowed in a large number of participants.</p>	Complied
<p>Principle 6: respect workers' rights and conditions Protect workers' rights and ensure safe and decent working conditions.</p>			
<p>Criteria 6.1: Any form of discrimination is prohibited.</p>			
6.1.1	(C) A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	<p>PT Inti Indosawit Subur – Muara Bulian has established Company Policy under "Kebijakan Perusahaan", was signed by Managing Director on 1st December 2014. In point 13 mentioned: "Company Treats employees fairly, whether in terms of acceptance, judgment, conditions and work environment, and representation irrespective of race, tribe, caste, national origin, religion/faith, disability, gender, sexual orientation, union membership, political affiliation and/or age".</p> <p>This policy has been informed to all employees and being placed into noticed board in public area and easily accessed.</p>	Complied

		<p>PT Inti Indosawit Subur – Muara Bulian has also SOP for employment recruitment According on SOP: AA-HR-305.2-R0 dated 1 February 2009 about “<i>Penerimaan Karyawan Baru</i>” (Recruitment and Selection of Employee), the company will accept new employee based on their capabilities and qualifications. This policy has been communicated to worker. The policy described the organization recognize and respect to the rights of local, migrant or urban worker.</p> <p>Workers register for mill and estates mentioned that all workers came from different backgrounds (race, religion, gender, etc). Ethnical diversity of worker and during interview with workers, no discrimination was identified based on religion, ethnic, gender. No evidence of discrimination found during the audit.</p> <p>Company provided working tools to the workers, relevant to the nature of the work performed.</p> <p>This employee list proves that the company does not practice any form of discrimination, employees are given the opportunity to work regardless of ethnicity, religion, origin, and gender:</p> <p>Data verified: List of Employee June 2021 “Daftar Karyawan” there were not found any evidence of discrimination and migrant workers.</p> <p>Scheme Smallholders</p> <p>All KUD’s (KUD Budi Sari, KUD Karya Lestari, KUD Tuah Sakato, KUD Subur Makmur) has established the policy related to equal opportunity and treatment for work under “Kebijakan Koperasi” dated 2nd December 2020, was signed by Head of Cooperative.</p>	
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.</p>	<p>PT Inti Indosawit Subur – Muara Bulian has provided a policy in relation to this indicator requirement, stated in “Kebijakan Perusahaan”, dated 1st December 2014. Based on interview with employee in POM and Estate, PT Inti Indosawit Subur – Muara Bulian has prepared the policy related to anti-discrimination was strictly enforced. They were no cases of discrimination in company. Document review of workers “Daftar Karyawan” there were not find any evidence of discrimination.</p>	Complied

		<p>Data verified: List of Employee June 2021 "Daftar Karyawan" there were not found any evidence of discrimination and migrant workers</p> <p>Scheme Smallholders</p> <p>All KUD's (KUD Budi Sari, KUD Karya Lestari, KUD Tuah Sakato, KUD Subur Makmur) has clearly stated the policy to provide equal opportunity policy to all workers as written in "Kebijakan Koperasi". During field audit, it was not found discrimination against gender, tribe, religion and race. All workers have the right and obligation in accordance to the type of work.</p>	
6.1.3	<p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p>	<p>PT Inti Indosawit Subur – Muara Bulian has had a SOP related to new employment recruitment. According on SOP Rekrutment dan Seleksi Karyawan No. SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding "<i>Penerimaan Karyawan Baru</i>" (Recruitment and Selection of Employee), the company will accept new employee based on their capabilities and qualifications. This policy has been communicated to worker.</p> <p>This procedure were communicated to all employees in the workplace and stakeholders.</p> <p>There are two types of employees that are applied in PT Inti Indosawit Subur – Muara Bulian, which are permanent employees (known as SKU-B and SKU-H) and daily workers (known as BHL/PHL). Workers register for mill and estates mentioned that all workers came from different backgrounds (race, religion, gender, etc). Ethnical diversity of worker and during interview with workers, no discrimination was identified based on religion, ethnic, gender. No evidence of discrimination found during the audit.</p> <p>Fixed Employee (SKU-H and SKU-B) is confirmed under the joint work Agreement (PKB), while the Daily worker with the daily work agreement with a minimum validity period of 1 year.</p> <p>Based on interview with the HR Dept., thath recruitment of employees is based on</p>	Complied

		<p>an analysis of workforce needs and within it has considered, the required competencies, experience and expertise required. For this reason, employee acceptance tests and interviews will be conducted. Employee assessments are always carried out every 6 months as a basis for being able to promote positions or levels/groups which will affect to the monthly salary.</p> <p>Taken example of recruitment at Muara Bulian Mill on period 2019 and</p> <p>Scheme Smallholder</p> <p>Based on document sampled verification at (KUD Budi Sari, KUD Karya Lestari, KUD Tuah Sakato, KUD Subur Makmur), they understand no forced labor or trafficked labor allowed.</p> <p>Most of the farmers are managed their land independently. All the workers are considered as casual workers. The workers are hired based on verbal agreement related to rate per piece of work, payment system, working tool provision, etc. No work performed based on debt bond.</p>	
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p>	<p>Based on interview with nurse and female workers, pregnancy testing is applicable for all female workers without discrimination.</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>Based on interview with management representatives, the company has implemented the protection of women reproductive rights, in form of maternal leave, period leave, and regular pregnancy check for female sprayers and strictly prohibit pregnant and/or breastfeeding female worker applying pesticides. The latest pregnancy test July 2021.</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p>	<p>PT Inti Indosawit Subur – Muara Bulian has formed a Gender Committee at Muara Bulian Estate and Mill which is chaired by Ms. Natariva Sembiring, based on the Gender Committee Organizational Structure was stated on 15 February 2020.</p>	Complied

		<p>Gender committees consisting of representatives of all units in the Muara Bulian Group play a role in: addressing issues related to women's rights and counselling for women workers who experience acts of violence and sexual harassment and other issues related to women workers. Coordinators are assigned at Muara Bulian Estate by Ms. Rimma S, at Muara Bulian Plasma is responsible for Ms. Nova Novrianti and at Muara Bulian Mill is responsible for Rita Anggraini.</p> <p>In 2021 Gender Committee Work Program has been established including the issues that will be discussed at the meeting, including:</p> <ul style="list-style-type: none"> - Improving maternal and child health through Posyandu (integrated service post), immunization and vitamin supplement activities. - Conduct regular gender committee meetings at least every 4 months - Provision of supplementary food (during Posyandu) - Sports activities for employees - Environmental cleanliness in residential areas - Assessment of healthy housing for employees - Religious activity <p>The regular monthly gender committee meeting was held on 13 March 2021 which discussed the protection of the rights of women workers from the company, the meeting was attended by 8 representatives of women workers from each affair (a list of attendance can be shown at the time of the audit). Based on the records of the routine meeting and interviews with management, that during the period 2021 there were no cases related to women workers.</p>	
6.1.6	There is evidence of equal pay for the same work scope.	Company has had state about the wages for workers base on Decree of Governor of Jambi SK No. 220/KEP.GUB/DISNAKERTRANS-3.3/2019, dated 25 October 2019; regarding: "Penetapan Upah Minimum Propinsi Jambi Tahun 2020" amount of IDR 2,630,162.13. UMP for year 2021 as per Decree of Governor of Jambi SK No. 883/KEP.GUB/DISNAKERTRANS-3.3/2020 dated 2 November 2020 regarding	Complied

		<p>"Penetapan Upah Minimum Propinsi Jambi Tahun 2021" amount of IDR 2,630,162.13.</p> <p>The Department of HRD (Manger HRD RO3) also issued Memorandum 001/HR-RO3/MEMO/02/2021 on 1 March 2021 related wages for year 2021 is 2,630,162.13 per month (25 Working Days) or equal to IDR 105,207 per day. The company has also given rice allowance for the workers, which is 15 kg/month for each worker, 9 kg/month for wife of workers and 7.5 kg/month for child of workers (maximum 3 children). The price of rice in August 2021 is IDR 9,500/kg.</p> <p>Salary scale structure for the period 2021 for all level of workers has shown during audit, this structure is based on Decree of Governor of Jambi SK No. 883/KEP.GUB/DISNAKERTRANS-3.3/2020 dated 2 November 2020.</p> <p>The company has provided a scripts/slip salary to employees, salary slip contains basic salary, allowances, premium, labor health coverage (<i>BPJS Tenaga Kerja and Kesehatan</i>) and deduction.</p> <p>Based on document review shown that the company has given equal pay/salary for the same work scope, including natura allowance.</p> <p>Taken sample of salary slip for period August 2021:</p> <ul style="list-style-type: none"> - Rowi-Harvester (PHL) basic IDR 2,104,140 (working days: 20 days), deduction (BPJS) IDR 105,208, received IDR 1,998,932. - Arnita Simanjuntak-nursery (PHL) basic IDR 1,062,484 (working days: 10 days), deduction (BPJS) IDR 78,906, received IDR 983,578. - Tumino - Harvester (SKU), basic IDR 2,804,900, premium IDR 80,000, deduction (BPJS) IDR 111,201, electric allowance IDR 40,000, total received 2,693,699. - Sutriyo - helper operator (PHL) basic IDR 2,104,140 (working days: 20 days), overtime IDR 4,591,407, premium IDR 12,671, deduction (BPJS) IDR 78,905, received IDR 6,629,313. 	
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		<ul style="list-style-type: none"> - Dedi Erwanto-operator (SKU) basic IDR 2,724,900 (working days: 25 days), overtime IDR 3,373,963, premium IDR 10,298, deduction (BPJS) IDR 110,208, received IDR 6,004,952. - Yanpiter Sembiring-operator (SKU) basic IDR 2,724,900 (working days: 25 days), overtime IDR 60,000, premium IDR 21,626, deduction (BPJS) IDR 210,061 received IDR 7,870,537. <p>Scheme Smallholder:</p> <p>The workers at KUD were paid based on daily rate and only pay when they have work. However, individual members have adjusted the worker payment, referring to the government regulation. The wage has been given monthly are calculated based on tonnage of FFB harvested per rotation, amounting to IDR 150,000/ton of FFB, working for 2-3 to reach 1 ton. Based on the verification of data on casual working wages at Bulian Plasma, has shown that the wage is in accordance with local government regulations of Jambi Province.</p>	
<p>Criteria 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p>(C) Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.</p>	<p>The company have established work agreement for permanent employees through joint work agreement (PKB-Perjanjian Kerja Bersama) in term for 2 years. During the audit the PKB is for period of 2018 – 2020 and has done registered by Dirjen PHI/JSK the Ministry of Employment on 8 April 2018.</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 Monday to Saturday) and the wages has provided is based on waging regulation (Decree of Governor of Jambi) valid as of 1 January 2021.</p> <p>The Collective Labor Agreement (PKB 2018-2020 period) and the daily labour contract of the wage was presented in Bahasa Indonesia, based on interview the</p>	Complied

		<p>workers has understood accordingly.</p> <p>Determination of wage for period 2021 is based on Decree of Governor of Jambi SK No. 883/KEP.GUB/DISNAKERTRANS-3.3/2020 dated 2 November 2020 regarding "Penetapan Upah Minimum Propinsi Jambi Tahun 2021" amount of IDR 2,630,162.13. The Department of HRD (Manager HRD RO3) also issued Memorandum 001/HR-RO3/MEMO/02/2021 on 1 March 2021 related wages for year 2021 is 2,630,162.13 per month (25 Working Days) or equal to IDR 105,207 per day. The company has also given rice allowance for the workers, which is 15 kg/month for each worker, 9 kg/month for wife of workers and 7.5 kg/month for child of workers (maximum 3 children). The price of rice in August 2021 is IDR 9,500/kg.</p> <p>Several examples of payslips are described above 6.1.6.</p>	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.</p>	<p>The company has set employment provisions in accordance with the rules and legal requirement. It is stated on employment contract off daily labour on article 1 about the types of work, working hours (maximum 40 hours per week and working from Monday to Saturday) and the wages has provides is based on waging regulation (Decree of Governor of Jambi) valid as of 1 January 2021.</p> <p>Determination of wages (including benefits and other benefit), working hours (including hours and overtime pay) and working days have been regulated in the PKB Period 2018-2020 in Article V; <i>Upah</i> - Wages, which explains:</p> <ol style="list-style-type: none"> 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. 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 c. Permanent workers receive additional wages (UMP / UMSK) and / or attendance incentives as stipulated further in separate provisions. 	Complied

		<p>Rice allowance has been given for the workers, which is 15 kg/month for each worker, 9 kg/month for wife and 7.5 kg/month for child of workers (maximum 3 children).</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>Provisions related to manpower have fulfilled the laws and regulations namely UU No. 13 of 2003 concerning Manpower - Ketenagakerjaan.</p>	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p>	<p>The company has set employment provisions in accordance with the rules and legal requirement. It is stated on employment contract off daily labour on article 1 about the types of work, working hours (maximum 40 hours per week and working from Monday to Saturday) and the wages has provided based on regulation.</p> <p>Determination of wages (including benefits and other benefit), working hours (including hours and overtime pay) and working days have been regulated in the PKB Period 2018-2020 in Article V; <i>Upah</i> - Wages, which explains:</p> <ul style="list-style-type: none"> 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. 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 c. Permanent workers receive additional wages (UMP / UMSK) and / or attendance incentives as stipulated further in separate provisions. <p>Rice allowance has been given for the workers, which is 15 kg/month for each worker, 9 kg/month for wife and 7.5 kg/month for child of workers (maximum 3 children).</p> <p>Provisions on holidays and leave (both maternity leave and menstruation leave) have been regulated in Article VIII regarding Non-working Days; including:</p>	Complied

		<p>absenteeism, rest days of the week, official holidays, annual leave, maternity leave and others.</p> <p>Provisions related to manpower have fulfilled the laws and regulations namely UU No. 13 of 2003 concerning Manpower - Ketenagakerjaan.</p>	
<p>6.2.4</p>	<p>(C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p>	<p>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: PT Inti Indosawit Subur – Muara Bulian has provided adequate housing with electrical and clean water supply, medical clinic, sport facilities, religious facilities, education facilities and other amenities. Based on field inspection, the facilities found to be in good condition. The company has prepared facilities for their workers.</p> <p>Record seen: Data dan Layout of Public Facilities in Muara Bulian Estate and Mill year 2021, such as:</p> <p>Muara Bulian Mill</p> <ul style="list-style-type: none"> - Housing Type B/CM (1 unit), Type C (4 Unit), Type D (5 unit), type E (38 Unit). - Polyclinic (1 unit). - Mosque (2 units). - Church (1 unit). - School bus (1 unit). - Ambulance (1 unit). - Sport facilities. <p>Muara Bulian Estate</p> <ul style="list-style-type: none"> - Housing: Staff (18 units), type D1(22 units), Type E1 (191 units). - Kindergarten (1 unit). - Clinic (2 units). - Mosque (3 units). 	<p>Complied</p>

		<ul style="list-style-type: none"> - Church (1 units). - School bus (4 units). - Ambulance (1 unit). - <i>Koperasi</i> (1 units). - Employee hall (1 unit). - Sport facilities (football, volleyball, tennis, badminton). 	
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 (<i>Koperasi Jaya Abadi</i>).</p> <p>Scheme Smallholder</p> <p>The farmer members are a developed transmigration village. Provision of food can be obtained from existing markets in the village. Based on the results of field visits to the sample villages indicate that in the village was available markets and small shops that provide basic necessities.</p>	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>Determination of wage for period 2021 is based on Decree of Governor of Jambi SK No. 883/KEP.GUB/DISNAKERTRANS-3.3/2020 dated 2 November 2020 regarding "<i>Penetapan Upah Minimum Propinsi Jambi Tahun 2021</i>" amount of IDR 2,630,162.13. The Department of HRD (Manager HRD RO3) also issued Memorandum 001/HR-RO3/MEMO/02/2021 on 1 March 2021 related wages for year 2021 is 2,630,162.13 per month (25 Working Days) or equal to IDR 105,207 per day.</p> <p>The company has also given rice allowance for the workers, which is 15 kg/month for each worker, 9 kg/month for wife of workers and 7.5 kg/month for child of workers (maximum 3 children). The price of rice in August 2021 is IDR 9,500/kg.</p> <p>The company also made calculations related to DLW, based on the wages given to employees as costs given by the company. Following is DLW Calculation of Muara</p>	Complied

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Bulian Group.		
No.	In Kind Benefits	Total (IDR)
1.	Housing (Cost of Building: 30 years) + (Annual Maintenance: Number of Houses) ÷ 12 Months	257,575
2.	Electricity & Water (Annual cost of water & electricity ÷ Number of houses) ÷ 12 Months	73,573
3.	Education [(Total cost not including teacher and non teacher labour cost + school transport + school building maintenance + food for children) ÷ number of workers] ÷ 12 months	25,534
4.	Creche Facilities (TPA) (Building maintenance + Food for children + supplies + caretaker cost) ÷ Number of workers	8,752
5.	Healthcare (Kesehatan) (Maintenance of clinic, medicine & medical materials, ambulance transport cost + cost of healthcare workers) ÷ Number of workers	772
6.	Food	152,375
7.	Sport & Recreation Facilities	3,172
	Total Cost of In Kind Benefits	521,754
	Average Monthly Take Home Salary per Worker	2,356,654

		Total Value of Prevailing Wage	2,878,408	
<p>PROCEDURAL NOTE:</p> <p>The RSPO has published guidelines on the calculation of Decent Living Wage (DLW) in June 2019. Since Indonesia does not have DLW benchmark yet, the RSPO Secretariat will conduct a DLW benchmark study in accordance with the Global Living Wage Coalition (GLWC) and Indonesian laws and regulations.</p> <p>In the meantime, until DLW benchmark for Indonesia is endorsed by the RSPO, the unit of certification carries out interim measures that was published by RSPO (dated 11 November 2019), including:</p> <ol style="list-style-type: none"> 1. Payment of minimum wages in accordance with applicable regulations 2. Assessment of wages paid (prevailing wages) and in-kind benefits. <p>Once the DLW benchmark is available, this procedural note is no longer applicable.</p>				
6.2.7	<p>Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p>	<p>Based on document review and interview with management, it was known that PT IIS Muara Bulian still has casual workers (PHL) for the main types of work such as harvesting and production. PT IIS-Muara Bulian in the present period has replanting work which is mostly done by daily workers (PHL).</p> <p>For the main types of work that are still being carried out by PHL, PT IIS Muara Bulian has set a plan regarding the PHL Promotion Program which has been approved by HRD RO3 - Jambi, the program has been set until 2025.</p> <p>The following is the realization of promotion to permanent workers, for 2021 at estate there are 14 workers as harvester and 2 workers as FFB loading workers, 1 worker as Division Clerk, 1 worker as Ambulance Driver, 3 workers as Teacher and at Mill there are 1 worker, and for the mill, management will re-evaluate the others worker for promotion until the end of the year 2021.</p> <p>The following are the sample of promotion workers to permanent workers (SKU):</p> <p>Estate:</p> <ol style="list-style-type: none"> 1. Memorandum of RH Plantation 3 - Jambi No. 0203/HR-RO3/MEMO/SK/08/2021 dated 25 August 2021 on behalf Sumantri as harvester (SKU). 	Complied	

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		<ol style="list-style-type: none"> 2. Memorandum of RH Plantation 3 - Jambi No. 0201/HR-RO3/MEMO/SK/08/2021 dated 25 August 2021 on behalf Bambang Royadi as harvester (SKU). 3. Memorandum of RH Plantation 3 - Jambi No. 0209/HR-RO3/MEMO/SK/08/2021 dated 25 August 2021 on behalf Jufri Yanto as harvester (SKU). 4. Memorandum of RH Plantation 3 - Jambi No. 0202/HR-RO3/MEMO/SK/08/2021 dated 25 August 2021 on behalf Sari Romadon as harvester (SKU). 5. Memorandum of RH Plantation 3 - Jambi No. 0204/HR-RO3/MEMO/SK/08/2021 dated 25 August 2021 on behalf Tarmizi bin M Yusuf as harvester (SKU). 6. Memorandum of RH Plantation 3 - Jambi No. 0205/HR-RO3/MEMO/SK/08/2021 dated 25 August 2021 on behalf Eva Hidayat as harvester (SKU). 7. Memorandum of RH Plantation 3 - Jambi No. 0206/HR-RO3/MEMO/SK/08/2021 dated 25 August 2021 on behalf Edi Sargito as harvester (SKU). 8. Memorandum of RH Plantation 3 - Jambi No. 0196/HR-RO3/MEMO/SK/08/2021 dated 25 August 2021 on behalf Rhamadhasya as FFB loading worker (SKU). 9. Memorandum of RH Plantation 3 - Jambi No. 0197/HR-RO3/MEMO/SK/08/2021 dated 25 August 2021 on behalf Ricky Fio Fendi as FFB loading worker (SKU). 10. Memorandum of RH Plantation 3 - Jambi No. 0193/HR-RO3/MEMO/SK/08/2021 dated 25 August 2021 on behalf Rimma Situmorang as Production Clerk (SKU). 	
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		<p>11. Memorandum of RH Plantation 3 - Jambi No. 0190/HR-RO3/MEMO/SK/08/2021 dated 25 August 2021 on behalf Rini Susunti as Teacher (SKU).</p> <p>12. Memorandum of RH Plantation 3 - Jambi No. 0189/HR-RO3/MEMO/SK/08/2021 dated 25 August 2021 on behalf Hosiah as Teacher (SKU).</p> <p>13. Memorandum of RH Plantation 3 - Jambi No. 0191/HR-RO3/MEMO/SK/08/2021 dated 25 August 2021 on behalf Khoirunisa as Teacher (SKU).</p> <p>Muara Bulian POM: Memorandum of RH Plantation 3 - Jambi No. 0183/HR-RO3/MEMO/SK/08/2021 dated 30 August 2021 on behalf Sutriyo as Boiler Operator (SKU).</p>	
<p>Criteria 6.3: The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
<p>6.3.1</p>	<p>(C) A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p>	<p>Freedom of association policy is written in Bahasa Indonesia, as stated in "Kebijakan Perusahaan", dated 1st December 2014 "<i>Menghormati hak setiap karyawan untuk membentuk atau menjadi serikat pekerja sesuai dengan keinginannya dan untuk melakukan tawar menawar secara kolektif</i>".</p> <p>This policy has been informed to all employees and being placed into public area easily accessed.</p> <p>PT Inti Indosawit Subur – Muara Bulian has had Labor Union has registered in DISNAKERTRANS under Decree of Head of Social, Manpower and Transmigration Agency in Batang Hari Regency no. 568/506/DSKT on: Registration of PUK SPPP.SPSI PT Inti Indo Sawit Subur with registration number: no. 568/041/DSKT/2011, dated April 18, 2011 chaired by Mr. Janto Siburian.</p> <p>Structure of organization of labor union as per "Surat Keputusan PC F.SPPP-SPSI Kabupaten Batanghari Nomor: KEP 03/PD.F.SPPP-SPSI/JAMBI/VIII/2016 dated 4th</p>	<p>Complied</p>

		<p>August 2016 tentang Komposisi dan Personalia Pengurus Unit Kerja (PUK. SPPP-K.SPSI) PT Inti Indosawit Subur” for periode 2016 – 2021.</p> <p>Scheme Smallholders: There is no labour union that formed by smallholders (N/A)</p>	
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.</p>	<p>Based on interview with chairman of labour union obtained information that there is no discrimination, pressure, or any form of negative treatment for the board of labour union. The member of labour union is freely elected.</p> <p>Scheme Smallholders: There is no labour union that formed by smallholders (N/A)</p>	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.</p>	<p>Based on interview with chairman of labour union obtained information that there is no interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers.</p> <p>Based on the labour union statutes, the right to become a member of a labour union is a permanent employee. Each member has voting rights (right to be elected and to vote).</p> <p>Scheme Smallholders: There is no labour union that formed by smallholders (N/A)</p>	Complied
<p>Criteria 6.4: Children are not employed or exploited.</p>			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p>	<p>A formal policy for the protection of children, including prohibition of child labour and remediation under “Kebijakan Perusahaan”, was signed by Managing Director on 1st December 2019, in point 14 mentioned: It is not allowed all children to work in every activity in company”.</p>	Complied

		<p>The company's policy is also published to use posters at any strategic places in the plantations (Muar Bulian Estate and Muar Bulian Mill).</p> <p>All contracts, including those for the supply of FFB, contain specific clauses regarding compliance with applicable legal requirements including those concerning child labor / prohibitions on the employment of children under 18 years, and this can be proven by third parties. Taken sample:</p> <ul style="list-style-type: none"> • FFB Supplier Agreement dated 22 October 2019. on behalf of Tonggor Hutabarat, found at no. 12 regarding child protection: "Do not employ child labor (18 years) • Contract Work Agreement No. 151/E3KMB/04/19 dated 18 April 2019 collaborations between PT Inti Indosawit Subur and Mr. Mahyudin Abdul Rahman for the type of construction work 1 unit of workshop at Muara Bulian Estate. • Work Agreement Renting Heavy Equipment No. 016/E3KMB/01/20 dated January 2, 2020, collaboration between PT IIS and PT Uniteda Arkato for the type of rental service for 1 unit of heavy equipment (Bakhoe Loader (Type: JCB 3 CX). <p>Scheme Smallholder:</p> <p>Plasma Muara Bulian have established policies related to the prohibition of employing children (under 18 years old). Samples taken for the KUD Budi Sari, KUD Karya Lestari, KUD Tuah Sakato, KUD Subur Makmur Policy, explained in point 10; It is forbidden to employ children under the age of 18 in every plantation operational activity".</p> <p>This policy was disseminated to all members on 13 March 2021.</p> <p>Based on document review (list of employees) of KUD Budi Sari, KUD Karya Lestari, KUD Tuah Sakato, KUD Subur Makmurthere were found that a minimum age met (the youngest of harvester born year 1996 – based on ID verification)</p>	
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<p>6.4.2</p>	<p>(C) Documented evidence on the fulfilment of worker’s minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.</p>	<p>PT Inti Indosawit Subur – Muara Bulian has established Company Policy under “Kebijakan Perusahaan”, was signed by Managing Director on 1st December 2014, in point 14 mentioned: It is not allowed all children to work in every activity in company”.</p> <p>The company's policy is also published to use posters at any strategic places in the plantations (Muara Bulian Estate and Muara Bulian Mill).</p> <p>All contracts, including those for the supply of FFB, contain specific clauses regarding Comply with applicable legal requirements including those concerning child labour / prohibitions on the employment of children under 18 years, and this can be proven by third parties.</p> <p>Taken sample:</p> <ul style="list-style-type: none"> • FFB Supplier Agreement dated 22 October 2019. on behalf of Tonggor Hutabarat, found at no. 12 regarding child protection: “Do not employ child labor (18 years) • Contract Work Agreement No. 151/E3KMB/04/19 dated 18 April 2019 collaborations between PT Inti Indosawit Subur and Mr. Mahyudin Abdul Rahman for the type of construction work 1 unit of workshop at Muara Bulian Estate. • Work Agreement Renting Heavy Equipment No. 016/E3KMB/01/20 dated January 2, 2020, collaboration between PT IIS and PT Uniteda Arkato for the type of rental service for 1 unit of heavy equipment (Bakhoe Loader (Type: JCB 3 CX). <p>Based on the agreement document (Cooperation Agreement contract), that in Article 7. About responsibilities and obligations, described in relation to legal requirements and documentation, employees (including not to employ minors), human rights and business-ethics.</p> <p>In some work orders documents (dokumen SPK) is also explained in relation to legal requirements, employment (including wage) and Comply with legislation and the</p>	<p>Complied</p>
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		<p>obligation to respect human rights and business ethics in article 1 No. 6-9; article 12 related to protection to children or prohibition to employ under 18 years to and no. 13 related to business ethics.</p> <p>Scheme Smallholder: Plasma Muara Bulian have established policies related to the prohibition of employing children (under 18 years old). Samples taken for the KUD Budi Sari, KUD Karya Lestari, KUD Tuah Sakato, KUD Subur Makmur Policy, explained in point 10; It is forbidden to employ children under the age of 18 in every plantation operational activity". This policy was disseminated to all members on 13 March 2021. Based on document review (list of employees) of KUD Budi Sari, KUD Karya Lestari, KUD Tuah Sakato, KUD Subur Makmur there were found that a minimum age are met (the youngest of harvester born year 1996 – based on ID verification).</p>	
6.4.3	(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.	<p>Based on interview with chairman of labour union obtained information that the minimum age of workers has been socialized to the respective workers in all level. According to the list of workers period June 2021, there is no underage employee found.</p> <p>Based on interview with worker and document verification, there is no indication on forced labour and/or trafficked labour.</p>	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	<p>PT Inti Indosawit Subur – Muara Bulian established the Policy, was signed by Managing Director dated 1st December 2014, that stated: "It is not allowed all children to work in every activities/process in company".</p> <p>Based on document review of list of workers, interview with workers and observation during field visit, it was no found workers hired less than 18 years.</p>	Complied
<p>Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			

6.5.1	<p>(C) A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.</p>	<p>A policy to protect the reproductive rights as it is found in company policy that's signed by Managing Director, dated 01st December 2014 and on one part of the policies stated that: "<i>Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya</i>" - (To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights)". The company's policy is also published to use posters at any strategic places in the plantations (Muara Bulian Estate and Muara Bulian Mill).</p> <p>There is a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention.</p> <p>Gender committee has dissemination on 12 February 2021 attended by 8 representatives of women workers from each affair (a list of attendance can be shown at the time of the audit). Based on the records of the routine meeting and interviews with management, that during the period 2019-2020 there were no cases related to women workers.</p> <p>Scheme Smallholder:</p> <p>Most of the farmers are managed their land independently. Therefore, the policy does not directly applicable to them. Organization has policy to prevent sexual harassment and violence against women in "Kebijakan ICS Group Manager" which 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).</p>	Complied
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.</p>	<p>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 – Muara Bulian has established the company policy dated 1st December 2014 related to A policy to protect the reproductive rights of all,</p>	Complied

		<p>especially of women. The policy stated that "To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights".</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>Based on interview with Gender Committee, company has implemented the protection of women reproductive rights, in form of maternal leave, period leave, and regular pregnancy check for female sprayers and strictly prohibit pregnant and/or breastfeeding female worker applying pesticides. The latest pregnancy test in July 2021</p> <p>Scheme Smallholder:</p> <p>Most of the farmers are managed their land independently. Therefore, the policy does not directly applicable to them. Organization has policy to prevent sexual harassment and violence against women in "Kebijakan ICS Group Manager" which 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).</p>	
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.</p>	<p>The company has identified female workers as new mother and made assessment their need base on consultation with them. Record showed during audit are:</p> <ul style="list-style-type: none"> • List of new mother PT IIS Muara Bulian. • Example of questionnaire for new mother. <p>Based on field visit at worker housing facilities found that the company already has a good childcare facility "<i>Tempat Penitipan Anak</i>" which has breast feeding room. Interview result with the childcare worker and gender committee revealed that the new mother (female worker) could easily access the childcare "<i>Tempat Penitipan Anak</i>".</p>	Complied

<p>6.5.4</p>	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.</p>	<p>PT Inti Indosawit Subur – Muara Bulian 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 protect 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 "<i>Buku Keluhan Karyawan</i>". For 2020 there are 5 complaints and for 2021 until September there are 3 complaints. The company has resolved all complains according to the procedure. Verified document for example:</p> <ul style="list-style-type: none"> • Complaint on 20 May 2021 from employee namely Wanto (admin office), related damage to Water Closet of the estate office, this complaint has followed up on 25 May 2021. • Complaint on 29 June 2021 from employee namely Kristin Novi (sprayer), related damage to floor of house, this complaint has followed up on 8 July 2021. • Complaint on 4 August 2021 from employee namely Bambang (admin office), related damage to the roof of the house, this complaint has followed up on 9 August 2021. <p>Scheme Smallholder:</p>	<p>Complied</p>
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		<p>The scheme smallholders have mechanism of consultation and communication in "Mekanisme komunikasi, konsultasi dan keluhan Kebun Plasma Muara Bulian Group", April 2021.</p> <p>Based on logbook of record in the form of "<i>Penerimaan Keluhan dan Tanggapan</i>" for year 2020 and 2021 period, there was no grievance reported.</p>	
<p>Criteria 6.6: No forms of forced or trafficked labour are used.</p>			
6.6.1	<p>(C) All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports; • Payment of recruitment fees; • Contract substitution without worker's consent • Involuntary overtime; • Lack of freedom of workers to resign • Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement • Debt bondage • Withholding of wages 	<p>Based on document verification and interviews with management at the time of the audit, PT IIS had implemented the employee recruitment process in accordance with established procedures and complied with applicable laws and regulations (Law No. 13 of 2003). Based on the PKWT and BHL Contract of Work Agreement documents, the company has explicitly determined voluntary work and at the time of recruitment of employees this agreement document was falsified directly to prospective employees, then this agreement document was made in duplicate (1 copy was given to the employee concerned). PT IIS also does not withhold employee identity documents, withhold wages, coercion for overtime and also impose penalties on employees if the employee quits.</p> <p>According to documents review and interview with the workers, gender committee, worker union, revealed that there is no retention of identity documents or passports, payment of recruitment fees, contract substitution without worker's consent, involuntary overtime, lack of freedom of workers to resign, penalty for termination of employment, penalty (unless the unit of certification and the workers are agree and it is stated in the employment agreement), debt bondage and withholding of wages.</p>	Complied
6.6.2	<p>(C) Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.</p>	<p>Company has had a SOP related to new employment recruitment. According to SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding "<i>Penerimaan Karyawan Baru</i>" (Recruitment and Selection of Employee), the company will accept new employee based on their capabilities and qualifications. This policy has been communicated</p>	Complied

		<p>to worker. This procedure were communicated to all employees in the workplace and stakeholders as well on November 2019.</p> <p>There are three types of employees that are applied in PT IIS, which are permanent employees (known as SKU-B and SKU-H) and daily workers (known as BHL/PHL) and contract workers (PKWT). Worker register for mill and estates mentioned that all workers came from different backgrounds (race, religion, gender, etc.). Ethnical diversity of worker and during interview with workers, no discrimination was identified based on religion, ethnic, gender. No evidence of discrimination found during the audit and migrant workers as well. Permanent Employee (SKU-H and SKU-B) is confirmed under the Collective Labor Agreement (PKB), while the Daily worker with the daily work agreement with a minimum validity period of 1 year.</p>	
<p>Criteria 6.7: 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>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	<p>PT Inti Indosawit SUbur – Muara Bulian has prepared the Standard Operating Procedure on personal protective equipment No. AA-SOP-OP-101.3-R0 dated 14/08/2013.</p> <p>Safety Committee (P2K3) for Estate has approved by Transmigration and Manpower Agency with Decree No: 218/SK- K3/DISNAKERTRANS- 3.1/2019, dated 17 May 2019. Validity: two years (upto 16 May 2021). Safety Officer (AK3 Umum) as responsible person for OHS is Mr. Erik P. Simatupang (License No. Reg. 63221/PK3/AJ/15/2018/P0, valid upto 31st December 2021).</p> <p>Safety meeting conducted in monthly basis. Based on Safety Committee Report, last 15 June 2021.record seen: Minutes of meeting agenda: review and analysis accident record/report, review disease report of clinic, review nearmiss report.</p> <p>Report of P2K3 meeting and OHS performance has reported to Manpower Agency in Batang Hari Regency each quarter (three-monthly), sample seen report P2K3 Muara Bulian POM period April - June 2021. Evidence of report receipt can be demonstrated during audit as per "Daftar Distribusi Eksternal".</p>	<p>Complied</p>

		<p><u>Scheme Smallholder:</u> Scheme smallholder has appointment the "Asisten Plasma" as person in charge for cooperative's health and safety aspects Safety Meeting in KUD has been conducted regularly. Meeting agenda consisting of training on PPE usage (Helmet, Goggles and Shoes and also Egrek equipped with Cover). Record of regular meeting management palsama can be demonstrated.</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 – Muara Bulian has developed the mechanism on handling an accident investigation under procedure no: SOP AA-OP-SMK3-07-FM Accident Investigation SOP, August 3, 2017. In the accident investigation form include: the accident data, details of injuries/sections exposure, photographs/sketches, evidence of investigation (witnesses, positions, equipment, documents), sequence of events (pre-contact, contact, post-contact), type of incident, cause of accident (unsafe, unsafe) accidents (personal and work factors), corrective and preventive actions, investigative team. During audit verification, found that the accident form was complete and adequate.</p> <p>Procedure for first aid and emergency situation available under "Kesiagaan dan Tanggap Darurat" document, number AA-EMS-447-PR, dated December 2010. The emergency situation identified such as land and forest fire, fire at housing and mill, hazardous waste spillage, boiler explosion, gas tank explosion, earthquake, flood, landslide, etc. A team for emergency response has been established, headed by Mill Manager and Estate Manager Records of accidents maintained properly by safety officers and reported regularly to local authorities.</p> <p>Evident taken:</p> <ul style="list-style-type: none"> • The company has appointed a workers who have attended First Aids training. • Training related to first aider was conducted on 8 July 2018, location in Muara Bulian Estate • Based on field visit to spraying team, warehouse area and worksop in Muara Bulian Estate has completed with first aid kit. Inside first aid kit company has 	Complied

		<p>completed with "Daftar Obat" which contain list of medicine and first aid kit equipment. The PIC also has shown the "Daftar Pemakaian Obat P3K – Medicine Usage List" as well in order to record the usage of first aid kit medicine and equipment. During audit and field visit shown that all the first aid kit found completed and well maintain</p> <p>PT Inti Indosawit Subur – Muara Buliasn has appointed a worker who have attended the First Aid training. Data verified: License for First Aider on behalf Lilis Aggreni Simanjuntak, register No. 001/P3K/Disnakertrans-3.1/2019 dated 5 August 2019 valid until 5 August. List of first aid kit (include portable first aid) as in "Checklist inspeksi P3K". There are 6 First Aid kit at Muara Bulian Estate (at location Workshop/traksi, Warehouse, TPS LB3, Afdeling office I – III) and 12 portable first aid kit brought by Field Foreman. While in Muara Bulian POM there were 9 first aid kit located in Fuel storage/Ware house, Workshop, Office, Warehouse central, Laboratory, engine room, chemical warehouse, WTP station, Hazardous waste storage.</p> <p>Scheme Smallholder:</p> <p>The cooperative has prepared the procedure for emergency under document "Rencana Tindakan Tanggap Darurat" dated 2nd January 2021, consist of fire, earthquake, flood, and landslide.</p> <p>The cooperative has prepared the procedure for emergency under document "Bukti Telah Memahami dan Melaksanakan Tindakan Darurat", consist of fire, earthquake, flood, landslide.</p> <p>The procedure for work incident has demonstrated as in document "Mekanisme Pertolongan Pertama Pada Kecelakaan", document verified in KUD Budi Sari, KUD Karya Lestari, KUD Tuah Sakato, KUD Subur Makmur has reviewed the procedure in January 2021.</p> <p>KUD/Cooperative also has established the emergency call center and important call for emergency response.</p>	
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<p>6.7.3</p>	<p>(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>PT Inti Indosawit Subur - Muara Bulian has demonstrated the record of realization the OHS program 2021 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"> - Monitoring of emergency response and preparedness facilities, i.e: fire hydrant and fire extinguisher, updated in March 2021, location in POM. - Refreshment of socialization the company's policies, conducted in 6th January 2021 – location Estate was attended by 34 workers - Report of OHS inspection report, location in I POM dated 14^d January 2021 – reported OK for PPE usage, and OHS facilities (fire hydrant) - Record of handover of PPE, location in estate dated 18th April 2021; PPE: helmet, safety glasses. • "Checklist on monitoring of PPE use for harvester in Pulau Maria Estate dated 17th January 2021. Reported Ok for safety helmet, AP boot, safety glasses, chisel cover. <p>Non conformity raised during onsite audit:</p> <p>During field visit to smallholder block at Hamparan 32 – Kavling/Block 31 KUD Tuah Sakato and Hamparan 51 KUD Subur Makmur, auditor team found the FFB transporter who carried out FFB loading activity was not wearing appropriate PPE (safety boot) as per risk assessment.</p> <p>PT Inti Indosawit Subur – Muara Bulian has prepared the procedure of PPE - "SOP Alat Pelindung Diri" No: AA-SOP-OP- 101.3. The procedure stated that the company has provided adequate and appropriate protective equipment for all workers at place of works, in line with the risk assessment.</p> <p>PT Inti Indosawit Subur – Muara Bulian POM has taken action to address the nonconformity, audit team has verify the corrective action and the NC has been</p>	<p>Non-compliance</p>
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		Closed on 4 December 2021. Please see the detail of nonconformity on section 3.4 Details of Nonconformities.					
6.7.4	All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.	<p>PT Inti Indosawit Subur – Muara Bulian has been provided insurance to all workers including non-permanent worker. Insurance covered by BPJS, as mandated by government regulation. Medical checkup provided for all workers (not only for high-risk worker).</p> <p>PT Inti Indosawit Subur – Muara Bulian has also been provided clinic for all workers. Referral are made to nearest hospital should the case is severe/critical. Medical check-up has been conducted for all workers all in Muara Bulian The medical check-up including blood test, physical examination, audiometric test and spirometric test. Result of examination for worker is kept. Company also providing social and accident insurance in from BPJS Ketenagakerjaan – for all workers.</p> <p>Document verification:</p> <ul style="list-style-type: none"> • Transfer form to BPJS Ketenagakerjaan, month May 2021 • Rekapitulasi Rincian Pembayaran Iuran both BPJS Kesehatan dan Ketenagakerjaan month May 2021 • Transfer record/form via Mandiri Bank for period June 2021, validation number11011100154, dated 10 June 2021, <p>Scheme Smallholder:</p> <p>No workers being employ permanently by the smallholders. Provision of insurance in case of accident, through donation from smallholders and "Kelompok Tani".</p>	Complied				
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	<p>PT Inti Indosawit Subur – Muara Bulian POM has shown the record of "Indeks K3 Pabrik/Kebun Muara Bulian January – August 2021. Reported in Muara Bulian POM & Estate:</p> <table border="1" data-bbox="981 1321 1805 1366"> <thead> <tr> <th>Category</th> <th>Case Number</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Category	Case Number			Complied
Category	Case Number						

		<table border="1"> <tr> <td></td> <td>Muara Bulian POM</td> <td>Muara Bulian Estate</td> </tr> <tr> <td>Fatality</td> <td>Nil</td> <td>Nil</td> </tr> <tr> <td>Permanent disable</td> <td>Nil</td> <td>Nil</td> </tr> <tr> <td>Fire</td> <td>Nil</td> <td>Nil</td> </tr> <tr> <td>Property damage</td> <td>Nil</td> <td>Nil</td> </tr> <tr> <td>Medical aid</td> <td>1</td> <td>14</td> </tr> <tr> <td>First aid</td> <td>Nil</td> <td>Nil</td> </tr> <tr> <td>Near miss report</td> <td>Nil</td> <td>Nil</td> </tr> </table> <p>Scheme Smallholder: The procedure for work incident has demonstrated as in document "Mekanisme Pertolongan Pertama Pada Kecelakaan", document verified in KUD Budi Sari, KUD Karya Lestari, KUD Tuah Sakato, KUD Subur Makmur has reviewed the procedure in January 2021. KUD/cooperatives record the work incident in "Rekaman kejadian Kecelakaan Kerja Tahun 2021". Record of incident were also available in Puskesmas (Village clinic). According to record of accident there is no accident reported since January – June 2021 in KUD Budi Sari, KUD Karya Lestari, KUD Tuah Sakato, KUD Subur Makmur.</p>		Muara Bulian POM	Muara Bulian Estate	Fatality	Nil	Nil	Permanent disable	Nil	Nil	Fire	Nil	Nil	Property damage	Nil	Nil	Medical aid	1	14	First aid	Nil	Nil	Near miss report	Nil	Nil	
	Muara Bulian POM	Muara Bulian Estate																									
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First aid	Nil	Nil																									
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Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.																											
Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.																											
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control.	Integrated Pest Management Plan has been implemented and documented by PT Inti Indosawit Subur – Muara Bulian Estate. IPM Plan has been prepared within annual budget 2020. Muara Bulian Estate established Division Work Program	Complied																								

		<p>annually for IPM for each Division/Afdeling. IPM plan includes detection and census of pest and diseases, weeds controlling, planting and upkeep of beneficial plant, use of pesticide and herbicide.</p> <p>IPM plan include the following:</p> <ul style="list-style-type: none"> - Identification of potential pests and thresholds - The techniques used (cultural, biological, mechanical and physical methods) - The native species used as part of the biological control method - Reducing the use of chemicals over a period of time - Prophylactic use of pesticides - Minimization of pesticide use - Review on the plans to suit the present condition such as replanting <p>According to the Agricultural Policy Manual SOP AA-APM-OP-1100.10. R6 <i>Pengendalian Hama dan Penyakit</i> (Pests & Disease Control), certificate holder has plan to implement integrated pest management.</p> <p>According to the interview with pest control officer in Muara Bulian Estate obtain information that management has had a schedule to regularly monitored pest attack (census) as follows:</p> <ul style="list-style-type: none"> • Census of caterpillar/bag worm by monthly basis. • Census of <i>Ganoderma</i> annually. • Census rat infestation by recap the record of sortation in loading ramp. • Census of Barn Owl Box occupation in three monthly bases. <p>The last census in Muara Bulian Estate has been conducted in second week of August 2021. 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 (Muara Bulian Estate block A16a Afdeling 1) visually there was no issues related to the outbreak or infestation. However, there were a usage of natural predator (<i>Tyto alba</i>) to reduce a rat infestation. Due to</p>	
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		<p>weather condition (heavy rain), there is no field visit to smallholder plot. However, there is no report of outbreak in their plot so far.</p> <p>Scheme Smallholder: According to document verification and field visit to the smallholders plot in 3 KUD's, 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 www.cabi.org on in global invasive species database http://www.iucngisd.org/gisd/search.php .	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
Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.	<p>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</i>, <i>fluoroksifir</i>, <i>methyl metsulfuron</i>, <i>triklofir</i>, <i>diuron</i>, <i>diuron</i>, <i>lamda sihalotrin</i> and <i>2,4-D dimetil amina</i>, <i>bacillus thuringiensis</i></p>	Complied

		<p><i>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 http://pestisida.id/simpes_app/index.php.</p> <p>Scheme Smallholder:</p> <p>During the audit, sighted the list of pesticide recommendation (by active ingredients) that can used by smallholder such as isopropyl amine glyphosate, fluoroksifir, methyl metsulfuron and triklofir. During January 2020 – February August 2021, the smallholders used pesticide with active ingredients isopropyl amine glyphosate, fluoroksifir and methyl metsulfuron. There is no record of parakuat diklorida usage.</p>	
7.2.2	(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided.	Certificate holder has showed the record of LD50 calculation in each unit based on amount of pesticide used. For example, Kebun Luar Muara Bulian 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 – August 2021 known that LD50 of isopropyl amina glifosat was 0.2841 mg/Ha.	Complied
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	Until this recertification audit obtain information that there is no pesticide use for control pest attack. All of pesticide only using for weeding (herbicide). Based on interview with IPM supervisor and smallholder representatives known that no outbreak that causes pesticide usage.	Complied
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.	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	Complied

		<p>has followed the national guidelines such as dosage, interval and infestation rate. Also, in accordance to Asian Agri's Research and Development guidelines.</p>	
<p>7.2.5</p>	<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>Paraquat which was the active ingredient of Gramoxone was still used in PT Inti Indosawit Subur – Muara Bulian Estate especially at replanting area, however the organisation has set internal target to reduce paraquat use. Paraquat is not banned in Indonesia according Act No.12/1992 regarding plant cultivation system, article 60 (g) jo. Article 38, and Ministry of Agriculture regulation No.107/Permentan/SR.140/9/2014 regarding pesticides supervisor. National regulation mentioned that paraquat dichloride is a restricted active ingredient so that its user must hold a certificate use of limited pesticides and the manufacturer must train first for the user of the pesticide.</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>To reduce the human and environmental risk, there is some continuous action that has been implemented as follows:</p>	<p>Complied</p>

		<ul style="list-style-type: none"> • 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. • 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. • Conducted regularly training for pesticide applicator and equipped them with appropriate PPE's. • 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. • Minimalize contamination for pesticide applicator and their families by ensuring them to clean themselves before back home. 	
	<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 Gulma</i> (Weed Control). This procedure has set the specific pesticide in with minimum risk in accordance with the target.</p>	
	<p>7.2.5c Which process was applied to verify why there is no other less hazardous alternative.</p>	<p>Certificate holder through Asian Agri's Research and Development Department has examined some pesticide in specific target. The result of examination and pesticide recommendation written in the SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control).</p>	

	<p>7.2.5d Process to limit the negative impacts of the application.</p>	<p>SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control) has set some procedures to reduce negative impact of the application as follows:</p> <ul style="list-style-type: none"> • Pesticide/herbicide selection to ensuring the application is effective. • Set up the appropriate nozzle in chemical weeding activity based on weed type, topography and availability of water. • Regularly spraying calibration to ensuring the application is effective and efficient. • Calculate pesticide/herbicide usage based on target (hectarage and weed type). <p>Spraying technic.</p>	
	<p>7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p>	<p>Certificate holder did not use pesticide to eradicated pest without the outbreak. If any census result shows the pest attack almost reach the economical threshold, they usually conducted campaign test using pesticide if needed.</p> <p>Chemical weeding activity has regularly set by management. For example, normally circle, path and collecting point weeding conducted 4 times a year in immature and mature area. Those application can be reduced in line with the palm ages.</p>	
<p>7.2.6</p>	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.</p>	<p>Pesticides are always applied in accordance with the product label and storage instruction. Agrochemicals storage was locked in areas with limited access. The storage was ventilated. MSDS and hazard symbol label were provided nearby of agrochemicals. Emergency shower and eyewash were also provided to anticipate in case of an emergency of agrochemical handling. The possible spillage was managed. Secondary containment was provided around the chemical storage area. Spill kit was also provided in the area.</p> <p>PT Inti Indosawit Subur – Muara Bulian Group has assigned chemical weeding team (<i>Tim Unit Semprot/TUS</i>) in each estate/unit to handling chemical weeding activity. The team member originated from own workers (for own estate) and local</p>	<p>Complied</p>

		<p>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 February 2021. 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 Afdeling 1 Muara Bulian Estate also perform spraying activity in smallholder plantation. Spraying team has been trained with pesticide handling training, agrochemical application training and limited pesticide training. Spraying team only handles herbicide to control the weed. Sprayers understood 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 Barokah, Budi Sari, Karya Lestari, Subur Makmur and Tuah Sakato 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> <p>Scheme Smallholder:</p> <p>Spraying works (pesticide application) in smallholder area were performed mostly by spraying team called TUS, which managed by PT Inti Indosawit Subur. Training records are kept by PT Inti Indosawit Subur. List of sprayer team of Plasma Muara Bulian was available, e.g.</p>	
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<p>7.2.7</p>	<p>(C) Storage of all pesticides in accordance with recognized best practices.</p>	<p>SOP for pesticide storage has been provided in SOP "Pengangkutan dan Penyimpanan Bahan Kimia AA-KL-02-EFP" dated 1 February 2008. Pesticides are stored in the determined area separated from fertilizer and other chemicals.</p> <p>Pesticide storage is provided in Divisions as well as in central storage. Agrochemical storage is locked areas with limited access. The storage is ventilated. MSDS and hazard symbol label are provided nearby of pesticides. Emergency shower and eyewash are also provided to anticipate in case of an emergency of agrochemical handling. PPE for handling of pesticides provided including boots, apron, safety glass, respiratory mask and hand gloves.</p> <p>The possible spillage is managed. Secondary containment is provided around the pesticide storage area. Spill kit is also provided in the area.</p> <p>Storage of pesticides found to be in accordance with hazard identification and risk assessment and national guideline for limited pesticide use. Empty chemical containers had been used for mixing chemicals for spraying pesticides in the field. The management of waste material from empty pesticide container disposed through hazardous waste store as per procedure "Penanganan Limbah Industri B-3 AA-KL-06-EFP" dated 1 November 2008.</p> <p>The company has temporary hazardous waste storage where all hazardous waste from all estates and mills collected.</p> <p>Scheme Smallholder:</p> <p>Most of farmer members of Muara Bulian Smallholder were not directly conducted pesticide application and handling. Spraying works (pesticide application) in smallholder area were performed mostly by spraying team called TUS from PT Inti</p>	<p>Complied</p>

		Indosawit Subur – Muara Bulian Estate. Some training records are kept by PT Inti Indosawit Subur. Muara Bulian Smallholder management ensured that all agrochemical usage and waste handling was performed by PT Inti Indosawit Subur.	
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>SOP for proper disposal of pesticide waste material was described in “Penanganan Limbah Industri B-3 AA-KL-06-EFP” dated 1 November 2008. Pesticide waste was reuse as mixing water for the next spraying activity. All empty pesticides containers were triple rinsed and stored in the temporary storage of hazardous wastes.</p> <p>The management of waste material from empty pesticide container disposed through hazardous waste store according to the procedure. The company has licensed temporary hazardous waste storage where all empty pesticide containers from agrochemical storage collected.</p> <p>Personnel interviewed can clearly explain the mechanism of pesticide waste handling including MSDS and personal protective equipment as well as first aid.</p> <p>Scheme Smallholder:</p> <p>Most farmer members of Muara Bulian Smallholder were not directly conducted pesticide application and handling. Spraying works (pesticide application) in smallholder area were performed mostly by spraying team called TUS from PT Inti Indosawit Subur – Muara Bulian Estate. Some training records are kept by PT Inti Indosawit Subur. Muara Bulian Smallholder management ensured that all agrochemical usage and waste handling was performed by PT Inti Indosawit Subur.</p>	Complied
7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	<p>Based on interview with Estate Management, surrounding community and field observation, there was no pesticide applied aerially in Muara Bulian Estate.</p> <p><u>Smallholder:</u></p> <p>Based on interview with Estate Management, surrounding community and field observation, there was no pesticide applied aerially in Muara Bulian Plasma.</p>	Not Applicable

7.2.10	<p>(C) 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>The latest medical check-up performed year 2020 – location in at company medical healthcare attended by workers of fertilizer applicators, spraying applicator and PIC in pesticides storage.</p> <p>The result of MCU has communicated to related workers</p> <p>Scheme Smallholder:</p> <p>Most farmer members of Muara Bulian Smallholder were not directly conducted pesticide application and handling. Spraying works (pesticide application) in smallholder area were performed mostly by spraying team called TUS from PT Inti Indosawit Subur – Muara Bulian Estate.</p>	Complied
7.2.11	<p>(C) No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives.</p>	<p>PT Inti Indosawit Subur – Muara Bulian and KUD’s prohibits pregnant or breast-feeding women to perform chemical spraying. To mitigate, estate performed monthly pregnancy test.</p> <p>PT Inti Indosawit Subur – Muara Bulian and KUD’s has also kept the record that spraying is not conducted by pregnant or breast-feeding women. The company has been conducting PP Test (pregnant test) every month.</p> <p>The last of pregnancy test conducted on June and July 2021 All the female sprayer in well condition and not being pregnant nor breast feeding.</p> <p>Scheme Smallholder:</p> <p>Most farmer members of Muara Bulian Smallholder were not directly conducted pesticide application and handling. Spraying works (pesticide application) in smallholder area were performed mostly by spraying team called TUS from PT Inti Indosawit Subur – Muara Bulian Estate.</p>	Complied

Note For 7.2.11

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

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

7.3.1	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>Waste products has been identified and documented under the "<i>Evaluasi Aspek-Dampak Lingkungan</i>" (Environmental Aspect impacts EMS-431-003-LT). This document is updated once a year, last update is Revision 14, dated 14 March 2019. This document covering all operation in Estates and mill.</p> <p>All polluting activities has been assessed including emission from boiler and generator, effluent from mill waste-water, particulate from boiler stack, noise, used lubricant and filter, old battery, used laboratory chemical, clinical/medical waste, mill effluent, EFB, smoke, dust, fiber and shell, empty agrochemical container, boiler ash, scrap iron, used tires, waste water and domestic household refuse.</p> <p>PT Inti Indosawit Subur – Muara Bulian POM and Estate has a waste management plan, identifying type and source of waste and the disposal plan. PT Inti Indosawit Subur – Muara Bulian POM and Estate prepared a procedure to handle hazardous waste titled "<i>Prosedur Penanganan Limbah B3</i>" No. AA-KL06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third party transporter.</p> <p>There is a mechanism "<i>Mekanisme Penanganan Sampah Domestik</i>" to segregate organic and inorganic waste, further to re-use or re-cycle inorganic domestic waste (such as plastic) and composting the organic domestic waste. Company has disseminated the mechanism of domestic waste handling to all employee and resident of emplacement. Domestic waste resulted from domestic housing resident segregated activity. Company provided the organic and anorganic trash can in each housing area. There are personel/workers who has been trained to collect the organic and anorganic waste and transport to landfill (TPSA).</p>	Complied
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The implementation of Palm Oil Mill Effluent (POME) into the plantation and monitoring wells was reported in March 2021, to the "Kepala Kantor Lingkungan Hidup Kabupaten Batang Hari".

EFB management has been carried out in accordance with the annual plan, the following is the monitoring of the longitudinal application for the 2021 period:

Month	Appl. EFB to Estate(Ton)
Jan	3.465
Feb	2.923
Mar	3.740
Apr	3.229
Mei	2.800
Jun	2.954

Scheme Smallholder:

Plasma Muara Bulian has set the Environmental aspect and impact assessment as per "Evaluasi Aspek Dampak Lingkungan Kebun Plasma Muara Bulian" January 2021. The mitigation plan for environmental aspect and impact has been defined, e.g:

- Manuring/Fertilizing – monitoring ex fertilizer sack, appropriate fertilizing as recommendation
- Weeds control - Ex Herbicides container store in the hazardous waste storage.
- Pest and disease handling: Ex pesticide container store in the hazardous waste storage
- FFB transportation: optimizing FFB transportation by designed the TPH (FFB

		<p>collecting place) in one way along collection road</p> <p>During site visit, Smallholder are aware of the environmental impacts and the mitigation plan. For example, the ex-fertilizer sack must be handled by collected in Cooperative office to reuse as loose fruit container.</p>							
<p>7.3.2</p>	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p>	<p>PT Inti Indosawit Subur – Muara Bulian POM and Estate has a waste management plan, identifying type and source of waste and the disposal plan. PT Inti Indosawit Subur – Muara Bulian POM and Estate prepared a procedure to handle hazardous waste titled “<i>Prosedur Penanganan Limbah B3</i>” No. AA-KL06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third-party transporter.</p> <p>There is a mechanism “<i>Mekanisme Penanganan Sampah Domestik</i>” to segregate organic and inorganic waste, further to re-use or re-cycle inorganic domestic waste (such as plastic) and composting the organic domestic waste. Company has disseminated the mechanism of domestic waste handling to all employee and resident of emplacement. Domestic waste resulted from domestic housing resident segregated activity. Company provided the organic and anorganic trash can in each housing area. There are personel/workers who has been trained to collect the organic and anorganic waste and transport to landfill (TPSA).</p> <p>The implementation of Palm Oil Mill Effluent (POME) into the plantation and monitoring wells was reported in March 2021, to the “Kepala Kantor Lingkungan Hidup Kabupaten Batang Hari”.</p> <p>EFB management has been carried out in accordance with the annual plan, the following is the monitoring of the longitudinal application for the 2021 period:</p> <table border="1" data-bbox="981 1198 1588 1358"> <thead> <tr> <th>Month</th> <th>Appl. EFB to Estate(Ton)</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>3.465</td> </tr> <tr> <td>Feb</td> <td>2.923</td> </tr> </tbody> </table>	Month	Appl. EFB to Estate(Ton)	Jan	3.465	Feb	2.923	<p>Non-compliance</p>
Month	Appl. EFB to Estate(Ton)								
Jan	3.465								
Feb	2.923								

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		<p>Scheme Smallholder:</p> <p>Plasma Muara Bulian has set the Environmental aspect and impact assessment as per “<i>Evaluasi Aspek Dampak Lingkungan Kebun Plasma Muara Bulian</i>” January 2021. The mitigation plan for environmental aspect and impact has been defined, e.g:</p> <ul style="list-style-type: none"> ▪ Manuring/Fertilizing – monitoring ex fertilizer sack, appropriate fertilizing as recommendation ▪ Weed control - Ex Herbicides container store in the hazardous waste storage. ▪ Pest and disease handling: Ex pesticide container store in the hazardous waste storage ▪ FFB transportation: optimizing FFB transportation by designed the TPH (FFB collecting place) in one way along collection road <p>During site visit, Smallholder are aware of the environmental impacts and the mitigation plan. For example, the ex-fertilizer sack must be handled by collected in Cooperative office to reuse as loose fruit container.</p> <p>Non conformity found during audit:</p> <p>PT Inti Indosawit Subur – Muara Bulian POM has prepared a procedure to handle hazardous waste titled “Prosedur Penanganan Limbah B3” No. AA-KL06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third-party transporter.</p>										

		<p>However, during field visit at Muara Bulian Estate, the auditor team found some (5 /or 6) used oil drums behind the material warehouse were not placed at temporary storage of hazardous waste.</p> <p>PT Inti Indosawit Subur – Muara Bulian POM has made the root cause analysis, correction and corrective action to address the nonconformity, audit team has verify the corrective action plan and accepted. The effectiveness of corrective action plan implementation will be verified in the next assessment. Please see the detail of nonconformity on section 3.4 Details of Nonconformities.</p>	
7.3.3	The unit of certification does not use open fire for waste disposal.	PT Inti Indosawit Subur – Muara Bulian estate also has Landfill for domestic waste disposal. No fire use founded for waste disposal	Complied
Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.	<p>PT Inti Indosawit Subur – Muara Bulian Estate has procedures to maintain soil fertility to ensure optimal and sustained yield, e.g. SOP AA-APM-OP-1100.05-R3 dated 23 November 2016 (Konservasi Tanah dan Air explains Soil & Water Conservation); SOP AA-APM-OP-1100.06-R6 dated 16 February 2017 (Menanam kacang related to Planting cover crops); SOP AA-APM-OP-1100.09.R5 dated 5 September 2016 (Pemupukan related to Fertilizer application). Leaf samplings are taken annually to accurately capture palm nutrient requirement (both macro and micronutrient) and serve as source for fertilizer recommendation –</p> <p>fertilizer application (inorganic, compost, POME application, and empty fruit bunch) follows fertilizer recommendation. Another effort is to plant legume cover crop during replanting to keep soil humidity.</p> <p>During the audit known that the management unit has applied fertilizer according to the fertilizer’s recommendation issued by Asian Agri Research and Development Department. Based on field visit in Block A16D Afdeling 1 using Amonium Clorida with dosage 2.2 kg/palm (this is in accordance with fertilizer’s recommendation 2021).</p>	Complied

		<p>In addition, management unit also applied POME application especially in early mature area to maintain soil fertility and increase production. The POME applied with dosage 800 m³/Ha/year.</p> <p>Based on interview with smallholders, most of their plots is no longer applied with fertilizer due to in replanting preparation in 2023 – 2023.</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>Soil analysis is conducted once every 7 years according to the oil palm age. The last Report of Soil Analysis issued on 21 January 2016, conducted by Asian Agri Research and Development Center (PT Nusa Pusaka Kencana Analytical and QC Laboratory) based on report No. 004/RD-INT/S/JAN/16. For immature plant using fertilizer recommendation from fertilization procedure based on plant age and record on procedure no. AA-APM-OP-11.00.09-R dated 12 June 2017.</p> <p>Foliar analysis conducted in periodic time. The latest foliar analysis was conducted on March 2020 and it aims to give fertilizer recommendation in the next year.</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"> • The last soil sampling conducted on December 2015. Parameter that tested is N, C, K, Ca, Mg and pH. • The last leaf sampling conducted on August 2020. Parameter that tested is major element (Ash, N, P, K Mg, Ca) dan Minor element (B, Cu, Zn, Mn, Fe). <p>Those reports are converted to be fertilizer recommendation by Asian Agri’s Research and Development Department.</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>EFB, POME and others palm residue are still applied to the land as additional nutrient beside the periodical manuring. This treatment are apply for Muara Bulian Estate. Whether for smallholders, only apply fertilizer.</p> <p>During this visit, auditor has observed the application of organic and inorganic fertilizers. For example: there is application Amonium Clorida in Block A16D Afdeling</p>	Complied

		<p>1 with dosage 2.2 kg/palm (this is in accordance with fertilizer’s recommendation 2021).</p> <p>Scheme Smallholder:</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 Barokah, Budi Sari, Karya Lestari and Subur Makmur 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.	Record of fertilizer application in estate are in places. For example, there is a record of application Amonium Clorida in Block A16D Afdeling 1 with dosage 2.2 kg/palm.	Complied
Criteria 7.5: Practices minimise and control erosion and degradation of soils.			
7.5.1	(C) Maps that identify marginal and fragile soils, including steep sloped land are available.	<p>Based on soil survey 2009 (28/04/2009 – 13/05/2009), it was noted that no fragile soil (all mineral soil). Muara Bulian Estate demonstrates soil classification map “Peta sebaran seri tanah” with scale 1:25,000, indicating the soil classification composed of Typic Dystrudepts, Typic Endoaquepts, Typic Endoaquults and Typic Kandiudults. The slope in the plantation, between 0-30%. (Steep slope categorized as >20° or 40%, Hilly slope between 13° – 20°. Terracing made in the slope 10° – 15°).</p> <p>Soil suitability analysis indicating the natural limitation in form of sandy texture, poor drainage, natural fertility, topography. The area of 563 Ha in Muara Bulian Estate is not suitable with requirement due to slope more than 30%.</p> <p>Scheme Smallholders:</p> <p>The soil map was available at plasma Muara Bulian office and KUD office with scale 1:40,000. There are 3 series of soil type defined by Research and Development Asian Agri based on soil survey on March 2014:</p> <ol style="list-style-type: none"> 1. Kompleks Typic Endoaquepts seri Singoan 	Complied

		<p>2. Kompleks Typic Dystrudepts seri Bulian 3. Kompleks Typic Kandiudults seri Bulian</p> <p>According to the type soil in Plasma Muara Bulian, there is no fragile soil identified in plasma area of Muara Bulian.</p>	
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.	Based on field visit in undulating area (newly immature) areas known that the management unit has provide terrace contour. For example, in immature area, Block A16c Afdeling 1. There is no fire usage during that process. The management unit also provide legume cover crop to minimize the soil erosion.	Complied
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.	There is no new palm oil planting in Muara Bulian Estate.	Not Applicable
<p>Criteria 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p>			
7.6.1	<p>(C) Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations.</p>	<p>Based on soil survey 2009 (28/04/2009 – 13/05/2009), it was noted that no fragile soil (all mineral soil). Muara Bulian Estate demonstrates soil classification map “Peta sebaran seri tanah” with scale 1:25,000, indicating the soil classification composed of Typic Dystrudepts, Typic Endoaquepts, Typic Endoaquults and Typic Kandiudults. The slope in the plantation, between 0-30%. (Steep slope categorized as >20° or 40%, Hilly slope between 13° – 20°. Terracing made in the slope 10° – 15°).</p> <p>Soil suitability analysis indicating the natural limitation in form of sandy texture, poor drainage, natural fertility, topography. The area of 563 Ha in Muara Bulian Estate is not suitable with requirement due to slope more than 30%.</p> <p>Scheme Smallholders:</p> <p>The soil map was available at plasma Muara Bulian office and KUD office with scale 1:40,000. There are 3 series of soil type defined by Research and Development Asian Agri based on soil survey on March 2014:</p>	Complied

		<ol style="list-style-type: none"> 1. Kompleks Typic Endoaquepts seri Singoan 2. Kompleks Typic Dystrudepts seri Bulian 3. Kompleks Typic Kandiudults seri Bulian <p>According to the type soil in Plasma Muara Bulian, there is no fragile soil identified in plasma area of Muara Bulian.</p>	
7.6.2	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 that conducted in 2016, 2017, 2018 and 2019. Replanting activity in steep area using a terrace contour for soil conservation.	Not Applicable
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	According to soil survey 2009, Muara Bulian Estate and its smallholders are categorized mineral soil. No peatland area within this unit of certification.	Not Applicable
Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas.	According to soil survey 2009, Muara Bulian Estate and its smallholders are categorized mineral soil. No peatland area within this unit of certification.	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 survey 2009, Muara Bulian Estate and its smallholders are categorized mineral soil. No peatland area within this unit of certification.	Not Applicable
PROCEDURAL NOTE: Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).			
7.7.3	(C) Subsidence of peat is monitored, documented and minimised.	According to soil survey 2009, Muara Bulian Estate and its smallholders are categorized mineral soil. No peatland area within this unit of certification.	Complied
7.7.4	(C) Availability of implementation evidence of the water and land cover management program.	According to soil survey 2009, Muara Bulian Estate and its smallholders are categorized mineral soil. No peatland area within this unit of certification.	Complied

7.7.5	<p>(C) Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation.</p>	<p>According to soil survey 2009, Muara Bulian Estate and its smallholders are categorized mineral soil. No peatland area within this unit of certification.</p>	<p>Complied</p>
<p>PROCEDURAL NOTE: For 7.7.5: Detailed information on the RSPO Drainability Assessment Guide along with related concepts and detailed actions is contained in the Guidelines currently being adjusted / tested by the RSPO Working Group on Peatlands (Peatland Working Group / PLWG). The final version must obtain PLWG approval in January 2019 and will include additional Guide on the steps to be followed after deciding not to replant and the consequences for other stakeholders, farmers, local communities, and the unit of certification concerned. It is recommended that the trial methodology period is proposed to be extended for 12 months for all relevant management units (ie management units that have plantations on peat) to utilize the methodology and provide input to PLWG so that existing procedures can be further refined as needed before January 2020. The unit of certification has the option to delay replanting until the issuance of the revised Guidelines for the guidelines. Additional guidance for alternative commodity crops and rehabilitation of natural vegetation will be regulated by the PLWG.</p>			
7.7.6	<p>(C) All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).</p>	<p>According to soil survey 2009, Muara Bulian Estate and its smallholders are categorized mineral soil. No peatland area within this unit of certification.</p>	<p>Not Applicable</p>
7.7.7	<p>(C) All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new</p>	<p>According to soil survey 2009, Muara Bulian Estate and its smallholders are categorized mineral soil. No peatland area within this unit of certification.</p>	<p>Not Applicable</p>

	<p>electricity lines on peatlands; unless if it is for a non-corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines.</p>		
<p>Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.</p>			
<p>7.8.1</p>	<p>A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters: 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>PT Inti Indosawit Subur – Muara Bulian POM and supply bases have established water management plan, consist of management water supply for domestic, water consumption and measurement of water quality. Identification water need as regulated in "Peraturan Menteri PU No.14/PRT/M/2010 (domestic consumption is 60 liters/person/day and water needed for mill processing, Ground and surface water resources and its permit, management and monitoring waste water, included domestic waste water. Company has obtained permit to use the surface water from Singoan River according to "Keputusan Menteri Pekerjaan Umum dan Perumahan rakyat Nomor 544/KPTS/M/2020 Tentang Pemberian Izin Pengusahaan Sumberdaya Air Kepada Perseroan Terbatas Inti Indosawit Subur Untuk Usaha Industri di Sei Singoan" dated 22 July 2020, valid until 5 years since issued.</p> <p>The Company has a water management document, both in the estate and mill. Monitoring the implementation of water management has been implemented on a regular basis, such as surface water quality monitoring each semester at Singoan river (upstream and downstream) are available in the report of RKL/RPL. Company has analysed water quality each semester to ensure the compliance against PP No. 82 tahun 2001 regarding water quality standard, the result of water quality monitoring on 27 April by Laboratory PT. ITEC Solution Indonesia (sample No. D.04.450-1.p-AP.21) shown that water quality is complies with national regulation.</p>	<p>Complied</p>

		<p>Procedure SOP AA-APM-OP-1100.05. R1 "Konservasi Tanah dan Air" has been established to maintain the quality and availability of water. Procedures was also established for protection and management of riparian buffer zones at or before replanting. Procedure mentioned that in 50m on the left and right side of riparian buffer zones, estates are prohibited to apply agrochemical, used manual manuring and river bank was planted by erosion barrier crop (planting of "vetiver" grass, Pheronema canescens and Bamboosa sp). The organisation also has policy that prohibits estates for planting in 50m on the left and right side of riparian buffer zones at or before replanting. Warning board placed regarding prohibition to apply agrochemicals and fertiliser in the buffer zone. Riparian buffers of small natural water courses were 50 metres wide on both sides of the rivers as defined in the procedure AA-KL-12-EFP "Restorasi Riparian dan Areal Sekitar Danau/Waduk atau Mata Air lainnya". Several evidence of maintaining quality and availability of water were evident, such as plan and realisation of riparian management, installation of warning boards, planting erosion prevention plan (e.g.Pheronema canescens, Terminalia cattapa, Bamboosa sp and vetiver grass) and monitoring of water quality.</p> <p>PT Inti Indosawit Subur – Muara Bulian does not limit access to clean water or does not pollute the water used by the community. Company has monitor clean water quality each semester to ensure the water use by community and employee are met with standard Permenkes No. 32 Tahun 2017 regarding clean water quality standard. Latest monitoring on 27 April 2021 by Laboratory PT. ITEC Solution Indonesia (sample No. D.04.450-1.m-AM.21) shown that water quality is met with the standard.</p>	
	<p>7.8.1b Workers have adequate access to clean water.</p>	<p>Company provide the clean water for workers at housing area with clean water from Muara Bulian Mill. Regular water analysis was performed to monitor the water quality. Water analysis performed by accredited laboratory "PT. ITEC Solution Indonesia" each semester for Clean water. Sample seen on Clean Water analysis on 27 April 2021 by Laboratory PT. ITEC Solution Indonesia (sample No. D.04.450-1.m-AM.21); standard refer to PermenKes No. 32 year 2017 Appendix I, Chapter</p>	

		<p>IIA, analysis result shown that all parameter analyzed are met with the standard regulation.</p> <p>Interview with workers during onsite audit confirmed that they have adequate access to clean water provide by company.</p>																		
7.8.2	<p>(C) Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).</p>	<p>PT Inti Indosawit Subur – Muara Bulian has establish management plan to protect water courses and wetlands, including securing and maintaining appropriate riparian.</p> <ul style="list-style-type: none"> – Riparian restoration with forest vegetation plant/tree (Pterocarpus indicus, pheronema canescens, vetiver, Terminalia cattapa, Ficus). – Establish zone for zero chemical. No spraying and fertilizing along riparian zone. Based on visit in riparian zone (Sempadan Sungai Singoan) – Conserve the natural vegetation in riparian zone – Restricted to conduct replanting palm oil in riparian area – During field visit to Singoan River at Muara Bulian Estate can be shown that riparian area are well maintained, no chemical application near to riparian, no disturbance on riparian, natural vegetation are protected and the signboard information and awareness are available. 	Complied																	
7.8.3	<p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p>	<p>Effluent from Muara Bulian Mill applied to plantation area as Land Application. Monitoring of effluent conducted in monthly period. BOD Analysis performed by DLH UPTD Lab. Lingkungan Daerah PemProv. Jambi, accredited by KAN LP-413-IDN.</p> <table border="1" data-bbox="981 1177 1951 1358"> <thead> <tr> <th>No</th> <th>Month</th> <th>pH</th> <th>BOD₅</th> <th>COD</th> <th>BOD Threshold Value</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Jan</td> <td>7.55</td> <td>4,830</td> <td>8,240</td> <td rowspan="2">5,000</td> </tr> <tr> <td>2</td> <td>Feb</td> <td>8.05</td> <td>600</td> <td>1,728</td> </tr> </tbody> </table>	No	Month	pH	BOD ₅	COD	BOD Threshold Value	1	Jan	7.55	4,830	8,240	5,000	2	Feb	8.05	600	1,728	Complied
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		3	March	5.81	1,005	3,336																																															
		4	April	7.45	3,220	6,720																																															
		5	May	7.86	1,692	3,142																																															
		6	June	8.27	1,446	2,648																																															
		7	July	8.23	1,205	2,060																																															
		8	August	8.21	1,206	2,265																																															
7.8.4	Mill water use per tonne of FFB is monitored and recorded.	<p>Muara Bulian POM 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 2021, updated in August.</p> <p>Budget in 2021 is 1.00 M3/Ton FFB, record in January – August 2021 has shown:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB Process (MT)</th> <th>Water Usage (m3)</th> <th>Usage (m3/MT FFB)</th> <th>Budget (m3/MT FFB)</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>32,354</td> <td>29,694</td> <td>0.92</td> <td>1.00</td> </tr> <tr> <td>Feb</td> <td>32,862</td> <td>30,455</td> <td>0.93</td> <td>1.00</td> </tr> <tr> <td>March</td> <td>32,032</td> <td>30,174</td> <td>0.94</td> <td>1.00</td> </tr> <tr> <td>April</td> <td>29,512</td> <td>26,455</td> <td>0.90</td> <td>1.00</td> </tr> <tr> <td>May</td> <td>27,200</td> <td>24,622</td> <td>0.91</td> <td>1.00</td> </tr> <tr> <td>June</td> <td>22,352</td> <td>23,427</td> <td>1.05</td> <td>1.00</td> </tr> <tr> <td>July</td> <td>17,778</td> <td>15,641</td> <td>0.88</td> <td>1.00</td> </tr> <tr> <td>August</td> <td>17,727</td> <td>16,755</td> <td>0.95</td> <td>1.00</td> </tr> </tbody> </table>						Month	FFB Process (MT)	Water Usage (m3)	Usage (m3/MT FFB)	Budget (m3/MT FFB)	Jan	32,354	29,694	0.92	1.00	Feb	32,862	30,455	0.93	1.00	March	32,032	30,174	0.94	1.00	April	29,512	26,455	0.90	1.00	May	27,200	24,622	0.91	1.00	June	22,352	23,427	1.05	1.00	July	17,778	15,641	0.88	1.00	August	17,727	16,755	0.95	1.00	Complied
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Criteria 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised			
7.9.1	Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented	<p>All energy used in both mills is monitored and recorded under document of "<i>Laporan Unit Pabrik 2018</i>" and "<i>Pemakaian Energi Pabrik Muara Bulian 2018</i>". Fossil fuel records are maintain and trends shown. Energy use records include accurate measurements of renewable energy use per tonne of FFB processed. All the shell and fibre is consumed internally as boiler fuel.</p> <p>Muara Bulian POM is using 100% fiber and most of shell production for power generation during FFB processing. The fiber and nut shell is by-product from CPO production. Muara Bulian POM has calculated the total energy required for process, based on FFB tonnage x steam required to process one ton FFB x energy required to generate one kg steam. Muara Bulian POM has also calculated the potential energy generated from using fiber and nut shell. From calculation it was known that there is energy surplus, whereby used as power generation when mill is in operation but not processing FFB (electricity source, cleaning, etc.).</p> <p>Until June 2021, FFB processing in Muara Bulian Palm Oil Mill was 112,891 tons, producing 22,629 tons CPO. Total energy use for Palm Oil Mill process was 402.07 MJ/ton CPO, energy use from Fosil fuel was 26.87 MJ/ton CPO and energy use from renewable source (shell and fibre) was 375.20 MJ/ton CPO. From the total energy use for palm oil mill process can be shown that renewable energy use was 93% and energy from fossil fuel was 7%.</p> <p>Fossil fuel usage is recorded for operational purpose, including the efficiency analysis. Total diesel fuel usage since January – May 2021 by Muara Bulian POM was 25,125 litre for operational Genset and heavy equipment and in 2021 was 58,396 litre. Total diesel fuel usage in Muara Bulian Estate since January – June 2018 was 156,866 litre. Muara Bulian Estate has a programme for efficiency of fossil fuel usage by increasing the ratio on diesel fuel usage (km/l) minimum 3.80 km/L for operational dump truck.</p>	Complied

		<p>During audit, can be shown that efficiency for diesel fuel usage has been minimize by monitoring klep stell, air cleaner maintenance, tire pressure monitoring, and stel nozzle monitoring.</p> <p>Scheme Smallholder:</p> <p>Group Manager Plasma Muara Bulian has prepared a plan for improving efficiency of the use of fossil fuels and to optimise renewable energy, under document "Program Efisiensi Penggunaan Bahan Bakar Fosil dan Energi Terbarukan", following plan to mitigate polluting activities, i.e:</p> <ul style="list-style-type: none"> • Optimizing FFB transportation by designed the TPH (FFB collecting place) in one way at collection road • Fossil fuel efficiency by test run and regular service of dump truck <p>During audit can be demonstrated that Plasma Muara Bulian has implementing the TPH design in one way at collection road. Sample seen in KUD Budi Sari, KUD Karya Lestari, KUD Tuah Sakato, KUD Subur Makmur</p> <p>Plasma Muara Bulian also monitor the fossil fuel usage regularly and monitoring the trip of dump truck.</p>	
<p>Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>			
7.10.1	<p>(C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p>	<p>Mill and Estate:</p> <p>List for assessing pollution and emission sources, including gaseous, particles, soot emissions and effluent provided in document "Identifikasi Aspek Dampak Lingkungan untuk PMKS dan Estate di Muara Bulian", dated 4 January 2021.</p> <p>The identification listed all relevant activities that generate pollution and emission from office, plantations, palm oil mill, mill effluent treatment up to workers activities, such as:</p> <ul style="list-style-type: none"> - Boiler stack emission including particulate and soot 	Complied

		<ul style="list-style-type: none"> - POME methane emission - Use of fertilizer - Use of Pesticide - Diesel fuel usage - Vehicle and heave equipment emission - 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. - The company has developed pollution and emission reduction plan. The plan covers planning, implementing plans and monitoring activities generating pollution and emission. Reduction of pollution such as: <ul style="list-style-type: none"> ✓ POME application/Land application permitted for plantation in mineral soil. ✓ Hazardous waste storage management and monitoring (permitted by government) ✓ Domestic waste management by sanitary landfill ✓ Emission measurement each semester from Boiler, Genset, Heavy equipment and vehicle. ✓ Biogas Plant with capacity 3 MW. - Emission monitoring system by using "RSPO PalmGHG" system calculation version 4. Emission from estate and mill operation was calculated and monitored, emission reduction achieved. The result of GHG calculation available in appendix C. diesel electric generator emission <p>Scheme Smallholder: Document(s) assessing pollution and emission sources, including gaseous, particles, soot emissions and effluent has been provided by Group Manager Plasma Muara</p>	
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		Bulian as per "Identifikasi Sumber Polusi di Perkebunan Petani" dated 12 January 2021.	
7.10.2	(C) Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).	There is no new planting within certified area of PT Inti Indosawit Subur – Muara Bulian Estate and Mill after November 2005. Currently, replanting activities still in progress. Year of Planting for Muara Bulian Estate: 1991, 1992 and 1994. Whereas, Year of Planting for Smallholders is 1991, 1992, 1993, 1994, 1995, 1996, 1999, 2000, 2001 and 2006.	Not Applicable
7.10.3	(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.	There is no new planting within certified area of PT Inti Indosawit Subur – Muara Bulian Estate and Mill after November 2005. Currently, replanting activities still in progress. Year of Planting for Muara Bulian Estate: 1991, 1992 and 1994. Whereas, Year of Planting for Smallholders is 1991, 1992, 1993, 1994, 1995, 1996, 1999, 2000, 2001 and 2006.	Complied
Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	(C) Land for new planting or replanting is not prepared by burning.	PT Inti Indosawit Subur – Muara Bulian POM established Company Policy signed by Managing Director, Kevin Tio, on 1 December 2014. Point 6 of the policy stated the company uses Zero Burning practice in developing plantation and actively support initiative to prevent and monitor forest fire and haze. Based on field observation to Block B91c that will become B18k, it was evident that no fire has been used for replanting in Muara Bulian Estate. Scheme Smallholder: The Smallholder Manager has prepared the policy that there were no land preparation by burning, as per "Kebijakan Manager Plasma Muara Bulian" dated 2 December 2020, in poin 6: "Melakukan praktek tanpa bakar dalam kegiatan	Complied

		pembangunan perkebunan dan petani maupun desa secara aktif mendukung inisiatif mencegah mengawasi kebakaran hutan dan asap” (Implementing non-burning practices in plantation development activities, farmers and villages actively support initiatives to prevent and control forest fires and smoke).	
7.11.2	The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.	<p>PT Inti Indosawit Subur – Muara Bulian POM established Company Policy signed by Managing Director, Kevin Tio, on 1 December 2014. Point 6 of the policy stated the company uses Zero Burning practice in developing plantation and actively support initiative to prevent and monitor forest fire and haze.</p> <p>Based on field observation to Block B91c that will become B18k, it was evident that no fire has been used for replanting in Muara Bulian Estate.</p> <p>Scheme Smallholder:</p> <p>The Smallholder Manager has prepared the policy that there were no land preparation by burning, as per “Kebijakan Manager Plasma Muara Bulian” dated 2 December 2020, in poin 6: “Melakukan praktek tanpa bakar dalam kegiatan pembangunan perkebunan dan petani maupun desa secara aktif mendukung inisiatif mencegah mengawasi kebakaran hutan dan asap” (Implementing non-burning practices in plantation development activities, farmers and villages actively support initiatives to prevent and control forest fires and smoke).</p>	Complied
7.11.3	The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.	<p>PT Inti Indosawit Subur – Muara Bulian POM established Company Policy signed by Managing Director, Kevin Tio, on 1 December 2014. Point 6 of the policy stated the company uses Zero Burning practice in developing plantation and actively support initiative to prevent and monitor forest fire and haze.</p> <p>Based on field observation to Block B91c that will become B18k, it was evident that no fire has been used for replanting in Muara Bulian Estate.</p> <p>Scheme Smallholder:</p>	Complied

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<p>Criteria 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>			
<p>PROCEDURAL NOTE for 7.12:</p> <p>The RSPO Principles and Criteria 2018 include new requirements to ensure the effective contribution of the RSPO in stopping deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Approach Guide into the revised standard.</p> <p>The RSPO ToC also encourages RSPO to commit to balancing between sustainable livelihoods and reducing poverty with the need to conserve, protect and improve the quality of ecosystems.</p> <p>High Forest Cover Countries (HFCC) are in dire need of economic opportunities that can help people choose their own path in carrying out development, while at the same time providing social and economic benefits and safeguards.</p> <p>Procedures will be developed that are adapted to support the development of sustainable palm oil by indigenous peoples and local communities who have legal or customary rights. The procedure will apply in certain HFCC countries and in the High Forest Cover Landscape (HFCL) within it.</p> <p>The development of this procedure will be guided by the No Deforestation Joint Steering Group (NDJSG) between the RSPO and HCSA members. In HFCC countries, RSPO will work with governments, communities and other stakeholders to develop this procedure through participatory processes at national and regional levels. The duration of this activity is specified in the Terms of Reference for NDJSG and is publicly available.</p>			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests.</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Muara Bulian Estate and Mill after November 2005. Currently, replanting activities still in progress.</p> <p>Year of Planting for Muara Bulian Estate: 1991, 1992 and 1994 (replanting 2016 – 2019). Whereas, Year of Planting for Smallholders is 1991, 1992, 1993, 1994, 1995, 1996, 1999, 2000, 2001.</p>	Not Applicable

	<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>7.12.2</p>	<p>(C) HCV and HCS forests, and other conservation areas are identified as follows: 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 Muara Bulian is an existing plantation, therefore no more expansion area or land development.</p> <p>Muara Bulian Estate: PT Inti Indosawit Subur Muara Bulian has conducted the HCV identification in coordination with "Fakultas Kehutanan Institut Pertanian Bogor" on February – March 2011 and final report on October 2011, under "Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT Inti Indosawit Subur – Muara Bulian Estate, Provinsi Jambi". The HCV assessment conducted based on "Panduan Kawasan Bernilai Konservasi Tinggi di Indonesia", issued by Konsorsium Revisi HCV Toolkit Indonesia dated 12/07/2008. HCV assessor were RSPO approved assessor consist of: Nyoto Santoso (leader) and member: M. Sayidina Ali, Udi Kusdinar, Sutopo, Eko Adhiyanto.</p> <p>The HCV identification carried out with public stakeholder consultation with surrounding communities. The HCV Identification report has been peer reviewed by WWF Indonesia (Mr. Deni Rahadian) on 22 September 2011.</p> <p>The presence of HCVs at PT IIS Muara Bulian is mainly under category HCV 1.1, HCV 1.2, HCV 4.1 and HCV 5 with total HCV areas of 76.18 Ha; where mostly the identified HCV areas were determined as riparian area and water catchment area. During audit ASA 1.2 the HCV area at Muara Bulian Estate were increase with additional of riparian area. Currently the HCV total was 104.18 ha, the additional HCV area was increasing of riparian zone along the river side which is not replanting by company and stated as HCV area with size of 28 ha.</p> <p>The HCV identification document has explained the general condition of landscape surrounding company's plantation: there is no protected forest/ecosystem that feasible for wildlife to maintain its viability. Therefore, no recommendation for wildlife corridor.</p>	<p>Complied</p>

		<p>Scheme Smallholder: HCV assessment has been conducted by IPB facilitated by group manager and PT Inti Indosawit Subur on February – March 2011 in area Plasma Muara Bulian.</p>	
	<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>There is no new planting within certified area of PT Inti Indosawit Subur – Muara Bulian Estate and Mill after November 2005. Currently, replanting activities still in progress. Year of Planting for Muara Bulian Estate: 1991, 1992 and 1994 (replanting 2016 – 2019). Whereas, Year of Planting for Smallholders is 1991, 1992, 1993, 1994, 1995, 1996, 1999, 2000, 2001.</p>	
<p>7.12.3</p>	<p>(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p>	<p>According to HCV assessment result, confirmed that there is no High Forest Cover Landscapes (HFCLs). The presence of HCVs at PT IIS Muara Bulian is mainly under category HCV 1.1, HCV 1.2, HCV 4.1 and HCV 5 with total HCV areas of 76.18 Ha; where mostly the identified HCV areas were determined as riparian area and water catchment area. During audit ASA 1.2 the HCV area at Muara Bulian Estate were increase with additional of riparian area. Currently the HCV total was 104.18 ha, the additional HCV area was increasing of riparian zone along the river side which is not replanting by company and stated as HCV area with size of 28 ha. The HCV identification document has explained the general condition of landscape surrounding company's plantation: there is no protected forest/ecosystem that feasible for wildlife to maintain its viability. Therefore, no recommendation for wildlife corridor.</p>	<p>Complied</p>
<p>PROCEDURAL NOTE for 7.12.3: Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.</p>			

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7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Muara Bulian Estate and Mill after November 2005. Currently, replanting activities still in progress.</p> <p>Year of Planting for Muara Bulian Estate: 1991, 1992 and 1994 (replanting 2016 – 2019). Whereas, Year of Planting for Smallholders is 1991, 1992, 1993, 1994, 1995, 1996, 1999, 2000, 2001.</p> <p>Soil type of Muara Bulian Estate and Smallholders is mineral, there is no peatland within the unit of certification.</p>	Not Applicable
7.12.5	<p>Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p>	<p>There is no rights of local communities identified in HCV areas. All HCV areas are inside the HGU of PT Inti Indosawit Subur – Muara Bulian.</p> <p>The presence of HCVs at PT IIS Muara Bulian is mainly under category HCV 1.1, HCV 1.2, HCV 4.1 and HCV 5 with total HCV areas of 76.18 Ha; where mostly the identified HCV areas were determined as riparian area and water catchment area. During audit ASA 1.2 the HCV area at Muara Bulian Estate were increase with additional of riparian area. Currently the HCV total was 104.18 ha, the additional HCV area was increasing of riparian zone along the river side which is not replanting by company and stated as HCV area with size of 28 ha.</p>	Not Applicable
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p>	<p>Muara Bulian Estate:</p> <p>Based on HCV Identification Report, 2011 shows in area of Muara Bulian Estate, found 9 types of mamalia species, 5 species are protected such as: <i>Manis javanica</i>, <i>Fellis bengalensis</i>, <i>Helarctos malayanus</i>, <i>Cervus unicolor</i>, <i>Prionodon linsang</i>, 11 types of protected bird species such as: <i>Alcedo meninting</i>, <i>Anthreptes malaccensis</i>, <i>Arachnotera longiostra</i>, <i>Ardea purpurea</i>, <i>Egretta garzeta</i>, <i>Halcyon chloris</i>, <i>Rhipidura javanica</i>, <i>Spizaetus cirhatus</i>, etc; 4 types of reptile species such as: <i>Varanus salvator</i>, <i>Cuora amboinensis</i>, <i>Naja sumatrana</i>, <i>Phyton reticulatus</i>.</p>	Complied

		<p>Company has determined conservation management and monitoring plan refer to HCV identification result. Conservation management and monitoring plan 2020 and 2021 can be demonstrated. Based on field verification, company has demonstrated effort for management and monitoring of HCV area to protect rare species and its habitat through planting of wooden tree, HCV area patrol, flora and fauna monitoring. The Estates have maintained notice-boards at the entrance to the properties and next to buffer zones or worker housing to prohibit the capture or hunting of fauna and disturbance of vegetation. Wildlife monitoring is conducted monthly by foreman and clerk afedling/division. The animal/species findings are recorded in the form "Daftar Temuan Satwa liar di Areal Kebun". Evidence of wildlife monitoring can be demonstrated. For example monitoring result on August 2021 location at Sengoan river the presence of animal during monitoring such as: Raja udang meninting (<i>Alcedo meninting</i>), Kipasan belang (<i>Rhipidura javanica</i>), Burung madu polos (<i>Anthreptes sp</i>), Monyet ekor panjang (<i>Macaca fascicularis</i>), Biawak (<i>Varanus salvator</i>), Babi (<i>Sus crofa</i>), Ular kobra (<i>Naja sumatrana</i>), Bajing (<i>Callosciurus sp</i>). Other sample monitoring on</p> <p>Planting trees and vetiver grass on the river buffer zone (Sengoan river) has been done to enhance the HCV area and biodiversity. Monitoring and patroll of HCV area and installing identity signboard and warning signboard on the field also done for awareness and conservation campaign.</p> <p>HCV management and monitoring including Flora and fauna monitoring reported each semester to BKSDA (Natural Resources Conservation Body) Jambi Province, latest report semester II 2019 reported on 20 February 2020.</p> <p>Scheme Smallholder:</p> <p>Group manager has determined HCV management and monitoring plan as recommended in HCV Assessment Report. Management plan to conserve RTE species for such as highlights members adjacent to protected areas/natural waterways/potential HCVs including as part of the regular field checks to ensure</p>	
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		<p>compliance, i.e clear boundaries and no encroachments, monitoring of RTE species. Presented in "Conservation Management Plan PT Inti Indosawit Subur, Plasma Muara Bulian Tahun 2018". List of HCVS and RTEs findings display on the notice board is available during onsite audit.</p> <p>Plasma Muara Bulian management has made the HCV management and monitoring plan refer to recommendation of HCV identification report. HCV management plan is apply in 6 KUD Plasma Muara Bulian. HCV management plan in each KUD consist of:</p> <ul style="list-style-type: none"> - Signboard placement of prohibition chemical application near to waterways/riparian area with distance 3 m in left and right side - Training and awareness of HCV against smallholder member regularly at minimum once a year - Monitoring of animal/wildlife <p>Conservation management plan has been disseminated to all KUD and socialized to all member of KUD. During audit and interview with sample smallholder member indicated that they have aware and understand regarding conservation management plan of KUD.</p>	
7.12.7	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>There is no new planting within certified area of PT Inti Indosawit Subur – Muara Bulian Estate and Mill after November 2005. Currently, replanting activities still in progress.</p> <p>Year of Planting for Muara Bulian Estate: 1991, 1992 and 1994 (replanting 2016 – 2019). Whereas, Year of Planting for Smallholders is 1991, 1992, 1993, 1994, 1995, 1996, 1999, 2000, 2001.</p>	Not Applicable
7.12.8	(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Muara Bulian Estate and Mill after November 2005. Currently, replanting activities still in progress.</p>	Not Applicable

		Year of Planting for Muara Bulian Estate: 1991, 1992 and 1994 (replanting 2016 – 2019). Whereas, Year of Planting for Smallholders is 1991, 1992, 1993, 1994, 1995, 1996, 1999, 2000, 2001.	
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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2020** for **Muara Bulian 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 **Muara Bulian Palm Oil Mill** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.35
PKO	0.35

Extraction	%
OER	19.69
KER	5.41

Production	t/yr
FFB Process	243,280
CPO Produced	47,892
PKO Produced	13,160

Land Use	Ha
OP Planted Area	8,656
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	104.18
Total	

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	16,770.52	1.77	0	0	0	0	16,770.52	1.77
CO ₂ Emission from fertilizer	912.80	0.06	1,244.57	0.01	0	0	2,157.38	0.02
NO ₂ Emission from fertilizer	778.52	0.05	1,016.39	0.01	0	0	1,794.90	0.02
Fuel Consumption	385.02	0.02	282.17	0.003	0	0	667.19	0.01
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-15,896.22	-1.01	0.00	0.00	0.00	0.00	-15,896.22	-1.01

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Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	2,950.64	0.19	2,543.13	0.03	0	0	32,598.60	0.05

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO _{2e}	tCO _{2e} /tFFB
Emission		
POME	24,139.17	0.10
Fuel Consumption	107.75	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	-3.60	0.00
Sales of PKS	-35,371.60	-0.15
Sales of EFB	0.00	0.00
Total	-11,128.28	-0.05

Summary of Kernel Crusher Emission and Credit (if applicable)

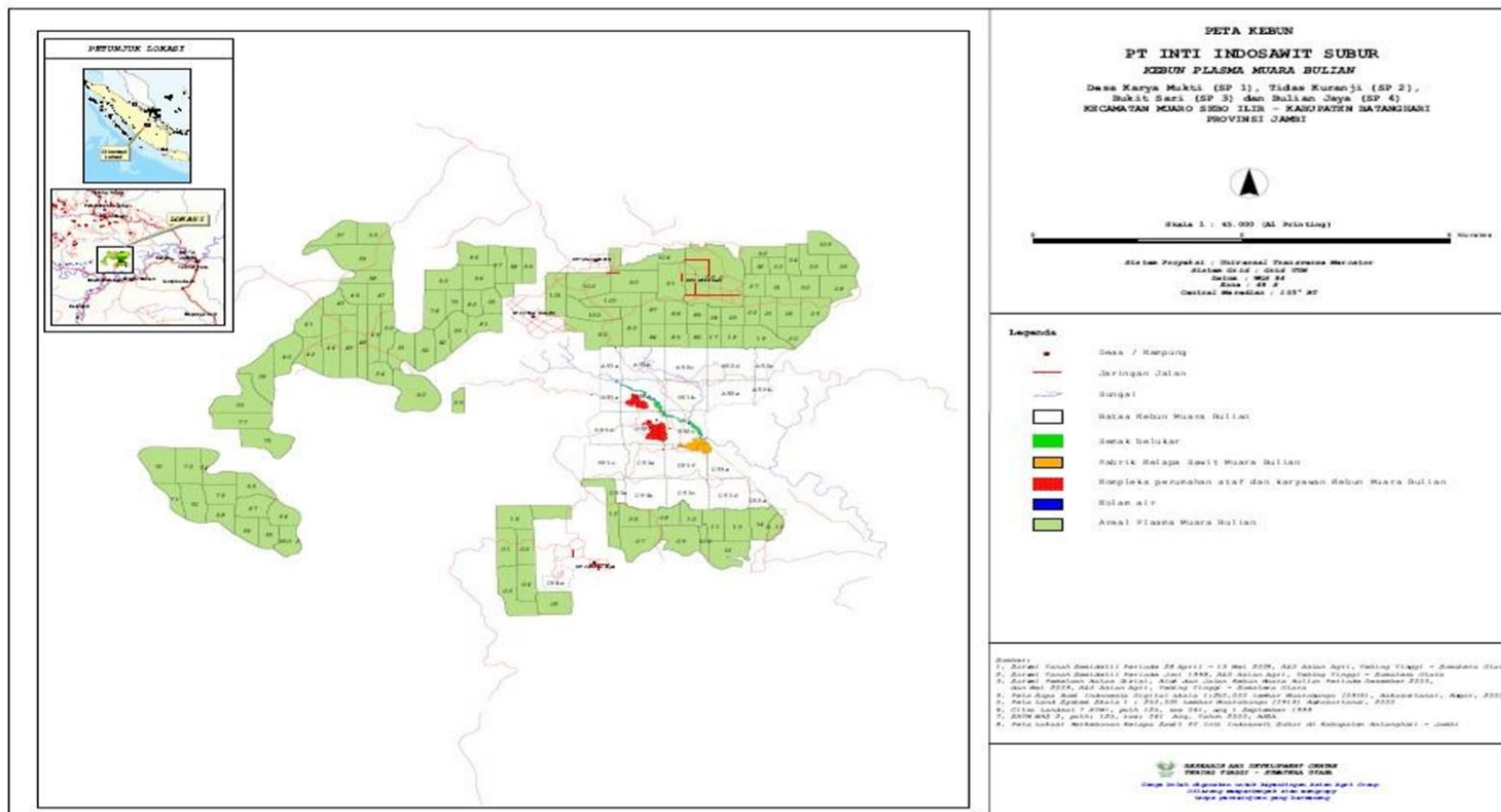
Emissions	tCO _{2e}
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

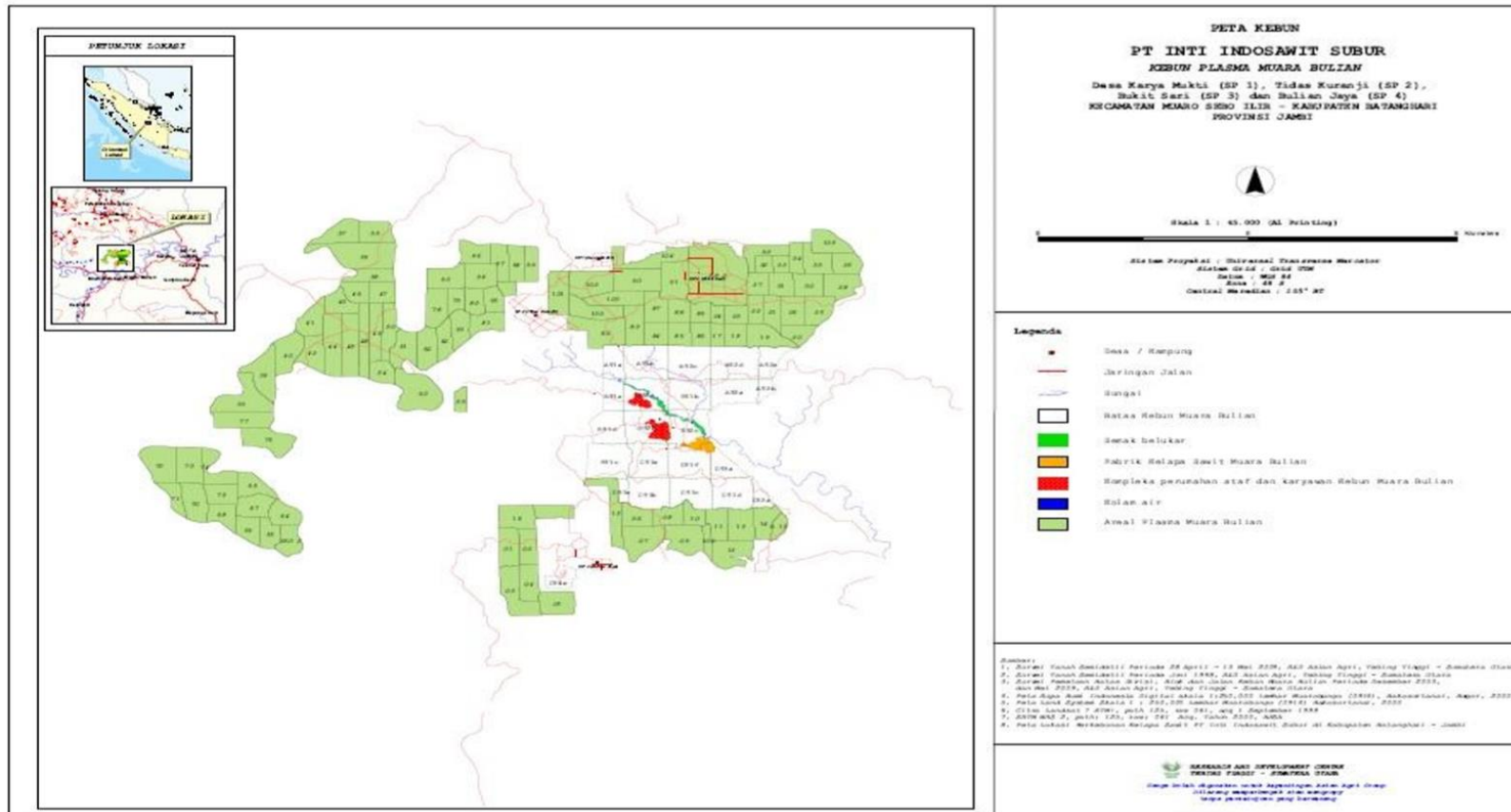
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

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

Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map



Appendix E: List of Smallholder Registered and Sampled

KUD Barokah
(615 members)
KUD Subur Makmur
(560 members)
KUD Budi Sari
(445 members)
KUD Makmur Rejeki
(360 members)
KUD Karya Lestari
(350 members)
KUD Buah Sakato
(1001 members)

Appendix F: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
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