

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

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

<p>Client Company name (Parent Company): Sime Darby Plantation Berhad</p>
<p>Client company Address: Level 3, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia</p>
<p>Certification Unit: PT. Indotruba Tengah – Sekunzir Palm Oil Mill</p> <p>Location of Certification Unit: Amin Jaya Village, Pangkalan Banteng Sub District, Kotawaringin Barat District, Kalimantan Tengah Province, Indonesia.</p>
<p>Date of Final Report: 07/07/2022</p>

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	Sime Darby Plantation Berhad		
RSPO Membership Number	1-0008-04-000-00	Membership Approval Date	07/09/2004
Address	Level 3, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT. Indotruba Tengah – Sekunzir Palm Oil Mill		
Location / Address	Liaison Office: The Plaza Office Tower, 36th Floor, Jl. MH Thamrin Kav.28-30, Jakarta – 10350, Indonesia. Certification Unit: Amin Jaya Village, Pangkalan Banteng Sub District, Kotawaringin Barat District, Kalimantan Tengah Province, Indonesia.		
Website	www.simedarbyplantations.com		
Management Representative	Alagendran Maniam (Head of Sustainability and Quality Management – Minamas Plantation)	E-mail	alagendran.maniam@simedarbyplantation.com
Telephone	+62-21-29926000	Facsimile	+62-21-29922686

2. Certification Information			
Certificate Number	RSPO 744702	Certificate Start Date	07/07/2022
Date of First Certification	23/11/2010	Certificate Expiry Date	06/07/2027
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	To conduct a recertification assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by the organisation's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organisation's specified objectives, as applicable with regard to the scope of the management standard, and to confirm the on-going achievement and applicability of the forward strategic plan and where applicable to identify potential areas for improvement of the management system.		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input type="checkbox"/> Annual Surveillance Assessment (ASA Choose an item.) <input checked="" type="checkbox"/> Recertification Assessment (RA 2) <input type="checkbox"/> Scope Extension		

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Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	45 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
SGS-ID-ISPO-0043	ISPO (Permentan 38 tahun 2020)	PT SGS Indonesia	11/08/2025

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Sekunyir Palm Oil Mill	Amin Jaya Village, Pangkalan Banteng Sub District, Kotawaringin Barat District, Kalimantan Tengah Province, Indonesia	02° 26' 41.00" S	112° 00' 25.00" E
Sekunyir Estate	Amin Jaya Village, Pangkalan Banteng Sub District, Kotawaringin Barat District, Kalimantan Tengah Province, Indonesia	02° 26' 48.00" S	112° 00' 32.00" E
Seruyan Estate	Pembuang Hulu II Village, Hanau District, Seruyan Regency, Kalimantan Tengah Province, Indonesia	02° 24' 28.00" S	112° 04' 05.00" E

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
Sekunyir Estate	3,287.33	52.26	215.60	3,555.19	92.46
Seruyan Estate	3,194.65	45.48	939.27	4,179.40	76.43
Total	6,481.98	97.74	1,154.87	7,734.59	83.80

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6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Sekunyir Estate	799.40	984.80	0	0	1,503.13	2,487.93	799.40
Seruyan Estate	924.60	872.87	0	0	1,397.18	2,270.05	924.60
Total (ha)	1,724.00	1,857.67	0	0	2,900.31	4,757.98	1,724.00

Note: Only Mature area is considered as production area

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Nov 2019 – Oct 2020)	Actual (Oct 2019 – Mar 2022)		Forecast (May 2022 – Apr 2023)
		Previous license period (Oct 2019)	Current license period (Nov 2019 – Mar 2022)	
Sekunyir Estate	81,020.00* (+81,829.38**)	6,794.19	149,736.93	67,994.35
Seruyan Estate	73,080.00* (+65,596.62**)	6,794.19	134,709.10	57,903.65
Total	301,526.00	298,034.41		125,898.00

Note:
*) The estimated FFB from last certification cycle ASA1.4 in 2019 by other CB
**) FFB volume from extension between Nov 2020 till Mar 2022

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Nov 2019 – Oct 2020)	Actual (Oct 2019 – Mar 2022)		Forecast (May 2022 – Apr 2023)
		Previous license period (Oct 2019)	Current license period (Nov 2019 – Mar 2022)	
Nil		Nil	Nil	
Total		Nil		

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9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage / year			
	Estimated last year (Nov 2019 – Oct 2020)	Actual (Oct 2019 – Mar 2022)		Forecast (May 2022 – Apr 2023)
		Previous license period (Oct 2019)	Current license period (Nov 2019 – Mar 2022)	
PT. Indotruba Timur	0	0	590.17	0
Total	0	590.17		0

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month – Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	October 2019	13,588.38	-	13,588.38
2	November 2019	12,162.78	-	12,162.78
3	December 2019	10,101.30	-	10,101.30
4	January 2020	11,256.67	-	11,256.67
5	February 2020	10,703.40	-	10,703.40
6	March 2020	10,634.43	-	10,634.43
7	April 2020	12,152.65	-	12,152.65
8	May 2020	12,047.13	-	12,047.13
9	June 2020	12,655.60	-	12,655.60
10	July 2020	9,459.90	-	9,459.90
11	August 2020	11,072.02	-	11,072.02
12	September 2020	11,807.62	-	11,807.62
13	October 2020	11,324.08	-	11,324.08
14	November 2020	10,220.44	-	10,220.44
15	December 2020	11,042.23	-	11,042.23
16	January 2021	8,897.03	-	8,897.03
17	February 2021	8,566.02	-	8,566.02
18	March 2021	10,209.41	-	10,209.41
19	April 2021	10,773.37	-	10,773.37
20	May 2021	10,239.68	-	10,239.68
21	June 2021	10,437.42	-	10,437.42
22	July 2021	8,813.35	-	8,813.35
23	August 2021	9,462.16	-	9,462.16
24	September 2021	7,026.07	-	7,026.07

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25	October 2021	6,473.08	-	6,473.08
26	November 2021	6,428.53	-	6,428.53
27	December 2021	7,005.88	-	7,005.88
28	January 2022	7,643.46	-	7,643.46
29	February 2022	6,950.20	-	6,950.20
30	March 2022	8,880.12	590.17	9,470.29
TOTAL		298,034.41	590.17	298,624.58

Note:

ASA1.4 conducted on 7-10 October 2019 – the latest RAV carried out 11-16 April 2022, volume reported from October 2019 – March 2022. Since March 2022, PT. Indotruba Tengah decided to change Supply Chain Module from IP to MB and started to receive uncertified FFB based on letter No.002/AL-UM/IV/2022.

10. Summary of Certified Tonnage (not applicable for ISS)

Estimated last year* (Nov 2019 – Oct 2020)	Actual (Oct 2019 – Mar 2022)		Forecast (May 2022 – Apr 2023)
	Previous license period (Oct 2019)	Current license period (Nov 2019 – Mar 2022)	
FFB	FFB		FFB
154,100.00* (+ 263,001.00**) mt	13,588.38 mt	284,446.03 mt	125,898.00 mt
	298,034.41 mt		
CPO (OER: 23.38%)	CPO (OER: 21.92%)		CPO (OER: 23.25%)
33,900.00* (+ 63,644.00**) mt	3,011.73 mt	64,620.55 mt	29,271.28 mt
	67,632.28 mt		
PK (KER: 4.63%)	PK (KER: 4.32%)		PK (KER: 5.00%)
6,940.00* (+ 12,390.00**) mt	660.57 mt	12,655.92 mt	6,294.90 mt
	13,316.49 mt		

Note:

*) The estimated FFB from last certification cycle ASA1.4 in 2019 by other CB

**) Volume extension FFB, CPO and PK from volume extensions between Nov 2020 till Mar 2022

10A. Monthly Records of Certified CPO & PK since the last audit

No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	October 2019	3,011.73	660.57
2	November 2019	2,774.88	545.19
3	December 2019	2,293.31	414.72
4	January 2020	2,589.65	480.47
5	February 2020	2,554.05	442.42

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6	March 2020	2,472.08	477.65
7	April 2020	2,734.75	557.44
8	May 2020	2,755.89	546.93
9	June 2020	2,876.68	574.99
10	July 2020	2,038.41	459.33
11	August 2020	2,378.00	505.90
12	September 2020	2,580.52	567.86
13	October 2020	2,462.92	541.62
14	November 2020	2,131.38	399.54
15	December 2020	2,530.40	481.90
16	January 2021	1,911.66	377.23
17	February 2021	1,876.26	346.93
18	March 2021	2,375.72	410.91
19	April 2021	2,610.39	440.80
20	May 2021	2,464.35	445.09
21	June 2021	2,409.21	455.71
22	July 2021	2,046.81	401.97
23	August 2021	2,177.72	433.11
24	September 2021	1,601.47	341.91
25	October 2021	1,501.65	346.62
26	November 2021	1,489.15	312.85
27	December 2021	1,613.27	318.97
28	January 2022	1,775.94	350.55
29	February 2022	1,581.34	298.17
30	March 2022	2,012.69	379.14
TOTAL		67,632.28	13,316.49

11. Summary of Actual Volume sold					
Current License period (November 2019 – March 2022)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	3,249.55	-	-	33,413.60	36,663.15
PK (MT)	11,014.38	-	-	141.76	11,156.14
Credits	20,000.00	-	-	-	20,000.00
Previous License period (October 2019)					

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CPO (MT)	3,020.21	-	-	3,431.03	6,451.24
PK (MT)	599.72	-	-	-	599.72
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. Sime Darby Oils Pulau Laut Refinery	RSPO_PO1000010504	6,269.76	-
2	PT. Teguh Sempurna – Pematang Kernel Crushing Plant	RSPO_PO1000004588	-	11,614.10
TOTAL			6,269.76	11,614.10

Note:

Notes for Auditor: Please refer to table 9A for reporting period

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)
	N/A			
TOTAL				

Note:

Notes for Auditor: Please refer to table 9A for reporting period

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

No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	PT. A	36,844.63	-
2	PT. CA	-	141.76
TOTAL		36,844.63	141.76

Note:

Notes for Auditor: Please refer to table 9A for reporting period

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)
1	Nestle S.A.	RSPO_PO1000001171	20,000.00

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TOTAL	20,000.00
Note: Based on PalmTrace	

12. Independent Smallholders Certified Tonnage / Volume									
Phase	Estimated last year (Not applicable)			Actual (Not applicable)			Forecast (Not applicable)		
	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									
IS-CSPKO									
IS-CSPKE									

13. Independent Smallholders Actual Sold Tonnage / Volume						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
Current License period (Not applicable)						
Credits				N/A	N/A	N/A
Physical						

Section 2: Assessment Process

Certification Body:

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

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

2.1 Assessment Methodology, Programme, Site Visits

The Certificate Holder was transferred to BSI from previous CB on 18 February 2021. Subsequently, as per RSPO Secretariat announcement on Coronavirus Outbreak – RSPO P&C On-site & Remote Audits dated 24 March 2020; BSI conducted Remote Audit RSPO P&C RAV with the 30% audit duration on 20 February 2021. The RSPO P&C RAV on-site assessment was conducted on 11-14 and 16 April 2022 with 100% audit duration + 50% sample size. The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on 10 March – 10 April 2022; link <https://www.rspo.org/certification/public-announcement/page/6?>.

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

The Critical NC close out on-site assessment was conducted on 12 May 2022. 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 201 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 (Re- Certification)	Year 2 (ASA 2_1)	Year 3 (ASA2_ 2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_4)
Sekunyir POM	X	X	X	X	X
Sekunyir Estate	X	X	X	X	X
Seruyan Estate	X	X	X	X	X

Tentative Date of Next Visit: March 6, 2023 - March 9, 2023

Total Number of Mandays: 11

2.2 BSI Assessment Team

Name	Role	Competency
Pratama Agung Sedayu (PS)	Team Leader	<p>Education: Holds a Bachelor Degree majoring Social Economic of Agriculture, University of Jenderal Soedirman.</p> <p>Work Experience: 12 years of practical auditing experience with several accredited Certification Bodies covering assessment against Organic programs, RSPO, FSC, Timber certification, ISO 9001 and ISO 14001. 2 years working experience as consultant on FSC and SVLK certification and independent verifier on BioCert, SDS under CAFÉ Practices program..</p> <p>Training attended: Completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISPO Lead Auditor endorsed Course and Endorsed RSPO P&C Lead Auditor Course and Endorsed RSPO SCCS Lead Auditor Course, SMETA Requirements training.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: Legal Requirements, land & Legal issue, management plans, environmental policies, business ethical, waste and GHG management, water and energy resources, HCV management and monitoring, conservation policies.</p>

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<p>Eko Purwanto (EP)</p>	<p>Team Member</p>	<p>Education: Holds a Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Institute of Agriculture (IPB).</p> <p>Work Experience: Over 9 year working expiring in oil palm plantation with last position as Estate Manager. He has experience in implementing good agricultural practice including integrated pest management and limited pesticides uses. 10 years working experience as auditor since 2012 covering ISO9001, RSPO and ISPO.</p> <p>Training attended: Completed SMETA Requirements Training, ISPO Permentan 38/2020, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, CQI and IRCA Certified ISO 45001:2018 Lead Auditor Training Course, ISO 37001:2016 Anti-bribery Management System Implementing Training Course, RSPO P&C 2018 Refresher Training, Sustainability Reporting Assurance Training, RSPO P&C Lead Auditor Refresher Course, RSPO Supply Chain Certification Refresher Course, RSPO NEXT Training Course For Lead Auditor by RSPO Secretariat, Elaborating on the RSPO P&C Social and Labour Standards and the Mechanics of Social Auditing, RABQSA accredited Lead Auditor Training of Environment Management System, Endorsed RSPO Green House Gas (GHG) Training for Trainer, Endorsed RSPO P&C Lead Auditor Training, Understanding Environmental Management System (EMS), Indonesia Sustainable Palm Oil (ISPO) Lead Auditor Training, Endorsed RSPO Supply Chain Certification (SCC) Lead Auditor Training, RABQSA accredited Lead Auditor Training of Quality Management System.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: Occupation Health Safety requirement, Economic management plan, mill best practices, estate best practices and RSPO supply chain requirements, continuous improvement plan.</p>
<p>Arif Faisal Simatupang (AF)</p>	<p>Team Member</p>	<p>Education: Holds a Bachelor Degree in Agriculture, Majoring Agronomy, Gadjah Mada University</p> <p>Work Experience: Over 3 years of working experience in palm oil estate as Land Acquisition Officer and later as Division Manager with PT PP London Sumatera Indonesia Tbk. 8 years working experience as auditor since 2014 covering RSPO P&C and ISPO.</p> <p>Training attended: Completed ISO9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO SCC Auditor Lead Auditor Course, ISPO Auditor Training, HCV and GIS training and SA8000 Auditor training.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English.</p> <p>Aspect covered in this audit: Social policies, social impact assessment, worker welfare, grievance procedure, communication procedures, stakeholder engagement, contribution to local development.</p>
<p>Dr. Suhaili Bin Sahari</p>	<p>Peer Reviewer</p>	<p>Education: Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato' Mohd Muda.</p>

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		<p>Work Experience:</p> <p>Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p>Training attended:</p> <ol style="list-style-type: none"> 1. ISO 9001:2015 Lead Auditor and Internal Auditor 2. Occupation Health & Safety 3. ISO 14001:2015 Standard 4. RSPO Standards: RSPO P&C 2018 MY-NI 2019 5. MSPO Standards: MS 2530:2013 part 1, 2, 3 and 4 6. Problem Solving Technique: 8 D, ICC, QCC, Systematic PS 7. HACCP MS 1480:2019 8. GAP Standard: Global GAP, Euro GAP 9. ASI Peer Reviewer training
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Accompanying Persons:

Name	Role
Nil	

2.3 Assessment Plan

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

Date	Time	Subjects	PS	EP	AFS
Sunday, 10/04/2022	09.10 – 11.05	Flight Jakarta to Pangkalan Bun	√	√	√
	11.05 – 18.30	Traveling from Pangkalan Bun Airport to PT Indotruba Tengah	√	√	√
Monday, 11/04/2022	07.30 – 08.30	<p>Opening Meeting:</p> <ul style="list-style-type: none"> - Auditee Presentation (Introduction of PIC, Profile of Certified Management Unit) - Auditor Team Presentation (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) 	√	√	√

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Date	Time	Subjects	PS	EP	AFS
	08.30 – 12.00	<p>Field Observation to Sekunyir Estate</p> <p>Aspect to be verified:</p> <ul style="list-style-type: none"> • Implementation of Legal aspect (boundaries, occupied land, disputes – if any) and HCV area • Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) • Implementation of Environmental, Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) • Implementation of Occupational Health & Safety Aspect • Implementation of Employment Procedure and Mechanism Aspect • Observation of Workers Facilities (Housing, School, Worship Place) <p>Interview at Sekunyir Estate:</p> <ul style="list-style-type: none"> • Gender Committee • New Mother • Worker Union • Sample of workers 	√	√	√
	12.00 – 13.00	Lunch break	√	√	√
	13.00 – 16.30	<p>Document review:</p> <p>Aspect to be verified</p> <ul style="list-style-type: none"> • Implementation of Legal aspect (boundaries, occupied land, disputes – if any) and HCV area • Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) • Implementation of Environmental, Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) • Implementation of Occupational Health & Safety Aspect • Implementation of Employment Procedure and Mechanism Aspect 	√	√	√
Tuesday, 12/04/2022	07.30 – 12.00	Stakeholders consultation to related agencies and local communities at Kotawaringin Barat Regency (by phone call)			√
	07.30 – 12.00	<p>Continue Field Observation to Sekunyir Estate</p> <p>Aspect to be verified</p> <ul style="list-style-type: none"> • Implementation of Legal aspect (boundaries, occupied land, disputes – if any) and HCV area • Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) 	√	√	

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Date	Time	Subjects	PS	EP	AFS
		<ul style="list-style-type: none"> Implementation of Environmental, Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect Observation of Workers Facilities (Housing, School, Worship Place) Interview at Sekunyir Estate : <ul style="list-style-type: none"> Gender Committee Worker Union Sample of workers Contractors 			
	12.00 – 13.00	Lunch break	√	√	√
	13.30 – 16.30	Field Observation Sekunyir POM : <ul style="list-style-type: none"> RSPO Supply Chain (FFB Receiving, Weighbridge), Hazardous & Toxic Storage, Chemical Storage, Fire Control Simulation, Effluent Pond Processing Station (Fertilizer, Tippler, Press, Clarification, Ripple Mill), Power Station, Workshop Interview at Sekunyir POM : <ul style="list-style-type: none"> Gender Committee Worker Union Sample of workers Contractors 	√	√	√
Wednesday, 13/04/2022	07.30 – 12.00	Document review Sekunyir POM : Aspect to be verified Implementation of Environmental, Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) <ul style="list-style-type: none"> Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect Implementation of Supply Chain System against FFB receiving from certified Estate 	√	√	√
	12.00 – 13.00	Lunch break	√	√	√
	13.30 – 16.30	Field Observation Sekunyir POM : <ul style="list-style-type: none"> RSPO Supply Chain (FFB Receiving, Weighbridge), Hazardous & Toxic Storage, Chemical Storage, Fire Control Simulation, Effluent Pond Processing Station (Fertilizer, Tippler, Press, Clarification, Ripple Mill), Power Station, Workshop Interview at Sekunyir POM : <ul style="list-style-type: none"> Gender Committee Worker Union 	√	√	√

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Date	Time	Subjects	PS	EP	AFS
		<ul style="list-style-type: none"> • Sample of workers • Contractors 			
Thursday, 14/04/2022	07.30 – 12.00	<p>Field Observation to Seruyan Estate</p> <p>Aspect to be verified Implementation of Legal aspect (boundaries, occupied land, disputes – if any) and HCV area</p> <ul style="list-style-type: none"> • Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) • Implementation of Environmental, Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) • Implementation of Occupational Health & Safety Aspect • Implementation of Employment Procedure and Mechanism Aspect • Observation of Workers Facilities (Housing, School, Worship Place) <p>Interview at Seruyan Estate:</p> <ul style="list-style-type: none"> • Gender Committee • New Mother • Worker Union • Sample of workers 	√	√	√
	12.00 – 13.00	Lunch break	√	√	√
	13.00 – 17.00	<p>Document review Seruyan Estate:</p> <p>Aspect to be verified</p> <ul style="list-style-type: none"> • Implementation of Legal aspect (boundaries, occupied land, disputes – if any) and HCV area • Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) • Implementation of Environmental, Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) • Implementation of Occupational Health & Safety Aspect • Implementation of Employment Procedure and Mechanism Aspect 	√	√	√
Friday, 15/04/2022	-	National holiday	√	√	√
Saturday, 16/04/2022	07.30 – 12.00	<p>Continue Field Observation to Seruyan Estate</p> <p>Aspect to be verified</p> <ul style="list-style-type: none"> • Implementation of Legal aspect (boundaries, occupied land, disputes – if any) and HCV area • Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) 	√	√	√

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Date	Time	Subjects	PS	EP	AFS
		<ul style="list-style-type: none"> Implementation of Environmental, Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect Observation of Workers Facilities (Housing, School, Worship Place) Interview at Seruyan Estate: <ul style="list-style-type: none"> Gender Committee Worker Union Sample of workers Contractors 			
	12.00 – 13.00	Lunch break	√	√	√
	13.00 – 15.00	Review outstanding aspects and reporting	√	√	√
	15.00 – 15.30	Report preparation	√	√	√
	16.00 – 17.00	Closing Meeting <ul style="list-style-type: none"> Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timeline of CAR's, Conclusion) Comments, Responses and Questions 	√	√	√

Critical NC Close Out

Date	Time	Subjects	PS
Thursday, 12/05/2022	14.00 – 14.15	Opening Meeting: <ul style="list-style-type: none"> Auditee Presentation (Introduction of PIC, Corrective Action Implementation) Auditor Team Presentation (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Corrective Action Plan) 	√
	14.15 – 16.00	Interview and document review for PIC in Unit and Head Office <ul style="list-style-type: none"> Critical NC 2.3.1 Critical NC 3.8.7 	√
	16.00 – 17.00	Closing Meeting <ul style="list-style-type: none"> Presentation of NCR Close Out Result (Non Conformities Status, Conclusion, Follow up Action) Comments, Responses and Questions 	√

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?	<p>Yes. Timebound Plan of Sime Darby Plantation Berhad has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table.</p> <p>As at 16 January 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI):</p> <p>http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</p>	Complied
<p>Have all the estates and mills certified within five (5) years after obtaining RSPO membership?</p> <p>If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021</p>	<p>Yes. All estates and mill has been certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at December 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 1 October 2018, the mill has completed the selling off transaction.</p> <p>In Indonesia, PT. Mitral Austral Sejahtera was sold and currently Sime Darby Plantation have no control in the management.</p>	Complied
<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>If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.</p>	<p>No. There is no new acquisitions as at latest Timebound Plan 2021.</p>	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	<p>Although there are deviation has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles/"Hak Guna Usaha (HGU)"</p>	Complied

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<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required.</p> <p>Is this consistent with the ACOP reporting?</p>	<p>Yes.</p> <p>Indonesia operation:</p> <ul style="list-style-type: none"> - PT. Swadaya Andika: Mill closed down and all the supply bases was transferred to PT. Laguna Mandiri - Rantau POM. The operation of Selabak Estate, Randi Estate, Sangkoh Estate, Lanting Estate is currently under PT. Laguna Mandiri - Rantau POM certification. - PT. Mitral Austral Sejahtera: The properties was sold and currently Sime Darby Plantation Berhad have no control in the management. The property was disposed on 25 June 2019 and an official letter on disposal of PT. Mitral Austral Sejahtera was sent to RSPO Secretariat on 27 June 2019. <p>Malaysia Operation:</p> <ul style="list-style-type: none"> - Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate, Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate has been transferred to SOU Lavang. - Bintang Oil Mill: Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at December 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 1 October 2018, the mill has completed the selling off transaction. <p>Papua New Guinea Operation:</p> <ul style="list-style-type: none"> - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March 2020 as public Notification letter: www.rspo.org/certification/public-announcement <p>For Liberia operations:</p> <p>As at 16 January 2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI): www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations. ACOP 2020 has been cross-referenced as below: www.rspo.org/members/29</p>	<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>Although there lapses has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles.</p>	<p>Complied</p>

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<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>No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as these 2 assets were disposed.</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>Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units.</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>New plantings within Sime Darby Plantation Berhad that have completed NPP notification</p> <ol style="list-style-type: none"> 1. NBPOL (Poliamba Limited) 23 May 2020 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyplantation-berhad-nbpol-poliamba-limited 2. NBPOL (Guadalcanal Plain Palm Oil Ltd) 6 April 2018 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-a-subsiary-of-sime-darby-plantationbhd-guadalcanal-plain-palm-oil-ltd 3. NBPOL (Ragu Agri Industries Limited) 29 January 2018 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-ramuagri-industries-ltd 4. NBPOL (Ramu Agri Industries Limited) 2 September 2016 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-ramu-agri-industries-limited 5. NBPOL (Higaturu Oil Palms) 21 June 2016 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-higaturu-oil-palms 6. NBPOL (Poliamba Limited – Lamawan) 7 April 2014 – no comments captured in RSPO Website https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamawan-png 7. NBPOL (Poliamba Limited – Lamendauen) 7 April 2014 – no comments captured in RSPO Website https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol- 	<p>Complied</p>

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	<p>poliambalimited-lamendauen-png</p> <p>8. NBPOL (Roka Mini estate) 4 November 2013 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-roka-mini-estate</p> <p>9. NBPOL (J estate) 1 November 2013 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-j-estate</p> <p>10. NBPOL (Higaturu Oil Palm) 14 December 2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-limited-higaturu-oil-palm</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>No land conflicts. Both operating units in Liberia and Indonesia (PT. Mitral Austral Sejahtera) has been excluded in the latest Timebound Plan as both sites was disposed.</p> <p>The RaCP tracker was checked 14 April 2022. There are 21 Management units that have potential liabilities. There are some discrepancy between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited, there are 19 management units for the Indonesia Operations that requires LUCA. All 21 LUCAs were submitted but the review was delayed due to change of RSPO reviewer. As of 14 April 2022, 13 LUCAs review completed; 10 Concept Note Required; 10 Concept Notes Submitted; 10 Concept Notes Approved; 8 Compensation Plan Submitted; 1 Compensation Plan Approved; 9 Remediation Plan Submitted; 0 Remediation Plan Submitted; 0 Remediation Plan Approved.</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>Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism.</p> <p>Audit team checked on RSPO Case Tracker and found the last complaint raised against Sime Darby Plantation Berhad recorded: Complaint Reference RSPO/2017/07/RB; Respondent PT. Minamas Gemilang (a subsidiary of Sime Darby Plantation Berhad); Complainant Mr. Oky Wardianto Complaint Submitted 19 November 2017; Country Indonesia; Status Complaint Closed, Complaint Panel Decision Letter 10 July 2019.</p>	<p>Complied</p>

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<p>Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after 1st January 2010. The issue are mainly awaiting for Land Titles.</p> <p>Sighted internal audit report: Internal Audit RSPO PT. Sandika Nata Palma and PT. Budidaya Agro Lestari, dated 29 October – 13 November 2021. Covering all P&C and multiple management unit requirement.</p> <p>Internal audit RSPO PT. Guthrie Peconina Indonesia, dated 2 February – 11 March 2022. Covering all P&C and multiple management unit requirement.</p> <p>The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance</p>	<p>Choose an item.</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>Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after 1st January 2010. The issue are mainly awaiting for Land Titles. Sighted internal audit: Internal Audit RSPO PT. Sandika Nata Palma and PT. Budidaya Agro Lestari, dated 29 October – 13 November 2021. Covering all P&C and multiple management unit requirement.</p> <p>Internal audit RSPO PT. Guthrie Peconina Indonesia, dated 2 February – 11 March 2022. Covering all P&C and multiple management unit requirement.</p> <p>The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance.</p>	<p>Choose an item.</p>
<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>No critical/major non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.</p>	<p>Complied</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Respective sites maintained stakeholder engagements as part of the estates/mills operations. Especially in Indonesia, socialization of company.</p> <p>Based on review to RSPO case tracker, there is no active complaint case to Sime Darby Plantation Berhad.</p>	<p>Complied</p>

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.</p>	<p>Not Applicable because no scheme smallholder as supply base of PT. Indotruba Tengah.</p>	<p>Complied</p>

Approved Time Bound Plan

Sime Darby Plantation Berhad – RSPO Certification for Timebound Plan – Malaysia Operation

No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name						
1	Sungai Dingin	Sungai Dingin Oil Mill	-	Karangan, Kedah	Certified	12/08/2011	-
		Anak Kulim Estate					
		Sungai Dingin Estate					
		Somme Estate					
		Bukit Selarong Estate					
		Padang Buluh Estate					
		Bukit Hijau Estate					
		Jentayu Estate					
2	Chersonese	Chersonese Oil Mill	-	Kuala Kurau, Perak	Certified	05/10/2011	-
		Chersonese Estate					
		Kalumpong Estate					
		Tali Ayer Estate					
		Holyrood Estate					
3	Elphil	Elphil Oil Mill	-	Sungai Siput, Perak	Certified	16/08/2011	-
		Kamuning Estate					
		Elphil Estate					
		Kinta Kellas Estate					
4	Flemington	Flemington Oil Mill	-	Teluk Intan, Perak	Certified	05/10/2011	-
		Flemington Estate					
		Bagan Datoh Estate					

		Sabak Bernam Estate					
		Sg. Samak Estate					
5	Seri Intan/Selaba	Seri Intan Oil Mill	-	Teluk Intan, Perak	Certified	03/03/2011	-
		Selaba Oil Mill					
		Seri Intan (+ Selaba) Estate					
		Sabrang Estate					
		Sogomana Estate					
		Sg. Wangi Estate					
		Bikam Estate					
		Cluny (+ Bedford) Estate					
6	Tennamaram	Tennamaram Oil Mill	-	Bestari Jaya, Selangor	Certified	03/03/2011	-
		Tennamaram Estate					
		Sungai Buluh Estate					
		Bukit Talang Estate					
7	Bukit Kerayong	Bukit Kerayong Oil Mill	-	Kapar Selangor	Certified	15/04/2011	-
		Bukit Kerayong Estate					
		Bukit Cheraka Estate					
		Elmina Estate					
8	East	East Oil Mill	-	Carey Island, Selangor	Certified	19/05/2011	-
		East Estate					
		Sepang Estate					
		Dusun Durian Estate					
9	West	West Oil Mill	-	Carey Island, Selangor	Certified	19/05/2011	-
		West Estate					

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10	Bukit Puteri	Bukit Puteri Oil Mill	-	Raub, Pahang	Certified	07/07/2011	-
		Bukit Puteri Estate					
11	Kerdau	Kerdau Oil Mill	-	Temerloh, Pahang	Certified	07/07/2011	Jentar Estate has merged with Kerdau Estate and reported to the CB in March/April 2021.
		Kerdau Estate					
		Jentar Estate					
		Mentakab Estate					
		Chenor Estate					
Sg Mai Estate							
12	Jabor	Jabor Oil Mill	-	Kuantan, Pahang	Certified	07/07/2011	-
		Jabor Estate					
13	Labu	Labu Oil Mill	-	Nilai, Negeri Sembilan	Certified	30/12/2011	New Labu Estate has become a division of Labu Estate.
		Labu Estate					
14	Tanah Merah	Tanah Merah Oil Mill	-	Port Dickson, Negeri Sembilan	Certified	19/05/2010	-
		Tanah Merah Estate					
		Bukit Pelandok Estate					
15	Sua Betong	Sua Betong Oil Mill	-	Port Dickson, Negeri Sembilan	Certified	18/02/2014	Siliao Estate has now been merged into Salak Estate and Bradwall Estate.
		Sua Betong Estate					
		Sengkang Estate					
		Bradwall Estate					
		PD Lukut Estate					
		Tampin Linggi Estate					
		Sg. Bahru Estate					
Salak Estate							
16	Kok Foh	Kok Foh Oil Mill	-		Certified	07/07/2011	

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		Muar River Estate		Bahau, Negeri Sembilan			Sg. Gemas Estate has now been merged into Sg. Senarut Estate.
		Sg. Senarut Estate					
		Sg. Gemas Estate					
		Kok Foh Estate					
		Bukit Pilah Estate					
		St. Helier Estate					
		Sungai Sabaling Estate					
		Pertang Estate					
17	Kempas	Kempas Oil Mill	-	Jasin, Melaka	Certified	19/05/2010	Serkam Estate, previously from SOU18 (Diamond Jubilee) is now part of SOU 17 (Kempas)
		Kempas Estate					
		Tangkah Estate					
		Kemuning Estate					
18	Diamond Jubilee	Diamond Jubilee Palm Oil Mill	-	Jasin, Melaka	Certified	05/10/2011	Serkam Estate, previously from SOU18 (Diamond Jubilee) is now part of SOU 17 (Kempas) Welch Estate, previously from SOU 19 (Pagoh) is now part of SOU 18 (Diamond Jubilee)
		Serkam Estate					
		Diamond Jubilee Estate					
		Bukit Asahan Estate					
19	Pagoh	Pagoh Oil Mill	-	Muar, Johor	Certified	28/1/2014	-
		Pagoh Estate					
		Welch Estate					
		Lanadron Estate					
		Pengkalan Bukit Estate					
20	Chaah	Chaah Oil Mill	-	Chaah, Johor	Certified	18/11/2010	-
		Chaah Estate					
		Sg. Simpang Kiri Estate					

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		North Labis Estate					
21	Gunung Mas	Gunung Mas Oil Mill	-	Kluang, Johor	Certified	19/05/2010	* SDP acquired Lian Seng Estate in Johor in April 2017. Lian Seng Estate is merged into Bkt Paloh Estate of SOU 21 Gunung Mas, Lian Seng has been incorporated in the RSPO Certification Scope of SOU Gunung Mas in 2018.
		Gunung Mas Estate					
		Kempas Klebang Estate					
		Bukit Paloh Estate					
		Yong Peng Estate					
22	Bukut Benut	Bukit Benut Oil Mill	-	Kluang, Johor	Certified	05/11/2011	* SDP acquired Talisman Estate in Johor in April 2017. Talisman Estate is merged into CEP Nyior Estate of SOU 22 Bk Benut and has been incorporated in the RSPO Certification Scope of SOU Bk Benut in 2018.
		Bukit Benut Estate					
		Lambak Elaeis Estate					
		CEP Nyior Estate					
23	Ulu Remis	Ulu Remis Oil Mill	-	Layang-Layang, Johor	Certified	11/04/2011	-
		Ulu Remis Estate					
		Cenas Estate					
		Bukit Badak Estate					
		Tun Dr. Ismail Estate					
		Pekan Estate					
		Sembrong Estate					
24	Hadapan	Hadapan Oil Mill	-	Layang-Layang, Johor	Certified	29/3/2011	-
		Sri Pulai Estate					
		Kulai Estate					
		Layang Estate					
		CEP Renggam Estate					
26	Sandakan Bay	Sandakan Bay	-	Sandakan, Sabah	Certified	01/10/2008	-
		Tun Tan Siew Sin					

		Tunku Estate					
		Tigowis Estate					
		Sentosa Estate					
		Segaliud Estate					
27	Melalap	Melalap Oil Mill	-	Tenom, Sabah	Certified	21/1/2011	-
		Melalap Estate					
		Sapong Estate					
28	Binuang	Binuang Oil Mill	-	Kunak, Sabah	Certified	16/1/2009	-
		Binuang Estate					
		Sungang Estate					
		Tingkayu Estate					
		Jeleta Bumi Estate					
29	Giram	Giram Oil Mill	-	Kunak, Sabah	Certified	16/1/2009	-
		Giram Estate					
		Mostyn Estate					
30	Merotai	Merotai Oil Mill	-	Tawau, Sabah	Certified	16/1/2009	-
		Merotai Estate					
		Imam Estate					
		Tiger Estate					
		Table Estate					
31	Layang	Layang Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	-
		Layang Estate					
		Rasan Estate					
		Belian Estate					

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		Kelida Estate					
		Lavang (Special) Estate					
		Pekaka Estate					
		Ruai Estate					
		Dulang Estate					
		Charquest Estate					
		Paroh Estate					
32	Rajawali	Rajawali Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	-
		Rajawali Estate					
		Samudera Estate					
		Semarak Estate					
		Bayu Estate					
33	Derawan	Derawan Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	-
		Derawan Estate					
		Sahua Estate					
		Takau Estate					
		Damai Estate					
34	Pekaka	Pekaka Mill	-	Bintulu, Sarawak	Withdrawn	NA	Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate.) has been transferred to SOU Lavang.
35	Bintang	Bintang Oil Mill	-	Johor	NA	NA	* Sime Darby Plantation acquired Bintang Palm Oil Mill in Johor in April 2017. As at December 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 1 October 2018,

							the mill has completed the selling off transaction.
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Sime Darby Plantation Berhad – RSPO Certification for Timebound Plan – Indonesia Operation

No	Management Unit	Mill and Supply Base	Time Bound Plan	Latest Internal / External	Location	Status	Certified Date	Remarks (for uncertified unit)
	SOU Name			Audit Date				
1	PT. Lahan Tani Sakti	Alur Dumai Mill	-	-	Rokan Hilir District – Riau	Certified	16/01/2012	-
		Alur Dumai Estate						
2	PT. Sajang Heulang	Mustika Mill	-	-	Tanah Bumbu District – South Kalimantan	Certified	03/07/2013	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		Mustika Estate						
		KKPA-2 PT.SHE Estate						
		KKPA-3 PT.SHE Estate						
		KKPA-5 PT.SHE Estate						
Pantai Bonati Estate	06/07/2011							
3	PT. Ladangrumpun Suburabadi	Angsana Mill	-	-	Tanah Bumbu District – South Kalimantan	Certified	06/07/2021	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		Angsana Estate						
		Pantai Bonati Estate						
		Gunung Sari Estate						
		KKPA-1 PT.SHE Estate						
		KKPA-4 PT.SHE Estate						
Subur Abadi Plasma 1 Estate	TBC	TBC	TBC	TBC				
4		Bebunga Mill	-	-		Certified	16/03/2012	

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	PT. Langgeng Muaramakmur	Bebunga Estate			Kotabaru District – South Kalimantan			KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		Sungai Cengal Estate						
		Bakau Estate						
		KKPA LMR	TBC	TBC		TBC	TBC	
5	PT. Kridatama Lancar	Sukamandang Mill	-	-	Seruyan and East–Kotawaringin District Central Kalimantan	Certified	05/07/2011	-
		Sukamandang Estate						
		Sapiri Estate						
		Barasdanum Estate						
		Kuala Kuayan Estate						
6	PT. Bahari Gembira Ria	Ladang Panjang Mill	-	-	Muaro Jambi District - Jambi	Certified	09/07/2012	Only Division 3 is certified (1,202 Ha). Total Areas of Division 1 and 2 (1,796.19 Ha) HGU still in process
		Ladang Panjang Estate						
		Plasma BGR Estate	TBC	TBC		TBC	TBC	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
7	PT. Tunggal Mitra Plantations	Manggala Mill	-	-	Rokan Hilir District – Riau	Certified	25/11/2010	-
		Manggala 1 Estate						
		Manggala 2 Estate						
		Manggala 3 Estate						
8	PT. Paripurna Swakarsa	Pondok Labu Mill	-	-	Kotabaru District – South Kalimantan	Certified	16/03/2012	-
		Pondok Labu Estate	-	-				
		Binturung Estate						
		Rampa Estate						
		Sesulung Estate						
9		Gunung Aru Mill	-	-		Certified	05/07/2011	-

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	PT. Bersama Sejahtera Sakti	Gunung Aru Estate			Kotabaru District – South Kalimantan			
		Gunung Kemasan Estate						
		Laut Timur Estate						
		Pantai Timur Estate						
		KKPA MBP	TBC	TBC		TBC	TBC	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
10	PT. Guthrie Pecconina	Rantau Panjang Mill	-	-	Musir Banyuasin District – South Sumatera	Certified	16/03/2012	Remarks: Land legalisation process for 4,152.70 ha is still in process.
		Rantau Panjang Estate						
		Bumi Ayu Estate						
		Karang Ringin Estate						
		Napal Estate						
		Mangun Jaya Estate						
		Sungai Jernih Estate and GPI KKPA Estate	2023	-				
11	PT. Laguna Mandiri	Rantau Mill	-	-	Kotabaru District – South Kalimantan	Certified	30/12/2011	
		Rantau Estate						
		Matalok Estate						
		Betung Mill						
		Betung Estate						
		Sekayu Estate						

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12	PT. Indotruba Tengah	Sekunyir Mill	-	-	Seruyan and West Kotawaringin District – Central Kalimantan	Certified	23/11/2010	-
		Sekunyir						
		Seruyan Estate						
13	PT. Swadaya Andika	Selabak Mill	-	-	Kotabaru District – South Kalimantan	Certified	16/03/2012	Mill closed down and all the supply bases was transferred to PT. Laguna Mandiri - Rantau POM. The supply base Selabak Estate, Randi Estate, Sangkoh Estate, Lanting Estate is currently under PT. Laguna Mandiri – Rantau Factory certification.
		Selabak Estate						
		Randi Estate						
		Sangkoh Estate						
		Lanting Estate						
14	PT. Bina Sains Cemerlang	Sungai Pinang Mill	-	-	Musi Rawas District – South Sumatera	Certified	11/09/2012	Remarks: Land legalisation process for 308.35 Ha is still in process.
		Sungai Pinang Estate						
		Bukit Pinang Estate						
15	PT. Teguh Sempurna	Pemantang Mill	-	-	Seruyan and East Kotawaringin District – Central Kalimantan	Certified	05/07/2011	-
		Pemantang Estate						
		Kawan Batu Estate						
		Hatan Tiring Estate						
		Batang Garing Estate						
16	PT. Bhumireksa Nusa Sejati	Teluk Bakau Mill	-	-	Indra Giri Hilir District – Riau	Certified	11/10/2011	-
		Teluk Bakau Estate						
		Nusa Lestari Estate						
		Nusa Perkasa Estate						
		Mandah Mill						
		Mandah Estate						
		Rotan Semelur Estate						
01/04/2014								
17		Teluk Siak Mill	-	-		Certified	11/10/2011	-

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	PT. Intipersada Aneka	Teluk Siak Estate			Pekanbaru, Siak District – Riau			
		Pinang Sebatang Estate						
		Aneka Persada Estate						
18	PT. Tamaco Graha Krida	Ungkaya Mill	-	-	Morowali District – Sulawesi Tengah	Certified	10/7/2012	-
		Ungkaya Estate						
		Plasma TGK Estate	TBC	TBC		TBC	TBC	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
19	PT. SIME Indo Agro	Bukit Ajong Mill	-	-	Sanggau District – West Kalimantan	Certified	18/10/2010	Land legalisation process for East Estate for 5,815.64 Ha is still in process.
		West Estate						
		East Estate						
		East* Estate /Sei Mawang Estate	2023	-		-		Land legalisation for Sei Mawang is still in process
		East Plasma Estate	-	-		Certified	18/7/2016	-
		West Plasma Estate						
20	PT. Padang Permai /PT. Perkasa Subur Sakti	Blang Simpo Mill	-	-	Aceh Tamiang and East Aceh District – Nanggroe Aceh Darussalam	Certified	03/05/2013	-
		Tamiang (PT PPP) Estate						
		Batang Ara (PT PSK) Estate						
		Blang Simpo-01 Estate						
		Blang Simpo-02 Estate						
21	PT. Natapalma Sandika	Lembiru Mill	-	-	Ketapang District – West Kalimantan	Certified	03/07/2014	PT. Sandika Natapalma and PT. Budidaya Agro Lestari is sharing one mill i.e. Lembiru Mill.
		Lembiru Estate						
		Awatan Estate						

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		Karya Palma Estate	TBC	TBC		TBC	TBC	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		KKPA SNP Estate	TBC	TBC		TBC	TBC	
22	PT. Budidaya Agro Lestari	Pelanjau (PT BAL) Estate	-	-	Ketapang District – West Kalimantan	Certified	03/07/2019	-
		Sungai Putih (PT BAL) Estate	2023	-		-		Land Approval is obtained in 2015 while the other approvals are still in processing HGU obtained as per May 2018. KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		Beturus (PT BAL) Estate	2023	-		-		
		KKPA BAL Estate	TBC	TBC		TBC	TBC	
23	PT. Mitral Austral Sejahtera	MAS Mill	NA	NA	Sanggau District – West Kalimantan	NA	NA	The properties was sold and currently SDP have no control in the management. Please find latest information on 'Updates on PT. Mitral Austral Sejahtera' worksheet and updates to RSPO Secretariat.
		MAS 1 Estate						
		MAS 2 Estate						
		MAS 4 Estate						
		Plasma MAS Estate						

Sime Darby Plantation Berhad – RSPO Certification Timebound Plan – New Britain Palm Oil (NBPOL) Papua New Guinea Operation

No	Management Unit	Mill and Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks (for uncertified unit)
	SOU Name						
1	Guadalcanal Plains Palm Oil Limited (GPPOL)	Tetere Oil Mill	-	Guadalcanal Province, Solomon Islands	Certified	18/03/2011	-
		Tetere Estate					
		Ngalimbiu Estate					
		Mbalisuna Estate					
		Smallholders – West Zone (83)					

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		Smallholders – Central Zone (53)					
		Smallholders – MBA East Zone (59)					
		Smallholders – MBE East Zone (37)					
2	Milne Bay Estate (MEB)	Hagita Oil Mill	-	Milne Bay Province, PNG	Certified	15/02/2018	-
		Giligili Estate					
		Hagita Estate					
		Waigani Estate					
		Sagarai Estate					
		Padipadi Estate					
		Mariawatte Estate					
		Smallholders – East Gurney Estate (264)					
		Smallholders – West Gurney Estate (229)					
		Smallholders – East Sagarai Estate (157)					
		Smallholders – West Sagarai Estate (221)					
3	Poliamba (POL)	Poliamba Oil Mill	-	New Ireland Province, PNG	Certified	19/03/2012	-
		Kara Estate					
		Nalik Estate					
		West Coast Estate					
		Noatsi Estate					
		Madak Estate					
		Smallholders -North Division (615)					
		Smallholders- South Division (868)					
		Smallholders -West Division (309)					
4	Ramu Agricultural Industrial Ltd (RAIL)	Gusap Mill	-	Morobe Province, PNG	Certified	05/08/2010	-
		Gusap East (Gusap) Estate					

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		Gusap West (Paddox) Estate					
		Surinam Estate					
		Dumpu Estate					
		Ngaru Estate					
		J Estate (Jephcott) Estate					
		Smallholders - Madang VOPs (71)					
		Smallholders - Morobe VOPs (253)					
5	Higaturu Oil Palm (HOP)	Sangara Oil Mill	-	Oro Bay Province, PNG	Certified	01/02/2013	-
		Mamba Oil Mill					
		Embi Estate					
		Ambogo Estate					
		Sangara Estate					
		Sumbiripa Estate					
		Mamba Estate					
		Sambogo Estate					
		Scheme Smallholder Sorovi Division(2019)					
		Scheme Smallholder Saiho Division(842)					
		Scheme Smallholder Aeka Division (911)					
		Scheme Smallholder Igora Division (1367)					
		Scheme Smallholder Ilimo Division (671)					
6	West New Britain (WNB)	Mosa Oil Mill	-	Kimbe, West New Britain, PNG	Certified	10/09/2008	-
		Kumbango Oil Mill					
		Kapiura Mill					

		Numundo Mill					
		Waraston Mill					
		Bebere Estate					
		Kumbango Estate					
		Togulo Estate					
		Dami Estate					
		Waisisi Estate					
		Kautu Estate					
		Karaisu Estate					
		Moroa Estate					
		Bilomi Estate					
		Loata Estate					
		Haella Estate					
		Garu Estate					
		Daliavu Estate					
		Sapuri Estate					
		Malilimi Estate					
		Rigula Estate					
		Numundo Estate					
		Navarai / Karato ME /KDC EU Estate					
		Volupai / Lotomgam / Natupi / Goruru Estate					
		Lolokoru Estate					
		Ove Estate					
		Tamare Estate					

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		Smallholders LSS Mosa (1822)					
		Smallholders VOP East (1817)					
		Smallholders VOP Central (1964)					
		Smallholders VOP West (1279)					
		Smallholders LSS Kapiura (551)					
		Smallholders VOP Kapiura (850)					
		Smallholder Kaulong / Akami / Pushiki / Repamira / Sakapei					
7	Markham Farms Company Limited (MFCL) / Markham Agro Pte Ltd	Erap Mill	-	Markham Farms	Certified	27/3/2020	There is total NPP area: 710.30 Ha which is currently excluded from the certification scope until the NPP is approved
		Munum Estate					
		Maralumi Estate					
		Erap Estate					

3.3 Details of Nonconformities

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

During this Assessment there were 2 (two) Critical/Major; 3 (three) Minor nonconformities and 3 (three) Opportunity For Improvement raised. The PT. Indotruba Tengah – Sekunyir POM Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. 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 #	2189761-202204-M1	Date Issued	16 April 2022
Due Date	15 July 2022	Date of nonconformity Closure	12 May 2022
Clause & Category (Critical / Minor)	RSPO P&C 2018 - INA NI 2020 Indicator 2.3.1 Major/Critical		
Statement of Nonconformity:	Certificate Holder cannot demonstrate fulfilment of directly sourced FFB in form of proof of ownership status, right/claim of the land by grower.		
Requirement Reference:	For all directly sourced FFB, Palm Oil Mill (POM) requires: <ul style="list-style-type: none"> Information regarding the geolocation of FFB origins; Proof of ownership status, right/claim of the land by grower/smallholder; If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. 		
Objective Evidence:	<p>By 21 March 2022, PT. Indotruba Tengah – Sekunyir POM received FFB from non-certified oil palm plantation company PT. Indotruba Timur,</p> <ul style="list-style-type: none"> - As of 31 March 2022 in record "Statistik Produksi SKF" received 590.17 MT FFB from PT. Indotruba Timur. - Sampled "Surat Pengantar Buah dan Berondolan No.0169/SPB/I/ITR-X/04/2022 for delivery 644 bunches" - Sampled Weighbridge ticket No.260548 date 9 April 2022 for 7,395 kg FFB. - Certificate Holder shows Minamas Plantation prepared report "Laporan Responsible Sourcing Guideline for 3rd party FFB PT. Indotruba Timur to Sekunyir Factory No.SQM/RSG/2022/01" dated 31 January 2022. The report reviewing the readiness of non-certified FFB supplies from PT. Indotruba Timur: planting year (before and after 2010); environmental aspect (location against peat area, national park, conservation area, protected forest and production forest); social aspect (internal and external disturbance); financial aspect (i.e. tax issues). The report results stated low risk because no peat area in concession, no national park, conservation area, protected forest and production forest in the concession, "Pelepasan Kawasan Hutan of 1,164.75 Ha" in 13 May 2019. - Certificate Holder demonstrates operating license PT. Indotruba Timur: "Keputusan Bupati Seruyan No.188.45/343/2019 tentang Izin Usaha 		

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	<p>Perkebunan untuk Budidaya (IUP-B) atas nama PT. Indotruba Timur" dated 21 August 2019 for plantation of 1,253.8 Ha.</p> <ul style="list-style-type: none"> - No proof of ownership status, right/claim of the land by grower - guidance stipulates evidence of right of the land: Land Certificate/Customary Land Certificate/Ownership Certificate, Land-Use Rights (HGU) or other ownership evidences (that are recognizable) from the authority.
Corrections:	<p>PIC Legal Minamas (PSD) will request HGU document/process to obtain HGU to management of PT. Indotruba Timur and send it to CB. Evidence received: Letter "PT. Indotruba Timur No. B/014/ITR/UM/GR/VI/2021 to Deputi Bidang Survei Pengukuran dan Pemetaan Up. Direktur Penetapan Batas Bidang dan Direktur Survei dan Penetapan Tematik" stating the company is applying for "Pengukuran kadastral atas lahan seluas 1,003 Ha di Desa Pembuang Hulu II, Kecamatan Hanau, Kabupaten Seruyan, Provinsi Kalimantan Tengah" – survey planning for land of 1,003 Ha in Pembuang Hulu II village, Hanau District, Seruyan Regency, Kalimantan Tengah Province, letter dated 16 June 2021.</p>
Root Cause Analysis:	<p>Team Legal Minamas has not obtain HGU document/process to obtain HGU from PT. Indotruba Timur (FFB supplier).</p>
Corrective Actions:	<p>Team Legal PT. Indotruba Tengah will conduct effective monitoring through document "List Dokumen Legal" and all information required including the compliance level in periodic manner: once per year, 3 months from external audit - at the latest.</p> <p>Evidence reviewed "List Dokumen Legal PT. Indotruba Timur" dated 25 April 2022 indicating review upon "SK Penetapan Kawasan Hutan" - forest area determination; "Izin Usaha Perkebunan" - Plantation Business Permit; "Nomor Induk Berusaha/NIB" - Business Registration; "Hak Guna Usaha/HGU" - Land Title; "Permohonan Pengajuan HGU" - land title application process/progress.</p>
Assessment Conclusion:	<p>The team in unit and HO implement the correction and corrective action. Verification on correction through documented process/correspondence from FFB supplier to government evident. Corrective action verified through monitoring evident. Critical/Major NC closed out effectively.</p>

Non-conformity			
NCR Ref #	2189761-202204-M2	Date Issued	16 April 2022
Due Date	15 July 2022	Date of nonconformity Closure	12 May 2022
Clause & Category (Critical / Minor)	RSPO P&C 2018 - INA NI 2020 Indicator 3.8.7 Major/Critical		
Statement of Nonconformity:	The unit of certification has not been able to demonstrate evidence regarding inform the CB whilst there is an overproduction of certified tonnage.		
Requirement Reference:	Purchasing and Goods In i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBS received.		

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	<p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>														
Objective Evidence:	<p>Based on PalmTrace certified volume and Mill production statistic, obtained data below:</p> <p>--</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">Product</th> <th>PalmTrace certified volume (license period 23 Nov 2019 – 22 Mei 2022)</th> <th>Actual production since last onsite assessment until this recertification assessment</th> </tr> <tr> <th>MT</th> <th>MT</th> </tr> </thead> <tbody> <tr> <td>FFB</td> <td style="text-align: center;">111,275</td> <td style="text-align: center;">298,928.58</td> </tr> <tr> <td>CSPO</td> <td style="text-align: center;">29,055</td> <td style="text-align: center;">67,752.88</td> </tr> <tr> <td>CSPK</td> <td style="text-align: center;">5,635</td> <td style="text-align: center;">13,339.19</td> </tr> </tbody> </table> <p>--</p> <p>Therefore, there has been overproduction of FFB, CSPO and CSPK up to the time of this recertification assessment.</p> <ul style="list-style-type: none"> • Email from the company to CB on 7 January 2022 regarding request of volume extension for FFB of 11,842 MT; CSPO of 5,971 MT; and CSPK of 1,267 MT. • Email from the company to CB on 12 April 2022 regarding request of volume extension for FFB of 24,713 MT; CSPO of 5,988 MT; and CSPK of 1,119 MT. 	Product	PalmTrace certified volume (license period 23 Nov 2019 – 22 Mei 2022)	Actual production since last onsite assessment until this recertification assessment	MT	MT	FFB	111,275	298,928.58	CSPO	29,055	67,752.88	CSPK	5,635	13,339.19
Product	PalmTrace certified volume (license period 23 Nov 2019 – 22 Mei 2022)		Actual production since last onsite assessment until this recertification assessment												
	MT	MT													
FFB	111,275	298,928.58													
CSPO	29,055	67,752.88													
CSPK	5,635	13,339.19													
Corrections:	<p>PT. Indotruba Tengah - Sekunyir POM sent email requesting volume extension application to CB per 15 April 2022. RSPO approved on 21 April 2022. Data in PalmTrace during verification: FFB Estates 301,526 MT; CSPO 72,119 MT; CSPK 14,125 MT.</p>														
Root Cause Analysis:	<p>The PIC is not conducting monitoring effectively the actual production/overproduction during the license period causing issue in informing application for volume extension due to projected overproduction.</p>														
Corrective Actions:	<ul style="list-style-type: none"> - PT. Indotruba Tengah and the Head Office was revising document "Mekanisme Koordinasi Monitoring Stock Penjualan CPO & PK antara Dept. PSQM & Dept. GTM Jakarta" dated 26 April 2022. Section 2 stated "Dept. PSQM coordinating with Dept. GTM Jakarta related to RSPO certified product being produced and being sold in platform IT PalmTrace every 6 months via email". - Refresh training to team in PT. Indotruba Tengah-Sekunyir POM on new mechanism and agreed format in coordination with Dept. GTM Jakarta, dated 26 April 2022. - Update the production database "Statistik Produksi Sekunyir Factory January - April 2022". Actual FFB production October 2019-March 2022: 298,034.41 ton FFB 														
Assessment Conclusion:	<p>The team in unit and HO implement the correction and corrective action. Verification on correction through documented request for volume extension evident and approved by RSPO Secretariat. Corrective action verified through provision of training, revision of monitoring mechanism and agreed monitoring document evident.</p> <p>Critical/Major NC closed out effectively.</p>														

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Non-conformity																										
NCR Ref #	2189761-202204-N1	Date Issued	16 April 2022																							
Due Date	15 April 2023	Date of nonconformity Closure	Next Surveillance																							
Clause & Category (Critical / Minor)	RSPO P&C 2018 - INA NI 2020 Indicator 3.2.2 Minor																									
Statement of Nonconformity:	Unit of certification has submitted RSPO Metric Template to CB during this recertification assessment, however there are discrepancies between data in RSPO Metric Template against data in "Statistik Produksi SKF".																									
Requirement Reference:	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.																									
Objective Evidence:	<p>Based on review to RSPO Metric Template and data "Statistik Produksi SKF", obtained data below: ---</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr style="background-color: #d9e1f2;"> <th rowspan="2">Product</th> <th>RSPO Metric Template</th> <th>"Statistik Produksi SKF"</th> </tr> <tr style="background-color: #d9e1f2;"> <th>MT</th> <th>MT</th> </tr> </thead> <tbody> <tr> <td colspan="3">Period Jan-Dec 2021</td> </tr> <tr> <td>CPO</td> <td>25,523.84</td> <td>24,077.68</td> </tr> <tr> <td>PK</td> <td>4,693.06</td> <td>4,632.099</td> </tr> <tr> <td colspan="3">Period Mar 2021-Feb 2022</td> </tr> <tr> <td>CPO</td> <td>24,799.85</td> <td>23,647.037</td> </tr> <tr> <td>PK</td> <td>7,693.92</td> <td>4,556.651</td> </tr> </tbody> </table> <p>---</p> <p>There are variance of CPO and PK production in both period, January-December 2021 and March 2021-February 2022.</p>			Product	RSPO Metric Template	"Statistik Produksi SKF"	MT	MT	Period Jan-Dec 2021			CPO	25,523.84	24,077.68	PK	4,693.06	4,632.099	Period Mar 2021-Feb 2022			CPO	24,799.85	23,647.037	PK	7,693.92	4,556.651
Product	RSPO Metric Template	"Statistik Produksi SKF"																								
	MT	MT																								
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Period Mar 2021-Feb 2022																										
CPO	24,799.85	23,647.037																								
PK	7,693.92	4,556.651																								
Corrections:	PIC (Staff SQM) revise the metric template data and erase opening stock data - to be consistent with "Statistik Produksi Sekunyir Factory" data.																									
Root Cause Analysis:	PIC took data for metric template based on "Statistik Produksi Sekunyir POM" with additional opening stock data in early year 2022.																									
Corrective Actions:	<ul style="list-style-type: none"> - To provide refresh training. - During each end of monthly period data as required by RSPO Metric Template, Staff SQM in unit will monitor actual CPO and PK production in coordination with Sekunyir POM staff. The data will be input into RSPO Metric Template in accordance to period required. 																									

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Assessment Conclusion:	Minor NC remains open. Correction of the Metric Template has been accepted by Audit Team. Corrective Action Plan reviewed and sufficient. Corrective Action Plan will be verified effectiveness during subsequent assessment visit.
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Non-conformity			
NCR Ref #	2189761-202204-N2	Date Issued	16 April 2022
Due Date	15 April 2023	Date of nonconformity Closure	Next Surveillance
Clause & Category (Critical / Minor)	RSPO P&C 2018 - INA NI 2020 Indicator 6.1.4 Minor		
Statement of Nonconformity:	The unit of certification cannot demonstrate pregnant women are not discriminated in the recruitment procedure, by giving alternative opportunity in the position that not harmful for the reproduction organ (and/or the fetus).		
Requirement Reference:	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.		
Objective Evidence:	In the SOP of Employee Recruitment (No. 394/ITH-SOP-26/11 dated 5 January 2022) Clause 5.3, stipulates "... dan jika perempuan tidak dalam masa hamil." – if female worker, not pregnant.		
Corrections:	PIC has coordinated with SQM staff to review the content of SOP Recruitment and the specific discriminatory sentence has been erase/revised.		
Root Cause Analysis:	PIC controlling the SOP Perekrutan Karyawan (KTU/KaSie) has not review the content of the SOP compared to the P&C Standard.		
Corrective Actions:	<ul style="list-style-type: none"> - Provide refresh training to PIC document. - PIC document SOP (SQM and KTU/KaSie) will review and monitors SOP issued and monitor onsite minimum once per year to highlight and identify changes in regulation/standard. 		
Assessment Conclusion:	Minor NC remains open. Corrective Action Plan reviewed and sufficient. Minor NC will be verified effectiveness during subsequent assessment visit.		

Non-conformity			
NCR Ref #	2189761-202204-N3	Date Issued	16 April 2022
Due Date	15 April 2023	Date of nonconformity Closure	Next Surveillance
Clause & Category (Critical / Minor)	RSPO P&C 2018 - INA NI 2020 Indicator 7.3.2 Minor		
Statement of Nonconformity:	Based on field visit to Sekunyir Estate Landfill, disposal of waste material was not according to waste management procedure "SOP Pengelolaan Limbah B3 & Bukan B3" dated 10 January 2022.		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		

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Objective Evidence:	"SOP Pengelolaan Limbah B3 & Bukan B3" dated 10 January 2022 – Section 5.2.8 stated waste contains tin and plastic send for sanitary landfill. Based on field visit to Sekunyir Estate Landfill, block C07, it was found: <ul style="list-style-type: none"> - The domestic waste and other waste category was piled up; and not put into landfill; - Found hazardous waste from Manthene and Kencepat (a.i. Acephate) bags in the waste pile;
Corrections:	<ul style="list-style-type: none"> - Select and collect back all hazardous was mixed in landfill and stored in licensed hazardous waste storage. - Re-arrange and tidying up landfill as per procedure.
Root Cause Analysis:	The worker has not understand the waste handling process, post trunk injection treatment; and do not treat Kencepat 75 SP as hazardous waste.
Corrective Actions:	<ul style="list-style-type: none"> - Perform refresh training for PIC landfill. - PIC for landfill perform periodic control to ensure hazardous waste does not mixed up with other type of waste dedicated for landfill.
Assessment Conclusion:	Minor NC remains open. Corrective Action Plan reviewed and sufficient. Minor NC will be verified effectiveness during subsequent assessment visit.

Opportunity for Improvements	
OFI #	Description
OFI 1	RSPO P&C 2018 - INA NI 2020 Indicator 4.3.1 The unit of certification developed Annual CSR Program 2022 and has documented the CSR Implementation of 2021. Certificate Holder expected program related community economic development inclusion and CSR program dissemination to wider stakeholders.
OFI 2	RSPO P&C 2018 - INA NI 2020 Indicator 6.2.7 Sekunyir Estate has appointed all temporary (PKWT) harvester as permanent workers (PKWTT/SKU). For Seruyan Estate, the appointment of temporary (PKWT) harvester as permanent workers is under process. Consistent and aligned harvester recruitment (as core work) directly refers to the procedure of recruitment of permanent worker (SOP of Employee Recruitment No. 394/ITH-SOP-26/11 dated 5 January 2022).
OFI 3	RSPO P&C 2018 - INA NI 2020 Indicator 6.7.2 Certificate Holder demonstrated SOP related to occupational health and safety; HIRADC for Sekunyir POM review and updated 10 January 2022; HIRADC for Sekunyir Estate and Seruyan Estate review and updated 10 January 2022; SOP for Emergency No.73PSQM-ESH/13 available; Expected consistency communicating safety briefing for visitor.

Positive Findings	
PF #	Description
PF 1	Certificate Holder manages communication and socialization of company policy to contractors in good manner. Based on audit team verification/interview session, contractor for replanting land preparation can explains company policy and implementation of HCV protection policy and procedures.

3.3.1 Status of Nonconformities Previously Identified and Observations

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

Opportunity for Improvement	
OFI#	Description
OFI 1	<p>RSPO P&C 2020 Indicator 6.7.1</p> <p>Manpower Services of Kalimantan Tengah stated P2K3 (safety committee) Decree for PT. Indotruba Tengah – Sekunyir Estate. Meanwhile the P2K3 (safety committee) structure has been included for all unit (Sekunyir, Seruyan Estate and Sekunyir POM).</p> <p>Verification:</p> <p>The safety committee for PT. Indotruba Tengah now covers all units; the committee/P2K3 Structure has been approved by Manpower Agency based on Decree No.146/DISNAKERTRANS/II/2022 dated 23 February 2022.</p>
OFI 2	<p>RSPO P&C 2020 Indicator 7.8.1a</p> <p>The company has set buffer zones for rivers, lakes and springs in the Buffer Zone Management SOP. Reference to the RSPO INA NI 2020 guidance and national regulation during evaluation of buffer zone width.</p> <p>Verification:</p> <p>Riparian buffers of small natural river were 10 - 15 m wide on both sides of the rivers, depend on the wide of river; lake buffer 50 m; water spring buffer 50 m.</p>
OFI 3	<p>RSPO P&C 2020 Indicator 7.8.1b</p> <p>- Water usage permit under renewal process.</p> <p>The results of clean water analysis carried out against "Peraturan Menteri Kesehatan No. 32 tahun 2017", results of the analysis shows parameters of Organic Substances (KMnO4), <i>E. Coli</i> and <i>Total Coliform</i> found above standard. Hence, the water only used for bathing and washing purposes.</p> <p>Verification:</p>

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	<p>Water usage permit renewed in 2021. Permit for water extraction: "Keputusan Menteri Pekerjaan Umum dan perumahan Rakyat No.284/KPTS/M/2021 tentang Pemberian Izin Pengusahaan Sumber Daya Air Kepada Perseroan Terbatas Indotruba Tengah untuk Operasional Pabrik Pengolahan Kelapa Sawit di Sungai Bahaya Kabupaten Kotawaringin Barat Provinsi Kalimantan Tengah" dated 9 March 2021, valid for 5 years until 2026.</p> <p>The latest clean water analysis was carried out in November 2020, while in 2021 was postponed due to prolonged COVID-19 pandemic. With the basis of latest water analysis, company consistent to prohibit employee and their family to use of clean water for consumption, limited for bathing and washing purpose.</p>
<p>OFI 4 (from ASA1.4 in 2019)</p>	<p>RSPO P&C 2013 Indicator 4.6.11</p> <p>Ensure that medical checks for pesticide operators are carried out according to a predetermined schedule.</p> <p>Verification:</p> <p>Audit team review against the new RSPO P&C 2020 Indicator 7.2.10. Due to COVID-19 pandemic condition started in year 2020, special annual medical surveillance was postponed until normal condition. This was in accordance with circular from Minister of Manpower No.M/7/AS.02.02/V/2020 regarding "Rencana Keberlangsungan Usaha dalam menghadapi Pandemi COVID-19 dan Protokol Pencegahan Penularan COVID-19 di Perusahaan" for temporarily postpone the medical checks of the workforce until occupational safety and health are met or until the COVID-19 pandemic ends.</p> <p>Based on interview with management and paramedic as well as minutes of management meeting on 5 February 2022, annual medical check up will be carried out this year (2022).</p>
<p>OFI 5 (from ASA1.4 in 2019)</p>	<p>RSPO P&C 2013 Indicator 4.7.3</p> <p>Ensure supervision of the use of PPE</p> <p>Verification:</p> <p>Audit team review against the new RSPO P&C 2020 Indicator 6.7.3. Based on field observation in the high risk workplace in the Mill and Estate, known that the workers provided proper PPE in accordance with the HIRAC and/or MSDS. For instance:</p> <ul style="list-style-type: none"> - Harvester: has been provided sickle and axe cover. - Manuring, spraying, checmical storage operator: has been provided rubber gloves, mask, face protector, apron, boots. - Genset/engine room, boiler operator: has been provided mas and ear muff/ear plug. - Sanitation facilities and PPE storage for pesticide/fertilizer applicator provided in the Division Offices called BSS (Block Spraying System) and BMS (Block Manuring System). Therefore, the PPE and working tools are washed and stored in the special place and prohibited to be placed in worker's houses. <p>Interview with the workers and Labor Union, the PPE has been provided, exchanged regularly or anytime if broken without any charge/deduction. The PPE stocks sighted on material storage.</p>
<p>OFI 6 (from ASA1.4 in 2019)</p>	<p>RSPO P&C 2013 Indicator 5.3.3</p> <p>Ensure that no leachate from empty bunch flows to the environment without management</p> <p>Verification:</p> <p>Audit team review against the new RSPO P&C 2020 Indicator 7.3.1. Based on field observation in the Sekunyir POM empty bunch stockpile, the leach water from the stockpile was flowing to dedicated drain.</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2189761-202204-M1	Critical	RSPO P&C 2018 - INA NI 2020 Indicator 2.3.1	16 April 2022	Closed. 12 May 2022.
2189761-202204-M2	Critical	RSPO P&C 2018 - INA NI 2020 Indicator 3.8.7	16 April 2022	Closed. 12 May 2022.
2189761-202204-N1	Minor	RSPO P&C 2018 - INA NI 2020 Indicator 3.2.2	16 April 2022	Open. Until subsequent assessment.
2189761-202204-N2	Minor	RSPO P&C 2018 - INA NI 2020 Indicator 6.1.4	16 April 2022	Open. Until subsequent assessment.
2189761-202204-N3	Minor	RSPO P&C 2018 - INA NI 2020 Indicator 7.3.2	16 April 2022	Open. Until subsequent assessment.

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. Indotruba Tengah-Sekunzir 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)
Governmental Department of Kotawaringin Barat Regency; Governmental Department of Kotawaringin Barat Regency;	Environmental Agency (Mr. S*** – Pollution Department); Manpower Agency (Ms. Nining Agustina); Plantation Agency (Ms. M*** – Monitoring Department)	Phone interviews

Governmental Department of Kotawaringin Barat Regency		
Governmental Department of Kotawaringin Barat Regency Note: no response	Lands Office	Phone interview but no response
Communities	Amin Jaya Village (Mr. K*** – Village Head); Sungai Pakit Village (Mr. K*** – Village Head); Pembuang Hulu II Village (Mr. A*** – Village Head)	Phone interviews
Local Contractor of FFB Transporter	CV Putera Isen Mulang (Mr. S*** – Owner)	Phone interview
Internal Union	Worker Union – SPSI/ <i>Serikat Pekerja Seluruh Indonesia</i> (Ir. J*** – Worker Union Head); Gender Committee (Ms. R*** – Gender Committee Head)	Direct interviews
NGO	Borneo Orangutan Survival (BOS) Foundation (Mr. Eko Prasetyo – Best Management Practices Specialist)	Phone interview
NGO Note: no response	<ul style="list-style-type: none"> - Aid Environment Indonesia - Wetlands Indonesia - Wildlife Conservation Society Indonesia - Lingkar Komunitas Sawit (LINKS) - Orangutan Land Trust - Forest Watch Indonesia - Wahana Lingkungan Hidup Indonesia (WALHI) 	Via Email but no response

Stakeholders comment	
1	<p>Feedbacks: Environmental Agency of Kotawaringin Barat Regency</p> <p>The company has complied with applicable regulations, among others has had environmental document, license of hazardous temporary warehouse, license of POME Land Application, etc. There is no official complaints from stakeholder related environmental issue.</p> <p>However, the Wastewater Management Report has just submitted to the Agency for 4 periods report of 2021 and 2022.</p> <p>Audit Team verification and response:</p> <p>There is no environmental issues based on document review, field observation, and other stakeholder consultation. The previously Waste-water Management Report did not submit to Environmental Agency in the Regency, but in to Provincial due to PT. Indotruba Tengah is located in two regencies. The management committed the further report will be submitted to the Environmental Agency of Kotawaringin Barat Regency.</p>
2	<p>Feedbacks: Manpower Agency of Kotawaringin Barat Regency</p> <ul style="list-style-type: none"> - The company is encouraged to form and report Bipartite Committee (<i>Lembaga Kerjasama Bipartit</i>) even though its already has Labor Union. - OHS Committee Report has been given regularly by the company on a periodic basis (3 months), besides that it has also carried out a mandatory report on labor reports. The workers wage has been given according to 2022 minimum payment. - There is no other negative issue from the stakeholders or in the perspective of Manpower Agency.

	<p>Audit Team verification and response:</p> <ul style="list-style-type: none"> - The auditor verified and reported the company's compliance toward employment and OHS aspects in Criteria 6.1 to 6.7. - Audit team raised OFI for indicator 6.2.7 and 6.7.2 related to core work alignment consistency and communication of safety briefing. - Audit team raised Minor NC on indicator 6.1.4 related to SOP of Employee Recruitment
3	<p>Feedbacks: Plantation Agency of Kotawaringin Barat Regency</p> <ul style="list-style-type: none"> - For the disputed area of 870.31 Ha, since 2011 there was no escalated conflict in the field. The company did not follow up the case considering potential negative social impacts. - The company is encouraged to put community economic development in its CSR program, not only common charity program. Therefore, the impact to the community can be sustainable. - The biannual plantation development report (Laporan Perkembangan Usaha Perkebunan/LPUP) was submitted only to Provincial Plantation Agency. The Plantation Agency of Kotawaringin Barat Regency also need to monitor the plantation development report. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> - There is no land conflict in the disputed land of 870.31 Ha in Seruyan Estate. The current status has been explained under Criterion 4.8. - The company's CSR program received comment from Pembuang Hulu II Village. Audit team issued OFI for indicator 3.2.1, a program related community economic development. - The recent LPUP was not submitted to Plantation Agency in the Regency, but in to Provincial due to PT. Indotruba Tengah is located in two Regencies. The management committed subsequent report scheduled for submission to the Plantation Agency of Kotawaringin Barat Regency.
4	<p>Feedbacks: Amin Jaya Village Head</p> <ul style="list-style-type: none"> - Amin Jaya Village Official give a positive perspective to the company. Because even though the company area does not include in Amin Jaya Village administrative area, CSR programs were regularly given to the village. - There was no negative issue regarding the company. <p>Audit Team verification and response:</p> <p>There is no negative issue to be followed up. The company's social impact assessment (SIA) was based on impact approach, not only based on administrative coverage. Verified and found complied.</p>
5	<p>Feedbacks: Sungai Pakit Village Head</p> <p>The relationship between the company and the community has run quite well and harmoniously. The company as employ village community as company's worker. There is no negative issue in the aspects of CSR program, employment, and environmental.</p> <p>Audit Team verification and response:</p> <p>There is no negative issue to be followed up.</p>
6	<p>Feedbacks: Pembuang Hulu II Village Head</p> <ul style="list-style-type: none"> - For the disputed area of 870.31 Ha, since 2011 there was no escalated conflict in the field. The company did not follow up the case considering potential negative social impacts. - The company is encouraged to disseminate its annual CSR program. Therefore, the Village Head can know what company's program for village development, not only based on request. <p>Audit Team verification and response:</p>

	<p>The company's CSR program also been criticized by Plantation Agency to put community economic development program. Audit team issued OFI for indicator 4.3.1, a program related community economic development.</p>
<p>7</p>	<p>Feedbacks: CV Putera Isen Mulang - Local Contractor of FFB Transporter in Pembuang Hulu II Village</p> <ul style="list-style-type: none"> - The company has utilized local contractor from Pembuang Hulu II Village, which is a original village/local community. - The company has helped the contractor to improve its legality, which was previously individual to has a legal entity as CV (commanditaire vennootschap), that has registered in Law Ministry. - The detailed contractual agreement has been established, including the job description, prices, and payment time. - The contractor has paid its workers with governmental minimum wage, including the provision and payment of employment insurance (BPJS <i>Ketenagakerjaan</i>). <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> - The contractor has legalized formed based on Notarial Deed No. 6 dated 16 September 2021, and has been registered in Law Ministry based on Decree No. AHU-0059443-AH.01.14 Year 2021 dated 17 September 2021. - The auditor has verified the evidence of payment that has been in accordance with contractual agreement. - Evidence of workers payment and employment insurance have been verified and complied.
<p>8</p>	<p>Feedbacks: Head of Worker Union – SPSI (<i>Serikat Pekerja Seluruh Indonesia</i>)</p> <p>The company has provided adequate housing that the temporary housing is regularly upgraded to temporary housing. The payment has been conducted in accordance of government minimum wage decree of 2022. The PPE also has been provided in accordance with HIRAC or MSDS. Regular meeting of Labor Union with Management Representative has been conducted regularly. There is no negative issue related employment and worker welfare.</p> <p>Audit Team verification and response:</p> <p>The auditor has described the company's compliance toward employment and OHS aspects in Criteria 6.1 to 6.7. Audit team issued OFI for indicator 6.2.7 related to core work alignment consistency.</p>
<p>9</p>	<p>Feedbacks: Head of Gender Committee</p> <ul style="list-style-type: none"> - The company has had a policy to protect female workers from sexual harassment in the workplace as well as a grievance mechanism. The company has implemented regulations related to the reproductive rights such as menstruation leave and childbirth leave (3 months), as well as prohibition of pregnant and breastfeeding women to work in chemical area. - The company also has assessed and fulfilled the need of new mothers, by providing monthly 'Posyandu' (monthly venue to consult and assess the need and health condition of pregnant mother and baby under 5 years old) including free vitamins. The company also has provided daycare/creche if the mothers wanted to work again after finishing their childbirth leave. - There is no negative issue related reproduction rights or discrimination based on gender. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> - The auditors have verified documentation concerning reproductive rights, and there is no negative issue raised. - On the Day 3 audit, there was a Posyandu activity (monthly venue to consult and assess the need and health condition of pregnant mother and baby under 5 years old). The auditors have observed clinics

	<p>and daycares/creches in both Sekunyir Estate and Seruyan Estate, as company's provision to fulfill the need of expectant and new mothers.</p> <ul style="list-style-type: none"> - There is no discrimination based on gender. However, the company can not demonstrate that the pregnant women are not discriminated in the recruitment procedure, by giving alternative opportunity in the position that not harmful for the reproduction organ (fetus). The evidence is based on SOP of Employee Recruitment (No. 394/ITH-SOP-26/11 dated 5 January 2022) in Clause 5.3, stated that the pregnant women can not be recruited. It is become a nonconformity against Indicator 6.1.4 minor, that pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. The standard stated alternative equivalent employment is offered for pregnant women.
<p>10</p>	<p>Feedbacks: Borneo Orangutan Survival (BOS) Foundation - Best Management Practices Specialist Staff</p> <ul style="list-style-type: none"> - The company's area is located in the Map of Orangutan Distribution in Borneo (based on Population and Habitat Viability Analysis/ <i>PHVA of 2016</i>) with a high projection. - Since orangutans has a broad cruising range, it is likely for them to get back to the company's area. Therefore, it is important to ensure that the company has had a procedure to handle the conflicts, as well as mitigation plan to prevent it. - It is important to ensure that the company has had management and monitoring plan for HCV and riparian to support the habitats of orangutan. - If the HCV Assessment was conducted in 2010, it is important to ensure that the management and monitoring plan are reviewed regularly considering updated field condition. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> - In the HCV Assessment of 2010, it is mentioned that the company's HCV area is orangutan crossing line with several orangutan appearance based on public consultation. Based on the data, until this audit, there is no appearance of orangutan in company's operational area (HGU). It is then verified through consultation with Village Heads of Pembuang Hulu II, Amin Jaya, and Sungai Pakit, audit team found that there is no appearance of orangutan in company's HGU. However, but in villagers area of Pembuang Hulu II around 4 years ago, and appearance of orangutan nest around 2 years ago. - The company has demonstrated HCV updated management and monitoring plan to support orangutan habitat. Based on field observation, this HCV of riparian is well managed by planting trees and installing riparian marking and signboards. HCV area maintain intact even though felling/land clearing activities performed as part of replanting program.
<p>11</p>	<p>Feedbacks:</p> <ul style="list-style-type: none"> - Aid Environment Indonesia - Wetlands Indonesia - Wildlife Conservation Society Indonesia - Lingkar Komunitas Sawit (LINKS) - Orangutan Land Trust - Forest Watch Indonesia - Wahana Lingkungan Hidup Indonesia (WALHI) <p>Note: <i>The audit team sent emails to these NGOs on 4 April 2022, asking for comment or advice concerning this audit. However, until closing meeting, there was no reply of feedback from them (except from Borneo Orangutan Survival Foundation above.</i></p> <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> -

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List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Nil					
<p><i>Assessor Notes:</i> Based on review of legality documents (HGU Decree, HGU Certificate and Risalah Panitia B) and interview with management, Village Heads and Plantation Agency, it is found that the HGU areas were came from government land bank that initially was purposed for transmigration program. Due to the failure of the transmigration program, the government offered the land to investors. Therefore, there was no land acquisition process to the individual landowners or customary rights and no FPIC related process.</p>					

Previous land owner / user comment	
	<p>Feedbacks: <i>Note: Based on review of legality documents (HGU Decree, HGU Certificate and Risalah Panitia B) and interview with management, Village Heads and Plantation Agency, it is found that the HGU areas were came from government land bank that initially was purposed for transmigration program. Due to the failure of the transmigration program, the government offered the land to investors. Therefore, there was no land acquisition process to the individual landowners or customary rights and no FPIC related process.</i></p>
	<p>Audit Team verification and response: -</p>

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.

Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that PT. Indotruba Tengah – Sekunyir POM has complied with the Indonesia National Interpretation 2020 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that PT. Indotruba Tengah – Sekunyir POM is certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Pratama Agung Sedayu	Name: Alagendram Maniam
Company Name: On behalf BSI Services Malaysia Sdn Bhd	Company Name: PT. Indotruba Tengah – Sekunyir POM
Title: Lead Auditor	Title: Head of Sustainability and Quality Management
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 14 May 2022	Date: 17 May 2022

Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
<p>Principle 1: Behave ethically and transparently 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>			
1.1.1	<p>(C) Management documents that are specified in the RSPO P&C are made publicly available.</p>	<p>PT. Indotruba Tengah has prepared procedure for handling information request as per "SOP Permintaan Informasi No.01/SPO/2016 rev.00" dated 1 April 2016. The procedure "Section VI. Waktu Penyampaian Informasi" has explained the responsible of PIC and time frame for the responses of the request on information max. 1 week for request not requiring Head of Department approval; if requiring Head of Department approval max. 1 month. PT. Indotruba Tengah - Sekunyir POM has identified the relevant stakeholder updated in 8 April 2022, such as: government agencies, contractor, NGO, head of village, community organization, labor organization and supplier.</p> <p>As per "SOP Permintaan Informasi No.01/SPO/2016 rev.00" dated 1 April 2016. The procedure "Daftar Dokumen Yang Boleh Diberikan kepada Para Pihak", there are 29 type of document of information, including; land titles/user rights, occupational health and safety plans, plans and impact assessments relating to environmental and social impacts, HCV & HCS documentation, pollution prevention and reduction plans, negotiation procedure, and details of complaints and grievances, continuous improvement plans.</p>	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p>	<p>PT. Indotruba Tengah refers to Memorandum No.028/PSQM-UM/VII/2012 dated 31 July 2012, stating that 8 policies and other documents available for public made available in each operating unit, based on request.</p>	Complied

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		Based on site visit to Sekunyir POM, Sekunyir Estate and Seruyan Estate, the copy of 8 Company Policies were put on board, available in English and Bahasa Indonesia.	
1.1.3	(C) Records of requests for information and responses are maintained.	<p>Requests for information are responded by the department concerned in accordance with their authority, provided at "Rekaman Permintaan Informasi dan Tanggapan", in 2020 there was 4 information requested, such as:</p> <ul style="list-style-type: none"> • Dated 25 May 2020, coming form Insurance Office (BPJS Ketenagakerjaan) related to request to attending the regulation of BPSJ Ketenagakerjaan (work insurance) – has responded on 26 May 2020. Closed. • Dated 3 March 2020, coming from Hanau Sub District Agency related to request for transportation unit assistance. Has been followed up on 3 March 2020. Closed. <p>In 2021 there was 6 information requested, such as:</p> <ul style="list-style-type: none"> • Dated 2 June 2021, coming from "Surat Sekretaris Daerah Kabupaten Seruyan No.66-0/893/DLH/VI/2021" related to "Undangan Peringatan Hari Lingkungan Hidup". Has been followed up by attending the meeting on 5 June 2021. Closed. • Dated 2 August 2021, coming from Letter No.560/DRG/VIII/2021 "Kantor Desa Derangga-Kecamatan Hanau, Kabupaten Seruyan" related to recommendation to fulfil request from student of IAIN Palangka Raya for Muslim bodies casket. Has been followed up through approval inter office mail No.166/SRE-AC/VIII/2021 on 6 August 2021. Closed. • PT. Indotruba Tengah sent report to Badan Koordinasi Penanaman Modal Kabupaten Kotawaringin Barat, Report No.1174115, status Approved on 8 October 2021. <p>As of March 2022 there was 3 information requested, such as:</p> <ul style="list-style-type: none"> • Dated 13 February 2022, coming from "BPJS Kesehatan No.108/VIII-07/0122" related to compliance review on: worker database, worker not registered with insurance, payslip for worker dated 20 January 2022. Has 	Complied

		<p>been followed up through letter "No014/SRE-Eks/I/2022/s Laporan Pemeriksaan Kepatuhan BPJS Kesehatan" on 19 January 2022. Closed.</p> <p>Records of response of request information documented in the same book, consist of person handle the request, information given and acknowledgement from the person in-charge and signature. Record of incoming communication available in each estate and mill unit.</p>	
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p>	<p>PT. Indotruba Tengah has prepared procedure for handling information request as per SOP No.394/ITH-KOM-01/11, revision 01. The procedure has explained: the responsible of PIC and time frame for the responses of the request on information no later than 15 days.</p> <p>The procedur has been communicate to relevant stakeholder on 17 July 2021, attended by 15 community representatives: Polsek Pangkalan Banteng, Koramil Pangkalan Banteng, Kecamatan Pangkalan Banteng, Amin Jaya village, Sungai Pakit village, Pembuang Hulu II village, Karang Mulya village, Derangga village, PT. Indotruba Tengah identified the relevant stakeholder updated in 8 April 2022, such as: government agencies, contractor, NGO, head of village, community organization, labor organization and supplier.</p>	Complied
1.1.5	<p>An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.</p>	<p>PT. Indotruba Tengah identified the relevant stakeholder updated in 8 April 2022, such as:</p> <ul style="list-style-type: none"> - government agencies: Pemerintah Kabupaten Seruyan, Pemerintah Kabupaten Kotawaringin Barat, Dinas Tenaga Kerja & Transmigrasi Wilayah III Pengawasan Ketenagakerjaan Kabupaten Kotawaringin Barat, Balai lingkungan Hidup Kabupaten Kotawaringin Barat, Dinas Tanaman Pangan Hortikultura dan Perkebunan Kabupaten Kotawaringin Barat - contractor/suppliers; - NGOs; - head of villages/ community organization: Camat Pangkalan Banteng, Camat Hanau, komandan Rayon Militer Pangkalan Banteng, Polisi Sektor Hanau, Polisi Sektor Pangkalan Banteng, Desa Amin Jaya, Desa Pembuang Hulu II, 	Complied

		Desa Sungai Pakit, Tokoh Masyarakat Derangga, Tokoh Masyarakat Amin Jaya SP1, - labor organization: SPSI PUK PT. ITH	
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.	PT. Indotruba Tengah referring to “Kode Etik Bisnis Minamas 2019” which referring to Code of Business Conduct Handbook Sime Darby Plantation, August 2018”. This policy on the conduct of fair and ethical business on all transactions and business operating, including the prohibition of all forms of corruption, bribery and fraud in the use of funds and resources; to avoid conflict of interest; corporate hospitality; donation and sponsorship; communication and other policies.	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	PT. Indotruba Tengah already has a system or mechanism to monitor the implementation of company policies including the company code of ethics. In every transaction resulting from the work that has been completed.	Complied
Principle 2: Operate legally and respect rights			
Implement legal requirements as the basic principles of operation in any jurisdiction.			
Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The unit of certification complies to relevant regulations.	PT. Indotruba Tengah has shown the updated list of legal requirement up to year 2022. All legal requirements comply with the regulations and laws, including those related to land status, occupational health and safety, environmental, labour, agricultural practice, and mill operation, such as: <ul style="list-style-type: none"> Establishment Deed “Perseroan Terbatas PT. Indotruba Tengah No.178”, dated 13 March 1990. Registration to Ministry of Law “Keputusan Menteri Kehakiman Republik Indonesia No.C2-1164.HT.01.01.Th’91” dated 30 March 1991. Environmental Permit Approval “Surat Menteri pertanian Republik Indonesia No.020/RKL-RPL/BA/X/94, Perihal Persetujuan RKL-RPL Perkebunan Kelapa 	Complied

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		<p>Sawit dan Pabrik Minyak Sawit PT. Indotruba Tengah” dated 18 October 1994.</p> <ul style="list-style-type: none"> • Land title of Land Use Right (HGU), issued by Minister of Agrarian and Chief of National Land Agency – presented in four HGU certificate documents, which was about 7,734.60 Ha, such as: <ul style="list-style-type: none"> - HGU number 04/1988, covered 3.260 Ha – valid until 24 September 2033, based on “Surat Keputusan Menteri Negara Agraria/Kepala Badan Pertanahan Nasional” No. 152/HGU/BPN/97, dated 26 September 1997. - HGU number 05/1988, covered 829.2 Ha – valid until 24 September 2033, based on “Surat Keputusan Menteri Negara Agraria/Kepala Badan Pertanahan Nasional” No. 11/HGU/BPN/99, dated 11 April 1998. - HGU number 05/1988, covered 740.4 Ha – valid until 23 June 2033, based on “Surat Keputusan Menteri Negara Agraria / Kepala Badan Pertanahan Nasional” No.10/HGU/BPN/98, dated 2 April 1998. - HGU number 06/1988, covered 2,905 Ha – valid until 23th June 2033, based on “Surat Keputusan Menteri Negara Agraria / Kepala Badan Pertanahan Nasional” No.13/HGU/BPN/98, dated 2 April 1998. • Business permit as shows in document of “Surat Pendaftaran Usaha Perkebun (SPUP) No. 700/Menhutbun-VII/200” dated 21 June 2020, issued by Minister of Forestry and Plantation, covered 7,734.60 Ha and processing unit (POM) with permitted capacity 45 tonnes FFB/hour and installed capacity 30 tonnes FFB/hour. • Degree of plantation operation assessment (Penilaian Usaha Perkebunan), category: 2nd class, based on Degree of Governor of Central Kalimantan, No.188.44/81/2019. • Permit for Land Application: “Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Kabupaten Kotawaringin Barat No.503/010/LH/DPMPTSP.D tentang Izin Pembuangan Air Limbah kepada Perkebunan Kelapa Sawit PT. Indotruba Tengah” dated 10 July 2020, valid up to 30 June 2025. The land application permitted for plantation area of 	
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		<p>224 Ha in 10 blocks.</p> <ul style="list-style-type: none"> • Permit for water extraction: "Keputusan Menteri Pekerjaan Umum dan perumahan Rakyat No.284/KPTS/M/2021 tentang Pemberian Izin Pengusahaan Sumber Daya Air Kepada Perseroan Terbatas Indotruba Tengah untuk Operasional Pabrik Pengolahan Kelapa Sawit di Sungai Bahaya Kabupaten Kotawaringin Barat Provinsi Kalimantan Tengah" dated 9 March 2021, valid for 5 years. The water intake debit 333.33 liters/second from Bahaya river. • Permit for hazardous waste storage "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Kabupaten Kotawaringin Barat No. 553/011/DPMPTSP-III/LH/2018 tentang Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun kepada PT. Indotruba Tengah-PKS Sekunzir", dated 25 September 2018 and valid until 5 years. • Company registration: "Nomor Induk Berusaha No.8120118100583 PT. Indotruba Tengah" dated 8 November 2018. • Sterilizer No.1 "Akta Izin No.18/Kab/B.0083A" dated 25 May 2005"; inspection as per "Surat Keterangan Memenuhi Persyaratan K3 No.566/2203/PUBT/X/2021" dated 3 November 2021 and "Sertifikat Pemeriksaan dan Pengujian No.1120.Insp.JBM/X/2021 Bejana Uap No.01 PT. Indotruba Tengah MAWP 3.1 kg/cm²" dated 1 November 2021, valid 1 year. • Back Pressure Vessel "Akta Izin No.18.W.14.KW/B.0018A" dated 9 February 1996; inspection "Sertifikat Pemeriksaan dan Pengujian No.1124.Insp.JBM/X/2021 Bejana Uap Back Pressure Vessel DBE/062/95 PT. Indotruba Tengah MAWP 3.4 kg/cm²" dated 1 November 2021, valid 1 year. • Steam turbine "Akta Izin No.25/W14/Turbin/1999" dated 10 December 1999; inspection "Sertifikat Pemeriksaan dan Pengujian No.858.Insp.JBM/X/2021 Turbin Uap Shinko 99494 PT. Indotruba Tengah cap.1060 kW" dated 1 November 2021, valid 1 year. 	
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		<ul style="list-style-type: none"> • Diesel Motor "Pengesahan Pemakaian Motor Dese No.161.HIPK.06.2007" dated 29 March 2007; inspection "Sertifikat Pemeriksaan dan Pengujian No.860.Insp.JBM/X/2021 Genset Motor Diesel Cummins C500 DSE PT. Indotruba Tengah 455KVA" dated 1 November 2021, valid 1 year. • Steam boiler "Akta Izin No.18/KAB/B.118" dated 19 July 2010; inspection "Surat Keterangan Memenuhi Persyaratan K3 No.566/2210/PUBT/X/2021" dated 3 November 2021 and "Sertifikat Pemeriksaan dan Pengujian No.1127.Insp.JBM/X/2021 Ketel Uap Vickers Hoskins 35 tonnes/hour PT. Indotruba Tengah" dated 1 November 2021, valid 1 year. • Hoisting Crane "Izin Pemakaian Pesawat Angkat Hoisting Crane No.01/W.14/I.PA/1996" dated 9 February 1996; inspection "Surat Keterangan Memenuhi Persyaratan K3 No.566/2214/PAA/X/2021" dated 3 November 2021 and "Sertifikat Pemeriksaan dan Pengujian No.882.Insp.JBM/X/2021 Hoist Crane Demag 5 tonnes PT. Indotruba Tengah" dated 1 November 2021, valid 1 year. • Lightning arrester "Sertifikat Penggunaan Instalasi Penyalur Petir No.01/W.14/S-PT/1996" dated 9 February 1996; inspection "Surat Keterangan Tidak Memenuhi Persyaratan K3 No.566/2220/IPP/X/2021" dated 3 November 2021 and "Sertifikat Pemeriksaan dan Pengujian No.332.Insp./PJK3/JBM/X/2021 Instalasi Penyalur Petir PT. Indotruba Tengah" dated 1 November 2021, valid 1 year. <p>As action to comply, PT. Indotruba Tengah appoint CV Arif Bersaudara to renovate the lightning arrester, minutes of handover 10 November 2021. Sighted work agreement: "Surat Perjanjian Kerja Pembuatan Tower Penangkal Petir PT Indotruba Tengah-Sekunzir POM & CV Arif Bersaudara No.23/SKF/SPK-LKL/X/2021" dated 8 October 2021.</p> <ul style="list-style-type: none"> • Hydrant "Surat Keterangan Memenuhi Persyaratan K3 No.566/2221/IPP/X/2021" dated 3 November 2021 and "Sertifikat Pemeriksaan dan Pengujian No.113.Insp/PJK3/JBM/X/2021 Hydrant Kebakaran PT. Indotruba Tengah" dated 1 November 2021, valid 1 year. 	
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		The list of relevant regulation available in each office, and the copy of legal is under supervision of PSWM Department.	
2.1.2	A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.	<p>PT. Indotruba Tengah demonstrated list of applicable regulation and legislation under "Daftar Peraturan Terkait RSPO-ISPO Tahun 2022", updated by Assistant PSD L, D & L on 24 January 2022. The list comprise of 51 Undang-undang/Act; 49 Peraturan Presiden/President Regulation; 4 Instruksi Presiden/President Instruction; 7 Keputusan Presiden/President Decree; 141 Keputusan dan Peraturan Menteri/Ministerial Decree; 1 Governor Decree.</p> <p>PT. Indotruba Tengah has "SOP Persyaratan Hukum No.011/PH-GP/I/II/11" dated 10 February 2011. Section 5. PIC stated PSD Department and ESH Manager responsible for identifying and inventory and evaluating compliance of all applicable legal and statutory requirement related to OHS, Environmental, Activity, Product, Service of Company; responsible to summarize the applicable legal and statutory requirements; to communicate applicable legal and statutory evaluation to all operating unit and other parties; to maintain the copy of applicable legal and statutory document obtained; to monitor the implementation of applicable legal and statutory.</p> <p>Manager is responsible to communicate applicable legal and statutory evaluation to all subordinates; to understands the legal responsibility; to revise relevant document when new applicable legal and statutory occurs.</p> <p>Control and monitoring was regulated under the SOP; Section 6.2 Compliance stipulates PSD Department, Group Hukum & Perizinan and ESH Manager shall: identifying new regulation applicability, review the impact for current activity/operation; identifying the steps to comply; communicating to all parties, including contractor; monitor the performance through inspection, operational data analysis, internal audit and external audit.</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.	PT. Indotruba Tengah demonstrated the record on report of inspection and monitoring of legal boundaries – last report on 14-15 January 2022, conducted by Internal Inspection Team consisted of PSD, PSQM and POD. There was	Complied

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		<p>identified 46 poles – the pole position is accordance with legal boundary poles map – issued by National Land Agency (BPN). Verified:</p> <p>Pole No.23 – reported OK, field visit to location in Seruyan Estate field A018 block A34; boundary with plantation company PT. Tapian Nadenggan; GPS S 2° 25' 37.0" & E 112° 4' 52.2";</p> <p>Pole No.24 – reported OK, field visit to location in Seruyan Estate field B017 block B34; boundary with plantation company PT. Tapian Nadenggan; GPS S 2° 24' 24.4" & E 112° 4' 54.4";</p> <p>Pole No.25 – reported OK, field visit to location in Seruyan Estate field C017 block C34; boundary with plantation company PT. Tapian Nadenggan; GPS S 2° 25' 10.56" & E 112° 4' 52.5";</p> <p>Pole No.26 – reported OK, field visit to location in Seruyan Estate field C017 block C34; boundary with company plantation PT. Tapian Nadenggan; GPS S 2° 25' 41.5" & E 112° 4' 51.5";</p> <p>Pole No.12 – reported OK, field visit to location in Sekunyir Estate field B003 block B09; boundary with community land/oil palm plot; GPS S 2° 25' 3.11" & E 112° 0' 32.7";</p> <p>Pole No.13 – reported OK, field visit to location in Sekunyir Estate field B003 block B09; near community land/Amin Jaya village; GPS S 02° 24' 23.38" & E 112° 0' 39.5";</p> <p>Pole No.14 – reported OK, field visit to location in Sekunyir Estate field A006 block A10; adjacent to community land; GPS S 2° 23' 54.9" & E 112° 0' 44.8";</p> <p>Pole No.15 – reported OK, field visit to location in Sekunyir Estate field A006 block A10; boundary with plantation company PT. Bumi Jaya Alam Permai; GPS S 2° 23' 33.8" & E 112° 0' 51.2";</p> <p>Areas checked and no planting beyond the boundary poles.</p>	
Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is available.	PT. Indotruba Tengah demonstrated the list of contracted parties.	Complied

		<p>In 2021 there was contractor for lightning arrester construction, contract verification:</p> <ul style="list-style-type: none"> • "Surat Perjanjian Kerja Pembuatan Tower Penangkal Petir PT Indotruba Tengah-Sekunyir POM & CV Arif Bersaudara No.23/SKF/SPK-LKL/X/2021" dated 8 October 2021. <p>As of March 2022 there was contractor for replanting PT. Karya Murni Prima and FFB transportation i.e. CV Putra Isen Mulang. Contract verification:</p> <ul style="list-style-type: none"> • Contract of replanting as per "Addendum I Surat Perjanjian Kerja Replanting PT. Indotruba Tengah dan PT. Karya Murni Prima No.006/Replanting/ITH-SRE/IV/2019" dated 26 February 2021. <p>Contract of FFB transport as per "Surat Perjanjian Kerja No. SKE/SPK-LKL/I/2022006" dated 2 January 2022.</p>	
2.2.2	All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.	<ul style="list-style-type: none"> • Contract of FFB transport as per "Surat Perjanjian Kerja Pengangkutan TBS & Berondolan, Angkut Alat Panen, Angkut Karyawan, Angkut Pupuk, Angkut Sampah, dan Angkut Lain-lain PT Indotruba Tengah – CV Putra Isen Mulang No. SKE/SPK-LKL/I/2022006" dated 2 January 2022 – Section 7.8 stipulated - always comply to all legal requirement, including from local government and public official referring and relevant to laws relate to implementation of agreement and other requirement related to health, safety, environment and manpower, including but not limited to prohibit under age worker and illegal worker. <p>Evidence for checking requirement from transport contractor: Work permitNo.006/SKE-K3/I/2022 dated 8 January 2022: 1 unit prime mover, 2 dump truck, 3 drivers; no worker under 18 years old; fire extinguisher; PPE: helmet, safety shoes;</p> <ul style="list-style-type: none"> • "Surat Perjanjian Kerja Pembuatan Tower Penangkal Petir PT Indotruba Tengah-Sekunyir POM & CV Arif Bersaudara No.23/SKF/SPK-LKL/X/2021" dated 8 October 2021. Chapter 12 stipulated contractor shall follow law and regulation related to health and safety, manpower. 	Complied

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		Evidence for checking requirement from construction contractor: Work permit – high risk job CV Arif Bersaudara, 7 November 2021; 2 workers, more than 18 years old; PPE: full body harness, safety rope, safety shoes, helmet, etc.	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.	<p>Contract of FFB transport as per "Surat Perjanjian Kerja Pengangkutan TBS & Berondolan, Angkut Alat Panen, Angkut Karyawan, Angkut Pupuk, Angkut Sampah, dan Angkut Lain-lain PT. Indotruba Tengah – CV Putra Isen Mulang No. SKE/SPK-LKL/I/2022006" dated 2 January 2022 – Section 7.8 stipulated - always comply to all legal requirement, including from local government and public official referring and relevant to laws relate to implementation of agreement and other requirement related to health, safety, environment and manpower, including but not limited to prohibit under age worker and illegal worker.</p> <p>Based on stakeholder consultation, audit team meet the transport contractor and he confirmed the requirement stipulated in contract being uphold by contractor and checked through "Izin Kerja"/work permit; stating the contractor meet contract requirement and eligible for work:</p> <ul style="list-style-type: none"> - Establishment deed/"Akta Notaris Yongky Irawan SH., M.Kn. No.6 untuk CV Putera Isen Mulang" dated 16 September 2021. Registered in Ministry of Justice "Surat Keterangan Terdaftar CV Putera Isen Mulang No.AHU-0059443-AH.01.14 Tahun 2021" dated 17 September 2021; - Social insurance membership/"Sertifikat Kepesertaan BPJS No.2100000001184621 CV Putra Isen Mulang", dated 11 October 2021; <p>Company registration/"Perizinan Berusaha Berbasis Resiko Nomor Induk Berusaha CV Putera Isen Mulang No.1410210016294", 14 October 2021.</p>	Complied
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; 	PT. Indotruba Tengah – Sekunzir POM mainly received and process FFB coming from company-owned estate, Sekunzir Estate and Seruyan Estate.	Non-compliance

	<ul style="list-style-type: none"> • Proof of ownership status, right/claim of the land by grower/smallholder; • If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. 	<ul style="list-style-type: none"> - Information regarding geolocation of FFB origins was similar to palm oil mill details (under same company) see Section 1; - Proof of ownership (under same company) land title see 2.1.1; - Business license (under same company) of Business permit as in document of "Surat Pendaftaran Usaha Perkebun (SPUP) No. 700/Menhutbun-VII/200" dated 2020. <p>As of 21 March 2022, PT. Indotruba Tengah – Sekunyir POM received FFB from non-certified oil palm plantation company PT. Indotruba Timur, "Surat Pengantar Buah dan Berondolan No.0169/SPB/I/ITR-X/04/2022 for delivery 644 bunches" – Weighbridge ticket No.260548 date 9 April 2022 for 7,395 kg FFB. In record "Statistik Produksi SKF" received 590.17 MT FFB from PT. Indotruba Timur as of 31 March 2022.</p> <p>Minamas Plantation prepared report "Laporan Responsible Sourcing Guideline for 3rd party FFB PT. Indotruba Timur to Sekunyir Factory No.SQM/RSG/2022/01" dated 31 January 2022. The report reviewing the readiness of non-certified FFB supplies from PT. Indotruba Timur: planting year (before and after 2010); environmental aspect (location against peat area, national park, conservation area, protected forest and production forest); social aspect (internal and external disturbance); financial aspect (i.e. tax issues). The report results stated low risk because no peat area in concession, no national park, conservation area, protected forest and production forest in the concession, "Pelepasan Kawasan Hutan of 1,164.75 Ha" in 13 May 2019.</p> <p>CH demonstrates operating license PT. Indotruba Timur: "Keputusan Bupati Seruyan No.188.45/343/2019 tentang Izin Usaha Perkebunan untuk Budidaya (IUP-B) atas nama PT. Indotruba Timur" dated 21 August 2019 for plantation of 1,253.8 Ha.</p> <p>CH demonstrates the land title is in process, HGU not issued; "Surat Keputusan Bupati Seruyan No.188.45/90/26 tentang Perubahan dan Perpanjangan Izin Lokasi Seluas 10,500 Ha Menjadi 1,253.8 Ha untuk Keperluan Pelepasan</p>	
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		<p>Kawasan Hutan atas nama PT. Indotruba Timur di Desa Pembuang Hulu II Kecamatan Hanau, Kabupaten Seruyan”.</p> <p>Critical Non-conformity: Certificate Holder cannot demonstrate fulfilment of directly sourced FFB in form of proof of ownership status, right/claim of the land by grower.</p>	
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1.	<p>PT. Indotruba Tengah – Sekunyr POM mainly received and process FFB coming from company-owned estate, Sekunyr Estate and Seruyan Estate.</p> <ul style="list-style-type: none"> - Information regarding geolocation of FFB origins was similar to palm oil mill details (under same company); - Proof of ownership (under same company); - Business license (under same company) of Business permit as in document of “Surat Pendaftaran Usaha Perkebun (SPUP) No. 700/Menhutbun-VII/200” dated 2020. <p>There is no indirectly source FFB.</p>	Complied
<p>Principle 3: Optimise productivity, efficiency, positive impact and resilience Implement plans, procedures and systems for continuous improvement.</p>			
<p>Criteria 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</p>			
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>PT. Indotruba Tengah has provided long-term management plan in document “Bisnis Plan PT. Indotruba Tengah”. This document described the five-year business projection, stating the business pan for 2022-2026 of PT. Indotruba Tengah.</p> <p>The long-term management plan covered parameter as follows:</p> <ul style="list-style-type: none"> • Estimation of seedling requirements • Projection of FFB production (MT) • Projection of Oil Extraction and Kernel Extraction (%) 	Complied

		<ul style="list-style-type: none"> • Projection of CPO production (MT) • Projection of PK production (MT) • Estimation of CPO (IDR/MT) • Estimation of PK (IDR/MT) • Estimation of Revenue (IDR) • Estimation of Production Cost (IDR/MT CPO) • Replanting Program (Ha) <p>Estimated production of PT Indotruba Tengah FY 2022-2026:</p> <table border="1" data-bbox="1003 726 1910 1007"> <thead> <tr> <th>Description</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>FFB Production (MT)</td> <td>106,120</td> <td>104,601</td> <td>108,590</td> <td>105,270</td> <td>105,260</td> </tr> <tr> <td>OER (%)</td> <td>23.25</td> <td>23.25</td> <td>23.25</td> <td>23.50</td> <td>23.50</td> </tr> <tr> <td>KER (%)</td> <td>4.50</td> <td>4.70</td> <td>4.70</td> <td>4.70</td> <td>4.70</td> </tr> <tr> <td>CPO Production (MT)</td> <td>24,673</td> <td>24,320</td> <td>25,247</td> <td>24,738</td> <td>24,736</td> </tr> <tr> <td>PK Production (MT)</td> <td>4,775</td> <td>4,916</td> <td>5,104</td> <td>4,948</td> <td>4,947</td> </tr> </tbody> </table> <p>PT. Indotruba Tengah demonstrates "Independent Auditors Report to the Shareholders, by Buntoro Rianto (CPA No.AP.0235) from Kantor Akuntan Publik Tanudiredja, Wibisana, Rintis & Rekan", dated 25 March 2021. The audit opinion "in our opinion, the accompanying financial statement present fairly, in all material respects, the financial position of PT. Indotruba Tengah as at 31 December 2020, and its financial performance and cash flows for the year then ended, in accordance with Indonesian Financial Accounting Standards.</p>	Description	2022	2023	2024	2025	2026	FFB Production (MT)	106,120	104,601	108,590	105,270	105,260	OER (%)	23.25	23.25	23.25	23.50	23.50	KER (%)	4.50	4.70	4.70	4.70	4.70	CPO Production (MT)	24,673	24,320	25,247	24,738	24,736	PK Production (MT)	4,775	4,916	5,104	4,948	4,947	
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3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	<p>The five-year replanting program period as follows:</p> <table border="1" data-bbox="1003 1337 1695 1382"> <thead> <tr> <th>Year</th> <th>Program (Ha)</th> <th>Realization (Ha)</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Year	Program (Ha)	Realization (Ha)				Complied																														
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		<p><i>*) period Jun-Dec 2020</i></p> <p>Based on the replanting record and replanting activity photos, there is no fire usage during the process. All process proceeds by heavy weight for palm felling, chipping, pry the roots, digging etc.</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>Management review carried out on 15 February 2021, discussing matters such as:</p> <ul style="list-style-type: none"> - Legal boundary marking, - Avoid instigating violence - Pesticide use record (including LD50) and pesticide storage and disposal control - OHS Training and PPE provision as per risk analysis; Emergency Response Plan; - Identification of Green House Gas emission <p>Replanting realization "Realisasi Replanting Program Sekunyir Estate Jan-Dec 2020": felling chipping for 279.44 Ha (38,946 palms) in June-October 2020; pry the root 279.44 Ha (38,946 palms) in June-November 2020; Construction of new</p>			Complied																								

		<p>collection road (3,630 meters) in October-November 2020; Construction of middle drain (5,786 meters) in July-November 2020; Terrace construction width 5.1 meters (4,917 meters) in August-October 2020; Planting hole 279.44 Ha (44.664 holes) in August-December 2020; Cambering in July-December 2020 (187,939 meters); Planting palm 279.44 Ha in August-December 2020 (44,664 palms); planting legume cover crop August-December 2020 for 279.44 Ha.</p> <p>Management review of social aspect and impact conducted on 6 January 2022, discussing matters such as:</p> <ul style="list-style-type: none"> • Occupational aspects; • Public services; • Economic development of surrounding communities; • FPIC and conflict resolutions; • Environment aspects. <p>Managemet review on 8 April 2022 discussing internal audit result and status of corrective action. Internal audit conducted on 24-26 February 2022 resulting 9 critical NC and 5 minor NC issued related to implementation of RSPO P&C Indonesia NI 2020. Correction and Corrective Action have been determined and implemented, due date on 8 April 2022.</p> <p>Latest internal audit of RSPO P&C carried out by Mr. Tjahjo Moeljo Widjajanto and Mr. Asmara Hadi. Mr. Tjahjo has been trained with RSPO Internal Audit based ISO19001:2002 by PT. Bumi Hijau Cemerlang on January 2011. Mr Asmara Hadi demonstrate training certificate titled Understanding and Implementing RSPO SCCS, by Mutu Institute, 21-22 December 2020.</p> <p>NCR issued related indicator 1.1.1; 1.1.3; 2.2.3; 2.2.2; 3.3.3; 3.4.2; 6.7.2; 6.7.3; 7.2.2; 7.2.10; 7.3.2; 7.10.1; and 7.12.2. Based on minutes of management review, all non-conformities from internal audit have been closed out.</p> <p>Management review conducted as per requirement stating management review carried out after internal audit and prior to external audit, with minimum once in 12 months (1 year). The latest management review carried out on 8 April</p>	
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		2022, attended by all unit head, internal auditor and COU of PT. Indotruba Tengah.																					
<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	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification.</p>	<p>Estate has Kaizen Charter: To reduce harvesting cost by improving harvesting productivity and to reduce FFB transport from IDR 50 to IDR 48/kg. Another continual improvement implemented by Estates is collecting FFB using Mini Tractor Prime Mover, therefore increase the productivity of FFB transport. Observed during field visit at Block A21 Division 3 Sekunyir Estate and Block B25 Division 1 Seruyan Estate.</p> <p>Palm Oil Mill has Initiatives to Saving Cost in Sekunyir Factory: Reduce cost for lorry's bushing by replacing metal bushing with polyp lush; replacement of blowdown silencer using material ex-sterilizer coming from Sukamandang Factory; Replacement of rotary airlock fibre cyclone No.2.</p>	Complied																				
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.</p>	<p>Unit of certification has submitted RSPO Metric Template to CB during this recertification assessment, however there are some discrepancy between data in RSPO Metric Template against data in "Statistik Produksi SKF".</p> <p>Based on review to RSPO Metric Template and data "Statistik Produksi SKF", obtained data below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">Product</th> <th>RSPO Metric Template</th> <th>"Statistik Produksi SKF"</th> </tr> <tr> <th>MT</th> <th>MT</th> </tr> </thead> <tbody> <tr> <td colspan="3">Period Jan-Dec 2021</td> </tr> <tr> <td>CPO</td> <td>25,523.84</td> <td>24,077.68</td> </tr> <tr> <td>PK</td> <td>4,693.06</td> <td>4,632.099</td> </tr> <tr> <td colspan="3"> </td> </tr> <tr> <td colspan="3">Period Mar 2021-Feb 2022</td> </tr> </tbody> </table>	Product	RSPO Metric Template	"Statistik Produksi SKF"	MT	MT	Period Jan-Dec 2021			CPO	25,523.84	24,077.68	PK	4,693.06	4,632.099				Period Mar 2021-Feb 2022			Non-compliance
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CPO	24,799.85	23,647.037							
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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>Standard Operating Procedures for estate and mill operation has been established. SOP for estate is available on Minamas Plantation Agricultural Reference Manual (ARM) Oil Palm Planting No.POLICY:110/EST-ARM/13 dated 16 September 2013.</p> <p>SOP for palm oil mill is available on Palm Oil Mill manual No.POLICY:1110/POD-FAC/2007 and POLICY:130/POD-FAC/07 dated 30 April 2007.</p>	Complied						
3.3.2	A mechanism to check consistent implementation of procedures is in place.	<p>The company has established mechanism to check consistent implementation of procedures under SOP 721/TQEM-PKA/08; dated 12/06/2008; "Pedoman Kerja Asisten Lapangan TQEM" and SOP SDP/GSQM/SORASOP/01; dated 07/01/2019; Structured Oil Recovery Assessment (SORA). The objectives of the procedure are to check if the result of work are in accordance with existing procedures; to evaluate the work and keep in accordance with the standards; to use as a reference for making improvements. Inspections are carried out on items related to harvesting, weeding, manuring, pest and disease, replanting and nursery, covers: checking of harvesting quality, FFB grading at palm oil mill, checking of OHS, mill cleanlines evaluation, and monitoring of delivery and palm products loading/unloading.</p>	Complied						

3.3.3	Records of monitoring and any actions taken are maintained and available.	<p>PT. Indotruba Tengah monitors operational activity in all level of workers. Each field supervisor has equipped with monitoring sheets/worksheets. For example, harvesting supervisor collected harvesting record and quality of each harvesters. The report submitted to estate manager daily.</p> <p>In palm oil mill, daily operational activity recorded in daily worksheet by mill supervisor before reported to the mill manager.</p> <p>To ensure the result of operational activity in line with the procedures, mill/estate manager conducted regularly monitoring of and management review to solve the findings issues. All results of management review shall be implemented by respective staff.</p> <p>Estate monitoring: Structured Crop Recovery Assessment dated 10-16 October 2021; checking crop losses, crop quality and crop freshness. Seruyan Estate scored 98.99%. Sekunyir Estate scored 94.83%.</p> <p>Checking on harvesting interval, completion of task, separation of unripe and overripe, checking on average bunch weight.</p> <p>Based on field observation at Block A21 Division 3 Sekunyir Estate and Block B25 Division 1 Seruyan Estate, harvesting activity have been performed according to the SOP and best agricultural practices.</p> <p>POM monitoring: Structured Oil Recovery Assessment (SORA) dated 12-16 October 2021. Sekunyir POM scored 91.60%. Checking for CPO and PK stock deviation; dispatch flowmeter; FFB process and balance declaration; CPO dispatch vs CCTV; Oil and Kernel Losses Declaration; Sludge il recycle into process.</p>	Complied
<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	(C) SEIA in new planting or operation including mills, is conducted independently and participatively by involving the	There is no new planting at PT. Indotruba Tengah – Sekunyir POM and its Supply bases (Sekunyir Estate and Seruyan Estate).	Complied

	<p>affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.</p>	<p>A comprehensive Social and Environmental Impact Assessment (SEIA) has been carried out by PT. Indotruba Tengah (cooperated with independent consultant PT. Anima Rekayasa Perkasa) before development of mill and plantation. SEIA document present in "Laporan Akhir Analisis Dampak Lingkungan (ANDAL) Perkebunan Kelapa Sawit Kumai dan Pabrik Minyak Sawit PT. Indotruba Tengah" year 1993.</p> <p>Aspect of plantation and mill management that have social and environmental impact were identified and listed on SEIA document. SEIA are conducted since 1993 and covered 10,000 Ha plantation areas and maximum mill capacity are 60 MT FFB/hour, this document has been approved by Agriculture Department based on decree No.220/95/B/I/94 dated 17 January 1994 and Approval Letter from Agriculture Department No. 020/RKL-RPL/BA/X/94, dated 18 October 1994.</p> <p>During SEIA, the company conducted stakeholders meeting with surrounding local communities which affected the project. The SEIA has been conducted and documented according to local requirements and include consultation with relevant stakeholders to identify impact and to develop any mitigation measures.</p> <p>Another SIA study also conducted by Aksenta consultant on 24 – 28 August 2009. Final report of SIA document was published on January 2010. SIA study conducted through participative by involving affected stakeholder (surrounding community, local government, company, and non-government organisation). Evidence of stakeholder consultation and focus group discussion were available in the document.</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.</p>	<p>During audit SEIA document were available. Social and environmental management plan and its monitoring have been developed as per RKL – RPL document. RKL – RPL document is part of SEIA document wich has been communicated and involving the affected parties and stakeholder.</p> <p>Social Environment management and monitoring plan to prevent negative impact such as:</p>	Complied

		<ul style="list-style-type: none"> - Soil fertility management and soil erosion prevention by EFB mulching to increase organic material, land cover crop planting, U shape palm oil frond stacking, silt pit and road silt pit development, individual terracing in slope area, mounting, water management and neprolephis planting, appropriate fertilizing according to procedure. - Water quality management to prevent water pollution by waste water management at palm oil mill with land application according to regulation and permit. Water quality monitoring conducted each semester to monitor the water quality met with regulation threshold. - Air quality and noise management by centralized the housing area/emplacement, provision of PPE masker and earmuff for workers at mill, - Biodiversity management and monitoring to enhance and protect the biodiversity within the plantation area by establish HCV area and conserve the HCV area, management and monitoring HCV area, socialization to workers and surrounding community. - Hazardous waste handling and monitoring. Company has develop temporary hazardous waste storage and manage hazardous waste according to regulation. - Fire prevention and mitigation. Company has establish procedure for emergency response and develop the emergency response team; training and simulation related to fire prevention and mitigation; monitoring hotspot and fire during dry season. - Enhance surrounding community economic rate and environment healthy. Company has developing approach programme of CSR. <p>Social Impact Assessment by Aksenta consultant on 24 – 28 August 2009 was prepared with focus group discussion with worker on 25 August 2009; focus group discussion with surrounding community on 26 August 2009. Attendance</p>	
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		<p>from Amin Jaya village, Derangga village, Karang Mulya village, Pembuang Hulu II village.</p>	
<p>3.4.3</p>	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p>	<p>Implementation of social and environmental management and monitoring plan can be demonstrated as per "Laporan Hasil Pelaksanaan RKL – RPL". Report of RKL – RPL were evaluated and reported each semester to government institution (Kementerian Lingkungan Hidup dan Kehutanan) through online system reporting (SIMPEL).</p> <p>The SEIA management and monitoring plan:</p> <ul style="list-style-type: none"> - Maintain soil fertility and erosion: use of EFB, use of POME (incl. monitoring BOD), construction silt pit, road side pit, U-shape frond stacking, platform, maintain <i>Neprolepis</i> , conduct leaf census, fertilizer follow recommendation, monitoring soil fertility in land application, monitoring erosion - Water quality and Effluent management: using POME pond installation, and POME land application, monitoring and recording effluent water, monitoring and recording well water, - Air quality and noise: boiler chimney and planting trees around POM, provision of PPE (masker, ear protection and helmet) for worker, monitoring air emission, odor and ambient, monitoring boiler and genset emission and noise - Flora and Fauna Biodiversity: established HCV map, socialization HCV to all staff and worker, prohibit hunting-poaching-poisoning, monitoring HCV, monitoring wildlife - Hazardous waste management: temporary hazardous waste storage with license, transporting hazardous waste with licensed transporter, monitoring hazardous waste balance, reporting to government - Fire Prevention and Fire Control: Establish fire fighting team, training to fire fighting team, prepare fire fighting infrastructure, equipment and tools, fire danger rating and fire risk, - Surrounding community social, economy, culture and health condition: communication, partnership with cooperative for FFB transport, provide 	<p>Complied</p>

		<p>qurban, road hardening, aide for school and student, medical treatment for community</p> <p>The monitoring and report comprise of critical evaluation and compliance evaluation.</p> <p>Each institution such as "Dinas Lingkungan Hidup" in local regency and province can access the report through SIMPEL. Evidence of reporting can be demonstrated during audit, sample seen for report year 2020-2022:</p> <ul style="list-style-type: none"> - Tanda Terima Elektronik dated 19 February 2021, Reporting period 1 July 2020 – 31 December 2020, Company ID 1261. - Tanda Terima Elektronik dated 25 August 2021, Reporting period 1 January 2021 – 30 June 2021, Company ID 1261. - Tanda Terima Elektronik dated 10 April 2022, Reporting period 1 July 2021 – 31 December 2021, Company ID 1261. - "Surat Pengantar PT. Indotruba Tengah kepada Dinas Lingkungan Hidup Kabupaten Kotawaringin Barat No.008/SKF-SP/I/2022, Laporan RKL-RPL Semester II 2021 PT. Indotruba Tengah", dated 10 January 2022. - Report RKL – RPL are publicly available for stakeholder to be access and reviewed. <p>PT. Indotruba Tengah has obtained the PROPER status of Blue which indicated that company has obey and comply all the government regulation related to Environmental dan social. Proper are the tools to assess the performance of environmental and social management by company. PROPER assessment result can be shown during audit as per "Hasil Evaluasi Kinerja Pengelolaan Lingkungan PROPER 2019 – 2020" by Ministry of Environment and Forestry.</p> <p>Participative approach to develop social impact management plan PT. Indotruba Tengah, dated 5 January 2021. Explained industrial relation aspect, public servicing aspect, surrounding community economic development aspect, FPIC and conflict resolution aspect, environment aspect. "Rencana Mitigasi Dampak</p>	
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		<p>Sosial Perkebunan Secara Partisipatif PT. Indotruba Tengah Periode 2020-2021”, dated 5 January 2021.</p> <p>Participative Social Impact Management Review “Review Management Rencana & Realisasi Pengelolaan dan Pemantauan Dampak Sosial Perkebunan Secara Partisipatif – PT. Indotruba Tengah 2020-2021”, dated 6 January 2022. Explained industrial relation aspect, public servicing aspect, surrounding community economic development aspect, FPIC and conflict resolution aspect, environment aspect.</p> <p>Socialization and communication to relevant stakeholder on 17 July 2021, attended by 15 community representatives: Polsek Pangkalan Banteng, Koramil Pangkalan Banteng, Kecamatan Pangkalan Banteng, Amin Jaya village, Sungai Pakit village, Pembuang Hulu II village, Karang Mulya village, Derangga village.</p>	
Criteria 3.5: A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.	<p>The company has prepared a procedure for hiring workers, regulated that hiring and promotion of workers based on skill, work experiences, and job evaluation as per document “Standard Operating Procedure – Penerimaan Karyawan No. 394/ITH-SOP-26/11).</p> <p>The procedure has explained:</p> <ul style="list-style-type: none"> - Prepared meet the standard of competence that inferred in the Position Description and Job Profile. Recruitment selection, hiring and promotion has based on skills, capabilities, qualities, and medical fitness. - Job opportunities were communicated and given to surrounding villagers at firstpriority where no discrimination found observed during interview and related records of workers being employed. All workers has treated equally in accordance with company regulation including rights of worker as well. <p>Based on interview with workers in the Estates and Mills, it is known that workers have received documentation of hiring (contractual agreement) and promotion. The clauses in the contractual agreement have complied with the national employment regulation. The procedure of recruitment, promotion and</p>	Complied

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		<p>retirement has been disseminated and implemented well. There is no discrimination related those processes, which the application and promotion assessed based on requirements and assessments of competencies and achievements, that has been described in the vacancies in advance. There is no distinguishment of rights and obligations in the same employment types.</p>	
<p>3.5.2</p>	<p>Employment procedures are implemented and records are maintained.</p>	<p>Based on document review and interview with unit management of PT. Indotruba Tengah, since 2019 there was no recruitment but only worker promotion, retirement and termination process. Sample of documentation of grade promotion for instance:</p> <ul style="list-style-type: none"> - List of grade promotion in 2021 totalled 18 workers in Seruyan Estate, 9 workers in Sekunyir Mill, and 26 workers in Sekunyir Estate. - The documentation consist of: assessment and evaluation form, promotion form, approval from Region HR Head No. 010/HRBP-KTB/VII/2021 dated 2 July 2021. <p>Sample of documentation of promotion from temporary worker to permanent worker:</p> <ul style="list-style-type: none"> - Seruyan Estate (on process): Performance evaluation, Permanent (full time) Worker Application of 11 workers dated 12 January 2022 and Letter of Seruyan Estate Manager to CEO Upstream dated 12 January 2022 related proposal for workers addition. - Sekunyir Estate (approved): Performance evaluation, Permanent (full time) Worker Application of 10 workers, Letter of Seruyan Estate Manager to CEO Upstream related proposal for workers addition, approval from CEO Upstream dated 29 March 2022. The issuance of appointment letter of permanent workers are being processed. <p>It is has been verified during interview with workers and Labor Union that due to Covid 19 pandemic, the company has postponed its recruitment process. However, currently the company is starting to recruit some workers particularly for harvester.</p>	<p>Complied</p>

Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.</p>	<p>The company has established the OHS policy that was signed by Head of Plantation Upstream Indonesia in December 2011, stated that the company committed to provide safety and health workplace by implementation effectively management to prevent workplace accidents and unhealthy to all employees, guest and contractor. The policy was also displayed at in public board both in mill and estates.</p> <p>The company also has prepared the procedure for Identification and evaluation of hazardous potential evaluation (No. Doc. 724/TQEM-ESH/10).</p> <p>The review of HIRAC of 2021 has been conducted. The company has issued HIRAC of 2022 for Sekunyir Mill, Sekunyir Estate, and Seruyan Estate. The activities that have been covered among other land clearing, manuring, harvesting, road maintenance, FFB transport, IPM activities, weighbridge, grading station, sterilizer station, pressing station, engine room, boiler, dispatch of CPO. All working risks have been identified and mitigated, such as by giving regular training, increasing supervision, PPE provision, and regular medical check-up.</p> <p>Based on field observation and interview with workers and Labor Union, the HIRAC has been implemented in the field such as by giving regular dissemination of OHS awareness and provision of appropriate PPE. One of the improvements of to reduce risk is by build specific storage for harvesting pole and sickle in every housing area. The harvesters are prohibited to store their sickle in the house.</p>	Complied
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p>	<p>The company has prepared the annual OHS program, consisted of:</p> <ul style="list-style-type: none"> - OHS meeting, - Installation OHS signs, - Provision of PPE program, - OHS inspection, 	Complied

		<ul style="list-style-type: none"> - Medical check-up (general and special) program - OHS training - OHS reporting and submission to manpower Agency. <p>The effectiveness of the H&S plans to address health and safety risks have been monitored in the form of:</p> <ul style="list-style-type: none"> - Monthly OHS Committee meeting, to discuss and address current OHS issues. - Documentation of accident record and the calculation of LTA. - Annual review of HIRAC. - Trimester OHS Report, that has been submitted regularly to Manpower Agency. The recent report is for period of October – December 2021, has been reported on 17 March 2022. 	
Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.			
3.7.1	(C) A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender-specific needs, and which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training.	<p>PT. Indotruba Tengah has shown the document of training program 2021-2022, as per "Program Pelatihan Pengembangan Sumber Daya Manusia".</p> <p>Training program consisted of:</p> <ul style="list-style-type: none"> • Refreshment training on BMP procedure for harvester, pesticides applicator, fertilizing, FFB sortation, planned in August, September, November and December • Refreshment training on implementation of RSPO requirement for staff and supervision, planned in June and December • OHS training for all workers, planned in October, February and June 2021 • Training on handling of hazardous waste, planned in March • Training for operator in mill, e.g: boiler operator, enginee room operator, pressing operator • Refreshment training/socialization of the company's policies • Refreshment training of HCV 	Complied

		Record of training realization provided in indicator 3.7.2	
3.7.2	Records of training are maintained, where appropriate on an individual basis.	<p>Document of implementation the training has demonstrated, e.g:</p> <ul style="list-style-type: none"> • Training of Block Harvesting System (BHS) on 7 April 2022 at Block C009 Sekunyir Estate; 22 February 2022, located in Block D013 Seruyan Estate; training material was evident. • Training of Block Manuring System (BMS) on 6 September 2021 at Block E0002 Sekunyir Estate; 11 February 2022, located in Block C012 Seruyan Estate; training material was evident. • Training of RSPO supply chain on 9 March 2022, attended by 39 participants. • Training of Block Spraying System (BSS) on 21 March 2022, located at Field B015, training material covers knowledge of spraying tools and pesticides, correct schedule and dosage, spraying tools calibration, MSDS, PPE, health and safety and first aid (ERP). • Training of Integrated Pest Management on 7 April 2022 at Block C009 Sekunyir Estate; training material was evident. • Training of Leaf Sampling Unit on 7 February 2022 at Block D004 Sekunyir Estate; training material was evident. • Training of FFB Transport Operation on 11 October 2021 at Traction Sekunyir Estate; attended by 21 participants; on 8 November 2021 at Traction Seruyan Estate; training material was evident, covers operating unit Prime Over and Badang, safety driving and maintenance. <p>PT. Indotruba Tengah – Sekunyir POM provides training and certification for the operators, to meet regulation. Record sighted:</p> <ul style="list-style-type: none"> - Agung Susilo, Sterilizer Operator; "Sertifikat Pembinaan Teknik K3 Bidang Sterilizer", 3 August 2020. - Herman, Crane Operator; "Sertifikat Pembinaan Teknik K3 Bidang Pesawat Angkat dan Angkut Operator K3 Crane No.5/2909/AS.02.00/VIII/2020", 31 	Complied

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		<p>August 2020. License/Lisensi K3 Pesawat Angkat dan Angkut No.12.38109-OPK3/C-PAA/VIII/2020” 31 August 2020-31 August 2025.</p> <ul style="list-style-type: none"> - Suwarno, Loader Operator; “Sertifikat Pembinaan Teknik K3 Bidang Pesawat Angkat dan Angkut Operator K3 Loader No.5/2907/AS.02.00/VIII/2020”, 31 August 2020. License/Lisensi K3 Pesawat Angkat dan Angkut No.12.38107-OPK3/L-PAA/VIII/2020” 31 August 2020-31 August 2025. - Sutris Eko Purnomo, Motor Diesel Operator; “Surat Keterangan Pembinaan Teknik K3 Bidang Pesawat Tenaga dan Produksi Operator K3 Motor Diesel Kelas I No.Ser.981/OPK.K3/PTP/VII/2018”, 30 July 2018. License/Lisensi K3 Operator Pesawat Tenaga & Produksi No.4368/PM/PTP/VII/2018” 30 July 2018-30 July 2023. - Wardi, Welder; “Sertifikat Juru Las Kelas III No.S.218/JL/SMAW-PNK3/VIII/2018”, 6 August 2020 	
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.	The latest refreshment training of supply chain has been conducted to personnel involved in supply chain requirement in Sekunyir POM, on 9 March 2022. The training subjected to Manual RSPO SCCS (SCCS-Std/RSPO/PSQM/02) Rev.01 dated 2 July 2020. Training attended by 39 relevant personnel including Mill Manager, Office Assistant, Process Assistant, SQM Staff, Safety Officer, operators, weighbridge clerk, production clerk and security.	Complied
<p>Criteria 3.8: Supply chain requirements for mills.</p> <p>Procedure note: all requirements are classified as Critical Indicators. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if</p>	In the previous certification period, PT. Indotruba Tengah - Sekunyir POM uses RSPO supply chain model Identity Preserved. The mill only received and processed FFB from certified supply bases which comprise of company-own estate (Sekunyir Estate and Seruyan Estate). There was no non-certified FFB intake, verified through mill FFB record.	Complied

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	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.		
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>During this assessment period, PT. Indotruba Tengah - Sekunzir POM since March 2022 has received and processed FFB from un-certified supplier which is PT Indotruba Timur, therefore in next certification the mill will uses Mass Balance as the supply chain model.</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. Indotruba Tengah - Sekunzir POM was recorded in RSPO Public Summary report, certificate and RSPO IT Platform.</p> <p>The palm oil mill has met registration and reporting requirement as it registered in RSPO IT Platform (PalmTrace) with ID number RSPO_PO1000000321.</p> <p>Below are the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in period 23 November 2019 – 22 November 2020 (based on RSPO P&C Public Summary Report and RSPO P&C Certificate No.RSPO-MUTU/001 by previous CB PT. Mutuagung Lestari):</p> <p><u>Forecast volume (23 November 2019 – 22 November 2020)</u></p> <p>FFB: 154,100 MT</p> <p>CPO: 33,900 MT (OER: 21.99%)</p> <p>PK: 6,940 (KER: 4.50%)</p>	Complied
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>PT. Indotruba Tengah – Sekunzir POM is subsidiary of Sime Darby Plantation Berhad, a member of RSPO, with RSPO membership No.1-0008-04-000-00 since 7 September 2004.</p>	Complied

		PT. Indotruba Tengah – Sekunyir POM has meet all registration and reporting requirements. RSPO IT Platform/PalmTrace account RSPO_PO1000000321.	
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> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<p>PT. Indotruba Tengah – Sekunyir POM demonstrates “Manual RSPO SCCS Standar Sertifikasi Rantai Pasok RSPO Dokumen No.SCCS-Std/RSPO/PSQM/02”, dated 2 July 2020.</p> <p>PT. Indotruba Tengah - Sekunyir POM is able to demonstrate complete and up-to-date records and report demonstrating compliance with the supply chain’s general requirement and modular requirement, including training records.</p> <p>As per Manual, the responsible person in charge to the supply chain system is Mr. Sudarwedi Hidayat – Kepala Seksi Administrasi PKS Sekunyir as per Inter Office Mail from Manager No.005/SKF/MR/III/2020 dated 3 March 2020. During audit, the PIC is able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill.</p> <p>PT. Indotruba Tengah – Sekunyir POM has a procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill, as described in Section “4.3 Pembelian dan Barang Masuk”.</p>	Complied
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill; 	<p>PT. Indotruba Tengah – Sekunyir POM demonstrates “Manual RSPO SCCS Standar Sertifikasi Rantai Pasok RSPO Dokumen No.SCCS-Std/RSPO/PSQM/02”, dated 2 July 2020. Section 4.2.3 indicated Internal audit will be carried out minimum 2 months prior to external audit.</p> <p>Latest internal audit of RSPO P&C carried out on 24-26 February 2022. Internal auditor was Mr. Tjahjo Moeljo Widjanto and Mr. Asmara Hadi. Mr. Tjahjo has</p>	Complied

	<p>a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b) Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>been trained with RSPO Internal Audit based ISO19001:2002 by PT. Bumi Hijau Cemerlang on January 2011. Mr Asmara Hadi demonstrate training certificate titled Understanding and Implementing RSPO SCCS, by Mutu Institute, 21-22 December 2020.</p> <p>There were 9 critical NC and 5 minor NC issued related to implementation of RSPO P&C Indonesia NI 2020. Correction and Corrective Action have been determined and implemented, due date on 8 April 2022.</p> <p>Management review conducted as per requirement stating management review carried out after internal audit and prior to external audit, with minimum once in 12 months (1 year). The latest management review carried out on 8 April 2022, attended by all unit head, internal auditor and COU of PT. Indotruba Tengah.</p>	
<p>3.8.7</p>	<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. Indotruba Tengah – Sekunyir POM has demonstrated “Manual RSPO SCCS Standar Sertifikasi Rantai Pasok RSPO Dokumen No.SCCS-Std/RSPO/PSQM/02”, dated 2 July 2020 “4.3 Pembelian dan Barang Masuk” indicates the Weighbridge Operator in POM has to ensure supplier information covers 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. Marketing in Jakarta responsible to verify the validity of supplier certificate or trader and distributor license.</p> <p>PT. Indotruba Tengah – Sekunyir POM receive FFB from certified source only. Certified source consist of company-owned Sekunyir Estate and Seruyan Estate. Document “Surat Pengantar Buah” (FFB Delivery Note) and FFB weighing ticket 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 Buah No.22Q641” dated 9 April 2022 from Sekunyir Estate, Division II, Block E04 (550 bunches) and D05 (200 bunches) – total 750 bunches; vehicle KH 8009 GP, stamp “RSPO Certified”; - Weighbridge ticket “Sekunyir Factory” No.260541 dated 9 April 2022, for 750 FFB bunches; nett weight 10,100 kg; from Sekunyir Estate, Division II, Block 	<p>Non-compliance</p>

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		<p>14E004 and 15D005; vehicle KH 8009 GP; Driver Hadianto; stamp "RSPO Certified".</p> <ul style="list-style-type: none"> - FFB delivery "Surat Pengantar Buah No.39522021035" dated 9 April 2022 from Seruyan Estate, Division II, Block E012 – total 310 bunches; vehicle PM 02, stamp "RSPO Certified". - Weighbridge ticket "Sekunyir Factory" No.260552 dated 9 April 2022, for 310 FFB bunches; nett weight 5,760 kg; from Seruyan Estate, Block 13E012; vehicle PM 002; Driver Samsul; <p>Non-certified:</p> <ul style="list-style-type: none"> - FFB delivery "Surat Pengantar Buah No.0169/SPB/I/ITR-X/04/2022" dated 9 April 2022 from PT Indotruba Timur, Division I, Block B33 (167 bunches), B30 (152 bunches), B29 (99 bunches), B26 (110 bunches), A30 (116 bunches), total 644 bunches; vehicle KH 8793 AD; stamp "Non RSPO certified"; - Weighbridge ticket "Sekunyir Factory" No.260548 dated 9 April 2022, for 644 FFB bunches; nett weight 7,395 kg; from PT Indotruba Timur, Division I, Field 1; vehicle KH 8793 AD; Driver Andi Asrori; stamp "Non RSPO certified". <p>PT. Indotruba Tengah – Sekunyir POM has demonstrated "Manual RSPO SCCS Standar Sertifikasi Rantai Pasok RSPO Dokumen No.SCCS-Std/RSPO/PSQM/02", dated 2 July 2020; Section 4.3 "Pembelian dan Barang Masuk (Goods In)", one of them explains about mechanism for handling non-conforming FFB and/or documents.</p> <p>Critical non-conformity:</p> <p>The unit of certification has not been able to demonstrate evidence regarding inform the CB whilst there is an overproduction of certified tonnage.</p> <p>Based on PalmTrace certified volume and Mill production statistic, obtained data below:</p>	
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Product	PalmTrace certified volume (license period 23 Nov 2019 – 22 Mei 2022)	Actual production since last onsite assessment until this recertification assessment
	MT	MT
FFB	111,275	298,928.58
CSPO	29,055	67,752.88
CSPK	5,635	13,339.19

- Therefore, there has been overproduction of FFB, CSPO and CSPK up to the time of this recertification assessment.
- Email from the company to CB on 7 January 2022 regarding request of volume extension for FFB of 11,842 MT; CSPO of 5,971 MT; and CSPK of 1,267 MT.

3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> The name and address of the buyer; The name and address of the seller; The loading or shipment / delivery date; The date on which the documents were issued; RSPO certificate number; 	<p>RSPO Certified CPO was sold to sister company PT Sime Darby Oils Pulau Laut Refinery. The CSPO certified delivery was completed with Delivery document as follow:</p> <ul style="list-style-type: none"> - Sales Contract PT. Indotruba Tengah No.00750/ITH/KTR-CPO/LOK/VII/2021 dated 14 July 2021. Commodity: Crude Palm Oil in Bulk. Quantity: 750,000 kg. Seller: PT. Indotruba Tengah. Seller Address: The Plaza Tower Lt. 36, Jl. MH Thamrin kav.28-30, DKI Jakarta 10350. Buyer: PT. Sime Darby Oils Pulau Laut Refinery; Buyer Address: The Plaza Tower Lt. 36, Jl. MH Thamrin kav.28-30, DKI Jakarta 10350. Delivery Order No. 00846/00750/07/21/L-ITH-CPO. Delivery period 19-27 July 2021. Terms of Delivery CIF (Pulau Laut, Kalimantan) - Delivery Order No.00846/00750/07/21/L-ITH-CPO, dated 23 July 2021. Seller: PT Indotruba Tengah. Buyer: PT. Sime Darby Oils Pulau Laut Refinery. Product: CSPO. Quantity 750 MT. Name of vessel: TK Teratai Merah II. - Bill of Lading No.052/BS/VII/2021 dated 23 July 2021; shipped by PT Indotruba Tengah; consigned to PT. Sime Darby Oils Pulau Laut Refinery; on 	Complied
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<p>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</p> <p>g) The quantity of the products delivered;</p> <p>h) Any related transport documentation;</p> <p>i) A unique identification number.</p>	<p>board the procon (voyage) TB Cahaya Surya 2 / TK Teratai Merah II; Master Lor the procon (voyage) Rohadi; for the port of Pangkalan Banteng, to Kotabaru; Description of good Crude Palm Oil; weight 750,000 kg.</p> <ul style="list-style-type: none"> - Notes of receive "Berita Acara Serah Terima CPO" No.124/ITH/KTR-MKS/LOK/VII/2021 dated 23 July 2021, between first party Sutrisno (Factory Manager PT. ITH – Sekunyir POM), and second party Rohadi (Master of TK Teratai Merah II, representing PT. Sime Darby Oils Pulau Laut Refinery; regarding DO No.00846/00750/07/21/L-ITH-CPO, quantity 750,000 kg and contract No.00750/ITH/KTR-CPO/LOK/VII/2021. - Shipping Instruction No.074/VII/SI-CPO/SHIPP-MKT/2021 dated 12 July 2021 by PT Minamas Gemilang (Marketing) to TB Cahaya Surya 2 / TK Teratai Merah II; description of Good CPO (Crude Palm Oil); quantity 3,500 MT; Laycan 18-19 July 2021; Port of Loading Pangkalan Banteng; Port of Discharge Sugai Taib, Pulau Laut; Shipper: PT Indotruba Tengah, PT Teguh Sempurna, PT Kridatama Lancar; Consignee PT Sime Darby Oils Pulau Laut Refinery. - Shipping Announcement Transaction ID TR-c5bb9f50-1885. Seller: Sime Darby Plantation – Sekunyir POM, PT ITH. Member ID: RSPO_PO1000000321. Buyer: PT Sime Darby Oils Pulau Laut Refinery. Member ID: RSPO_PO1000003174. Product name: CSPO. Supply Chain Model: Segregated. Volume 748.31 MT. Contract No. 00750/ITH/KTR-CPO/LOK/VII/2021; Shipping date 13/08/2021. Ship Name TK TERATAI MERAH II. B/L Number VN/33529. Confirmation date 16/08/2021. <p>Information for RSPO certified products made available:</p> <ul style="list-style-type: none"> • The name and address of the buyer: PT. Sime Darby Oils Pulau Laut Refinery. The Plaza Tower Lt. 36, Jl. MH Thamrin kav.28-30, DKI Jakarta 10350; • The name and address of the seller: PT. Indotruba Tengah. The Plaza Tower Lt. 36, Jl. MH Thamrin kav.28-30, DKI Jakarta 10350; • The loading or shipment/ delivery date: 23 July 2021;
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		<ul style="list-style-type: none"> • The date on which the documents were issued: Contract: 14 July 2021; Transport document issued 23 July 2021; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): CSPO/Segregated; • The quantity of the products delivered: 750.00 MT; • Any related transport documentation: Bill of Lading No.052/BS/VII/2021 dated 23 July 2021; • Supply chain certificate number of the seller: MUTU-RSPO/001 (still from previous CB); • A unique identification number: Contract No.00750/ITH/KTR-CPO/LOK/VII/2021 dated 28 July 2020. <p>RSPO CSPK was sold to sister-company PT. Teguh Sempurna. The CSPK certified delivery was completed with Delivery Form.</p> <p>Sales of CSPK:</p> <ul style="list-style-type: none"> - Sales Contract PT. Indotruba Tengah No. 00225/ITH/KTR-KERNEL/LOK/III/2021 dated 23 March 2021. Commodity: Palm Kernel in Bulk. Quantity: 100,000 kg. Seller: PT. Indotruba Tengah. Seller Address: The Plaza Tower Lt. 36, Jl. MH Thamrin kav.28-30, DKI Jakarta 10350. Buyer: PT. Teguh Sempurna; Buyer Address: The Plaza Tower Lt. 36, Jl. MH Thamrin kav.28-30, DKI Jakarta 10350. Delivery Order No. 00232/00225/03/21/L-ITH-KERNEL. Delivery period 1-31 March 2021. - Delivery Order No.00232/00225/03/21/L-ITH-KERNEL, dated 23 March 2021. Seller: PT Indotruba Tengah. Buyer: PT. Teguh Sempurna. Product: Kernel. Quantity 100 MT. Name of Barge/vessel: By Truck. - Transport Note, "Surat Pengantar IKS No.59214/SKF-IKS/III/2021", dated 31 March 2021. Seller: PT. Indotruba Tengah. Customer: PT. Teguh Sempurna. Delivery Order No.00232/00225/03/21/L-ITH-KERNEL. Contract No. 	
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		<p>00225/ITH/KTR-KERNEL/LOK/ III/2021 Vehicle No. DA 8274 PN. Stamp RSPO Identity Preserved MUTU-RSPO/001.</p> <ul style="list-style-type: none"> - Weighbridge Ticket Sekunyir Factory "Despatch" No.059214, dated 31 March 2021. Seller: PT. Indotruba Tengah. Customer: PT. Teguh Sempurna. Product Palm Kernel. Quantity Net Weight 14,350 kg. Vehicle No. DA 8247 PN. Delivery Order No. 00232/00225/03/21/L-ITH-KERNEL. - Shipping Announcement Transaction ID TR-fb9c404c-48c6. Seller: Sime Darby Plantation – Sekunyir POM, PT ITH. Member ID: RSPO_PO1000000321. Buyer: PT Teguh Sempurna – Pematang Kernel Crushing Plant. Member ID: RSPO_PO1000004588. Product name: CSPK. Supply Chain Model: Segregated. Volume 98.32 MT. Contract No. 00225/ITH/KTR-IKS/LOK/III/2021; Shipping date 31/03/2021. Confirmation date 17/06/2021. <p>Information for RSPO certified products made available:</p> <ul style="list-style-type: none"> • The name and address of the buyer: PT. Teguh Sempurna. The Plaza Tower Lt. 36, Jl. MH Thamrin kav.28-30, DKI Jakarta 10350; • The name and address of the seller: PT. Indotruba Tengah. The Plaza Tower Lt. 36, Jl. MH Thamrin kav.28-30, DKI Jakarta 10350; • The loading or shipment/ delivery date: 31 March 2021.; • The date on which the documents were issued: D/O: 23 March 2021; Transport document issued 31 March 2021; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): CSPK/Segregated; • The quantity of the products delivered: 100.00 MT (D/O); 14,35 MT (weighbridge ticket); • Any related transport documentation: Transport Note, "Surat Pengantar IKS No.59214/SKF-IKS/III/2021" and Weighbridge Ticket Sekunyir Factory "Despatch" No.059214, dated 31 March 2021; 	
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		<ul style="list-style-type: none"> • Supply chain certificate number of the seller: MUTU-RSPO/001 (still from previous CB); • A unique identification number: D/O No. 00232/00225/03/21/L-ITH-KERNEL. 	
3.8.9	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure 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>The mill does not outsource its milling activity or transport activity. Transport of CSPO are instructed and managed by buyer. Transport of CSPK are using company-owned vehicle.</p> <p>Not applicable.</p>	Not Applicable

	systems, and all information, when this is announced in advance.		
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.	The mill does not outsource its milling activity or transport activity. Transport of CSPO are instructed and managed by buyer. Transport of CSPK are using company-owned vehicle. Not applicable.	Not Applicable
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	The mill does not outsource its milling activity or transport activity. Transport of CSPO are instructed and managed by buyer. Transport of CSPK are using company-owned vehicle. Not applicable.	Not Applicable
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 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>PT. Indotruba Tengah has maintained accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements as following:</p> <ul style="list-style-type: none"> - Delivery order - Daily mill reports - Daily reports - Monthly report - Weighbridge ticket of FFB - Weighbridge ticket of CSPK - Sales document and delivery document - PalmTrace Shipping Announcement and confirmation - Training record - Internal Audit - Minute of Management Review. 	Complied

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	<p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>RSPO SCCS Training record: "Notulen Training RSPO SCCS – Sekunyir Factory", dated 6 March 2022. The training related to RSPO IP and RSPO MB. Training attended by 39 personnel related to RSPO SCCS operations, i.e. Mill Manager, Assistant, production admin, warehouse keeper, weighbridge operator, finance, grading operator.</p> <p>PT. Indotruba Tengah – Sekunyir POM has demonstrated "Manual RSPO SCCS Standar Sertifikasi Rantai Pasok RSPO Dokumen No.SCCS-Std/RSPO/PSQM/02", dated 2 July 2020 "4.7 Record Keeping" indicates the Retention times for all records and reports shall be a minimum of ten (10) years and shall comply with relevant legal and regulatory requirements.</p> <p>Based on Daily Mill Record, the mill can record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p>																																			
<p>3.8.13</p>	<p>Extraction Rate 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 keep an up-to-date record of the FFB volume received, CPO and PK produced over a period of twelve (12) month, as in "Mill Production Summary".</p> <p>OER and KER are estimated based on associated inputs and upon past experience (previous year FFB, CPO and PK production).</p> <p>Summary of production:</p> <table border="1" data-bbox="999 999 1910 1361"> <thead> <tr> <th rowspan="2">Description</th> <th colspan="2">2021</th> <th colspan="2">2022</th> </tr> <tr> <th>Budget</th> <th>Actual</th> <th>Budget</th> <th>Actual (until Mar '22)</th> </tr> </thead> <tbody> <tr> <td>FFB Certified (MT)</td> <td>116,099.22</td> <td>104,348.49</td> <td>106.120</td> <td>23,473.78</td> </tr> <tr> <td>FFB Non Certified (MT)</td> <td>0</td> <td>0</td> <td>0</td> <td>590.17</td> </tr> <tr> <td>CPO (MT)</td> <td>26,412.57</td> <td>24,077.68</td> <td>24.673</td> <td>5,490.54</td> </tr> <tr> <td>PK (MT)</td> <td>5,572.76</td> <td>4,632.10</td> <td>4.775</td> <td>1,050.56</td> </tr> <tr> <td>OER (%)</td> <td>22.75</td> <td>23.07</td> <td>23.25</td> <td>22.90</td> </tr> </tbody> </table>	Description	2021		2022		Budget	Actual	Budget	Actual (until Mar '22)	FFB Certified (MT)	116,099.22	104,348.49	106.120	23,473.78	FFB Non Certified (MT)	0	0	0	590.17	CPO (MT)	26,412.57	24,077.68	24.673	5,490.54	PK (MT)	5,572.76	4,632.10	4.775	1,050.56	OER (%)	22.75	23.07	23.25	22.90	<p>Complied</p>
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		KER (%)	4.80	4.44	4.50	4.38	
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. Based on "Laporan Produksi" dan "Working Sheet Extraction" dated 31 March 2022, the sounding result and production report shows that actual conversion ratios from FFB into CPO are:</p> <p>Working Sheet Oil Extraction:</p> <ul style="list-style-type: none"> a. CPO production todate 5,490.54 kg; b. OER todate 22.90% <p>Working Sheet Kernel Extraction:</p> <ul style="list-style-type: none"> a. CPK production todate 1,050.56 kg; b. KER todate 4.38% 					Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Audit team verifies through documented procedures and record keeping that Sekunyir POM is only processing certified FFB into production of certified CSPO and CSPK.</p> <p>For next certification period, the unit of certification decide to use Mass Balance as the supply chain model, since the mill start receiving FFB from non-certified supply base.</p> <p>Sekunyir Palm Oil Mill has 2 weighbridges that uses for weighing palm product, both have been calibrated based on:</p> <ul style="list-style-type: none"> - "Keterangan Hasil Pengujian" No.510.3/806/DPPKUKM.3/SKHP/X/2021 dated 18 October 2021, issued by Dinas Perindustrian, Perdagangan, Koperasi, Usaha Kecil dan Menengah Kabupaten Kotawaringin Barat for weighbridge brand: GSC; Type GST-9700; Serial Number 05255; Capacity 40,000 kg; verified on 11 October 2021. Due for next verification on 11 October 2022. - "Keterangan Hasil Pengujian" No.510.3/807/DPPKUKM.3/SKHP/X/2021 dated 18 October 2021, issued by Dinas Perindustrian, Perdagangan, 					Complied

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		<p>Koperasi, Usaha Kecil dan Menengah Kabupaten Kotawaringin Barat for weighbridge brand: Metler Toledo; Type IND 560; Serial Number 44522668; Capacity 50,000 kg; verified on 11 October 2021. Due for next verification on 11 October 2022.</p> <p>Unit of certification has 3 storage tanks consist of Storage Tank No. 1 (capacity 1000 MT), No. 2 (capacity 1000 MT) and No.3 (capacity 2000 MT). Storage tanks are dedicated only for CPO from Sekunyir POM. Since March 2022, the mill starts to fill storage tank with mass balance CPO, since it received FFB from non-certified supply base. Cleaning of storage tanks evident by notes (“Berita Acara Pencucian Tangki”), ST No.1 on 3 August 2021, ST No.2 on 10 February 2022, and ST No.3 on 7 & 8 August 2019. For ST No.3 it has not been used since it was cleaned.</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>- Shipping Announcement Transaction ID TR-c5bb9f50-1885. Seller: Sime Darby Plantation – Sekunyir POM, PT ITH. Member ID: RSPO_PO1000000321. Buyer: PT Sime Darby Oils Pulau Laut Refinery. Member ID: RSPO_PO1000003174. Product name: CSPO. Supply Chain Model: Segregated. Volume 748.31 MT. Contract No. 00750/ITH/KTRCPO/LOK/VII/2021; Shipping date 13/08/2021. Ship Name TK TERATAI MERAH II. B/L Number VN/33529. Confirmation date 16/08/2021.</p> <p>- Shipping Announcement Transaction ID TR-fb9c404c-48c6. Seller: Sime Darby Plantation – Sekunyir POM, PT ITH. Member ID: RSPO_PO1000000321. Buyer: PT Teguh Sempurna – Pematang Kernel Crushing Plant. Member ID: RSPO_PO1000004588. Product name: CSPK. Supply Chain Model: Segregated. Volume 98.32 MT. Contract No. 00225/ITH/KTR-IKS/LOK/III/2021; Shipping date 31/03/2021. Confirmation date 17/06/2021.</p> <p>PT. Indotruba Tengah provides screenshot status of PalmTrace, for Remove and Credit Allocation, as follows:</p> <p>- Remove from Certified Stock with transaction ID ST-TR-6f7e0e96-bec0; Product CSPK; Supply Chain Model Identity Preserved; Volume to remove</p>	<p>Complied</p>

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		<p>707,29 MT; Reason For Removal: Sold as conventional; Removal Date: 14/04/2022.</p> <ul style="list-style-type: none"> - Credit Allocation with transaction ID ST-TR-5272fe6d-b3aa; Product CSPO; Supply Chain Model Identity Preserved; Volume allocated as credit 7.808 MT; Credit Type: CSPO Credit; Equivalent Credits: 7.808; Allocation Date: 14/04/2022. - Credit Allocation with transaction ID ST-TR-e01f5ca8-b7da; Product CSPO; Supply Chain Model Identity Preserved; Volume allocated as credit 20.000 MT; Credit Type: CSPO Credit; Equivalent Credits: 20.000; Allocation Date: 31/03/2022. 	
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. Indotruba Tengah – Sekunyir POM only makes claims on RSPO Certified product in compliance with RSPO Rules on Market Communications and Claims. Statement of RSPO certified and Identity Preserved are only stated in sales documents of RSPO certified product.</p>	Complied
General corporate communications			
4.1	<p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p>	<p>Sime Darby Plantation Berhad, the parent company of PT. Indotruba Tengah is highlighting its commitment to the principles of RSPO. The corporate communication can be found at https://www.simedarbyplantation.com.</p>	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> • Display its RSPO membership status • Display the RSPO web address (www.rspo.org) • 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>Sime Darby Plantation Berhad, in its website:</p> <ul style="list-style-type: none"> a. Display its RSPO membership status: No, Sime Darby Plantation Berhad did not display its RSPO membership status. The parent company stated “22 SOUs in Indonesia have received the RSPO certification while the rest were audited for certification” b. Display the RSPO web address: No. c. State the member supports the work of the RSPO: Not in direct manner. In the website, Sime Darby Plantation Berhad stated “As a vertically integrated palm oil company, the majority of the palm products processed by our 	Complied

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	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.	refineries originate from Sime Darby Plantation (SDP) mills which are certified to the Roundtable on Sustainable Palm Oil (RSPO)." d.State the member's history with regards to the RSPO: Not in direct manner. e.Use of RSPO Trademark to promote its membership of the RSPO: No, Sime Darby Plantation Berhad, did not use RSPO trademark in its corporate communication such in website.	
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	No, Sime Darby Plantation Berhad did not display its RSPO membership status. It is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied
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, Sime Darby Plantation Berhad 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. Indotruba Tengah – Sekunyir POM's 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, Sime Darby Plantation Berhad did not display its RSPO Corporate Logo in any document.	Complied
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. Indotruba Tengah - Sekunyir 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. Indotruba Tengah - Sekunyir POM followed the requirements of the RSPO SCCS. PT. Indotruba Tengah - Sekunyir POM stating the supply chain model and certificate number under which the claim is being made.	Complied

5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a) If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	<p>PT. Indotruba Tengah - Sekunyir POM is not a distributor and/or wholesaler. Not applicable.</p>	Not Applicable
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>PT. Indotruba Tengah - Sekunyir POM is not producing or selling end-product to consumer. No labelling on product whatsoever. Not applicable.</p>	Not Applicable
Business to consumer communication			

6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	PT. Indotruba Tengah - Sekunyir POM is not using product-specific claims in its CSPKO product PT. Indotruba Tengah - Sekunyir POM is producing and selling CSPO and CSPK; and not making a business to consumer communication. Not applicable.	Not Applicable
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	PT. Indotruba Tengah - Sekunyir POM is not using RSPO trademark and/or RSPO label. PT. Indotruba Tengah - Sekunyir POM is producing and selling CSPO and CSPK; and not making a business to consumer communication. 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. Indotruba Tengah - Sekunyir POM is not using RSPO-certified on-pack claim. PT. Indotruba Tengah - Sekunyir 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. Indotruba Tengah - Sekunyir POM is not making any claim related to their RSPO membership status. PT. Indotruba Tengah - Sekunyir 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. Indotruba Tengah - Sekunyir POM is not making any information about their supplier's RSPO membership status. PT. Indotruba Tengah - Sekunyir 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. Indotruba Tengah - Sekunyir POM is not using RSPO trademark and/or RSPO label. Not applicable.	Not Applicable

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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. Indotruba Tengah - Sekunyir 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 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 .	PT. Indotruba Tengah - Sekunyir POM is not a retailer or food service company. Not applicable.	Not Applicable
MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES			
Certified oil palm content (IP)			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	The Certified IP volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under IP model is considered 100% content.	Complied

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	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	The Certified IP volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under IP model is considered 100% content.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	The Certified IP volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under IP model is considered 100% content.	Complied
Labelling and trademark (IP)			
	Members are allowed to use the RSPO label in one of the following ways: <ul style="list-style-type: none"> • RSPO trademark which includes the tag 'CERTIFIED' or • RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. 	There is no product partial claims	Not Applicable
Messaging (IP)			
	Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements: <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org 	There is no product partial claims	Not Applicable

	<ul style="list-style-type: none"> • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 		
<p>Principle 4: Respect community and human rights and deliver benefit Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p>			
<p>Criteria 4.1: The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p>	<p>The company has established a policy to respect human rights, that prohibits intimidation and harassment including prohibiting retaliation against Human Rights Defenders (HRD) as per Human Rights Charter (<i>Piagam Hak Asasi</i>) of Sime Darby Plantation of 2020. The policy has explained, The company committed to protecting human right of all staff and employee and address human rights issue if available.</p> <p>The dissemination of the human rights policies to all levels of the workforce, operations, supply chain and local communities has been conducted annually. The recent dissemination was on 17 July 2021.</p>	Complied

		Moreover, the dissemination also has been conducted through morning briefing of workers and aignbords/posters in the office, workplaces, and housing of Mill and Estates.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.	In Human Rights Charter (<i>Piagam Hak Asasi</i>) of 2020, is stated that the company will not use any form of harassment, including the use of mercenaries and paramilitaries in its operations. Based on field observation, interview with workers, Gender Committee, Labor Union, Village Heads and Governmental Agencies, can be concluded that the company did not use any mercenaries and paramilitaries in its operation, but only private security. The company also did not use violence to address any dispute.	Complied
Criteria 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	The company has had procedure to address any dispute or conflict in SOP of Grievance Resolution of Stakeholder (No. 01/MPK-OU/XII/21 dated 01 December 2021). The SOP has included timing to respond the grievance (max 14 days), to ensure the anonymity of any party if requested, and grievance resolution without any reprisal or intimidation. If the cases can not be handled at Estate/Mill level, the cases will be escalated to the next level of management, using mediator, or to be escalated to the court or RSPO website (complaint panel).	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	This procedure is in place and has been disseminated to relevant stakeholder on 17 July 2022. The stakeholders including Labor Union, Gender Committee, Village Heads, Sub-District Police Officer, etc. Based on interview with workers, Labor Union, Gender Committee, Village Heads of Amin Jaya, Pembuang Hulu II, and Sungai Pakit, are mentioned that the stakeholders have known the grievance procedure through regular dissemination. There is no community representatives who illiterate surrounding company's area.	Complied

4.2.3	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.	The company has provide the "Suggestion Box" in every office area. Moreover, there is a Book of Grievance Submission. Based on document review, and interview with Gender Committee, Labor Union, Village Heads, and Governmental Agencies, can be concluded that there is no significant grievance (tend to be a conflict) from the workers or external stakeholder, but common issues like housing reparation or bad road condition that have always been followed up. For instance, grievance from Amin Jaya village on 31 March 2022 regarding bad road condition, has been followed up by heavy vehicle maintaining.	Complied
4.2.4	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.	Based on description of indicator 4.2.1, the SOP of grievance resolution has covered that if the cases can not be handled at Estate/Mill level, the cases will be escalated to the next level of management, using mediator, or to be escalated to the court or RSPO website (complaint panel).	Complied
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.	The company utilized Social Impact Assessment (SIA) including its Management and Monitoring Plan as well as participatory regular review to identify positive and negative impacts of company's operational activities, and to identify communities need to address its negative impact and to improve community wellbeing. The activity then programmed in Annual Corporate Social Responsibility (CSR) Program. The company has shown the CSR Program of 2021 and 2022, which includes the aspects of education, public health, religion, social and sports, environmental, culture. The targeted communities are who affected by company's operation, among others Village of Amin Jaya, Pembuang Hulu II, Sungai Pakit, Satuan Pemukiman (SP) 3, Derangga, as well as Sub-District and Regency Government. The CSR Realization Report of 2020 and 2021 have been observed and verified based on	OFI

		<p>consultation to Village Heads (Amin Jaya, Pembuang Hulu II, Sungai Pakit) and Plantation Agency.</p> <p>Opportunity for improvement (OFI):</p> <p>The unit of certification developed Annual CSR Program 2022 and has documented the CSR Implementation of 2021. Certificate Holder expected program related community economic development inclusion and CSR program dissemination to wider stakeholders.</p>	
<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	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p>	<p>PT. Indotruba Tengah demonstrated land title/Land Use Right (HGU), issued by Minister of Agrarian and Chief of National Land Agency – presented in four HGU certificate documents, total 7,734.60 Ha:</p> <ul style="list-style-type: none"> - HGU number 04/1988, covered 3,260 Ha – valid until 24 September 2033, based on “Surat Keputusan Menteri Negara Agraria / Kepala Badan Pertanahan Nasional” No 152/HGU/BPN/97, dated 26 September 1997 - HGU number 05/1988, covered 829.2 Ha – valid until 24 September 2033, based on “Surat Keputusan Menteri Negara Agraria / Kepala Badan Pertanahan Nasional” No 11/HGU/BPN/99, dated 11 April 1998 - HGU number 05/1988, covered 740.4 Ha – valid until 23 June 2033, based on “Surat Keputusan Menteri Negara Agraria / Kepala Badan Pertanahan Nasional” No 10/HGU/BPN/98, dated 2 April 1998 - HGU number 06/1988, covered 2,905 Ha – valid until 23 June 2033, based on “Surat Keputusan Menteri Negara Agraria / Kepala Badan Pertanahan Nasional” No 13/HGU/BPN/98, dated 2 April 1998 <p>The land title with HGU PT. Indotruba Tengah map scale 1 : 100,000.</p>	Complied

<p>4.4.2</p>	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p>	<p>Furthermore, the HCV and SIA report (year 2009 – prepared by Aksenta) have demonstrated the land compensation through FPIC process. All the data verified and provided in Bahasa.</p> <p>According to procedure of communication No.349/ITH-KOM-01/11, any information and documented related to land compensation was limited to be accessed. Will be verified during onsite audit.</p> <p>Based on interviews with villagers from Amin Jaya village, Amin Jaya village and Sungai Pakit village, the plantation of PT. Indotruba Tengah was allocated for transmigration project but failed. During that period, since the land was allocated by government on state land; and no village or community using the land, therefore no compensation.</p>	<p>Complied</p>
	<p>4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;</p>	<p>Based on interviews with villagers from Amin Jaya village, Amin Jaya village and Sungai Pakit village, the plantation of PT. Indotruba Tengah was allocated for transmigration project but failed. During that period, since the land was allocated by government on state land; and no village or community using the land, therefore no compensation.</p> <p>Based on verified legal document;</p> <ul style="list-style-type: none"> - "Risalah Panitia Pemeriksaan Tanah "B" No.01/PPTB/I/1995" dated 12 January 1995, Section A the land allocated through "Surat Keputusan Gubernur Kepala Daerah Tingkat I Kalimantan Tengah No.525.26/12/BPN" dated 10 June 1993, location Pangkalan Banteng village, Kumai District, Kotawaringin Barat Regency, Kalimantan Tengah Province of 1,622 Ha. Section D stated on the land, there was no land use by community. - "Risalah Panitia Pemeriksaan Tanah "B" No.02/PPTB/I/1995" dated 12 January 1995, Section A the land allocated through "Surat Keputusan Gubernur Kepala Daerah Tingkat I Kalimantan Tengah No.525.26/120/BPN" dated 10 June 1993, location Pembuang Hulu II village, Hanau District, Kotawaringin Timur Regency, Kalimantan Tengah Province of 1,281 Ha. Section D stated on the land, there was no land use by community. 	

	<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>"Risalah Panitia Pemeriksaan Tanah "B" No.006/PPTB/VIII/93" dated 7 August 1993, Section A the land allocated through "Surat Keputusan Gubernur Kepala Daerah Tingkat I Kalimantan Tengah No.525.26/12/BPN" dated 10 June 1993, location Pembuang Hulu II village, Hanau District, Kotawaringin Timur Regency, Kalimantan Tengah Province of 5,000 Ha. Section D stated on the land, there was no land use by community.</p> <p>Based on interviews with villagers from Amin Jaya village, Pembuang Hulu II village and Sungai Pakit village, the plantation of PT. Indotruba Tengah was allocated for transmigration project but failed. During that period, since the land was allocated by government on state land; and no village or community using the land, therefore no compensation.</p>	
<p>4.4.3</p>	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p>	<p>PT. Indotruba Tengah - Sekunyir POM has legal ownership – Land Title (HGU), which consists of Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities, which issued by Directorate of Measurement and Mapping of National Land Agency (BPN).</p> <p>PT. Indotruba Tengah demonstrated land title/Land Use Right (HGU), issued by Minister of Agrarian and Chief of National Land Agency – presented in four HGU certificate documents, total 7,734.60 Ha:</p> <ul style="list-style-type: none"> - HGU number 04/1988, covered 3,260 Ha – valid until 24 September 2033, based on "Surat Keputusan Menteri Negara Agraria / Kepala Badan Pertanahan Nasional" No 152/HGU/BPN/97, dated 26 September 1997 - HGU number 05/1988, covered 829.2 Ha – valid until 24 September 2033, based on "Surat Keputusan Menteri Negara Agraria / Kepala Badan Pertanahan Nasional" No 11/HGU/BPN/99, dated 11 April 1998 - HGU number 05/1988, covered 740.4 Ha – valid until 23 June 2033, based on "Surat Keputusan Menteri Negara Agraria / Kepala Badan Pertanahan 	<p>Complied</p>

		<p>Nasional” No 10/HGU/BPN/98, dated 2 April 1998</p> <ul style="list-style-type: none"> - HGU number 06/1988, covered 2,905 Ha – valid until 23 June 2033, based on “Surat Keputusan Menteri Negara Agraria / Kepala Badan Pertanahan Nasional” No 13/HGU/BPN/98, dated 2 April 1998 <p>The land title with HGU PT. Indotruba Tengah map scale 1 : 100,000.</p>	
4.4.4	All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.	<p>As explained in previous indicator 4.4.1 shown that:</p> <ul style="list-style-type: none"> - PT. Indotruba Tengah - Sekunzir POM has legal ownership – Land Title (HGU) Certificate holder has had procedure for land acquisition and complaints handling. 	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	<p>As explained in previous indicator 4.4.1 shown that:</p> <ul style="list-style-type: none"> - PT. Indotruba Tengah - Sekunzir POM has legal ownership – Land Title (HGU) - Certificate holder has had procedure for land acquisition and complaints handling. <p>Based on interviews with villagers from Amin Jaya village, Amin Jaya village and Sungai Pakit village, they have good communication with PT. Indotruba Tengah in term of representation. They stated the land was allocated for transmigration project but failed. During that period, since the land was allocated by government on state land; and no village or community using the land, therefore no compensation.</p>	Complied
4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.	<p>As explained in previous indicator 4.4.1 shown that:</p> <ul style="list-style-type: none"> - PT. Indotruba Tengah - Sekunzir POM has legal ownership – Land Title (HGU) - Certificate holder has had procedure for land acquisition and complaints handling. - Based on interviews with villagers from Amin Jaya village, Amin Jaya village and Sungai Pakit village, they have good communication with PT. Indotruba Tengah in term of representation. They stated the land was allocated for transmigration project but failed. During that period, since the land was allocated by government on state land; and no village or community using 	Complied

the land, therefore no compensation.

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.	Based on the area statement and interviews with management and Plantation Agency, it is found that there were no new plantings after 1 January 2010. The new development within operational area were conducted in 1993, 1994, 1995, and 1996. For plantings after 1996 (2013 and onwards) were replanting. Moreover, based on review of legality documents (HGU Decree, HGU Certificate and <i>Risalah Panitia B</i>) and interview with management, Village Heads and Plantation Agency, it is found that the HGU areas were came from government land bank that initially was purposed for transmigration program. Due to the failure of the transmigration program, the government offered the land to investors. Therefore, there was no land acquisition process to the individual landowners or customary rights and no FPIC related process. Based on these descriptions, this Criterion 4.5 related New Planting and FPIC process are not applicable.	Not Applicable
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions. All the relevant information and documents are made available, and community have option of resourced access to independent third-party advice through a documented, long-term and two-way process of consultation and negotiation.	There is no new planting in operational area based on explanation of Indicator 4.5.1. Therefore, this Criterion 4.5 related New Planting and FPIC process are not applicable.	Not Applicable
4.5.3	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	There is no new planting in operational area based on explanation of Indicator 4.5.1. Therefore, this Criterion 4.5 related New Planting and FPIC process are not applicable.	Not Applicable

	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.		
4.5.4	To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of land allocations process.	There is no new planting in operational area based on explanation of Indicator 4.5.1. Therefore, this Criterion 4.5 related New Planting and FPIC process are not applicable.	Not Applicable
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	There is no new planting in operational area based on explanation of Indicator 4.5.1. Therefore, this Criterion 4.5 related New Planting and FPIC process are not applicable.	Not Applicable
4.5.6	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.	There is no new planting in operational area based on explanation of Indicator 4.5.1. Therefore, this Criterion 4.5 related New Planting and FPIC process are not applicable.	Not Applicable
4.5.7	After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.	There is no new planting in operational area based on explanation of Indicator 4.5.1. Therefore, this Criterion 4.5 related New Planting and FPIC process are not applicable.	Not Applicable
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.	There is no new planting in operational area based on explanation of Indicator 4.5.1. Therefore, this Criterion 4.5 related New Planting and FPIC process are not applicable.	Not Applicable

<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>Based on explanation on Criterion 4.5, has mentioned that there is no land acquisition to individual landowner or customary rights in HGU granting process. After the company was granted of HGU in 1997 and 1998, the company did not conduct any land development/land acquisition. Until present, the company also has no plan to conduct any new land expansion in the near future.</p> <p>However, the Minamas Group (parent company) has had a SOP of Land Aquisition (No. 343/PSD-OKUP/11 dated 23 February 2012) if there is any land development/acquisition in the future. The procedure has covered land title and owner (male/female) identification, FPIC process, and fair land compensation/payment.</p>	Complied
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>The mutually agreed procedure for calculating and distributing fair and gender-equal compensation have been covered in the SOP of Land Aquisition (No. 343/PSD-OKUP/11 dated 23 February 2012). The procedure has covered land title and owner (male/female) identification, FPIC process, and fair land compensation/payment.</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement).</p>	<p>Based on explanation from Criterion 4.5 and Indicator 4.6.1, there was no land acquisition from individual land owner or customary right since the HGU granting process until present.</p> <p>Therefore, this indicator is not applicable.</p>	Not Applicable
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them.</p>	<p>Based on explanation from Criterion 4.5 and Indicator 4.6.1, there was no land acquisition from individual land owner or customary right since the HGU granting process until present.</p> <p>Therefore, this indicator is not applicable.</p>	Not Applicable
<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	(C) A mutually agreed procedure for identifying people entitled to compensation is in place.	In accordance with explanation of Criterion 4.5, that based on review of legality documents (HGU Decree, HGU Certificate and <i>Risalah Panitia B</i>) and interview with management, Village Heads and Plantation Agency, it is found that the HGU areas were came from government land bank that initially was purposed for transmigration program. Due to the failure of the transmigration program, the government offered the land to investors. Therefore, there was no land acquisition process to the individual landowners or customary rights and no FPIC related process. Until present, the company did not conduct any new land development/acquisition. However, the Minamas Group (parent company) has had a SOP of Land Aquisition (No. 343/PSD-OKUP/11 dated 23 February 2012) if there is any land development/acquisition in the future. The procedure has covered land title and owner (male/female) identification, FPIC process, and fair land compensation/payment.	Complied
4.7.2	(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.	Until present, the company did not conduct any new land development/acquisition. However, the Minamas Group (parent company) has had a SOP of Land Aquisition (No. 343/PSD-OKUP/11 dated 23 February 2012) if there is any land development/acquisition in the future. The procedure has covered land title and owner (male/female) identification, FPIC process, and fair land compensation/payment.	Not Applicable
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	Based on explanation from Criterion 4.5 and Indicator 4.7.1, there was no land acquisition from individual land owner or customary right since the HGU granting process until present. Therefore, this indicator is not applicable.	Not Applicable
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,	Currently, there is a land dispute in Seruyan Estate totalled 807.31 Ha, located in the south east of Seruyan Estate, in particular in the HGU Certificate No. 5 of	Complied

	<p>customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p>	<p>1998 and No. 6 of 1998, or in the southern boundary of blocks G25, G28, G31 and G34.</p> <p>The chronology of this disputed land described below (based on interview with management and stakeholders, as well as review of legal document, dispute resolution, and cronology documents):</p> <ul style="list-style-type: none"> - The company started to develop the plantation gradually in 1993, 1994, 1995, and 1996 after granted Location Permit. - The development was not finished yet in 1996. - The company was granted by HGU Decree in 1997 and 1998. - Just after granted of HGU, there was a national and global monetary crisis in 1998. The ongoing development in that time was postponed due to the lack of financing. - For the areas that not yet felled, and some areas that had been planted by oil palm, occupied by some communities (Group of H. Ruslan ± 486 Ha and others individuals ± 139 Ha). - Participatory identification, mapping, and verification have been conducted. H. Ruslan and other occupants stated that the land acquired by acquisition from previous landowners. - Due to PT Indotruba Tengah acquired the land from government (unsuccessful transmigration program), whereas H. Ruslan acquired the land from land compensation to the individual landowners, it seems that both parties have an equal justification of the land ownership status. - On 27 July 2011, the Agrarian Agency came to PT Indotruba Tengah to discuss the disputed area and asked whether the land initially abandoned by the company or occupied by the communities. - On 31 November 2011, had been conducted land verification by Agrarian Agency, Plantation Agency, and PT Indotruba Tengah. In this moment, PT Indotruba Tengah asked Agrarian Agency to appoint this area as 	
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		<p>abandoned area, so that the company has no obligation to pay the land taxes.</p> <ul style="list-style-type: none"> - During this moment, the company ever considered to put this case to the court. However, considering negative social impact that might predicted in that time (the tense has increased), the company postponed the plan. <p>Until present, there is no other follow up from all parties. The company did not continue this case considering negative social impact that might happen, even though the company have to pay this disputed land taxes annually.</p> <p>In this RSPO Recertification audit, the auditor team has sent public consultation letter to Agrarian Agency. However, there was no Staff of Agrarian Agency was willing to be interviewed.</p> <p>Based on the description, can be concluded that the company can demonstrated the land title of the disputed land. In accordance with the explanation of indicator 4.5.1, that based on review of legality documents (HGU Decree, HGU Certificate and <i>Risalah Panitia B</i>) and interview with management, Village Heads and Plantation Agency, it is found that the HGU areas were came from government land bank that initially was purposed for transmigration program. Due to the failure of the transmigration program, the government offered the land to investors. Therefore, there was no land acquisition process to the individual landowners or customary rights and no FPIC related process.</p> <p>Based on field observation to these disputed areas, can be concluded that the area has been participatory mapped and well demarcated, both occupant and the company did not disturb each other. Therefore, there is no conflict in the field currently. It is also has been verified based on interview with Villages Heads and Plantation Agency.</p>	
4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification</p>	<p>Based on explanation of Indicator 4.8.1 that in the disputed land of 807.31 ha, there is no conflict since the dispute escalated.</p>	Complied

	addresses any unresolved conflict through appropriate conflict resolution mechanisms.	Based on field observation to these disputed areas, can be concluded that the area has been participatory mapped and well demarcated, both occupant and the company did not disturb each other. Therefore, there is no conflict in the field currently. It is also has been verified based on interview with Villages Heads and Plantation Agency.	
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).	Based on explanation of Indicator 4.8.1 that in the disputed land of 807.31 ha, there is no evidence of land acquisition through dispossession or forced abandonment of customary and user rights. Based on review of legality documents (HGU Decree, HGU Certificate and <i>Risalah Panitia B</i>) and interview with management, Village Heads and Plantation Agency, it is found that the HGU areas were came from government land bank that initially was purposed for transmigration program. Due to the failure of the transmigration program, the government offered the land to investors. Therefore, there was no land acquisition process to the individual landowners or customary rights and no FPIC related process.	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).	The disputed land of 807.31 Ha has participatory mapped. The area is located in the south east of Seruyan Estate, in particular in the HGU Certificate No. 5 of 1998 and No. 6 of 1998, or in the southern boundary of blocks G25, G28, G31 and G34.	Complied
<p>Principle 5: Support smallholder inclusion 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.	PT. Indotruba Tengah - Sekunyir POM does not receive and process FFB from smallholder. Not applicable	Not Applicable
5.1.2	(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	PT. Indotruba Tengah - Sekunyir POM does not receive and process FFB from smallholder.	Not Applicable

		Not applicable	
5.1.3	(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	<p>PT. Indotruba Tengah - Sekunyir POM does not receive and process FFB from smallholder.</p> <p>However, PT. Indotruba Tengah demonstrate contract with local contractor: Contract of FFB transport as per "Surat Perjanjian Kerja Pengangkutan TBS & Berondolan, Angkut Alat Panen, Angkut Karyawan, Angkut Pupuk, Angkut Sampah, dan Angkut Lain-lain PT Indotruba Tengah – CV Putra Isen Mulang No. SKE/SPK-LKL/I/2022006" dated 2 January 2022 – Section 3 stipulated timeframe of contract, Section 4 stipulate the piece rate/service price per distance coverage, Section 6 stipulate payment period and method.</p> <p>Not applicable</p>	Not Applicable
5.1.4	(C) Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and re-payments through FFB price reductions for replanting and/or, other support mechanisms where applicable.	<p>PT. Indotruba Tengah - Sekunyir POM does not receive and process FFB from smallholder.</p> <p>Not applicable</p>	Not Applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	<p>PT. Indotruba Tengah - Sekunyir POM does not receive and process FFB from smallholder.</p> <p>However, PT. Indotruba Tengah demonstrate contract with local contractor: Contract of FFB transport as per "Surat Perjanjian Kerja Pengangkutan TBS & Berondolan, Angkut Alat Panen, Angkut Karyawan, Angkut Pupuk, Angkut Sampah, dan Angkut Lain-lain PT Indotruba Tengah – CV Putra Isen Mulang No. SKE/SPK-LKL/I/2022006" dated 2 January 2022 – Section 3 stipulated timeframe of contract, Section 4 stipulate the piece rate/service price per distance coverage, Section 6 stipulate payment period and method.</p>	Complied

5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.	PT. Indotruba Tengah - Sekunyir POM does not receive and process FFB from smallholder. However, PT. Indotruba Tengah demonstrate contract with local contractor: Contract of FFB transport as per "Surat Perjanjian Kerja Pengangkutan TBS & Berondolan, Angkut Alat Panen, Angkut Karyawan, Angkut Pupuk, Angkut Sampah, dan Angkut Lain-lain PT Indotruba Tengah – CV Putra Isen Mulang No. SKE/SPK-LKL/I/2022006" dated 2 January 2022. Sample payment: Permohonan Pembayaran based on SKE/SPK-LKL/I/2022/038 dated 26 February 2022; Bank voucher for payment Bank BNI 46 Pangkalan Bun dated 15 March 2022; Receipt of payment signed by contractor 18 March 2022.	Complied
5.1.7	Weighing equipment is verified by an independent third party on a regular basis.	Entire weighbridge has been calibrated by related government agencies according to national regulation (cooperative and industry agency of Kalimantan Tengah Province). Sighted official letter of annual calibration of weighbridge year 2020: <ul style="list-style-type: none"> • Brand: GSC;GST 9700; C05255, capacity maks/min 40,000 kg / 10 kg → has been calibrated on 16 January 2020 (valid until 4 July 2021). Certificate number: 510.3/594/DPPKUKM.3/SKHP/VII/2020 • Brand: METLER TOLEDO; IND 560; 44522668, capacity maks/min 50,000 kg / 10 kg → has been calibrated on 16 January 2020 (valid until 24 June 2021). Certificate number: 510.3/592/DPPKUKM.3/SKHP/VII/2020. Sighted official letter of annual calibration of weighbridge year 2021: <ul style="list-style-type: none"> • Brand: GSC; GST 9700; C05255, capacity max/min 40,000 kg / 10 kg → has been calibrated on 11 October 2021 (valid until 11 October 2022). Certificate No.510.3/807/DPPKUKM.3/SKHP/X/2021 dated 18 October 2021. • Brand: METLER TOLEDO; IND 560; 44522668, capacity maks/min 50,000 kg / 10 kg → has been calibrated on 11 October 2021 (valid until 11 October 2022). Certificate No.510.3/806/DPPKUKM.3/SKHP/X/2021 dated 18 October 2021. 	Complied

5.1.8	The unit of certification supports Independent smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholder on who runs the Internal Controlling System (ICS), who holds the certificate, and who owns and sells certified materials.	PT. Indotruba Tengah - Sekunyir POM does not receive and process FFB from smallholder. Not applicable	Not Applicable
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.	PT. Indotruba Tengah - Sekunyir POM does not receive and process FFB from smallholder. However, PT. Indotruba Tengah - Sekunyir POM has defined the procedure to grievance mechanism, including against agreed timeframe and the outcome as per communication procedure No. Policy 394/ITH-KOM-01/11, version 03. The procedure was explained: <ul style="list-style-type: none"> • The company has protect whistle-blower and ensuring no sanction for them • If the cases did not handle enough at Estate/Mill units, the cases will escalated to the next level of management The procedure was made already accommodate all stakeholders and with understandable language (Indonesian). PT. Indotruba Tengah - Sekunyir POM has provide the "Suggestion Box". Based on document review and interview; in 2020, 2021, 2022 there was no grievance coming from smallholder or contractor. Furthermore, the worker usually submitted a verbal comments related to workers housing facilities maintenance, then the company has followed up by renovate or repair.	Complied
Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	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.	PT. Indotruba Tengah demonstrates working plan to assist smallholder "PT. Indotruba Tengah Action Plan Pembangunan Kebun Plasma 1,500 Ha", dated 10 January 2022. - Environmental permit: UKL UPL/SPPL (Surat Pernyataan Pengelolaan Lingkungan) by MRC	Complied

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		<ul style="list-style-type: none"> - Feasibility survey: time limit 14 February 2022 by MRC - Survey HCV, LUCA, CSA: time limit 1 March 2022 by SQM - Inventory and land measurement for compensation: coordination with District Government, prepare measurement manpower time limit 7 March 2022 by PSD/Estate, RKTB, MRC - Verification legal ownership of land: coordination with District Government and Village Authorities, time limit 28 February 2022 - Negotiation: Getting information from other group of companies as comparison by PSD - Paper approval: 1-31 March 2022 by RKTB - Determining contractor for land preparation: 21 April 2022 by RKTB - Seedling purchase: 1 July 2022 by RKTB - Land preparation and planting: blueprint New Planting Program, field preparation, LCC-Rock Phospate provision time limit 1 May 2022 by RKTB - KUD application and establishment: time limit 1 September 2022 by RKTB - MoU development smallholder: time limit 1 September 2022 by RKTB - Application for smallholder list to Regency: time limit 1 October 2022 by RKTB - Development of smallholder: time limit 1 June 2023 by RKTB <p>Progress implementation: "Notulen Survey Calon Lahan Fasilitasi Kebun Masyarakat (Plasma)" dated 2 February 2022. The land survey carried out on Sidomulyo village with community and farmer group attending. There are 250 members with 2 Ha oil palm plantation each, totalling 500 Ha, ex-PIR-Trans PTPN XIII. Currently the smallholders are in process registering the land for land certificate (PTSL). Other discussion related to plantation costing. The area has been mapped.</p>	
5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and	PT. Indotruba Tengah demonstrates working plan to assist smallholder, as of audit date, verified "Notulen Survey Calon Lahan Fasilitasi Kebun Masyarakat (Plasma)" dated 2 February 2022. The land survey carried out on Sidomulyo	Complied

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	managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	village with community and farmer group attending. The meeting and survey were to determine the interest and to agreed smallholder construction cost.	
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	PT. Indotruba Tengah demonstrates working plan to assist smallholder, as of audit date, verified "Notulen Survey Calon Lahan Fasilitas Kebun Masyarakat (Plasma)" dated 2 February 2022. The land survey carried out on Sidomulyo village with community and farmer group attending. There are 250 members with 2 Ha oil palm plantation each, ex-PIR-Trans PTPN XIII. Currently the smallholders are in process registering the land for land certificate (PTSL).	Complied
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	PT. Indotruba Tengah does not have scheme smallholder in its supply base. This indicator is not applicable.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	Verified progress "Notulen Survey Calon Lahan Fasilitas Kebun Masyarakat (Plasma)" dated 2 February 2022. The land survey carried out on Sidomulyo village with community and farmer group attending. There are 250 members with 2 Ha oil palm plantation each, ex-PIR-Trans PTPN XIII.	Complied
Principle 6: respect workers' rights and conditions			
Protect workers' rights and ensure safe and decent working conditions.			
Criteria 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	The company has established the policy of equal opportunity, non-discrimination and treatment in employment, which is contained in the Guidelines for Sustainable Plantation Management No. 724/TQEM-SPMS/09. The policy was explained that in order to realize harmonious industrial relations, dynamic and fair company implemented industrial relations of each operational unit without distinction of race, religion, race and gender in all types of field work. This policy is in place and has been disseminated to relevant stakeholder on 17 July 2022. The stakeholders including Labor Union, Gender Committee, Village	Complied

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		Heads, Sub-District Police Officer, etc. This policy can be accessed upon requested.	
6.1.2	(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>During the audit, the company has shown evidence that non-discrimination and equal opportunity policy is implemented. Based on employee list of March 2022, can be concluded thatt the The company does not practice any form of discrimination, employees are given the opportunity to work regardless of ethnicity, religion, origin, and gender. The workers came from various religion, ethnic, and area.</p> <p>Based on interview with Labor Union, Gender Committee, Village Heads, Plantation Agency and Manpower Agency, they mentioned that there is no indication of discrimination conducted by the company. The job vacancies were published, the recruitment were based on competencies and suitability with the role needed. Local communities and women are not discriminated (there is no migrant worker).</p>	Complied
6.1.3	The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	<p>The company has prepared a procedure for hiring workers, regulated that hiring and promotion of workers based on skill, work experiences, and job evaluation in SOP of Employee Recruitment No. 394/ITH-SOP-26/11 dated 5 January 2022. The procedure has explained:</p> <ul style="list-style-type: none"> - Prepared eet the standard of competence that inferred in the Position Description and Job Profile. Recruitment selection, hiring and promotion has based on skills, capabilities, qualities, and medical fitness. - Job opportunities were communicated and given to surrounding villagers at first priority where no discrimination found observed during interview and related records of workers being employed. All workers are treated equally in accordance with company regulation including rights of worker as well. <p>It has been verified that the recruitment and promotion process are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. For instance, the promotion documentation of 2021 consist of:</p>	Complied

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		<ul style="list-style-type: none"> - Proposal of additional worker from Estate Manager to Region CEO. - Form of worker assessment for recruitment - Form of performance evaluation for promotion - List of worker assessment result - List of worker promotion - Proposal of promotion approval from Estate Manager to Region CEO on 15 February 2021. - Approval of Region CEO of worker promotion - Decree of worker grade increase e.g No. SK-KENAIKAN GRADE/SKU-SRE/2021/VII/014 dated 1 July 2021 of worker ID 27838 from Grade C3 to C4. - Contractual Agreement of Temporary Worker. Eg. No. 29/SKE/SPK-PKWT/XI/2021 dated 1 November 2021, for the role of harvester attendance. 	
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 to female workers, Gender Committee, and Labor Union, can be concluded that during recruitment process, the company did not conduct pregnancy test.</p> <p>However, In the SOP of Employee Recruitment (No. 394/ITH-SOP-26/11 dated 5 January 2022) Clause 5.3, stipulates "... dan jika perempuan tidak dalam masa hamil." – if female worker, not pregnant.</p> <p>The unit of certification cannot demonstrate pregnant women are not discriminated in the recruitment procedure, by giving alternative opportunity in the position that not harmful for the reproduction organ (and/or the fetus).</p> <p>Non-conformity:</p> <p>The unit of certification cannot demonstrate pregnant women are not discriminated in the recruitment procedure, by giving alternative opportunity in the position that not harmful for the reproduction organ (and/or the fetus).</p>	Non-compliance
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>The company has established a Gender Committee since RSPO initial certification in each unit as an organization to to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p>	Complied

		Based on document review and interview with Gender Committee, can be concluded that there was no issues concerning discrimination based on gender in recruitment and promotion, harassment in the workplace, or violation of reproduction rights.	
6.1.6	There is evidence of equal pay for the same work scope.	<p>Based on interview with management, workers, and Labor Union, there are several types of worker status in the company, that are Staff level, permanent worker (PKWTT), and temporary worker (PKWT). The company did not have a casual worker scheme. The employment contract, company regulation and work agreement provided in Indonesian language and available for both parties.</p> <p>The evidence of equal pay for the same work scope has demonstrated based on payment list and sample of payment slips. The employs wages payment referred to the minimum wage consists of basic wage plus a fixed allowance.</p> <p>For instance, the nursery workers with ID 27884, ID 28068, and ID 28122 have received basic salary of IDR 3,317,668 in March 2022.</p>	Complied
Criteria 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	(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>Related documents detailing payments and conditions of employment (regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc) stipulated in each contractual agreement and Company Regulation (<i>Peraturan Perusahaan</i>) of 2021 – 2023 in Bahasa Indonesia. Based on interview with sampled worker and worker union, the document accessible and they understand the information within.</p> <p>The company provides the worker’s salary based on governmental minimum wage. The company has had a regulation of minimum wage of 2022 based on Governor Decree No. 188.44/445/2021 dated 30 November 2021, amount of IDR 3,077,218.</p> <p>The payment has been verified based on review of list of payment and payment slips. For instance, the nursery workers with ID 27884, ID 28068, and ID 28122 have received basic salary of IDR 3,317,668 in March 2022.</p>	Complied

<p>6.2.2</p>	<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>Related documents detailing payments and conditions of employment (regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc) stipulated in each contractual agreement and Company Regulation (<i>Peraturan Perusahaan</i>) of 2021 – 2023.</p> <p>The Company Regulation of 2021 – 2023 has been approved by Manpower Agency, which means that the clauses have been in accordance with governmental regulation. The approval was based on Decree of Manpower Agency No. KEP.143/565/HI.03/IX/Nakertrans dated 23 September 2021.</p> <p>Moreover, based on review of Contractual Agreement also has been stated the clauses related regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. For instance, Contractual Agreement of Temporary Worker. Eg. No. 29/SKE/SPK-PKWT/XI/2021 dated 1 November 2021, for the role of harvester attendance.</p> <p>Based on interview with workers in the field, they have received and understood their contractual agreements.</p>	<p>Complied</p>
<p>6.2.3</p>	<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 provides is based on waging 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 Company Regulation of 2021 – 2023.</p> <p>The Company Regulation has explained 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, in compliance with national legal requirements).</p> <p>The legal compliance of employment regulations have been verified based on</p>	<p>Complied</p>

		<p>these evidence (collected based on document review, interview with workers, Gender Committee, Labor Union, Manpower Agency):</p> <ul style="list-style-type: none"> - Payment: regulation of minimum wage of 2022 based on Governor Decree No. 188.44/445/2021 dated 30 November 2021, amount of IDR 3,077,218. The payment has been verified based on review of list of payment and payment slips. For instance, the nursery workers with ID 27884, ID 28068, and ID 28122 have received basic salary of IDR 3,317,668 in March 2022. - Working hours: maximum 40 hours per week (7 hours per day) and working from Monday to Saturday. For overtime working has been paid based on governmental regulation of overtime payment. Holiday is 12 days/year according government regulation. - Sickness including menstruation leave and maternity leave: based on document review and interview with Gender Committee and Nurse/Midwife are been provided with no issue. - Worker protection: the company has provided Clinics in every Estate, paramedic (nurse and midwife), regular medical check-up (postponed in previous 2 years due to Covid 19 and will be conducted in 2022), and PPE in accordance with the HIRAC and MSDS. 	
6.2.4	<p>(C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p>	<p>The company has provide facilities to improve worker’s wellbeing based on document review, interview, and field observation, among others:</p> <ul style="list-style-type: none"> - Adequate housing: non-permanent, semi-permanent, and permanent. The non-permanent housing has been planned in CAPEX (Capital Expenditure) planning to be renovated to permanent housing gradually. Based on field observation in housing are, the company is building some permanent houses. - Sanitation facilities, domestic waste disposal, and drainage. - Water supplies: from water treatment and wells. 	Complied

		<ul style="list-style-type: none"> - Medical facilities: Clinics in each Estate and paramedic (nurses and midwives) - Educational facilities: schools and school busses. - Staple food store: provided by worker cooperative. - Electricity: from Mill and gensets - Mosque and Church. - Sport facilities: Field of golf, tennis, badminton, football. - Etc. 																							
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	The company has established Worker Cooperative (<i>Koperasi Karyawan</i>) and provided store to allow the cooperative to sell staple foods with affordable price. Moreover, the company is located only 30 minutes from Sub-District city of Pangkalan Banteng.	Complied																						
6.2.6	A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours.	<p>The company has calculated the decent living wage (<i>Perhitungan Prevailing Wages</i>) given to all workers according to regulations including workers who work on a piece / quota basis whose wage calculation is based on a quota that can be reached during regular working hours.</p> <p>The company calculates a living wage using the benefit approach that the company has provided to workers, including job support, rice allowances, facilities (provision of facilities: schools (including school transportation), housing, clean water, polyclinics (health), etc.), with the following calculations:</p> <table border="1"> <thead> <tr> <th>Benefit</th> <th>Explanation</th> <th>Total Cost</th> <th>No. Of Unit</th> <th>Unit Cost Per Year</th> <th>Per Wo</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Housing</td> <td>Cost Per Housing - Benefit in 30 years</td> <td>6.257.094.999</td> <td>187</td> <td>1.115.347</td> <td>92</td> </tr> <tr> <td>Housing Maintenance</td> <td>81.625.601</td> <td>187</td> <td>436.501</td> <td>36</td> </tr> <tr> <td>Electricity Supply</td> <td>1.450.293.998</td> <td>187</td> <td>7.755.583</td> <td>646</td> </tr> </tbody> </table>	Benefit	Explanation	Total Cost	No. Of Unit	Unit Cost Per Year	Per Wo	Housing	Cost Per Housing - Benefit in 30 years	6.257.094.999	187	1.115.347	92	Housing Maintenance	81.625.601	187	436.501	36	Electricity Supply	1.450.293.998	187	7.755.583	646	Complied
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		Water Supply	177.524.406	187	949.328	79,111	
		Community Building Maintenance	529.670.526	187	2.832.463	236,039	
	Health	Transport (Ambulance)	98.667.551	287	343.789	28,649	
		Doctor Visit	8.035.000	287	27.997	2,333	
		Other Health Cost	19.721.000	287	68.714	5,726	
	Social	Sports & Other Transport	23.225.125	287	80.924	6,744	
		Sports Equipment & facilities	61.914.673	287	215.731	17,978	
		School Transport	97.872.502	287	341.019	28,418	
		Independence day celebration	74.462.191	287	259.450	21,621	
		Teacher	215.702.839	287	751.578	62,631	
		Children care	617.088.413	287	2.150.134	179,178	
	Transport	Workers Transport	232.634.755	287	810.574	67,548	
		Total in-kind benefit	8,880,107,572		18,139,131	1,511,594	
		Average Monthly THP salary worker				3,193,750	
		Total Value of Prevailing Wage				4,705,344	

PROCEDURAL NOTE:

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>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, workers, and Labor Union, there are several types of worker status in the company, that are Staff level, permanent worker (PKWTT), and temporary worker (PKWT). The company did not have a casual worker scheme.</p> <p>Opportunity for improvement (OFI): Sekunyir Estate has appointed all temporary (PKWT) harvester as permanent workers (PKWTT/SKU). For Seruyan Estate, the appointment of temporary (PKWT) harvester as permanent workers is under process. The unit of certification has an opportunity for improvement to ensure the onward harvester recruitment (as core work) is directly refers to the procedure of recruitment of permanent worker (SOP of Employee Recruitment No. 394/ITH-SOP-26/11 dated 5 January 2022).</p>	OFI
<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>			
6.3.1	<p>(C) A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p>	<p>The company has established the policy of recognizing freedom of association and right to collective bargaining, which is contained in the Guidelines for Sustainable Plantation Management No. 724/TQEM-SPMS/09.</p> <p>The policy was explained that in order to realize harmonious industrial relations, dynamic and fair company implemented industrial relations of each operational unit to recognizing freedom of association and right to collective bargaining.</p> <p>This policy is publicly available, and stakeholder can access it upon request. Structure of Labor Union (<i>Serikat Pekerja Seluruh Indonesia/SPSI</i>) presented in</p>	Complied

		document of Decree No. 099/PC-FSPP-SPSI/KTB/X/2018 dated 26 th October 2018.	
6.3.2	Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.	The management and Labor Union regularly conducted meetings to discuss issues in the employment. The recent meeting conducted on 15 February 2022 to discuss medical check-up of 2022.	Complied
6.3.3	Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.	Based on interview with Head of Labor Union, it is known that the management does not interfere with the formation or operation of registered labour union. There is no coercion and intervention related to membership and the course of the organization.	Complied
Criteria 6.4: Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	Organization has established and documented policy or the protection of children, including prohibition of child labour as per "Social Policy", signed by Head Plantation since December 2011. Stated in point 6 that Plantation upstream Indonesia prohibit to use forced labour or child labour. In the SOP of Employee Recruitment (No. 394/ITH-SOP-26/11 dated 5 January 2022) also mentioned that the company will not recruit the candidate under 18 years old.	Complied
6.4.2	(C) Documented evidence on the fulfilment of worker's minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.	The policy has been included into service contracts, sample seen on Contractual Agreement with CV Putra Isen Mulang No. SKE/SPK-LKL/I/2022/006 dated 2 January 2022 for FFB Transport. In the contract stated that the contractor must be obey and comply to regulation and company policy including no forced labor and child labour. Based on workers list verification in Estates and Mill updated march 2022 can be demonstrated that there is no workers with age under 18 years old at the time they were recruited. It is also has been verified during field observation and interview with stakeholders, that the company did not recruit child labor.	Complied

6.4.3	(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.	Based on descriptions on indicator 6.4.1 and 6.4.2, it is clear that the company did not employ candidate under 18 years old.	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	<p>No child labor policy has been disseminated to relevant stakeholder on 17 July 2022. The stakeholders including Labor Union, Gender Committee, Village Heads, Sub-District Police Officer, etc.</p> <p>Moreover, he policy has been included into service contracts, sample seen on Contractual Agreement with CV Putra Isen Mulang No. SKE/SPK-LKL/I/2022/006 dated 2 January 2022 for FFB Transport. In the contract stated that the contractor must be obey and comply to regulation and company policy including no forced labor and child labour.</p> <p>Based on interview with workers, Labour Union, Gender Committee, Village Heads, including FFB Contractor, can be concluded that the company has disseminated and stakeholders has understood the no-child labor policy.</p>	Complied
Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.	<p>The company has establish a policy under Minamas Corporate Group as per "Gender Policy" dated 11 April 2011. In the policy point 1 stated that company commit to prevent the sexual harassment "<i>Endeavour top prevent sexual harassment and all other forms of violence against women, workers and community</i>".</p> <p>This procedure is in place and has been disseminated to relevant stakeholder on 17 July 2022. The stakeholders including Labor Union, Gender Committee, Village Heads, Sub-District Police Officer, etc.</p> <p>Based on interview with workers, Labour Union, Gender Committee, Village Heads, including FFB Contractor, can be concluded that the company has disseminated and stakeholders has understood the policy to prevent sexual harassment.</p> <p>Moreover, the company has formed a Gender Committee as a place to submit grievance related sexual harassment or violation of reproductive rights. Based on interview with Head of Gender Committee and women workers, are known</p>	Complied

		that there is no negative issue related to sexual harassment or violation of reproductive rights.	
6.5.2	(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>The company has established a policy under Minamas Corporate Group as per "Social Policy" dated 11 April 2011. In the policy point 4 stated that company commit to protect the reproductive right "<i>To develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive right</i>".</p> <p>This procedure is in place and has been disseminated to relevant stakeholder on 17 July 2022. The stakeholders including Labor Union, Gender Committee, Village Heads, Sub-District Police Officer, etc.</p> <p>Based on interview with workers, Labour Union, Gender Committee, Village Heads, including FFB Contractor, can be concluded that the company has disseminated and stakeholders has understood the policy to protect reproductive rights.</p> <p>Moreover, the company has formed a Gender Committee as a place to submit grievance related sexual harassment or violation of reproductive rights. Based on interview with Head of Gender Committee and women workers, are known that there is no negative issue related to sexual harassment or violation of reproductive rights.</p>	Complied
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.	<p>The Head of Gender Committee also has a role as a Company's Midwife (<i>Bidan</i>). Based on interview, she has identified the need of expectant mother and new mother. Based on interview with Midwife, sample of new mother and other women worker, the needs of new mother that has been identified among others to consult the health of their fetuses and babies, to get proper medical check-up and vitamins, a place and paramedic (nurse and midwife) to give proper birth, daycare/creche, etc.</p> <p>Management has fulfilled their need by conducting monthly 'Posyandu' as a moment to check their maternity (fetuses) and babies under 5 years old, to give</p>	Complied

		consultations and vitamins. In each estate also available Clinic and nurse/midwife for giving birth as well as daycare/creche.	
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.	<p>The company has had procedure to address any dispute or grievance in SOP of Grievance Resolution of Stakeholder (No. 01/MPK-OU/XII/21 dated 01 December 2021). The SOP has included timing to respond the grievance (max 14 days), to ensure the anonymity of any party if requested, and grievance resolution without any reprisal or intimidation. If the cases can not be handled at Estate/Mill level, the cases will be escalated to the next level of management, using mediator, or to be escalated to the court or RSPO website (complaint panel).</p> <p>Moreover, the company has formed a Gender Committee as a place to submit grievance related sexual harassment or violation of reproductive rights. Based on interview with Head of Gender Committee and women workers, are known that there is no negative issue related to sexual harassment or violation of reproductive rights.</p>	Complied
Criteria 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports; • Payment of recruitment fees; • Contract substitution without worker’s consent • Involuntary overtime; • Lack of freedom of workers to resign • Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement • Debt bondage • Withholding of wages 	<p>Organization has established and documented policy about force or trafficked labour in Social Policy point 1 stated that “The company prohibit forced labour or child labour”. Company forbid child labour, forced labour, and will provide work contract in language that understood by workers and make sure the payment give to workers in simple ways, on time and clear.</p> <p>Based on document verification (list of employees, salary slips and payroll for the period of March 2022) and interviews with company management and Manpower Agency, no work termination was identified that was not in accordance with the work contract, the determination of overtime time was in accordance with the Overtime Work Order (SPL), and was not identified there are employees who work because of debt with the company.</p> <p>Moreover, no salary deduction were not in accordance with the regulations, even though there were subsidies and deductions for BPJS (employment insurance)</p>	Complied

		<p>contributions that were in accordance with applicable regulations. There was no identification of a work bond that impeded employee resignation, there was no indication of a cost involved in the employee recruitment process.</p> <p>Based on field observation, and interview with Labor Union, is known that there is no migrant worker within the company.</p>	
6.6.2	<p>(C) Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.</p>	<p>Based on employee list, it has been identified that the company has employed PKWT. The procedure related PKWT is available in Internal Memorandum of Region HRD (No. 001i/HRBP-KTB/SOP-TK-PKWT/XII/2021 dated 1 December 2021).</p> <p>The implementation has been verified based on documentation of promotion from temporary worker to permanent worker below:</p> <ul style="list-style-type: none"> - Seruyan Estate (on process): Performance evaluation, Permanent (full time) Worker Application of 11 workers dated 12 January 2022 and Letter of Seruyan Estate Manager to CEO Upstream dated 12 January 2022 related proposal for workers addition. - Sekunyir Estate (approved): Performance evaluation, Permanent (full time) Worker Application of 10 workers, Letter of Seruyan Estate Manager to CEO Upstream related proposal for workers addition, approval from CEO Upstream dated 29 March 2022. The issuance of appointment letter of permanent workers are being processed. 	Complied
<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>			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	<p>The company has had a P2K3 Structure (OHS Committee) which was formed based on national regulation. P2K3 Structure has been approved by Manpower Agency based on Decree No. 146/DISNAKERTRANS/II/ 2022 dated 23 February 2022. The attachment are P2K3 structure and fire fighting team structure.</p> <p>According to national regulation, the P2K3 Secretary must be a licensed OHS Expert. The OHS Expert is Mr. Asmara Hadi with details below:</p>	Complied

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		<ul style="list-style-type: none"> - OHS Expert Certificate No. 13.2257/AK3/U/VII/2013 dated 4 July 2013. - OHS Expert License Reg. No. 6196/PK3/AJ/31/2020/P2 valid thru 20 January 2023. - Appointment Decree as OHS Expert in PT Minamas Gemilang (the name of Sime Darby in Indonesia) No. 5/226/AS.02.04/I/2020 dated 20 January 2020, valid for 3 years. <p>Regular meetings involving management and workers have been conducted to implement, discuss, and evaluate the OHS program and incident. For instance in the meeting on 17 January 2022 has discussed the plan of medical check-up of 2022, that in previous 2 years has been postponed due to Covid 19 (based on instruction from government).</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>Emergency Respond procedure written in Bahasa Indonesia was described in "SOP of Emergency Respond No. 7300/PSQM-ESH/13", the procedure are covered prevention action, preparation and mitigation, physical ability and training skill, communication and detail of emergency response mitigation step. Some scenarios of emergency situation were identified such as accident, fire earthquake, and chemical spillage.</p> <p>The procedure described the description of emergency situation may happen in plantation and mill, roles and responsibilities of each emergency response team include the mechanism how to conduct medical evacuation to near hospital/local health centre, also it was available the emergency contact number of each internal emergency team and external related parties. Evacuation route and muster point are available and made known to the employee.</p> <p>The structure of Emergency Response Team (ERT) has been established, consist of ERT commander, Fire Fighting Commander, Community Team, Fire Fighting Team, Transportation Team, Communication Team and Evacuation Team. The list of protection equipment for emergency was available such as fire extinguisher, fire engine etc. The awareness of employee was gained with the</p>	OFI

		<p>simulation of emergency response and Fire training conducted annually both for Mill and Estate.</p> <p>Evacuation routes and emergency flowcharts have been disseminated during simulation. Emergency signs and boards were provided in several areas. Muster points for each area such as workshop, warehouse, office etc. were sighted.</p> <p>The company has assigned the first aider on behalf Sukiran. He has certified as first aider based on Certificate No: Ser.3637/PK3/IX/2015 dated 2 Dec 2015.</p> <p>First aid equipments are available in the worksites. There are 26 first aid kit available in Sekunyir Estate, 6 first aid kit at Sekunyir Factory/Mill and 11 First aid kit in Seruyan Estate. Monitoring of First aid kit conducted in monthly basis. Evidence of monitoring can be shown during audit.</p> <p>Record of all accident are periodically review as per OHS Committee meeting. Record of accident report as per Accident report and LTI report. The data will be mentioned in indicator 6.7.5</p> <p>Opportunity for improvement:</p> <p>Certificate Holder demonstrated SOP related to occupational health and safety; HIRADC for Sekunyir POM review and updated 10 January 2022; HIRADC for Sekunyir Estate and Seruyan Estate review and updated 10 January 2022; SOP for Emergency No.73PSQM-ESH/13 available; Expected consistency communicating safety briefing for visitor.</p>	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>PPE Provision</p> <p>Based on interview with workers and Labor union, the PPEs are provided to all workers without any charge. The type of PPE is defined based on risk analysis (HIRAC) and/or MSDS. It has been shown evidences of regular PPE provision especially for high risk workplace such as chemical storage, pesticide application, manuring, mill’s machineries, harvesting, etc.</p> <p>Based on field observation in the high risk workplace in the Mill and Estate, known that the workers provided proper PPE in accordance with the HIRAC and/or MSDS. For instance:</p>	Complied

		<ul style="list-style-type: none"> - Harvester: has been provided sickle and axe cover. - Manuring, spraying, chemical storage operator: has been provided rubber gloves, mask, face protector, apron, boots. - Genset/engine room, boiler operator: has been provided mas and ear muff/ear plug. <p>Interview with the workers and Labor Union, the PPE has been provided, exchanged regularly or anytime if broken without any charge. The PPE stocks can be seen on material storage.</p> <p>Sanitation facilities for chemical applicator</p> <p>Sanitation facilities and PPE storage for pesticide/fertilizer applicator provided in the Division Offices called BSS (Block Spraying System) and BMS (Block Manuring System). Therefore, the PPE and working tools are washed and stored in the special place and prohibited to be placed in worker's houses.</p>	
6.7.4	<p>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.</p>	<p>The company provide Clinics in each Estate including its paramedic of nurse and midwife. A company doctor also available in Regional scope (covering several company in the group).</p> <p>For annual medical check-up has been postponed in previous two years due to Covid pandemic and Memorandum of Manpower Minister No. M/7/AS.02.02/V/2020 Tahun 2020 concerning to postpone medical check-up during Covid pandemic. However, the company has a plan to conduct medical check-up in mid-2022. The tender letter from several laboratories has been verified by auditor.</p> <p>Other than that, the company has provided the employees with employment and health insurance (<i>BPJS Ketenagakerjaan and BPJS Kesehatan</i>) to cover occupational accident and medical insurance in accordance with the national regulation, which is routinely paid every month for all workers including the dependant for health insurance. For instance the employment insurance has been paid on 30 March 2022.</p>	Complied

6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	The company has recorded its occupational injuries using Lost Time Accident (LTA) metrics. LTA report of 2021 has been made by each estate and mill as below:	Complied																																	
			<table border="1"> <thead> <tr> <th rowspan="2">UNIT</th> <th colspan="5">Year Todate</th> </tr> <tr> <th>Case</th> <th>LTI</th> <th>WH</th> <th>FR</th> <th>SR</th> </tr> </thead> <tbody> <tr> <td>Sekunyir Estate</td> <td>0</td> <td>-</td> <td>794,599</td> <td>-</td> <td>-</td> </tr> <tr> <td>Seruyan Estate</td> <td>3</td> <td>11</td> <td>685,342</td> <td>4</td> <td>16</td> </tr> <tr> <td>Sekunyir Mill</td> <td>0</td> <td>-</td> <td>243,747</td> <td>-</td> <td>-</td> </tr> </tbody> </table>					UNIT	Year Todate					Case	LTI	WH	FR	SR	Sekunyir Estate	0	-	794,599	-	-	Seruyan Estate	3	11	685,342	4	16	Sekunyir Mill	0	-	243,747	-	-
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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.	PT. Indotruba Tengah prepared Integrated Pest Management Plan "Program dan Penanganan Hama dan Penyakit Tanaman serta Pengendalian Hama Terpadu 2022".	Complied																						
			<table border="1"> <thead> <tr> <th>Type of Pest & Disease</th> <th>Activity</th> <th>Time frame</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td rowspan="6">Bagworm and nettle caterpillar infestation</td> <td>Monitoring/census for bagworm and nettle caterpillar infestation</td> <td>Every month</td> <td>-</td> </tr> <tr> <td>Nettle caterpillar control</td> <td></td> <td rowspan="6">Chemical control implemented when pest infestation surpassed economic threshold.</td> </tr> <tr> <td><u>Manual control</u></td> <td></td> </tr> <tr> <td>Handpicking</td> <td></td> </tr> <tr> <td>Handpicking the cocoon</td> <td></td> </tr> <tr> <td><u>Chemical control</u></td> <td></td> </tr> <tr> <td>Fogging with insecticide</td> <td></td> </tr> </tbody> </table>		Type of Pest & Disease	Activity	Time frame	Remarks	Bagworm and nettle caterpillar infestation	Monitoring/census for bagworm and nettle caterpillar infestation	Every month	-	Nettle caterpillar control		Chemical control implemented when pest infestation surpassed economic threshold.	<u>Manual control</u>		Handpicking		Handpicking the cocoon		<u>Chemical control</u>		Fogging with insecticide	
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			Spraying insecticide with knapsack		
			<u>Biological control</u>		Planting of beneficial plant depends on rainfall condition.
			Planting and maintenance beneficial plant 20% <i>Antigonon leptopus</i> , 20% <i>Turnera subulata</i> , 60% <i>Cassia tora</i>	January – March; October - December	
	Rat and squirrel infestation		Monitoring barn owl box and the population	Every month	-
			Monitoring the area and level of rat and squirrel infestation	Every month	-
	<i>Oryctes</i> / Rhino beetle infestation		Monitoring <i>Oryctes</i> infestation and monitor the area (mapping)	Every month	-
			Installation of Pherotrap		Control implemented when infestation beyond economic threshold.
			Chemical control		
	<i>Ganoderma sp</i> infestation		Monitoring <i>Ganoderma sp</i> infestation and monitor the area (mapping)	Every month	-
			Making isolation ditch and thinning out on palm infested with <i>Ganoderma</i>		Control implemented when infestation beyond economic threshold.
	<p>Census report:</p> <ul style="list-style-type: none"> - <i>Oryctes</i> census "Rekapitulasi Sensus dan Pengendalian <i>Oryctes</i> Sekunyir Estate; census in block C009 (C21)/2019, dated 4 March 2022, census covers area of 29.14 Ha, 386 palm monitored, 2 palms new attacked. Control: using Cypermetrin 50 EC 34,800 cc for 58.28 Ha (dosage 597 cc/Ha with 2 rotation per month); - Caterpillar census "Rekapitulasi Sensus dan Pengendalian Ulat Sekunyir Estate; census in block B008 (B21)/2019, dated 1 March 2022, census covers 				

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		<p>area of 39.98 Ha; <i>Sethora nitens</i> 0.08 per palm frond; in block C009 (C20)/1992, dated 5 March 2022, census covers area of 28.806 Ha; <i>Sethora nitens</i> 0.66 per palm frond; in block D010 (D20)/2019, dated 8 March 2022, census covers area of 31.82 Ha; <i>Sethora nitens</i> 0.68 per palm frond;</p> <ul style="list-style-type: none"> - <i>Ganoderma</i> census "Rekapitulasi Sensus dan Pengendalian <i>Ganoderma</i> Sekunyir Estate"; census in block B019/1992, dated 1 March 2022, census covers area of 42.38 Ha; total census for 123 palms – no new <i>Ganoderma</i> attack (0%); census in block A010/1995, dated 4 March 2022, census covers area of 29.34 Ha; total census for 134 palms – no new <i>Ganoderma</i> attack (0%); census in block A015/1994, dated 15 March 2022, census covers area of 33.08 Ha; total census for 126 palms – no new <i>Ganoderma</i> attack (0%). <p>Beneficial planting report "Rekapitulasi Sensus dan Pengendalian Ulat Sekunyir Estate – Penanaman Beneficial Plant"; block B008 (B20)/2019 of 39.09 Ha planted with <i>Turnera subulata</i> 256 clumps (655 meters), <i>Cassia cobanensis</i> 200 clumps (512 meters), <i>Antigonon leptopus</i> 32 clumps (82 meters); block D010 (D20)/2019 of 31.82 Ha planted with <i>Turnera subulata</i> 360 clumps (1131 meters), <i>Cassia cobanensis</i> 96 clumps (302 meters), <i>Antigonon leptopus</i> 26 clumps (82 meters).</p> <p>Seruyan Estate:</p> <ul style="list-style-type: none"> - <i>Oryctes</i> census "Rekapitulasi Sensus dan Pengendalian <i>Oryctes</i> Seruyan Estate" period January – March 2022: No infestation; - Caterpillar census "Rekapitulasi Sensus dan Pengendalian Ulat Seruyan Estate" period January – March 2022: No infestation; - <i>Ganoderma</i> census "Rekapitulasi Sensus dan Pengendalian <i>Ganoderma</i> Seruyan Estate" period January – March 2022; No infestation; 	
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		<p>Beneficial planting report "Rekapitulasi Sensus dan Pengendalian Ulat Seruyan Estate – Penanaman Beneficial Plant" period March 2022; Block 19A012 of 46.59 Ha planted with <i>Turnera subulata</i> 54 meters), <i>Cassia cobanensis</i> 108 meters, <i>Antigonon leptopus</i> 54 meters; Block 21B016 of 80.57 Ha planted with <i>Turnera subulata</i> 94 meters, <i>Cassia cobanensis</i> 203 meters, <i>Antigonon leptopus</i> 94 meters.</p> <p>Barn owl box monitoring in Seruyan Estate recorded in "Format Sensus Burung Hantu" period March 2022, described in Division I there are 74 BOB, 13 occupied and 61 not occupied, population 26; in Division II there are 76 BOB, 9 occupied and 67 not occupied, population 20; in Division III there are 66 BOB, 19 occupied and 47 not occupied, population 38.</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.	<p>PT. Indotruba Tengah use several species as part of IPM.</p> <p><i>Tyto alba</i> (Barn owl) as predator for rat and squirrel. Company made review to CABI list – Invasive Species Compendium. The CABI data list stipulates <i>Tyto alba</i> distribution in Indonesia was origin native and not invasive, based on reference to Bruce, 1999.</p> <p><i>Antigonon leptosus</i> (Coral vine) as natural host for caterpillar predator. Company made review to CABI list – Invasive Species Compendium. The CABI data list stipulates <i>Antigonon leptosus</i> distribution in Indonesia was introduced and no invasive status, based on reference to Burke and DiTommaso, 2011.</p> <p>Company made review to CABI list – Invasive species Compendium. The CABI data list stipulates <i>Cassia cobanensis</i> and <i>Turnera subulate</i> as – "No matches record found".</p>	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	Based on field visit and document review, there is no use of fire for pest control in whole area of Sekunyir Estate and Seruyan Estate.	Complied
<p>Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			

7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p>	<p>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 Standard Operation Procedure Referensi Manual Agronomi Penanaman Kelapa Sawit No.POLICY:110/EST-ARM/13" dated 16 September 2013. Section 15 Proteksi Tanaman Sub-section 2. Jenis Bahan Kimia untuk Pengendalian Hama Tanaman Kelapa Sawit" explains the type of pest, type of active ingredient for control, active ingredient percentage, Application: rate of active ingredient percentage, rate/palm and dilution – for mature and immature palm.</p> <p>The SOP also prerequisites for census process, economic threshold, application tools, calibration, application dosage, use of beneficial plant.</p> <p>Spraying works were conducted by selected spraying on specific target, for example weeds spraying on circle, path and TPH (market place). Other areas beside specific area were not applied. Riparian area along the river are prohibits to be performed spraying to minimize and reduce the negative environmental impact to the river and ecosystem. Pesticide and herbicide used by company was registered in the book of pesticides - "Komisi Pestisida" and has permit from government.</p> <p>Type of pesticide use by Estate and its weeds target are as follow:</p> <table border="1" data-bbox="1003 1018 1930 1394"> <thead> <tr> <th>Agro chemical</th> <th>Active ingredients</th> <th>Register No.</th> <th>Weeds target</th> </tr> </thead> <tbody> <tr> <td>Ally 20 WP</td> <td>Methyl metsulfuron</td> <td>RI.010301198837</td> <td><i>Ageratum conyzoides</i>, <i>Mikania sp</i>, <i>Pueraria javanica</i>;</td> </tr> <tr> <td>Basta 150 SL</td> <td>Amonium Glufosinat 150 g/l</td> <td>RI.01030119921113</td> <td>Wide leaf (<i>Ageratum conyzoides</i>); narrow leaf (<i>Axonophus compressus</i>, <i>Imperata cylindrica</i>, <i>Ischaemum timorense</i>, <i>Ottochloa nodosa</i>, <i>Setaria palmifolia</i>).</td> </tr> <tr> <td>Capture 50 EC</td> <td>Cypermethrin</td> <td>RI.01010120031874</td> <td>Pest</td> </tr> </tbody> </table>	Agro chemical	Active ingredients	Register No.	Weeds target	Ally 20 WP	Methyl metsulfuron	RI.010301198837	<i>Ageratum conyzoides</i> , <i>Mikania sp</i> , <i>Pueraria javanica</i> ;	Basta 150 SL	Amonium Glufosinat 150 g/l	RI.01030119921113	Wide leaf (<i>Ageratum conyzoides</i>); narrow leaf (<i>Axonophus compressus</i> , <i>Imperata cylindrica</i> , <i>Ischaemum timorense</i> , <i>Ottochloa nodosa</i> , <i>Setaria palmifolia</i>).	Capture 50 EC	Cypermethrin	RI.01010120031874	Pest	Complied
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		Centalon 480 EC	Triklopir Butoksi Etil	RI.01030120103716	General weed	
		Dithane 800 WP	Mankozeb	RI.010201197459	Fungi	
		Elang 480 SL	Isopropil Amina Glifosat 480 g/l	RI.01030119941170	Narrow leaf weed, <i>Asystasia</i> , <i>Imperata cylindrical</i>	
		Kencepat 75 SP	Acephate	RI.01010120103756	Pest, caterpillar	
		Kenlon 480 EC	Trikolopir Butoksi Etil 480 g/l	RI.01030120062433	Wood	
		Kenly 20 WG	Methyl metsulfuron	RI.01040120062432	<i>Chromolaena adorata</i> , <i>Ageratum conyzoides</i> , <i>Clidemia hirta</i>	
		Ken Up 480 SL	Glyphosate	RI. 01030120062435	Wide leaf (<i>Chromolaena adorata</i> , <i>Syndrella nodiflora</i> , <i>Mikana micrantha</i>); narrow leaf (<i>Ottochloa nodosa</i>)	
		Kenrane 288 EC	Floroksipir 1-MHE : 288 g/l	RI.01010120103759	<i>Legume</i> , <i>Asystasia</i>	
		Lifeline 280 SL	Amonium Glyphosate	RI.01030120175849	Narrow leaf and Wide leaf weed	
		Metaprima 20 WG	Methyl metsulfuron	RI.01030120031897	<i>Chromolaena adorata</i> , <i>Ageratum conyzoides</i> , <i>Clidemia hirta</i>	
		Prima Up 480 SL	Isopropilamina Glyphosate	RI.01030120031779	Narrow leaf weed	
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.	Document "Rekapitulasi LD50 dan Actual Pemakaian Pestisida" recorded pesticides use including active ingredients, LD50, area treated, amount of active ingredients applied per Ha and per ton FFB. Pesticide use in Sekunyir Estate:				Complied

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Trademark	UoM	Volume		
		2020	2021	2022*
Kenlon 480 EC/Dalopir	Liter	777	116	40
Centalon 480 EC	Liter	-	165	18
Kenly 20 WG	Liter	125	-	-
Lifeline 280 SL	Liter	-	2,065	-
Ken Up 480 SL	Liter	2,678	-	-
Capture 50 EC	Liter	-	5,191	3,348
Becano 500 SC	Liter	10	-	-
Ken Rane 288 EC	Liter	14	-	-
Prima Up 480 SL	Liter	1,794	6,304	1,732
Agristik	Liter	20	135	10
Metaprima	Kg	110	201	31
Ally 20 WP	Kg	585	-	-
Dithane 800 WP	Liter	10	31	5
Kencepat 75 SP	Kg	-	335	-

*up to March 2022
Pesticide use in Seruyan Estate:

Trademark	UoM	Volume		
		2020	2021	2022*
Kenlon 480 EC/Dalopir	Liter	132	6	49
Centalon 480 EC	Liter	70	38	-

		<table border="1"> <tr> <td>Kenly 20 WG</td> <td>Liter</td> <td>61</td> <td>-</td> <td>-</td> </tr> <tr> <td>Lifeline 280 SL</td> <td>Liter</td> <td>241</td> <td>98</td> <td>-</td> </tr> <tr> <td>Ken Up 480 SL</td> <td>Liter</td> <td>626</td> <td>-</td> <td>-</td> </tr> <tr> <td>Capture 50 EC</td> <td>Liter</td> <td>3,491</td> <td>4,975</td> <td>1,859</td> </tr> <tr> <td>Becano 500 SC</td> <td>Liter</td> <td>39</td> <td>-</td> <td>-</td> </tr> <tr> <td>Prima Up 480 SL</td> <td>Liter</td> <td>2,783</td> <td>2,943</td> <td>1,370</td> </tr> <tr> <td>Metaprima</td> <td>Kg</td> <td>52</td> <td>95</td> <td>59</td> </tr> </table> <p>*up to March 2022</p>	Kenly 20 WG	Liter	61	-	-	Lifeline 280 SL	Liter	241	98	-	Ken Up 480 SL	Liter	626	-	-	Capture 50 EC	Liter	3,491	4,975	1,859	Becano 500 SC	Liter	39	-	-	Prima Up 480 SL	Liter	2,783	2,943	1,370	Metaprima	Kg	52	95	59	
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7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	Use of pesticide are minimized as part of the plan, and in accordance with IPM Plans, there are no pesticide application outside of the targeted species and planned intervals. Pesticide are only used to reduce/eliminate existing pest, which has exceeded the economic threshold.	Complied																																			
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.	There is no prophylactic use of pesticides throughout Sekunyir Estate and Seruyan Estate. Pesticide/Herbicides are only used to reduce/eliminate existing pest, which has exceeded the economic threshold.	Complied																																			
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to: 7.2.5a Judgment of the threat and verify why this is a major threat.	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 Standard Operation Procedure Referensi Manual Agronomi Penanaman Kelapa Sawit No.POLICY:110/EST-ARM/13" dated 16 September 2013. Section 15 Proteksi Tanaman Sub-section 2. Jenis Bahan Kimia untuk Pengendalian Hama Tanaman Kelapa Sawit" explains the type of pest, type of active ingredient for control, active ingredient percentage, Application: rate of active ingredient percentage, rate/palm and dilution – for mature and immature palm. The SOP also prerequisites for census process, economic threshold, application tools, calibration, application dosage, and use of beneficial plant.	Complied																																			

		Based on record review, as stipulated in indicator 7.2.1 there was no use of WHO Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat.	
	7.2.5b Why there is no other alternative which can be used.	Certificate holder has showed the record of LD50 calculation in each unit based on amount of pesticide used. Sekunyir Estate and Seruyan Estate has calculated the LD50 of each pesticide (herbicide) in a monthly basis.	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	During the recertification audit, the audit obtain information that there was no pesticide used to control pest infestation. All of pesticide only using for weeding (herbicide). Based on interview with field assistant known that no pest infestation exceeds economic threshold that triggered pesticide usage.	
	7.2.5d Process to limit the negative impacts of the application.	Based on document verification, interview and field observation obtained information that there is no prophylactic use of pesticides.	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	PT. Indotruba Tengah implement a strict IPM plan and early-warning system. <ul style="list-style-type: none"> - There was no outbreak of pest, exceeds economic threshold. - No pest infestation exceeds economic threshold that triggered pesticide usage. 	
7.2.6	(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are 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.	Training provided for personnel handling pesticide; "Pelatihan Tim Block Spraying System" dated 21 March 2022 attended by Assistant, supervisor, sprayers and applicators. Located at Field B015, training material covers knowledge of spraying tools and pesticides, correct schedule and dosage, spraying tools calibration, MSDS, PPE, health and safety and first aid (ERP). Training provided for employee in Sekunyir Estate "Pelatihan Interpump" dated 3 October 2020 attended by 16 employees: mandor, and sprayers. Some topic that discuss such as safety pesticide handling, national regulation related to pesticide, symbol and label awareness and emergency procedure if any	Complied

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		<p>contamination or poisonous. The worker can describe purpose of PPE usage, attending regularly medical check and safety working procedures.</p> <p>Based on field observation at Block F003 Division 1 Sekunyr Estate and Block D017 Division 2 Seruyan Estate, verified that pesticides are handled and applied by well-trained person. Pesticide are applied according to SOP and good agricultural practices.</p>	
7.2.7	(C) Storage of all pesticides in accordance with recognized best practices.	<p>Based on field observation, the storage for all pesticide is in good condition. Based on filed visit (dated 13 and 14 April 2022) to pesticides storage and interview with storage keepers of Sekunyr Estate and Seruyan Estate; found that the storage for all pesticide is in good condition.</p> <p>A standard storage system appears to be implemented across by the organization. The storage is equipped with sufficient air ventilation to provide air circulation.</p> <p>Hazard signs, emergency shower, secondary containment, spill kit, appropriate PPE (overall, face shield, impermeable rubber gloves, apron, and mask) is available and ready for use.</p> <p>Working instruction for pre-mixing, stacking, and storing pesticide is current, MSDS is also readily available. Material Safety Data Sheets (MSDS) are obtained for all chemicals used and are available at the areas of mixing. These were all seen be controlled and were readily available.</p> <p>Training provided for personnel handling pesticide; "Pelatihan Tim Block Spraying System" dated 21 March 2022 attended by Assistant, supervisor, sprayers and applicators. Located at Field B015, training material covers knowledge of spraying tools and pesticides, correct schedule and dosage, spraying tools calibration, MSDS, PPE, health and safety and first aid (ERP).</p>	Complied
7.2.8	All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.	<p>All ex pesticides containers from Estates were collected and kept in temporary waste storage for 180 up to 365 days prior disposal to the permitted parties.</p> <p>Record seen related pesticides container disposal as per "Manifest Limbah Bahan Berbahaya dan Beracun (B3)" – No: KLHK-1643691769 dated 27 December</p>	Complied

		<p>2021, delivered to and by PT Indo Rudi Jaya, registered KLH-4584, address Jl. Sultan Adam Komplek Mandiri Permai No.42 RT.34, Kel. Surgi Mufti, Kec. Banjarmasin Utara, consist of:</p> <table border="1"> <thead> <tr> <th>Type of hazardous waste</th> <th>Volume (Ton)</th> <th>Manifest</th> </tr> </thead> <tbody> <tr> <td>Ex pesticides container (B104d)</td> <td>1.443</td> <td>KLHK-1643691769</td> </tr> <tr> <td>Medical waste (A337-1)</td> <td>0.0098</td> <td>KLHK-1643694375</td> </tr> </tbody> </table>	Type of hazardous waste	Volume (Ton)	Manifest	Ex pesticides container (B104d)	1.443	KLHK-1643691769	Medical waste (A337-1)	0.0098	KLHK-1643694375	
Type of hazardous waste	Volume (Ton)	Manifest										
Ex pesticides container (B104d)	1.443	KLHK-1643691769										
Medical waste (A337-1)	0.0098	KLHK-1643694375										
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p>	<p>There is no pesticides applied aerially in whole area of PT. Indotruba Tengah.</p>	<p>Complied</p>									
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p>	<p>In normal condition Sekunyir and Seruyan Estate conducted special annual medical surveillance for pesticides operators, due to COVID-19 pandemic condition, special annual medical surveillance was postponed until normal condition. This was in accordance with circular from Minister of Man Power No.M/7/AS.02.02/V/2020 regarding "Rencana Keberlangsungan Usaha dalam menghadapi Pandemi COVID-19 dan Protokol Pencegahan Penularan COVID-19 di Perusahaan" for temporarily postpone the medical checks of the workforce until occupational safety and health are met or until the COVID-19 pandemic ends.</p> <p>Based on interview with management and paramedic as well as minutes of management meeting on 5 February 2022, annual medical check up will be carried out this year (2022).</p>	<p>Complied</p>									

7.2.11	(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.	Based on interview with workers whom handling pesticides, during filed observation in Block A21 Division 3 Sekunyir Estate and Block D017 Division 2 Seruyan Estate, there was no works with pesticides is undertaken by person under the of 18, pregnant or breastfeeding women or other people that have medical restrictions. During filed visit and interview with workers handling fertilizer in Block E19 Division 2 Sekunyir Estate and Block B24 Division 1 Seruyan Estate, there was no works with fertilizer is undertaken by person under the of 18, pregnant or breastfeeding women or other people that have medical restrictions.	Complied
<p>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.</p>			
<p>Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
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.	Company has developed procedure for Hazardous waste handling and management as per "SOP Pengelolaan Limbah B3 & Bukan B3" dated 10 January 2022. The procedure describes the hazardous waste type, hazardous waste source and handling procedure. PT. Indotruba Tengah has conducted identification on waste and pollution source, "Identifikasi Sumber-sumber Limbah dan Pencemaran PT. Indotruba Tengah" dated 5 January 2022 such as in Sekunyir POM . Waste and pollution source in mill are house, workshop, warehouse, laboratory, used-filter, used-rag, old-iron, used-tires, oil can, grease can, used-bulb, paper, used-helmet, chemical bottle. Sekunyir & Seruyan Estate: Identified-activity that generates waste and pollution is generator hut, fertilization activity, workshop, chemical warehouse, spraying, office, housing/ mess, polyclinic, public bathroom. Meanwhile, name of generated wastes are used-oil, emission from air pollution, used-oil can, used oil-filter, used-spares part, used rag, used-PPE, used-accumulator, used-bulb,	Complied

		<p>used-sack, used-gloves, used-apron, rinse water, pesticide package, used-oil drum, used-chemical can, etc.</p> <p>Medical hazardous waste, such as: used injection bottle used injection liquid, used-medicine waste, used-injection needle, used-gloves, expired-medicine, and medicine plastic can and abate.</p> <p>The generated hazardous waste from workshop Sekunyir POM and estate has been stored in licensed temporary hazardous waste storage.</p> <p>Based on document's review, its shows that hazardous waste management in PT. Indotruba Tengah is conducted by storing each hazardous waste to licensed storage. Permit for hazardous waste storage "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Kabupaten Kotawaringin Barat No. 553/011/DPMPTSP-III/LH/2018 tentang Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun kepada PT. Indotruba Tengah-PKS Sekunyir", dated 25 September 2018 and valid until 5 years. PT. Indotruba Tengah hazardous waste storage located Seruyan Estate with coordinate 2° 24' 32.0" S and 112° 3' 59.8" E, Sekunyir Estate with coordinate 2° 26' 34.3" S and 112° 0' 27.5" E and Sekunyir POM with coordinate 2° 26' 34.3" S and 112° 00' 27.5" E.</p> <p>PT. Indotruba Tengah maintain the hazardous waste balance: input-output-disposal, record verified January 2019 – March 2022. Example in period July-December 2021, disposed of 1,443 kg chemical container, 376 kg used accu, 168 kg oil filters, 3,380 kg used oil, 9.8 kg medical waste, 79 kg contaminated rags, hand glove, and other.</p> <p>Work agreement PT. Indotruba Tengah with licensed transporter: "Surat Perjanjian Kerjasama Pengelolaan dan Pengangkutan Limbah B3 antara PT. Kridatama Lancar, PT. Teguh Sempurna, PT. Indotruba Tengah dengan PT. Indo Rudy Jaya and CV. Indo Rudy Green No.001/LB-3/KTT-KBR/2020", dated 8 May 2020.</p> <p>PT. Indo Rudy Jaya, licenced based on Ministry of Environment and Forestry Decree No. S.21/PSLB3-VPLB3/PPLB3/PLB.3/03/2020 that valid for 5 year since</p>	
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		the issuance, (3) hazardous waste is deliver to licenced collector PT Wastec (license based on Ministry of Environment Decree No S.1090/Menlhk/Setjen/PLB.3/12/2019 dated 20 Dec 2019, valid for 5 years), (4) reporting hazardous waste to Local Environmental Agency.	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	<p>Company has developed procedure for Hazardous waste handling and management as per "SOP Pengelolaan Limbah B3 & Bukan B3" dated 10 January 2022. The procedure describes the hazardous waste type, hazardous waste source and handling procedure.</p> <p>Section 5.2.8 stipulated waste contain tin and plastic send for sanitary landfill. Based on field visit to Sekunyir Estate Landfill, block C07, it was found: hazardous waste from Manthene and Kencepat (a.i. Acephate) bags and inner bag of fertilizer disposed into domestic pile; the waste pile was not put into landfill.</p> <p>Non-conformity:</p> <p>Based on field visit to Sekunyir Estate Landfill, disposal of waste material was not according to waste management procedure "SOP Pengelolaan Limbah B3 & Bukan B3" dated 10 January 2022.</p>	Non-compliance
7.3.3	The unit of certification does not use open fire for waste disposal.	Based on field visit to Sekunyir POM, Sekunyir Estate including housing Pondok II & III, Seruyan Estate including housing – waste disposal was not using fire. Audit team check to POM premise, estate offices, oil palm plantation.	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.	Both own estate has the procedure related to manage soil fertility (see detail in indicator 3.3.1). The implementation of manuring is based on fertilizer recommendation that set by Minamas Research Centre. Fertilizer dosage has set according to the soil needed refer to LSU and soil analysis.	Complied
7.4.2	Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.	PT. Indotruba Tengah demonstrates tissue sample analysis "Laporan Pengujian Analisa Jaringan Tanaman PT. Indotruba Tengah – Sekunyir Estate No.P9/2021" based on request letter No.002/PN & P-KTB/01/2021" dated 30 January 2021.	Complied

		<p>Date of sample received on 27 February 2021, date of analysis on 2-4 March 2021, date of issued on 5 March 2021. Analysis result shows parameter of ash, P, K Mg, Ca, N level. The analysis was carried out by Minamas Research Centre – Teluk Siak. Sample of analysis result: Lab code No.M-P-OP-202102-000236, 4.72% Ash, 0.0760% P, 1.6140% K, 0.1390% Mg, 0.407% Ca, 0.67% N, 3.98 ppm B.</p> <p>Another report “Laporan Pengujian Analisa Jaringan Tanaman PT. Indotruba Tengah – Seruyan Estate No.P10/2021” based on request letter No.002/PN&P-KTB/01/2021 dated 30 January 2021. Date of sample received on 27 February 2021, date of analysis on 2-4 March 2021, date of issued on 5 March 2021. Analysis result shows parameter of ash, P, K Mg, Ca, N level. The analysis was carried out by Minamas Research Centre – Teluk Siak.</p> <p>Sample of analysis result: Lab code No.M-P-OP-202102-000258, 3.90% Ash, 0.1130% P, 1.6860% K, 0.1080% Mg, 0.272% Ca, 0.58% N, 3.81 ppm B.</p> <p>PT. Indotruba Tengah demonstrates Soil Analysis report “Hasil Analisa Tanah No.188-LHU/UN8.2.1/PL/2020 Universitas Lambung Mangkurat Lembaga Penelitian dan Pengabdian Kepada Masyarakat Pusat Penelitian Lingkungan Hidup”, datum 15 July 2020. The soil analysis reflected the condition of C, N, pF, Ca-dd, Mg-dd, Na-dd, K-dd, Al-dd. Pb, Cu, Cd, Zn and Cation Exchange Capacity.</p>													
7.4.3	<p>A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p>	<p>PT. Indotruba Tengah implementing nutrient recycling strategy by using Empty Fruit Bunches (EFB) as soil nutrient. Record of application: “Monitoring Program & Realisasi Janjang Kosong Sekunyir Estate”</p> <table border="1" data-bbox="1003 1161 1610 1375"> <thead> <tr> <th>Month</th> <th>Actual Application 2021 (kg)</th> <th>Actual Application 2022 (kg)</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>1,503,860</td> <td>1,098,330</td> </tr> <tr> <td>Feb</td> <td>1,288,510</td> <td>1,078,180</td> </tr> <tr> <td>Mar</td> <td>1,430,240</td> <td>944,310</td> </tr> </tbody> </table>	Month	Actual Application 2021 (kg)	Actual Application 2022 (kg)	Jan	1,503,860	1,098,330	Feb	1,288,510	1,078,180	Mar	1,430,240	944,310	Complied
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		Apr	1,411,940	-	
		May	1,599,380	-	
		Jun	1,648,000	-	
		Jul	1,575,050	-	
		Aug	1,317,590	-	
		Sept	934,390	-	
		Oct	773,610	-	
		Nov	1,263,810	-	
		Dec	1,254,340	-	
		Total	16,000,720	3,120,820	
		"Monitoring Program & Realisasi Janjang Kosong Seruyan Estate"			
		Month	Actual Application 2021 (kg)	Actual Application 2022 (kg)	
		Jan	849,300	632,140	
		Feb	446,940	611,300	
		Mar	679,520	600,600	
		Apr	938,550	-	
		May	629,320	-	
		Jun	693,700	-	
		Jul	479,800	-	
		Aug	927,770	-	

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Sept	975,000	-
Oct	1,426,047	-
Nov	532,360	-
Dec	284,000	-
Total	8,862,307	1,844,040

Sekunyir Estate POME application program 2021 for organic nutrient:

Month	Application 2021 (kg)		Application 2022 (kg)	
	Plan	Actual	Plan	Actual
Jan	13,783	6,728	8,971	3,376
Feb	10,703	9,690	8,189	3,329
Mar	10,975	10,798	18,034	4,068
Apr	16,200	8,673	15,783	-
May	14,710	3,467	18,034	-
Jun	12,560	4,802	13,783	-
Jul	10,065	4,417	10,703	-
Aug	8,971	3,660	10,975	-
Sept	8,189	3,434	16,200	-
Oct	18,034	3,165	14,710	-
Nov	15,783	3,149	12,560	-
Dec	18,034	3,065	10,065	-
Total	158,007	65,048	158,007	10,773

		<p>POME application applied at Block D002, D003, D005, E001, E002, E003 Sekunyr Estate.</p>																																																																																																								
<p>7.4.4</p>	<p>Records of fertilizer inputs are maintained.</p>	<p>Unit of certification has record and maintained fertilizer input as on "Program & Realisasi Pemupukan". Fertilizer input Sekunyr Estate:</p> <table border="1" data-bbox="1003 564 1935 1023"> <thead> <tr> <th rowspan="2">Fertilizer type</th> <th colspan="2">2020</th> <th colspan="2">2021</th> <th colspan="2">2022</th> </tr> <tr> <th>Program</th> <th>Actual</th> <th>Program</th> <th>Actual</th> <th>Program</th> <th>Actual*</th> </tr> </thead> <tbody> <tr> <td>AC (Ammonium chloride)</td> <td>1,133,062</td> <td>943,896</td> <td>619,680</td> <td>619,680</td> <td>475,786</td> <td>241,462</td> </tr> <tr> <td>Dolomite</td> <td>345,050</td> <td>345,048</td> <td>477,350</td> <td>477,350</td> <td>268,390</td> <td>-</td> </tr> <tr> <td>Kieserite</td> <td>-</td> <td>-</td> <td>17,499</td> <td>17,499</td> <td>-</td> <td>-</td> </tr> <tr> <td>MOP</td> <td>1,033,933</td> <td>1,033,948</td> <td>856,549</td> <td>856,549</td> <td>341,595</td> <td>170,799</td> </tr> <tr> <td>HGFB</td> <td>27,627</td> <td>27,627</td> <td>30,110</td> <td>30,110</td> <td>23,748</td> <td>23,748</td> </tr> <tr> <td>RP</td> <td>294,864</td> <td>294,864</td> <td>662,373</td> <td>662,373</td> <td>369,405</td> <td>-</td> </tr> <tr> <td>NK 17-30</td> <td>-</td> <td>-</td> <td>974,626</td> <td>974,626</td> <td>951,555</td> <td>365,986</td> </tr> <tr> <td>CCM-45</td> <td>-</td> <td>-</td> <td>958,832</td> <td>958,832</td> <td>-</td> <td>-</td> </tr> </tbody> </table> <p><i>*Data up to March 2022</i></p> <p>Fertilizer input Seruyan Estate:</p> <table border="1" data-bbox="1003 1107 1935 1342"> <thead> <tr> <th rowspan="2">Fertilizer type</th> <th colspan="2">2020</th> <th colspan="2">2021</th> <th colspan="2">2022</th> </tr> <tr> <th>Program</th> <th>Actual</th> <th>Program</th> <th>Actual</th> <th>Program</th> <th>Actual*</th> </tr> </thead> <tbody> <tr> <td>HGFB</td> <td>31,840</td> <td>31,840</td> <td>25,269</td> <td>25,269</td> <td>23,091</td> <td>23,091</td> </tr> <tr> <td>AC (Amonium Chlorida)</td> <td>1,271,964</td> <td>660,730</td> <td>723,945</td> <td>723,945</td> <td>423,826</td> <td>195,483</td> </tr> <tr> <td>MOP</td> <td>1,058,669</td> <td>1,058,669</td> <td>429,866</td> <td>429,866</td> <td>306,870</td> <td>56,668</td> </tr> </tbody> </table>	Fertilizer type	2020		2021		2022		Program	Actual	Program	Actual	Program	Actual*	AC (Ammonium chloride)	1,133,062	943,896	619,680	619,680	475,786	241,462	Dolomite	345,050	345,048	477,350	477,350	268,390	-	Kieserite	-	-	17,499	17,499	-	-	MOP	1,033,933	1,033,948	856,549	856,549	341,595	170,799	HGFB	27,627	27,627	30,110	30,110	23,748	23,748	RP	294,864	294,864	662,373	662,373	369,405	-	NK 17-30	-	-	974,626	974,626	951,555	365,986	CCM-45	-	-	958,832	958,832	-	-	Fertilizer type	2020		2021		2022		Program	Actual	Program	Actual	Program	Actual*	HGFB	31,840	31,840	25,269	25,269	23,091	23,091	AC (Amonium Chlorida)	1,271,964	660,730	723,945	723,945	423,826	195,483	MOP	1,058,669	1,058,669	429,866	429,866	306,870	56,668	<p>Complied</p>
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Kieserite	-	-	17,499	17,499	-	-																																																																																																				
MOP	1,033,933	1,033,948	856,549	856,549	341,595	170,799																																																																																																				
HGFB	27,627	27,627	30,110	30,110	23,748	23,748																																																																																																				
RP	294,864	294,864	662,373	662,373	369,405	-																																																																																																				
NK 17-30	-	-	974,626	974,626	951,555	365,986																																																																																																				
CCM-45	-	-	958,832	958,832	-	-																																																																																																				
Fertilizer type	2020		2021		2022																																																																																																					
	Program	Actual	Program	Actual	Program	Actual*																																																																																																				
HGFB	31,840	31,840	25,269	25,269	23,091	23,091																																																																																																				
AC (Amonium Chlorida)	1,271,964	660,730	723,945	723,945	423,826	195,483																																																																																																				
MOP	1,058,669	1,058,669	429,866	429,866	306,870	56,668																																																																																																				

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		ROCK POSPHATE	298,118	298,118	452,146	452,146	375,061	-	
		DOLOMITE	365,194	348,466	400,260	400,260	263,041	-	
		NK_17-30	-	-	1,206,944	1,206,944	1,267,005	447,177	
		RP_Immature	71,132	65,125	143,400	143,400	227,959	31,895	
		CCM-45_Immature	184,379	184,379	609,611	609,611	689,636	163,132	
		HGFB_TBM Immature	-	-	2,738	2,738	7,852	-	
		KIESERITE_Immature	-	-	13,690	13,690	39,263	-	
		DOLOMITE_Immature	-	-	34,224	34,224	33,412	-	
		NK 16 : 28_Immature	-	-	26,712	26,712	306,623	77,685	
<i>*Data up to March 2022</i>									
Criteria 7.5: Practices minimise and control erosion and degradation of soils.									
7.5.1	(C) Maps that identify marginal and fragile soils, including steep sloped land are available.	<p>PT. Indotruba Tengah demonstrated semi-detail soil survey "Survey Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia" dated February 2015, carried out by Statistic Data Processing Minamas Research Centre.</p> <p>Based on the soil survey, there are no peat soil present in operational area of PT. Indotruba Tengah: Sekunyir Estate and Seruyan Estate.</p> <p>Soil type:</p> <ul style="list-style-type: none"> Soil type in Sekunyir Estate comprise of Humic endoaquept 126.98 Ha; Ultic Haplortod 740.14 Ha, Grossarenic Kandiuults 1,560.47 Ha, Arenic Plinthic Kandiuult 488.71 Ha, Typic Plinthudult 425.81 Ha. 							Complied

		<ul style="list-style-type: none"> Soil Type in Seruyan Estate comprise of Humic endoaquept 282.01 Ha; Grossarenic Kandiuults 1,507.38 Ha, Arenic Plinthic Kandiuult 570.22 Ha, Typic Plinthudult 873.86 Ha. <p>Slope classification</p> <table border="1" data-bbox="1003 507 1794 742"> <thead> <tr> <th colspan="2">Slope class</th> <th colspan="2">Hectarage</th> <th colspan="2">Total</th> </tr> <tr> <th>(%)</th> <th>(^o/degree)</th> <th>Sekunyir</th> <th>Seruyan</th> <th>Ha</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>0 – 4</td> <td>0 – 2</td> <td>3,342.11</td> <td>1,684.21</td> <td>5,026.31</td> <td>76.44</td> </tr> <tr> <td>4 – 12</td> <td>2 – 6</td> <td>0</td> <td>1,549.26</td> <td>1,549.26</td> <td>23.56</td> </tr> <tr> <td colspan="2">Total</td> <td>3,342.11</td> <td>3,233.47</td> <td>6,575.57</td> <td>100</td> </tr> </tbody> </table> <p>Based on slope classification, there is no fragile soil or erosion prone area.</p>	Slope class		Hectarage		Total		(%)	(^o /degree)	Sekunyir	Seruyan	Ha	%	0 – 4	0 – 2	3,342.11	1,684.21	5,026.31	76.44	4 – 12	2 – 6	0	1,549.26	1,549.26	23.56	Total		3,342.11	3,233.47	6,575.57	100	
Slope class		Hectarage		Total																													
(%)	(^o /degree)	Sekunyir	Seruyan	Ha	%																												
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4 – 12	2 – 6	0	1,549.26	1,549.26	23.56																												
Total		3,342.11	3,233.47	6,575.57	100																												
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.	Based on field visit and slope classification as described in report of semi-detail soil survey "Survey Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia" dated February 2015, carried out by Statistic Data Processing Minamas Research Centre, there is no steep terrain in PT Indotruba Tengah area. There is no replanting conducted in steep terrain area.	Complied																														
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.	<p>Based on field visit and Area Statement, there was no new planting in PT. Indotruba Tengah – Sekunyir Estate and Seruyan Estate.</p> <ul style="list-style-type: none"> Sekunyir Estate planting years: Planting year 1992, 1993, 1994, 1995, 2013, 2014, 2015, 2018, 2019, 2020, and 2021. Seruyan Estate planting comprise of planting year 1992, 1993, 1994, 2013, 2014, 2019, 2020, 2021, and 2022. <p>Oil palm planting after 1995 are replanting.</p>	Complied																														
<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>PT. Indotruba Tengah demonstrated semi-detail soil survey "Survay Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia" dated February 2015, carried out by Statistic Data Processing Minamas Research Centre.</p> <p>Based on the soil survey, there are no peat soil present in operational area of PT. Indotruba Tengah: Sekunyir Estate and Seruyan Estate.</p> <p>Soil type:</p> <ul style="list-style-type: none"> • Soil type in Sekunyir Estate comprise of Humic endoaquept 126.98 Ha; Ultic Haplortod 740.14 Ha, Grossarenic Kandiuults 1,560.47 Ha, Arenic Plinthic Kandiuult 488.71 Ha, Typic Plinthudult 425.81 Ha. • Soil Type in Seruyan Estate comprise of Humic endoaquept 282.01 Ha; Grossarenic Kandiuults 1,507.38 Ha, Arenic Plinthic Kandiuult 570.22 Ha, Typic Plinthudult 873.86 Ha. <p>Slope classification</p> <table border="1" data-bbox="1003 871 1794 1104"> <thead> <tr> <th colspan="2">Slope class</th> <th colspan="2">Hectarage</th> <th colspan="2">Total</th> </tr> <tr> <th>(%)</th> <th>(^o/degree)</th> <th>Sekunyir</th> <th>Seruyan</th> <th>Ha</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>0 – 4</td> <td>0 – 2</td> <td>3,342.11</td> <td>1,684.21</td> <td>5,026.31</td> <td>76.44</td> </tr> <tr> <td>4 – 12</td> <td>2 – 6</td> <td>0</td> <td>1,549.26</td> <td>1,549.26</td> <td>23.56</td> </tr> <tr> <td colspan="2">Total</td> <td>3,342.11</td> <td>3,233.47</td> <td>6,575.57</td> <td>100</td> </tr> </tbody> </table> <p>Based on slope classification, there is no fragile soil from steep slope or erosion prone area.</p> <p>Soil Suitability:</p> <p>In general the soil in PT. Indotruba Tengah has suitability level S3 (marginal), the main limiting factors are fertility (dominated by low acidity, low P-total and P-availability), effective medium rooting, climate (average 3-4 raining months per annum).</p>	Slope class		Hectarage		Total		(%)	(^o /degree)	Sekunyir	Seruyan	Ha	%	0 – 4	0 – 2	3,342.11	1,684.21	5,026.31	76.44	4 – 12	2 – 6	0	1,549.26	1,549.26	23.56	Total		3,342.11	3,233.47	6,575.57	100	Complied
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Total		3,342.11	3,233.47	6,575.57	100																												

7.6.2	Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan.	<p>Planting year in unit of certification are:</p> <ul style="list-style-type: none"> • Sekunyir Estate planting years: Planting year 1992, 1993, 1994, 1995, 2013, 2014, 2015, 2018, 2019, 2020, and 2021. • Seruyan Estate planting comprise of planting year 1992, 1993, 1994, 2013, 2014, 2019, 2020, 2021, and 2022. <p>Oil palm planting after 1995 are replanting.</p> <p>Based on field visit and report of semi-detail soil survey "Survey Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia" dated February 2015, carried out by Statistic Data Processing Minamas Research Centre, there is no marginal and fragile soils in PT Indotruba Tengah area.</p> <p>There is no extensive planting carried out by the unit of certification.</p>	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	<p>The unit of certification is able to present map, consist of information related to the soil type and topographic condition of the Estate. As unit of certification, the company have no plan for new development. Based on semi-detail soil survey "Survey Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia" dated February 2015, carried out by Statistic Data Processing Minamas Research Centre, there is no marginal and fragile soil, include peat and steep area that was identified within Sekunyir Estate and Seruyan Estate.</p> <p>Periodical soil surveys aim to calculate the soil fertility and soil nutrition necessity, which will use for manuring recommendation. Planning of drainage, irrigation systems, roads and other infrastructure are covered within Environmental Assessment or AMDAL/UKL-UPL in part of Pre-Development activities.</p>	Complied

Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.

7.7.1	<p>(C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas.</p>	<p>Based on semi-detail soil survey "Survey Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia" dated February 2015, carried out by Statistic Data Processing Minamas Research Centre.</p> <p>Based on the soil survey, there are no peat soil present in operational area of PT. Indotruba Tengah: Sekunyir Estate and Seruyan Estate.</p> <p>Soil type in Sekunyir Estate comprise of Humic endoaquept 126.98 Ha; Ultic Haplortod 740.14 Ha, Grossarenic Kandiudults 1,560.47 Ha, Arenic Plinthic Kandiudult 488.71 Ha, Typic Plinthudult 425.81 Ha.</p> <p>Soil Type in Seruyan Estate comprise of Humic endoaquept 282.01 Ha; Grossarenic Kandiudults 1,507.38 Ha, Arenic Plinthic Kandiudult 570.22 Ha, Typic Plinthudult 873.86 Ha.</p> <p>Based on the same survey information, there was no new planting in PT. Indotruba Tengah – Sekunyir Estate and Seruyan Estate.</p> <p>Sekunyir Estate planting comprise of Planting year 1992, 1993, 1994, 1995, 2013, 2014, 2015.</p> <p>Seruyan Estate planting comprise of planting year 1992, 1993, 1994, 2013, 2014.</p>	Not Applicable
7.7.2	<p>Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).</p>	<p>Based on semi-detail soil survey "Survey Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia" dated February 2015, carried out by Statistic Data Processing Minamas Research Centre.</p> <p>Based on the soil survey, there are no peat soil present in operational area of PT. Indotruba Tengah: Sekunyir Estate and Seruyan Estate.</p> <p>Soil type in Sekunyir Estate comprise of Humic endoaquept 126.98 Ha; Ultic Haplortod 740.14 Ha, Grossarenic Kandiudults 1,560.47 Ha, Arenic Plinthic Kandiudult 488.71 Ha, Typic Plinthudult 425.81 Ha.</p>	Not Applicable

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PROCEDURAL NOTE: Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).			
7.7.3	(C) Subsidence of peat is monitored, documented and minimised.	Based on semi-detail soil survey "Survey Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia" dated February 2015, carried out by Statistic Data Processing Minamas Research Centre. Based on the soil survey, there are no peat soil present in operational area of PT. Indotruba Tengah: Sekunyir Estate and Seruyan Estate. Soil type in Sekunyir Estate comprise of Humic endoaquept 126.98 Ha; Ultic Haplortod 740.14 Ha, Grossarenic Kandiudults 1,560.47 Ha, Arenic Plinthic Kandiudult 488.71 Ha, Typic Plinthudult 425.81 Ha. Soil Type in Seruyan Estate comprise of Humic endoaquept 282.01 Ha; Grossarenic Kandiudults 1,507.38 Ha, Arenic Plinthic Kandiudult 570.22 Ha, Typic Plinthudult 873.86 Ha.	Not Applicable
7.7.4	(C) Availability of implementation evidence of the water and land cover management program.	Based on the soil survey, there are no peat soil present in operational area of PT. Indotruba Tengah: Sekunyir Estate and Seruyan Estate. However, plantation manages the water and land cover program: Monitoring and managing soil erosion and mitigation of cover crop, terrace, frond stacking in "U" shape, good fertilizer regime for 2,300.60 Ha plantation in Sekunyir Estate and 1,507.38 Ha in Seruyan Estate.	Not Applicable
7.7.5	(C) Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The	Based on semi-detail soil survey "Survey Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia" dated February 2015, carried out by Statistic Data Processing Minamas Research Centre.	Not Applicable

	<p>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>Based on the soil survey, there are no peat soil present in operational area of PT. Indotruba Tengah: Sekunyir Estate and Seruyan Estate.</p> <p>Soil type in Sekunyir Estate comprise of Humic endoaquept 126.98 Ha; Ultic Haplortod 740.14 Ha, Grossarenic Kandiudults 1,560.47 Ha, Arenic Plinthic Kandiudult 488.71 Ha, Typic Plinthudult 425.81 Ha.</p> <p>Soil Type in Seruyan Estate comprise of Humic endoaquept 282.01 Ha; Grossarenic Kandiudults 1,507.38 Ha, Arenic Plinthic Kandiudult 570.22 Ha, Typic Plinthudult 873.86 Ha.</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>			
<p>7.7.6</p>	<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>Based on semi-detail soil survey "Survey Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia" dated February 2015, carried out by Statistic Data Processing Minamas Research Centre.</p> <p>Based on the soil survey, there are no peat soil present in operational area of PT. Indotruba Tengah: Sekunyir Estate and Seruyan Estate.</p> <p>Soil type in Sekunyir Estate comprise of Humic endoaquept 126.98 Ha; Ultic Haplortod 740.14 Ha, Grossarenic Kandiudults 1,560.47 Ha, Arenic Plinthic Kandiudult 488.71 Ha, Typic Plinthudult 425.81 Ha.</p> <p>Soil Type in Seruyan Estate comprise of Humic endoaquept 282.01 Ha; Grossarenic Kandiudults 1,507.38 Ha, Arenic Plinthic Kandiudult 570.22 Ha, Typic Plinthudult 873.86 Ha.</p>	<p>Not Applicable</p>
<p>7.7.7</p>	<p>(C) All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland</p>	<p>Based on semi-detail soil survey "Survey Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia" dated</p>	<p>Not Applicable</p>

	<p>conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non-corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines.</p>	<p>February 2015, carried out by Statistic Data Processing Minamas Research Centre.</p> <p>Based on the soil survey, there are no peat soil present in operational area of PT. Indotruba Tengah: Sekunyir Estate and Seruyan Estate.</p> <p>Soil type in Sekunyir Estate comprise of Humic endoaquept 126.98 Ha; Ultic Haplortod 740.14 Ha, Grossarenic Kandiudults 1,560.47 Ha, Arenic Plinthic Kandiudult 488.71 Ha, Typic Plinthudult 425.81 Ha.</p> <p>Soil Type in Seruyan Estate comprise of Humic endoaquept 282.01 Ha; Grossarenic Kandiudults 1,507.38 Ha, Arenic Plinthic Kandiudult 570.22 Ha, Typic Plinthudult 873.86 Ha.</p>	
<p>Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.</p>			
<p>7.8.1</p>	<p>A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters:</p> <p>7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.</p>	<p>Procedure is in place, SOP Pengelolaan Sempadan Sungai/Waduk, Daerah Aliran Sungai & Areal Konservasi No.HCV-SAA/07/2009" dated 1 June 2009. Purpose to maintain the riparian/buffer zone, lake buffer zone, water spring buffer zone and waterways buffer zone. The procedure developed to maintain and protect the water source quality. Procedures was also established for protection and management of riparian buffer zones at or before replanting. Procedure mentioned that in area of buffer zones are prohibited to apply agrochemical, used manual manuring and riverbank was planted by erosion barrier crop. The organization has policy that prohibits estates for planting in the left and right side of riparian buffer zones at or before replanting. Warning board placed regarding prohibition to apply agrochemicals and fertilizer in the buffer zone. Riparian buffers of small natural river were 10 - 15 m wide on both sides of the rivers, depend on the wide of river; lake buffer 50 m; water spring buffer 50 m.</p> <p>PT. Indotruba Tengah 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</p>	<p>Complied</p>

		<p>needed for mill processing, Ground and surface water resources and its permit, management and monitoring waste water, included domestic waste water.</p> <p>Monitoring of water management has been implemented on a regular basis, such as surface water quality monitoring each semester at Upstream Blok D12 river and downstream Blok F10 river. Report of water quality monitoring 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 Class IV.</p> <p>The result of latest water quality monitoring on period 2020-2021 by Laboratory PT. Mutu Agung Lestari shows that water quality complies with national regulation. The company does not limit access to clean water or does not pollute the water used by the community.</p>																
	<p>7.8.1b Workers have adequate access to clean water.</p>	<p>Company has provided clean water to all workers through water treatment with raw water from Pond at Sekunyir and Seruyan Estate. Regular monitoring of water quality has been carried out each semester to ensure the water use by workers are met with standard Permenkes No. 32 Tahun 2017 regarding clean water quality standard. Latest monitoring on November 2020 by Laboratory PT. Mutu Agung Lestari shown that water quality generally is met with the standard (Report of Testing No. 1645, 1646, 1647, 1648, /PKN/VII/20), however parameter of Zat Organik (KMnO4, E Coli and Total Coliform was exceed the threshold. Hence the water only uses for only used for bathing and washing purposes.</p> <p>Water analysis November 2020 – against Permenkes RI No.32 tahun 2017</p> <table border="1" data-bbox="1003 1157 1780 1385"> <thead> <tr> <th>Parameter</th> <th>Standard</th> <th>Result</th> </tr> </thead> <tbody> <tr> <td>Odor</td> <td>No odor</td> <td>No odor</td> </tr> <tr> <td>TDS</td> <td>1000 mg/L</td> <td>34 mg/L</td> </tr> <tr> <td>Taste</td> <td>No taste</td> <td>No taste</td> </tr> <tr> <td>Color</td> <td>50 TCU</td> <td><3.34 TCU</td> </tr> </tbody> </table>	Parameter	Standard	Result	Odor	No odor	No odor	TDS	1000 mg/L	34 mg/L	Taste	No taste	No taste	Color	50 TCU	<3.34 TCU	
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Turbidity	25 NTU	0.15 NTU																																														
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Fe	1.0 mg/L	<0.0057 mg/L																																														
Fl	1.5 mg/L	<0.003 mg/L																																														
Cd	0.005 mg/L	<0.0015 mg/L																																														
CaCO3	500 mg/L	23.5 mg/L																																														
Cr6	0.05 mg/L	<0.0010 mg/L																																														
Mg	0.5 mg/L	<0.0066 mg/L																																														
pH	6.5-8.5	6.59																																														
Zn	15 mg/L	<0.0023 mg/L																																														
Si	0.1 mg/L	<0.0033 mg/L																																														
Pb	0.05 mg/L	<0.0014 mg/L																																														
KMnO4	10 mg/L	0.09 mg/L																																														
E. Coli	0 CFU/100 ml	0 CFU/100 ml																																														
Total Coliform	50 CFU/100 ml	84 CFU/100 ml																																														
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>Procedure is in place, SOP Pengelolaan Sempadan Sungai/Waduk, Daerah Aliran Sungai & Areal Konservasi No.HCV-SAA/07/2009" dated 1 June 2009. Purpose to maintain the riparian/buffer zone, lake buffer zone, water spring buffer zone and waterways buffer zone. The procedure developed to maintain and protect the water source quality. Procedures was also established for protection and management of riparian buffer zones at or before replanting. Procedure mentioned that in area of buffer zones are prohibited to apply agrochemical, used manual manuring and riverbank was planted by erosion barrier crop. The organization has policy that prohibits estates for planting in the left and right side of riparian buffer zones at or before replanting. Warning board placed</p>	Complied																																													

		<p>regarding prohibition to apply agrochemicals and fertilizer in the buffer zone. Riparian buffers of small natural river were 10 - 15 m wide on both sides of the rivers, depend on the wide of river; lake buffer 50 m; water spring buffer 50 m. Seruyan Estate and Sekunyir Estate made monitoring of buffer zone and report in "Monitoring Area Nilai Konservasi Tinggi (NKT)" period July 2021-January 2022 indicating the signboard for buffer zone, vegetation and tree condition in buffer zone, vegetation in the water way, presence of water life, etc. No signs of pollution of illegal logging in buffer zones.</p> <p>Field visit to replanting area field B018, the buffer zone maintains the palm tree with natural vegetation regrowth. Replanting contractor understand the water way and buffer zone is not to disturb.</p>																	
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>PT Indotruba Tengah– Sekuinyir Palm Oil Mill has an effluent treatment through treated ponds system.</p> <p>To ensure the commitment on waste management implementation, the Certificate Holder has had permit of liquid waste water management for Land Application according to "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Kabupaten Kotawaringin Barat No. 503/010/LH/DPMPPTSP.D tentang Izin Pembuangan Air Limbah Kepada Perkebunan Kelapa Sawit PT. Indotruba Tengah" dated 10 July 2020 valid until 30 June 2025.</p> <p>BOD monitoring effluent tested each month by accredited laboratory (PT Mutu Agung Lestari) according to standard threshold PerMenLH No. 29 tahun 2003. Below are the record of effluent monitoring from January – December 2020:</p> <table border="1" data-bbox="1003 1161 1700 1377"> <thead> <tr> <th>No</th> <th>Month</th> <th>BOD Threshold (mg/L)</th> <th>Result on Pond Outlet (mg/L)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>January</td> <td>5,000</td> <td>3,627</td> </tr> <tr> <td>2</td> <td>February</td> <td>5,000</td> <td>1,418</td> </tr> <tr> <td>3</td> <td>March</td> <td>5,000</td> <td>2,740</td> </tr> </tbody> </table>	No	Month	BOD Threshold (mg/L)	Result on Pond Outlet (mg/L)	1	January	5,000	3,627	2	February	5,000	1,418	3	March	5,000	2,740	Complied
No	Month	BOD Threshold (mg/L)	Result on Pond Outlet (mg/L)																
1	January	5,000	3,627																
2	February	5,000	1,418																
3	March	5,000	2,740																

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4	April	5,000	1,988
5	May	5,000	1,055
6	June	5,000	2,352
7	July	5,000	3,771
8	August	5,000	2,206
9	September	5,000	4,872
10	October	5,000	3,368
11	November	5,000	1,610
12	December	5,000	4,833

January – December 2021:

No	Month	BOD Threshold (mg/L)	Result on Pond Outlet (mg/L)
1	January	5,000	1,229
2	February	5,000	645
3	March	5,000	1,202
4	April	5,000	951
5	May	5,000	125
6	June	5,000	1,142
7	July	5,000	1,161
8	August	5,000	961
9	September	5,000	717

		<table border="1"> <tr> <td>10</td> <td>October</td> <td>5,000</td> <td>955</td> </tr> <tr> <td>11</td> <td>November</td> <td>5,000</td> <td>1,610</td> </tr> <tr> <td>12</td> <td>December</td> <td>5,000</td> <td>970</td> </tr> </table> <p>According to above analysis result shown that BOD parameter met regulation standard "Peraturan Menteri Lingkungan Hidup No. 29 tahun 2003".</p>	10	October	5,000	955	11	November	5,000	1,610	12	December	5,000	970																																					
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12	December	5,000	970																																																
7.8.4	Mill water use per tonne of FFB is monitored and recorded.	<p>Sekunyir Palm Oil Mill performs monthly monitoring of mill water consumption per tonne FFB processed. The records are maintained under "Rekap Pemakaian Air Tahun 2020-2021".</p> <p>Monitoring of mill water use per ton FFB in January – December 2020 as below table:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB Process (MT)</th> <th>Water Usage (m³)</th> <th>Average (m³/MT FFB)</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>11,235.10</td> <td>16,077</td> <td>1.43</td> </tr> <tr> <td>February</td> <td>10,714.44</td> <td>15,916</td> <td>1.49</td> </tr> <tr> <td>March</td> <td>10,520.95</td> <td>15,244</td> <td>1.45</td> </tr> <tr> <td>April</td> <td>12,240.82</td> <td>16,394</td> <td>1.34</td> </tr> <tr> <td>May</td> <td>12,095.67</td> <td>15,816</td> <td>1.31</td> </tr> <tr> <td>June</td> <td>12,618.14</td> <td>17,763</td> <td>1.41</td> </tr> <tr> <td>July</td> <td>9,482.68</td> <td>13,406</td> <td>1.41</td> </tr> <tr> <td>August</td> <td>11,060.12</td> <td>16,108</td> <td>1.46</td> </tr> <tr> <td>September</td> <td>11,803.44</td> <td>15,037</td> <td>1.27</td> </tr> <tr> <td>October</td> <td>11,361.86</td> <td>15,375</td> <td>1.35</td> </tr> <tr> <td>November</td> <td>9,805.88</td> <td>14,006</td> <td>1.43</td> </tr> </tbody> </table>	Month	FFB Process (MT)	Water Usage (m ³)	Average (m ³ /MT FFB)	January	11,235.10	16,077	1.43	February	10,714.44	15,916	1.49	March	10,520.95	15,244	1.45	April	12,240.82	16,394	1.34	May	12,095.67	15,816	1.31	June	12,618.14	17,763	1.41	July	9,482.68	13,406	1.41	August	11,060.12	16,108	1.46	September	11,803.44	15,037	1.27	October	11,361.86	15,375	1.35	November	9,805.88	14,006	1.43	Complied
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December	11,424.42	19,954	1.75
TOTAL	134,363.50	186,096	1.39

Monitoring of mill water use per ton FFB in January – December 2021 as below table:

Month	FFB Process (MT)	Water Usage (m ³)	Average (m ³ /MT FFB)
January	8.925,19	13.060	1.46
February	8.552,99	12.957	1.51
March	10.169,89	14.725	1.45
April	10.791,96	16.175	1.50
May	10.265,65	11.407	1.11
June	10.404,46	13.773	1.32
July	8.851,52	12.529	1.42
August	9.419,46	14.058	1.49
September	7.061,89	10.740	1.52
October	6.461,53	10.706	1.35
November	6.442,56	10.064,0	1.66
December	7.001,41	10.258,0	1.47
TOTAL	104,348.49	150,452	1.44

		Based on table above can be shown that average water usage for mill process was 1.39 m ³ /MT FFB and it is still under budget of 1.50 m ³ /MT FFB.																													
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>PT. Indotruba Tengah has prepared the program for improving efficiency of the use of fossil fuels and to optimize renewable energy.</p> <p>Fossil fuel records are maintained and the trends shown. Energy use records include accurate measurements of renewable energy use per ton of FFB processed. All the shell and fiber are consumed internally as boiler fuel. Fossil fuel usage is recorded for operational purpose, including the efficiency analysis. Fossil fuel records are maintained and the trends shown. Energy use records include accurate measurements of renewable energy use per ton of FFB processed. Company already maximize the renewable energy use. All the shell and fiber are consumed internally as boiler fuel. Fossil fuel usage is recorded for operational purpose, including the efficiency analysis.</p> <p>In order to reduce use of fossil fuel for electricity, Since 2020 PT. Indotruba Tengah install grid electric network for worker housing.</p> <p>Data verified: The usage of shell and fibre use as boiler fuel period January-December 2020:</p> <table border="1"> <thead> <tr> <th>Period</th> <th>Fibre usage (MT)</th> <th>Shell usage (MT)</th> <th>KW</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>1,544.83</td> <td>769.60</td> <td>811.52</td> </tr> <tr> <td>February</td> <td>1,473.24</td> <td>733.94</td> <td>532.77</td> </tr> <tr> <td>March</td> <td>1,446.63</td> <td>720.69</td> <td>481.49</td> </tr> <tr> <td>April</td> <td>1,683.11</td> <td>838.50</td> <td>513.98</td> </tr> <tr> <td>May</td> <td>1,663.15</td> <td>828.55</td> <td>538.43</td> </tr> <tr> <td>June</td> <td>1,734.99</td> <td>864.35</td> <td>567.67</td> </tr> </tbody> </table>	Period	Fibre usage (MT)	Shell usage (MT)	KW	January	1,544.83	769.60	811.52	February	1,473.24	733.94	532.77	March	1,446.63	720.69	481.49	April	1,683.11	838.50	513.98	May	1,663.15	828.55	538.43	June	1,734.99	864.35	567.67	Complied
Period	Fibre usage (MT)	Shell usage (MT)	KW																												
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July	1,303.87	649.56	521.26
August	1,520.77	757.62	643.82
September	1,622.98	808.53	560.01
October	1,562.26	778.28	562.84
November	1,348.31	671.70	475.94
December	1,570.86	782.58	528.79
Total	18,474.99	9,203.91	6,792.52

The usage of shell and fibre use as boiler fuel period January-December 2021:

Period	Fibre usage (MT)	Shell usage (MT)	KW
January	1,227.21	611.37	811.52
February	1,176.03	585.87	532.77
March	1,398.36	696.63	481.49
April	1,483.89	739.24	513.98
May	1,411.52	703.19	538.43
June	1,430.61	712.70	567.67
July	1,217.08	606.32	521.26
August	1,292.17	645.23	643.82
September	971.01	483.74	560.01
October	888.46	442.61	562.84
November	885.85	441.31	475.94

		December	962.69	479.59	528.79		
		Total	14,344.92	7,147.87	6,792.52		

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

7.10.1	<p>(C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p>	<p>The source of greenhouse gas emission has identified on GHG Calculation report, as listed below:</p> <ul style="list-style-type: none"> - Methane from POME and composting at mill - Fossil fuels emissions from vehicles and engines (generator) - Chemical fertilizer - Electricity usage - Chemical spraying <p>Several efforts to reduce GHG emissions is prepared as follows:</p> <ul style="list-style-type: none"> - Zero burning - Utilization of waste fibre and shell as boiler fuel and electricity from turbines - Reduce chemical fertilizer using EFB composting <p>The records of each programme were sighted as evident implementation. The program was including objectives, targets, and timelines for a year. There was monitoring and evaluation every 6 months to ensure target was achieved.</p> <p>Sekunyir Palm Oil Mill waste water was processed through a series of waste water treatment ponds four anaerobic ponds. Process parameter monitoring and maintenance of the ponds were sighted. Quality of wastewater effluent is monitored monthly in line with the requirements on Kepmen LH 29/2003. The results of monitoring of wastewater effluent were reviewed including measurement of BOD, COD, oil and fat, N total result of discharge effluent conforms to the limits for parameters for period January 2020-December 2021</p>	Complied
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		<p>(see 7.8.3). Wastewater effluent monitoring was conducted by Laboratory PT. Mutu Agung Lestari.</p> <p>PalmGHG calculator for year 2020 and 2021 reviewed and approved. See appendix for PalmGHG result.</p>	
7.10.2	<p>(C) Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p>	<p>There is no new planting in PT. Indotruba Tengah. PT. Indotruba Tengah has identified the significant pollutants and greenhouse gas (GHG) emissions. Significant pollutants and GHG such as: Emission, particulate, noise from boiler and generator, effluent from mill wastewater, fertilizer application, chemical applicator and transport of FFB.</p> <p>Monitoring of air emissions and ambient air quality conducted every semester. Emissions test conducted testing by Accreditation Laboratory PT. Mutu Agung Lestari. The results of the analysis have been demonstrated and reported to Environmental Agency every six months, e.g: Subject of analysis for air emission and Air Ambient in Sekunyir Palm Oil Mill and Estate and Seruyan Estate.</p>	Complied
7.10.3	<p>(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.</p>	<p>The source of greenhouse gas emission has identified on GHG Calculation report, as listed below:</p> <ul style="list-style-type: none"> - Methane from POME and composting at mill - Fossil fuels emissions from vehicles and engines (generator) - Chemical fertilizer - Electricity usage - Chemical spraying <p>Several efforts to reduce GHG emissions is prepared as follows:</p> <ul style="list-style-type: none"> - Zero burning - Utilization of waste fibre and shell as boiler fuel and electricity from turbines - Reduce chemical fertilizer using EFB as fertilizer 	Complied

		<p>The records of each programme were sighted as evident implementation. The program was including objectives, targets, and timelines for a year. There was monitoring and evaluation every 6 months to ensure target was achieved.</p> <p>Sekunyir Palm Oil Mill waste water was processed through a series of waste water treatment ponds four anaerobic ponds. Process parameter monitoring and maintenance of the ponds were sighted. Quality of wastewater effluent is monitored monthly in line with the requirements on Kepmen LH 29/2003. The results of monitoring of wastewater effluent were reviewed including measurement of BOD, COD, oil and fat, N total result of discharge effluent conforms to the limits for parameters for period January – December 2020 and 2021. Wastewater effluent monitoring was conducted by Laboratory PT. Mutu Agung Lestari.</p>	
<p>Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.</p>			
<p>7.11.1</p>	<p>(C) Land for new planting or replanting is not prepared by burning.</p>	<p>Sekunyir Estate planting years: Planting year 1992, 1993, 1994, 1995, 2013, 2014, 2015, 2018, 2019, 2020, and 2021. Seruyan Estate planting comprise of planting year 1992, 1993, 1994, 2013, 2014, 2019, 2020, 2021, and 2022.</p> <p>There was no new planting in PT. Indotruba Tengah – Sekunyir Estate and Seruyan Estate. At the current assessment (RAV), unit of certification conducted replanting in Seruyan Estate in 2022. Replanting prepared by felling and chipping, none of the area performed burning for replanting. Contract of replanting was available under “Addendum Surat Perjanjian Kerja No.006/Replanting/ITH-SRE/IV/2019” dated 26 February 2021, between PT. Indotruba Tengah and PT. Karya Murni Prima. The contract covers work specification, such as: removal of weevil and roots; felling & chipping; digging and re-closing the former boulder and soil; leveling, chambering & compacting harvesting path; mechanical planting hole; plowing & harrowing; terracing; close-ended conservation trenches (CECT) for coastal and lowland area; silt pit; and ridge – for 180 SPH.</p> <p>Based on field visit to estates (C033 Division 2 Seruyan Estate) and interview with replanting contractor, there is no evidence of fire usage on the ground.</p>	<p>Complied</p>

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>Unit of certification has established procedure of Land Fire Prevention and Control as in "Pedoman Pencegahan dan Penanggulangan Kebakaran" (7302/PSQM-ESH/14 Rev.1 dated 23 February 2018). The procedure describing fire prevention and control measures as follow:</p> <ol style="list-style-type: none"> 1. Fire Prevention; Team formation increase readiness, tools checking, identification, invention, establish signboard and tower, cooperation with surrounding communities, dissemination to surrounding communities, conduct monitoring, implementation of zero burning during replanting. 2. Fire Control; Identification of location, be aware of fire source, control by patrol team, fire control team, request assistance from nearest company or report to relevant government, evaluation of fire control. <p>Fire Response Team with appropriate resources also provides in all area and registered by relevant agency. Fire watch tower also available in each estate to monitor fire adjacent the plantation. Report of Fire prevention & control to the relevant government body was available as in "Laporan Pemantauan Kebakaran Periode Juli-Desember 2021" handed over to Kepala Dinas Ketahanan Pangan dan Pertanian Kabupaten Seruyan on 17 March 2022.</p>	Complied
7.11.3	The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.	Based on information during interview with local communities, acknowledge that coordination for fire control between unit of certification and adjacent communities are involved and engaged.	Complied
<p>Criteria 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>			
<p>PROCEDURAL NOTE for 7.12: 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>			

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

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

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

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

7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests.</p> <p>Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).</p>	<p>There is no land cleared since 15 November 2018 without prior HCV-HCS assessment. There is no new planting. The company has started planting in 1992, no new planting area/developing area since November 2005 and 2014/2018. Replanting has been performed since 2013 - 2015.</p> <p>HCV assessment has been conducted by PT. Indotruba Tengah cooperated with independent Consultant Aksenta on August 2009. The HCV report documented in the "Laporan Identifikasi High Conservation Value PT. Indotruba Tengah, Kabupaten Kotawaringin Barat & Seruyan Provinsi Kalimantan Tengah, January 2010". HCV Assessment was conducted using HCV Toolkit Indonesia 2008.</p> <p>Based on communication with RSPO Secretariat dated 7 March 2022, BSI obtain statement "The unit has already been disclosed and RaCP is not applicable".</p>	Complied
7.12.2	<p>(C) HCV and HCS forests, and other conservation areas are identified as follows:</p> <p>7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.</p>	<p>HCV assessment has been conducted by PT. Indotruba Tengah cooperated with independent Consultant Aksenta on August 2009. The HCV report documented in the "Laporan Identifikasi High Conservation Value PT. Indotruba Tengah, Kabupaten Kotawaringin Barat & Seruyan Provinsi Kalimantan Tengah, January 2010".</p> <p>HCV Assessment was conducted using HCV Toolkit Indonesia 2008. The team consist of four members as following:</p> <p>1. Wibowo A. Djatmiko (Team leader: Ecological habitat/wildlife)</p>	Complied

		<p>2. Bambang Widyatmoko (GIS, Mapping, Environmental Services) 3. Gani Gunawan (Social, economic and cultural) 4. Erwin Hermawan (GIS expert) All of them list as HCV RSPO approved assesor. Based on the assessment report, in Sekunyir and Seruyan Estate there are three (4) types of HCV been identified: HCV 1.2 (Endangered Species), HCV 4.1 & 4.2 (riparian area), and HCV 1.3 (swamp refugia) with total HCV area 76.56 Ha (Seruyan Estate 45.8 Ha + Seruyan Estate 45.48 Ha). There are identify the important RTE species identify (based on information from surrounding community and presence of animal): <i>Pongo pygmaeus</i> (orangutan), <i>Helarctos malayanus</i> (beruang madu), <i>Manis javanica</i> (trenggiling) and <i>Spilornis cheela</i> (Elang ular bido). HCV public consultation was held in 25 August 2009. Attended by local authorities, local communities and company representative. Assessment conducted on the whole plantation that has been embedded and the areas around the plantation include rivers, forests, and others.</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. The company has started planting in 1992, no new planting area/developing area since November 2005 and 2014/2018. Replanting has been performed since 2013 - 2015. This indicator is not applicable.</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>Not applicable for Indonesia. This indicator is not applicable.</p>	<p>Not Applicable</p>

<p>PROCEDURAL NOTE for 7.12.3: Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.</p>			
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at 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 land cleared since 15 November 2018 without prior HCV-HCS assessment. There is no new planting. The company has started planting in 1992, no new planting area/developing area since November 2005 and 2014/2018. Replanting has been performed since 2013 - 2015.</p> <p>Based on communication with RSPO Secretariat dated 7 March 2022, BSI obtain statement "The unit has already been disclosed and RaCP is not applicable".</p> <p>PT. Indotruba Tengah made communication/socialization of HCV and protected species on 17 July 2021. The meeting also explains the monitoring result, as well as management and monitoring plan ahead. Attended by Pembuang Hulu II villagers, Sungai Pakit villagers, Derangga villagers, Karang Mulya villagers, BPD Pangkalan Banteng.</p> <p>This indicator is Not Applicable.</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 new planting. The company has started planting in 1992, no new planting area/developing area since November 2005 and 2014/2018. Replanting has been performed since 2013 - 2015.</p> <p>HCV assessment has been conducted by PT. Indotruba Tengah cooperated with independent Consultant Aksenta on August 2009. The HCV report documented in the "Laporan Identifikasi High Conservtion Value PT. Indotruba Tengah, Kabupaten Kotawaringin Barat & Seruyan Provinsi Kalimantan Tengah, January 2010". HCV Assessment was conducted using HCV Toolkit Indonesia 2008.</p> <p>Based on stakeholder consultation with surrounding community Pembuang Hulu II village and Amin Jaya village; the establishment of HCV assessment 2009 stated all HCV identified inside company permit, has been communicated and no land rights on community land identified as HCV/HCS, thus not affecting their right.</p>	Not Applicable

		<p>PT. Indotruba Tengah made communication/socialization of HCV and protected species on 17 July 2021. Attended by Pembuang Hulu II villagers, Sungai Pakit villagers, Derangga villagers, Karang Mulya villagers, BPD Pangkalan Banteng.</p> <p>This indicator is Not Applicable.</p>	
<p>7.12.6</p>	<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>According to HCV assessment 2009, there are identify the important RTE species identify (based on information from surrounding community and presence of animal): <i>Pongo pygmaeus</i> (orangutan), <i>Helarctos malayanus</i> (beruang madu), <i>Manis javanica</i> (trenggiling) and <i>Spilornis cheela</i> (Elang ular bido).</p> <p>The company has established Conservation Management Plan to manage and to monitor of RTE's as per "Program pemeliharaan dan monitoring Kawasan HCV dan Buffer zone PT. Indotruba Tengah".</p> <p>Company has monitor the RTE species and HCV area regularly in monthly basis. Based on document Monitoring of Flora and Fauna PT. Indotruba Tengah, there were animal presence in PT. Indotruba Tengah categorized as RTE species and protected species by national regulation: Kucing hutan (<i>Felis bengalensis</i>), Alap-alap putih (<i>Elanus hipoleucus</i>), Burung kuntul (<i>Bubulcus ibis</i>), Burung belibis (<i>Dendrocygna javanica</i>), Burung cucuk udang (<i>Alcedo caeruleus</i>).</p> <p>Policy or rules to protect RTE species included in "SOP Pengelolaan Sempadan Sungai/Waduk (DAS) & Areal Konservasi No.01/HCV-SAA/07/2009" dated 1 June 2009. Section O, stipulates prohibit to purposely cutting trees or shrub in the buffer area. Section P, stipulates all activities including felling trees, replanting in buffer area is prohibit. Section U stated prohibit hunting and poaching flora and fauna in buffer area. Section W stated if employees or communities found purposely damaging, taking advantage, or activity adversely impacting the buffer area will be processed against law.</p> <p>Appropriate disciplinary measures imposed in accordance with company rules and national law, should any individual working for the company is found to have captured, harmed, collected, or killed any RTE species implemented. PT. Indotruba Tengah has "SOP Penanganan Satwa Liar No.01/MAS/-SOP/09" dated 1 June 2009. Section 4.1, stipulates company will perform communication and</p>	<p>Complied</p>

		<p>socialization and convey: employee and contractor are not allowed to capture, pet, or kill RTE species; employee and contractor are not allowed to trade wildlife, sanction will be sacking or contract cancellation. All wildlife found will be seized and sent for rehabilitation, release in local area, hand over to government body for conservation.</p> <p>Programme to regularly educate the workforce about the status of the RTE species is implemented. PT. Indotruba Tengah has "SOP Penanganan Satwa Liar No.01/MAS/-SOP/09" dated 1 June 2009. Section 4.1, stipulates company will perform communication and socialization and convey company will educate and suggest employee and contractor to pet or hunt wildlife through socialization, briefing and signboard no hunting.</p> <p>Inspections conducted as recorded "Form Identifikasi Fauna di Kawasan Perkebunan Kelapa Sawit Seruyan Estate". Period 20 January 2021- 16 March 2022 found Varanus salvator, Python reticulatus, Spilornis cheela, Naja sp., Macaca fascicularis, Centropus sinensis, Acridotheres javanicus, Tupaia glis, Felis bengalensis; no traps/snares put up within or nearby areas.</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p>	<p>There is no new planting. The company has started planting in 1992, no new planting area/developing area since November 2005 and 2014/2018. Replanting has been performed since 2013 - 2015.</p> <p>HCV assessment has been conducted by PT. Indotruba Tengah cooperated with independent Consultant Aksenta on August 2009. The HCV report documented in the "Laporan Identifikasi High Conservtion Value PT. Indotruba Tengah, Kabupaten Kotawaringin Barat & Seruyan Provinsi Kalimantan Tengah, January 2010". HCV Assessment was conducted using HCV Toolkit Indonesia 2008.</p> <p>Management plan contained ongoing monitoring of status of HCV, HCS, other natural ecosystems, peatland conservation areas and RTE species have been developed</p> <p>Monitoring report of HCV sighted and verified for period January – December 2020 and 2021.</p>	Complied

7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.</p>	<p>There is no land cleared since 15 November 2018 without prior HCV-HCS assessment. There is no new planting. The company has started planting in 1992, no new planting area/developing area since November 2005 and 2014/2018. Replanting has been performed since 2013 - 2015.</p> <p>HCV assessment has been conducted by PT. Indotruba Tengah cooperated with independent Consultant Aksenta on August 2009. The HCV report documented in the "Laporan Identifikasi High Conservtion Value PT. Indotruba Tengah, Kabupaten Kotawaringin Barat & Seruyan Provinsi Kalimantan Tengah, January 2010". HCV Assessment was conducted using HCV Toolkit Indonesia 2008.</p> <p>Based on communication with RSPO Secretariat dated 7 March 2022, BSI obtain statement "The unit has already been disclosed and RaCP is not applicable".</p> <p>This indicator is Not Applicable.</p>	Not Applicable
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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2020 and 2021** for **Sekunyir POM** and supply base was calculated using the PalmGHG Calculator version 4. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2020** for **Sekunyir POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.03
PKO	1.03

Extraction	%
OER	24.48
KER	4.91

Production	t/yr
FFB Process	134376.17
CPO Produced	30104.74
PKO Produced	0

Land Use	Ha
OP Planted Area	6551.44
OP Planted on peat	0.00
Conservation (forested)	47.99
Conservation (non-forested)	0.00
Total	6599.43

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	26912.37	0.22	0.00	0.00	0.00	0.00	26912.37	0.22
CO ₂ Emission from fertilizer	4151.26	0.03	0.00	0.00	0.00	0.00	4151.26	0.03
NO ₂ Emission	3177.92	0.03	0.00	0.00	0.00	0.00	3177.92	0.03
Fuel Consumption	1988.69	0.02	0.00	0.00	0.00	0.00	1988.69	0.02
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-22969.00	-3.51	0.00	0.00	0.00	0.00	-22969.00	-3.51
Conservation Sequestration	-440.07	-0.07	0.00	0.00	0.00	0.00	-440.07	-0.07
Total	12821.17	1.96	0.00	0.00	0.00	0.00	12821.17	1.96

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	24101.20	0.20
Fuel Consumption	264.27	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	24365.47	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

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

*This mill has no kernel crusher operation.

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

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

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The summary of the Net GHG emitted in **2021** for **Sekunvir POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.26
PKO	1.26

Extraction	%
OER	23.08
KER	4.44

Production	t/yr
FFB Process	104,332.00
CPO Produced	24,077.68
PKO Produced	0

Land Use	Ha
OP Planted Area	6481.99
OP Planted on peat	0.00
Conservation (forested)	97.44
Conservation (non-forested)	0.00
Total	6579.43

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	34390.59	0.33	0.00	0.00	0.00	0.00	34390.59	0.33
CO ₂ Emission from fertilizer	7264.89	0.07	0.00	0.00	0.00	0.00	7264.89	0.07
NO ₂ Emission	5367.94	0.05	0.00	0.00	0.00	0.00	5367.94	0.05
Fuel Consumption	2056.81	0.02	0.00	0.00	0.00	0.00	2056.81	0.02
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-32597.71	-0.31	0.00	0.00	0.00	0.00	-32597.71	-0.31
Conservation Sequestration	-896.28	-0.01	0.00	0.00	0.00	0.00	-896.28	-0.01
Total	15586.23	0.15	0.00	0.00	0.00	0.00	15586.23	0.15

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	20450.84	0.20
Fuel Consumption	175.39	0.00
Grid Electricity Utilization	0.00	0.00
Credit		

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Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	20626.23	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

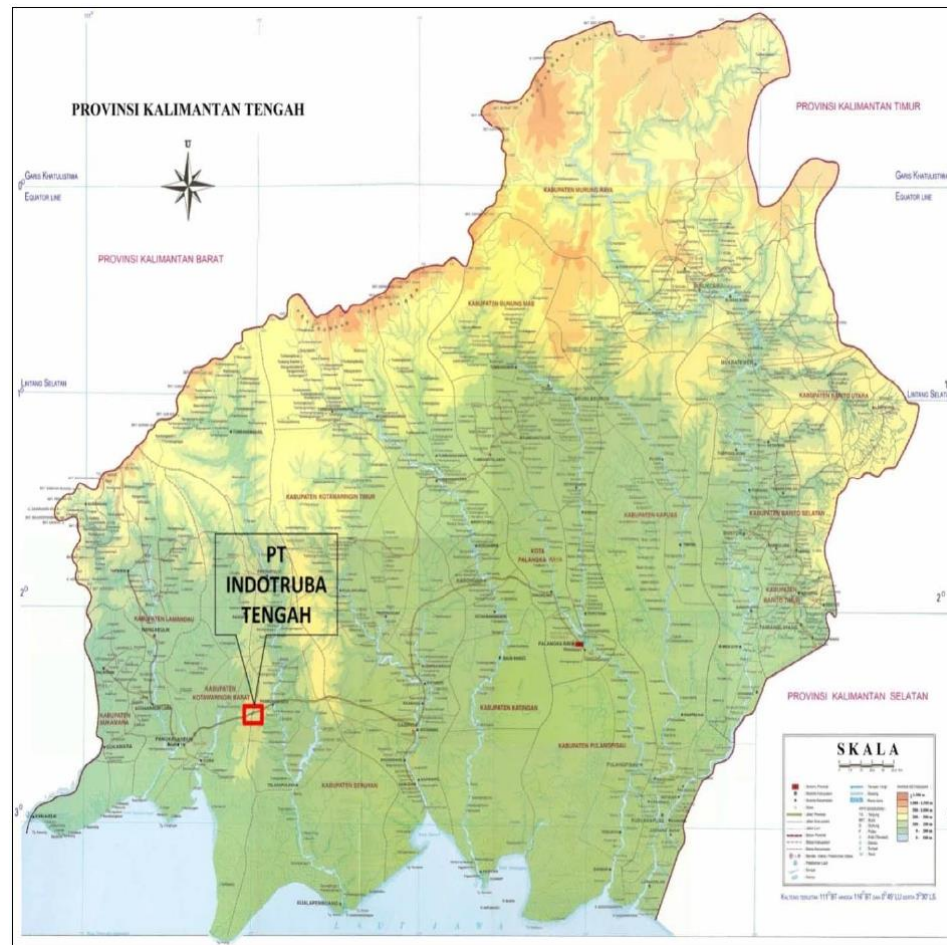
Emissions	tCO₂e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

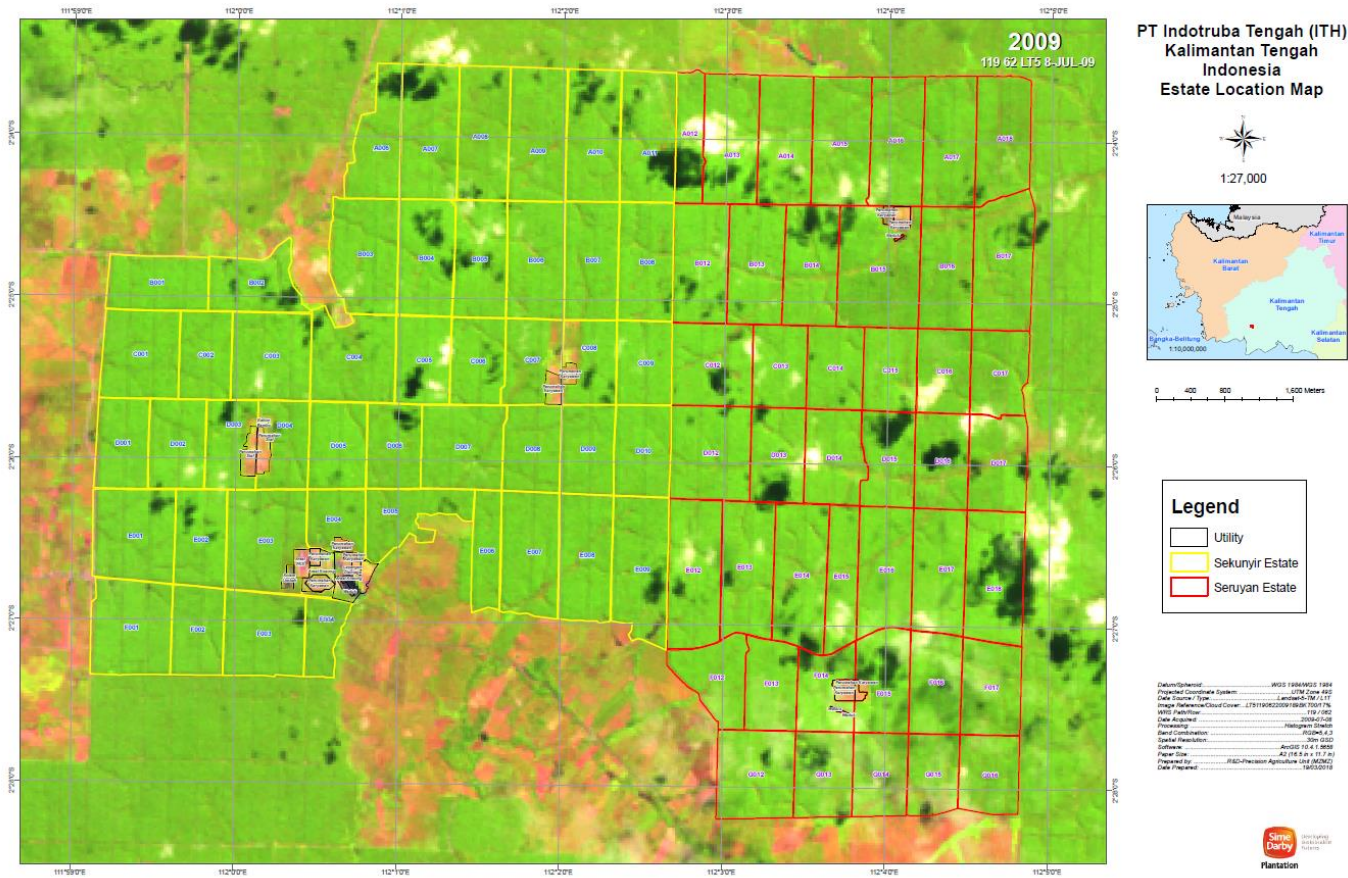
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	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



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Appendix E: List of Smallholder Registered and sampled

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
	N/A								
Total									

Note: * are smallholders sampled in this audit.

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
ISCC	International Sustainable Carbon Certification
ISS	Independent Smallholder Standard
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure