

ASSESSMENT REPORT

Roundtable on Sustainable Palm Oil Certification RSPO

Surveillance

Name of Management: Teluk Siak Palm Oil Mill – PT Aneka Inti Persada Subsidiary of Sime Darby

Organisation

Plantation Berhad

Plantation Name

: PT Aneka Inti Persada: Teluk Siak Estates, Pinang Sebatang Estate and

Aneka Persada Estate

: Village of Meredan, Sub District of Tualang and Koto Gasib, District of Siak, Location

Province of Riau, Indonesia

Certificate Code : MUTU-RSPO/007

Date of Certificate Issue : 11 October 2016 Date of License Issue : 11 January 2020 : 10 October 2021 Date of License Expiry : 10 October 2020 Date of Certificate Expiry

Assessment	Assessment	PT. Mutuagung Lestari	Reviewed	Approved
	Date	Auditor	by	by
ASA-1.3	26 – 30 August 2019	Andi Pratama Pasaribu (Lead Auditor), Mohamad Amarullah, Steve Mualim & Rindu Galih Rezza Rachmansyah	Ardiansyah	Octo H. P. N. Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.3	20 December 2019

PT Mutuagung Lestari • Raya Bogor Km 33,5 Number 19 • Cimanggis • Depok 16953 • Indonesia Telephone (+62) (21) 8740202 • Fax (+62) (21) 87740745/6 • Email: agri@mutucertification.com • www.mutucertification.com MUTU Certification • Accredited by Accreditation Services International on March 12th, 2014 with registration number ASI-ACC-055



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Figure 1. Location Map of PT Aneka Inti Persada



Figure 2. Operational Map of PT Aneka Inti Persada



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Abbreviations Used

AIP	:	Aneka Inti Persada
AMDAL (SEIA)	:	Analisis Mengenai Dampak Lingkungan (Social and Environmental Impact Assessment)
APE	:	Aneka Persada Estate
BPJS	:	Badan Penyelenggara Jaminan Sosial (Social Insurance Coordination Board
BKPM	:	Badan Koordinasi Penanaman Modal (Head of the Investment Coordinating Board)
BSS	:	Block Spraying System
BOB	:	Barn Owl Box
BOD	:	Biological Oxygen Demand
CH	:	Certificate Holder
CPO	:	Crude Palm Oil
CSR	:	Corporate Social Responsibility
FFB	:	Fresh Fruit Bunch
HCV	:	High Conservation Value
HGU	:	Hak Guna Usaha (Land Use Permit)
IUP-B	:	Izin Usaha Perkebunan-Budidaya (Plantation Operation Licence)
IPM	:	Integrated Pest Management
EFB	:	Empty Fruit Bunch
KER	:	Kernel Extraction Rate
MRC	:	Minamas Research Center
OER	:	Oil Extraction Rate
OHS	:	Occupational Health and Safety
PK	:	Palm Kernel
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
PSD	:	Plantation Service Department
PSE	:	Pinang Sebatang Estate
PT AIP	:	PT Aneka Inti Persada
RSP0	:	Roundtable on Sustainable Palm Oil
RKL/RPL	1:	Rencana Kelola Lingkungan/ Rencana Pemantauan Lingkungan (Environmental
		Management Plan / Environmental Monitoring Plan)
SCCS	:	Supply Chain Certification System
SIA	:	Social Impact Assessment
SOP		Standard Operating Procedure
SOU		Strategic Operation Unit
TSE		Teluk Siak Estate
TSF	1:	Teluk Siak Factory
UKL/UPL	:	Upaya Kelola Lingkungan/ Upaya Pemantauan Lingkungan (Environmental Management
		Efforts/ Environmental Monitoring Efforts)
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant



1.0	SCOPE of the CE	RTIFICATION ASSESSME	ENT					
1.1	Assessment Stan	dard Used	NITF (Indo endorsed RSPO Supseeking or Governors (Module D	onesian National Interpreta by the RSPO BoG 30 th Se oply Chain Certification S r holding certification Add s on 21 November 2014 for CPO Mill)	of RSPO P&C 2013 by INA- ation Task Force) July 2016, ptember 2016. Standard For organizations opted by the RSPO Board of revised on 14 June 2017 ciples and Criteria, 14 June			
1.2	Organisation Info	rmation						
1.2.1		listed in the certificate	PT Aneka Inti P	ersada – Sime Darby Plant	tation Berhad			
1.2.2	Contact person	instea in the continuate	Alagendran Ma		lation Bernau			
1.2.3	<u>'</u>	ess and site address	Head Office					
			 Head Office: Sime Darby Plantation Berhad No 2, Plantation Tower Jalan PJU 1A/7 Petaling Jaya, Malay 47301 Liaison Office: The Plaza Office Tower, 36th Floor Jl. MH Thamrin Kav. 28-30, 					
1.2.4	Telephone		Jakarta – 10350 +62-21-29926000					
1.2.5	Fax		+62-21-29922686					
1.2.6	E-mail		alagendran.maniam@simedarbyplantation.com					
1.2.7	Web page address		www.simedarbyplantations.com					
1.2.8		esentative who completed						
	the application for							
1.2.9	Registered as RSP	O member	1-0008-04-000-	00- 7 September 2004				
1.3	Type of Assessme	ent						
1.3.1	Scope of Assessme Management Unit	ent and Number of			E), Pinang Sebatang Estate			
1.3.2	Type of certificate		Single	` '				
1.4	Locations of Mill a	and Plantation						
1.4.1	Location of Mill							
				Coo	ordinate			
	Name of Mill	Location	ı	Latitude	Longitude			
	Teluk Siak	Village of Meredan, Tualang, District of Siak,		N 0° 35' 29"	E 101° 39' 32"			
1.4.2	Location of Certific	ation Scope of Supply Base	e					
	Name of Supply Base	Location		Coo Latitude	ordinate			
	Teluk Siak	Village of Meredan,	Sub district of	Latitude	Longitude E			
	ICIUN SIAN	Tualang, District of Siak,		0° 35' 05" – 0° 38' 09"	101° 37' 01"– 101° 42' 48"			



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	Pinang Sebatang	Village of Pinang Sebatang, Sub-district of Tualang, District of Siak, Riau Province.	0° 32	N 2' 35" – 0° 32' 34"	E 101° 34' 30" – 1	01° 39' 21"
	Aneka Persada	Village of Meredan, Sub-district of Tualang, District of Siak, Riau Province.	0° 32	N 2' 35" – 0° 37' 35"	E 101° 39' 21" – 1	01° 43' 08"
		·				
1.5	Description of Are	a Statement				
1.5.1	Tenure					
	• State				11,555.31	На
	 Community 				-	На
1.5.2	Area Statement					
	Total area				11,555.31	На
	Mature area				6,765.41	На
	Immature area				2,895.53	На
	• Mill				20.90	На
	 Emplashment 				113.02	На
	Infrastructure (I	Road & Bridges)			319.53	На
	 Nursery 				17.96	На
	 Occupation 				797.21	На
	Others area (er	nclave)			372.97	На
	• HCV				252.78	На

Planting Year and Cycles 1.6

Age profile of planting year 1.6.1

Dianting Voc		Hectarage (H	a)	
Planting Year	Teluk Siak Estate	Pinang Sebatang Estate	Aneka Persada Estate	Total
1994	0.00	222.48	0.00	222.48
1995	67.70	138.54	0.00	206.24
1996	344.31	0.00	778.49	1122.80
1997	295.83	439.12	113.45	848.40
1998	358.26	154.21	0.00	512.47
1999	0.00	70.74	317.27	388.01
2001	72.13	126.22	34.95	233.30
2003	76.67	0.00	0.00	76.67
2004	51.42	0.00	110.80	162.22
2006	25.10	0.00	47.63	72.73
2009	29.00	0.00	0.00	29.00
2011	30.00	30.00	0.00	60.00
2013	217.91	202.87	360.64	781.42
2014	339.36	315.98	396.37	1051.71
2015	292.14	275.23	430.59	997.96





	Sub Total Matu	re		2,199	.83		1,975.	39		2,	,590.19	6,7	65.41
	2016			194	.19		413.	39			127.76	7	35.34
	2017			310.	.92		303.	14			350.85	9	64.91
	2018			111.	.30		244.	18			55.93	4	11.41
	2019			0.	.00		292.	35			491.52	7	83.87
	Sub Total Immat	ure		616.	.41		1,253.	06	1,026.06		,026.06	2,8	95.53
	TOTAL			2,816	.24		3,228.	45	3,616.25			9,6	60.94
1.6.2	New Planting area	after Jar	uary 2	010				I.	- Ha				
1.6.3	Planting Cycle						2 nd Cycl	е					
4 =													
1.7 1.7.1	Description of Mill Description of Mill	II and Su	ipply B	ase									
1.7.1	Description of will						CPO)		-	Palm Ke	rnel	
	Name of Mill	Capa (tonnes			ocessed s/year)		t put	Extrac			Out put	Extra	action
		(torrics	, mour)	`		,	nnes)	(%			tonnes)		%)
	Teluk Siak	4!	-		,915		,533	22.6	1		7,166	4.	.98
1.7.2	*Production data so Description of Cer					(August .	2018 – July	2019)					
1.7.2	Description of Cer	uncauon	T	or Supply L	Das c						_		
	Name of Es	tato	To	tal Area	Planted	l Area	FF	В	Yie (tonn	-	Supplie	d to N	/ill
	Name of L3	iaic		(Ha)	(Ha	a)	(tonne	s/year)	ha/ye		FFB (tonnes/y	ear)	%
	Teluk Siak Estate			3,321.20	2	2,816.24	47	,466.21	16.8	85	47,46		100
	Pinang Sebatang	Estate		3,799.21	3	3,228.45	45	,019.46	13.9	94	45,01	9.46	100
	Aneka Persada Es	state		4,434.90	3	3,616.25	51	,502.83	14.2	24	51,50)2.83	100
	TOTAL		1	1,555.31	9	9,660.94	143	,988.50	14.9	90	143,98	8.50	100
	*Production data so	ource from	12 mor	nths before a	assessment	(August .	2018 – July	2019)					
1.7.3	FFB description from	om other	source										
	Name of			Tuno of O	rganisatio	n	number		roduct		Supplie	ed to N FB	/lill
	sources/Organ	isation		Type of O	gamsatio	"	smallhold	lers /	Area (H	la)		s/year	r)
	-				-		-		-			-	
					OTAL							-	
474	*Production data so		12 mor	nths before a	assessment	(August .	2018 – July	2019)					0 01/
1.7.4	Product categories	<u> </u>									FF	B, CP(J, PK
1.8	Tonnage of Produ	ıct				1							
1.8.1	Past Annual Claim		Produ	ct		Last	Year Proje	cted Cer	tified	Las	st Year Actu	al Cer	tified
							Volume				lume (Augu	st 201	
	FFD Draggered							10	4.002		July 2019		2.015
	FFB Processed CPO Production								4,982 1,524				3,915 2,533
	Palm Kernel (PK)	Production	n						8,763				2,533 7,166
	1 2 (3)		-			L			2,7.00	1			.,100



1.8.2	Product selling										
	Type of selling p	oroduct					Actual sellir	ng prod	luct for las 2019)		st 2018 to July
	CSPO sold as F										
	CSPK sold as F			oduct							1,85
	CSPO sold und										
	CSPK sold und										
	CSPO sold as o										32,41
	CSPK sold as c	onventiona	l								5,08
1.8.3	Estimate of Cer	tified FFB (Claim								
	Name of	Estates		Total Are (Ha)	ea	P	lanted Area (Ha)	1	(tonnes/		Yield onnes/ha/year)
	Teluk Sia	k Estate		3,321.2	0		2,816.24		50,8	320	18.05
	Pinang Seba	ntang Estat	9	3,799.2	1		3,228.45		47,	740	14.79
	Aneka Pers	ada Estate		4,434.9	0		3,616.25		55,4	140	15.33
	T01	AL		11,555.3	1		9,660.94		154,0	000	15.94
	*Projected FFB p	production fo	r 12 m	onths of certific	cate (11	October	2019 – 10 C	ctober .	2020)	I	
1.8.4	Estimate of Cer	tified Palm	Produ	ct Claim							
	Name of Mill	Capaci		FFB Processed	Out	CP t put	O Extraction	1 (Palm K	ernel Extraction	Supply Chair
	Nume of min	(tonnes/ h	OI IT I	tonnes/year)		nes)	(%)		onnes)	(%)	Module
	Teluk Siak	45		154,000	32	,340	21.00		7,700	5.00	IP
	*Projected CPO		roducti	·							IP
1.0	*Projected CPO a	and CSPK p	roducti	·							IP
1.9	*Projected CPO o	and CSPK p	roducti	·		ertificate	(11 October 2	2019 –	10 October	2020)	
1.9	*Projected CPO a	and CSPK p	roducti	·		ertificate	(11 October 2	2019 –	10 October	2020)	16 June 2020.
1.9	*Projected CPO o	and CSPK p	roducti	·		ertificate	(11 October 2	2019 –	10 October	2020)	
	*Projected CPO a Other Certifica Others	and CSPK p	roducti	·		ertificate	(11 October 2	2019 –	10 October	2020)	
	*Projected CPO of the Certification Others Time Bound Plants	and CSPK p	e	·	ths of ce	ISPO:	(11 October 2	2019 –	10 October	2020) June 2015 to	
	*Projected CPO a Other Certifica Others Time Bound Pl Manageme	tions tions tan trim trim trim	e	ion for 12 mont	ths of ce	ISPO:	TNI-ISPO-F Time Bound Plan	2019 –	dated 17 J	2020) June 2015 to	16 June 2020.
1.10	*Projected CPO of the Certification Others Time Bound Plantagement Mill Sekunyir.	tions tions Tim boul	e nd	ion for 12 mont	ths of ce	ISPO:	TNI-ISPO-F Time Bound Plan	-1506	dated 17 J	2020) June 2015 to tion	16 June 2020. Status Certified
1.10	*Projected CPO a Other Certifica Others Time Bound Pl Manageme Mill Sekunyir. PT. Indotr	tions tions Tim boul	e nd	Estate (Supp	bly Bas	ISPO:	TNI-ISPO-F Time Bound Plan	-1506	dated 17 J Loca Seruyan a varingin Di	2020) June 2015 to tion and West strict – Centra	16 June 2020. Status Certified
1.10	*Projected CPO a Other Certifica Others Time Bound Pl Manageme Mill Sekunyir. PT. Indotr Tengah Manggala.	tions tions Tim boul 20°	e nd 0	Estate (Supp	bly Bas	ISPO:	TIME Bound Plan ESIA 2010	-1506 (Kotav	Loca Seruyan a varingin Di Kalima	2020) June 2015 to tion and West strict – Centra	16 June 2020. Status Certified
1.10	*Projected CPO of the Certification Others Time Bound Planta Management Mill Sekunyir. PT. Indotratengah Manggala. PT. Tunggal Manggala.	tions tions Tim boul	e nd 0	Estate (Supplement) Sekur	bly Bas	ISPO:	TIME Bound Plan ESIA 2010 2010	-1506 (Kotav	Loca Seruyan a varingin Di Kalima	2020) June 2015 to tion and West strict – Centra	16 June 2020. Status Certified Certified
1.10	*Projected CPO a Other Certifica Others Time Bound Pl Manageme Mill Sekunyir. PT. Indotr Tengah Manggala.	tions tions Tim boul 20°	e nd 0	Estate (Supp Sekur Seruy Mangga	bly Bases	ISPO:	TNI-ISPO-F Time Bound Plan ESIA 2010 2010	-1506 (Kotav	Loca Seruyan a varingin Di Kalima	2020) June 2015 to tion and West strict – Centra	Status Certified Certified Certified
1.10	*Projected CPO of the Certification Others Time Bound Planta Management Mill Sekunyir. PT. Indotratengah Manggala. PT. Tunggal Manggala.	tions tions Tim boul 20°	e nd 0	Estate (Supp Sekur Seruy Mangga	bly Bas nyir ran ala 1 ala 2 ala 3	ISPO:	Time Bound Plan ESIA 2010 2010 2010	-1506 Kotav	Loca Seruyan a varingin Di Kalima kan Hilir D	2020) June 2015 to tion and West strict – Centra	Status Certified Certified Certified Certified
1.10 1	*Projected CPO of the Certification Others Time Bound Pl Manageme Mill Sekunyir. PT. Indotr Tengah Manggala. PT. Tunggal M Plantations	tions tions an ent Unit Tim bour 20° ditra 20°	e end 0 0	Estate (Supp Sekur Seruy Mangga Mangga Was	bly Bases nyir ala 1 ala 2 ala 3	ISPO:	Time Bound Plan ESIA 2010 2010 2010 2010 2010 2010	-1506 Kotav	Loca Seruyan a varingin Di Kalima kan Hilir D	tion west strict – Central strict – Riau	Status Certified Certified Certified Certified Certified Certified
1.10 1	*Projected CPO of the Certification Others Time Bound Plantagement Management Mill Sekunyir. PT. Indotragement Tengah Manggala. PT. Tunggal Manggala. PT. Tunggal Manggala. Plantations Bukit Ajong	tions tions an ent Unit Tim bour 20° ditra 20°	e end 0 0	Estate (Supplemental Sekur Seruy Mangga Mang	bly Bases nyir ran ala 1 ala 2 ala 3 st n proce	ISPO:	TNI-ISPO-F Time Bound Plan ESIA 2010 2010 2010 2010 2010	-1506 Kotav	Loca Seruyan a varingin Di Kalima kan Hilir D	tion west strict – Central strict – Riau	Status Certified Certified Certified Certified Certified Certified
	*Projected CPO of the Certification Others Time Bound Plantagement Management Mill Sekunyir. PT. Indotragement Tengah Manggala. PT. Tunggal Manggala. PT. Tunggal Manggala. Plantations Bukit Ajong	tions tions an ent Unit Tim bour 20° ditra 20°	e end 0 0	Sekur Seruy Mangga Mangga West (HGU o	bly Bas nyir ala 1 ala 2 ala 3 st n procee	ISPO: INDONI esss)	Time Bound Plan ESIA 2010 2010 2010 2010 2010 2010 2010	-1506 Kotav	Loca Seruyan a varingin Di Kalima kan Hilir D	tion west strict – Central strict – Riau	Status Certified Certified Certified Certified Certified Certified Certified Certified



			West Plasma	2010] [Certified
			Sei Mawang	2019		-
4	Teluk Siak.	2011	Teluk Siak	2011	Siak District – Riau	Certified
	PT Aneka Inti Persada		Pinang Sebatang	2011		Certified
	1 cisada		Aneka Persada	2011	1	Certified
5	Sungai Pinang.	2012	Sungai Pinang	2012	Musi Rawas District – South	Certified
	PT. Bina Sains Cemerlang		Sungai Pinang (HGU on process)	2020	Sumatera -	-
			Bukit Pinang	2012		Certified
			Bukit Pinang (HGU on process)	2020		-
6	Pemantang.	2011	Pemantang	2011	Seruyan and East	Certified
	PT. Teguh Sempurna		Kawan Batu	2011	Kotawaringin District – Central Kalimantan	Certified
			Hatan Tiring	2011		Certified
			Batang Garing	2011		Certified
7	Alur Dumai. PT Lahan Tani Sakti	2011	Alur Dumai	2011	Rokan Hilir District – Riau	Certified
8	Teluk Bakau.	2011	Teluk Bakau	2011	Indra Giri Hilir District – Riau	Certified
	PT. Bhumireksa Nusa Sejati		Nusa Perkasa	2011		Certified
			Nusa Lestari	2011		Certified
9	Mandah	2014	Mandah	2011	Indra Giri Hilir District – Riau	Certified
	PT. Bhumireksa Nusa Sejati		Rotan Semelur	2011		Certified
10	Angsana.	2011	Angsana	2011	Tanah Bumbu District – South	Certified
	PT Ladangrumpun Suburabadi		Gunung Sari	2011	Kalimantan	Certified
			Pantai Bonati	2011		Certified
			KKPA-1 PT.SHE	2013		Certified
			KKPA-4 PT.SHE	2013		Certified
11	Mustika.	2013	Mustika	2013	Tanah Bumbu District – South	Certified
	PT Sajang Heulang		KKPA-2 PT.SHE	2013	- Kalimantan	Certified
			KKPA-3 PT.SHE	2013		Certified
			KKPA-5 PT.SHE	2013		Certified
			SAP 1	2020		-
12	Gunung Aru.	2011	Gunung Aru	2011	Kotabaru District – South	Certified
	PT Bersama Sejahtea Sakti		Gunung Kemasan	2011	Kalimantan	Certified
			Laut Timur	2011		Certified
			Pantai Timur	2011]	Certified
			KKPA BSS	2020		-
13	Bebunga.	2011	Bebunga	2011	Kotabaru District – South	Certified
	PT. Langgeng Muaramakmur		Bakau	2011	Kalimantan	Certified
	a.rammu		Sungai Cengal	2011		Certified



14		2011	Sukamandang	2011	Seruyan and East	Certified
	Sukamandang		Sapiri	2011	Kotawaringin District – Central Kalimantan	Certified
	PT Kridatama Lancar		Barasdanum	2011	Central Kallinantan	Certified
			Kuala Kuayan	2011		Certified
15	Pondok Labu.	2012	Binturung	2012	Kotabaru District – South	Certified
	PT Paripurna Swakarsa		Pondok Labu	2012	Kalimantan	Certified
	SWakaisa		Rampa	2012		Certified
			Sesulung	2012		Certified
16	Rantau.	2012	Rantau	2012	Kotabaru District – South	Certified
	PT Laguna Mandiri		Matalok	2012	Kalimantan	Certified
			KKPA Sungai Cengal (1,382 SH)	2014		Certified
			Selabak (PT SAA)	2012		Certified
			Randi (PT SAA)	2012		Certified
			Sangkoh (PT SAA)	2012		Certified
			Lanting (PT LMR)	2012		Certified
17	Betung.	2014	Betung	2012	Kotabaru District – South	Certified
	PT Laguna Mandiri		Sekayu	2012	Kalimantan	Certified
18	Ungkaya.	2012	Ungkaya	2012	Morowali District – Sulawesi	Certified
	PT Tamaco Graha Krida		Plasma TGK	2020	- Tengah	-
19	Ladang Panjang.	2012	Ladang Panjang	2012	Muaro Jambi District - Jambi	Certified
	PT Bahari Gembira Ria		Ladang Panjang (HGU on process)	2020		-
			Plasma BGR	2020		-
20	Rantau Panjang.	2012	Rantau Panjang	2012	Musi Banyuasin District –	Certified
	PT Guthrie Pecconina Indonesia		Rantau Panjang (HGU on process)	2020	South Sumatera	-
			Bumi Ayu	2012		Certified
			Karang Ringin	2012		Certified
			Napal	2012		Certified
			Napal (HGU on process)	2020		-
			Mangun Jaya	2012		Certified
			Mangun Jaya (HGU on process)	2020		-
			Sungai Jernih	2020		-
			GPI KKPA	2020]	-
21	Blang Simpo.	2013	Tamiang (PT PPP)	2013	Aceh Tamiang and East Aceh	Certified
	PT Perkasa Subur Sakti		Batang Ara (PT PSK)	2013	District – Aceh	Certified
			Blang Simpo-01	2013		Certified
			Blang Simpo-02	2013		Certified
23	Lembiru.	2014	Lembiru	2014	Ketapang District – West	Certified



	PT Sandika Nata		Awatan	2014	Kalimantan	Certified
	Palma		Karya Palma	2019	-	-
			KKPA SNP	2020	-	-
			Pelanjau (PT BAL)	2019	-	IC
			Sungai Putih (PT BAL)	2019	-	-
			Baturus (PT BAL)	2019	-	-
			KKPA BAL	2020	-	-
			MAL	AYSIA		
1	Sg Dingin	2010	Bukit Hijau	2010	Kerangan, Kedah	Certified
	SOU 1		Padang Buluh	2010		Certified
			Bukit Selangor	2010		Certified
			Sg Dingin	2010		Certified
			Jentayu	2010		Certified
			Anak Kuli	2010		Certified
			Somme	2010		Certified
2	Chersonese	2011	Chersonese	2011	Kuala Kurau, Perak	Certified
	SOU 2		Holyrood	2011		Certified
			Kalumpong	2011		Certified
			Tali Ayer	2011		Certified
3	Elphil	2011	Kinta Kellas	2011	Sg Siput, Perak	Certified
	SOU 3		Elphil	2011		Certified
			Kamuning	2011		Certified
4	Flemington	2011	Flemington	2011	Teluk Intan, Perak	Certified
	SOU 4		Bagan Datoh	2011		Certified
			Sabak Bernam	2011		Certified
			Sg Samak	2011		Certified
5	Seri Intan	2011	Seri Intan (Main Division)	2011	Teluk Intan, Perak	Certified
	SOU 5		Sabrang	2011	-	Certified
			Sg Wangi	2011		Certified
			Sogomana (Main Division)	2011	-	Certified
6	Selaba SOU 5	2011	Seri Intan (Selaba Division)	2011	Teluk Intan, Perak	Certified
			Sogomana (Cashwood & Sg Beruas Division)	2011		Certified
			Bikam	2011		Certified
			Clumy	2011		Certified
7	Tennamaram	2011	Tennamaram	2011	Bestari Jaya, Selangor	Certified
	SOU 6		Sungei Buloh	2011		Certified
			Bkt Talang	2011		Certified



8	Bkt Kerayong	2011	Bkt Kerayong	2011	Kapar, Selangor	Certified
	SOU 7		Bkt Cherakah	2011		Certified
			Bkt Rajah	2011		Certified
			Bkt Lagong	2011		Certified
			Elmina	2011	1	Certified
9	East	2010	East	2010	Carey Island, Selangor	Certified
	SOU 8		Dusun Durian	2010		Certified
			Sepang	2010		Certified
10	West - SOU 9	2010	West	2010	Carey Island, Selangor	Certified
11	Bukit Putri - SOU 10	2011	Bukit Putri	2011	Raub, Pahang	Certified
12	Kerdau	2011	Kerdau	2011	Temerloh, Pahang	Certified
	SOU 11		Jentar	2011	†	Certified
			Mentakab	2011	1	Certified
			Sg Mai	2011	†	Certified
			Chenor	2011	1	Certified
13	Jabor - SOU 12	2011	Jabor	2011	Kuantan, Pahang	Certified
14	Labu	2011	Labu	2011	Nilai, Negeri Sembilan	Certified
	SOU 13		New Labu	2011	1	Certified
			Bradwall	2011		Certified
15	Tanah Merah	2010	Tanah Merah	2010	Port Dickson, Negeri Sembilan	Certified
	SOU 14		Sua Betong	2010		Certified
			Bukit Pelandok	2010		Certified
16	Sua Betong	2014	Salak	2014	Port Dickson, Negeri Sembilan	Certified
	SOU 15		Sengkang	2014		Certified
			Siliau	2014		Certified
			PD Lukut	2014		Certified
			Sungai Baru	2014		Certified
			Tampin Linggi	2014	-	Certified
17	Kok Foh		Bukit Pilah	2011	Bahau, Negeri Sembilan	Certified
	SOU 16		Kok Foh	2011		Certified
			Muar River	2011		Certified
			St. Helier	2011		Certified
			Pertang	2011		Certified
			Sg Gemas	2011		Certified
			Sg Sebaling	2011		Certified
			Sg Senarut	2011		Certified
18	Kempas	2010	Kempas	2010	Jasin, Melaka	Certified
	SOU 17		Kemuning	2010	1	Certified



			Tangkah	2010		Certified
19	Diamond Jubilee	2011	Bukit Asahan	2011	Jasin, Melaka	Certified
	SOU 18		Diamond Jubilee	2011		Certified
			Serkam	2011		Certified
20	Pagoh	2014	Pagoh	2014	Muar, Johor	Certified
	SOU 19	•	Lanadron	2014		Certified
		•	Pengkalan Bukit	2014		Certified
			Welch	2014		Certified
21	Chaah	2010	North Labis	2010	Chaah, Johor	Certified
	SOU 20	•	Cha'ah	2010		Certified
			Sg Simpang Kiri	2010		Certified
22	Gunung Mas	2010	Gunung Mas	2010	Kluang, Johor	Certified
	SOU 21		Kempas Klebang	2010		Certified
		•	Bukit Paloh	2010		Certified
		•	Yong Peng	2010		Certified
23	Bukit Benut	2011	Bukit Benut	2011	Kluang, Johor	Certified
	SOU 22		CEP Niyor	2011		Certified
		•	Lambak / Elaeis	2011		Certified
24	Ulu Remis SOU 23	2011	Pekan	2011	Layang-layang, Johor	Certified
			Sembrong	2011		Certified
		•	Tun Dr. Ismail	2011		Certified
		•	Ulu Remis	2011		Certified
		•	Bukit Badak	2011		Certified
			Cenas	2011		Certified
25	Hadapan	idapan 2011	CEP Rengam	2011	Layang-layang, Johor	Certified
	SOU 24		Kulai	2011		Certified
		•	Layang	2011		Certified
			Seri Pulai	2011		Certified
26	Sandakan Bay	2008	Tun Tan Siew Sin	2008	Sandakan, Sabah	Certified
	SOU 26		Tunku	2008		Certified
			Tigowis	2008		Certified
			Sentosa	2008		Certified
			Saguliud	2008		Certified
27	Melalap	2011	Melalap	2011	Tenom, Sabah	Certified
	SOU 27		Sapong	2011		Certified
28	Binuang	2009	Tingkayu	2009	Kunak, Sabah	Certified
	SOU 28		Sungang	2009		Certified
			Jelata Bumi	2009		Certified



			Binuang	2009		Certified
29	Giram	2009	Mostyn	2009	Kunak, Sabah	Certified
	SOU 29		Giram	2009		Certified
30	Merotai	2009	Imam	2009	Tawau, Sabah	Certified
	SOU 30		Merotai	2009		Certified
			Table	2009		Certified
			Tiger	2009		Certified
31	Lavang	2011	Belian	2011	Bintulu, Serawak	Certified
	SOU 31		Kelida	2011		Certified
			Lavang	2011		Certified
			Lavang (SE)	2011		Certified
			Rasan	2011		Certified
			Chartquest	2011		Certified
			Dulang	2011		Certified
			Peroh	2011		Certified
			Pekaka	2011		Certified
			Ruai	2011		Certified
32	Rajawali	2011	Rajawali	2011	Bintulu, Serawak	Certified
	SOU 32		Samudera	2011		Certified
			Semarak	2011		Certified
			Bayu	2011		Certified
33	Derawan	2011	Takau	2011	Bintulu, Serawak	Certified
	SOU 33		Damai	2011		Certified
			Derawan	2011		Certified
			Sahua	2011		Certified
			LIE	BERIA		
1	Grand Cape Mount	2018	Matambo	2018	Grand Cape Mount, Liberia	IC
			Grand Cape Mount	2018		IC
			Zodua	2018		IC
			Bomi	2018	Bomi, Liberia	IC
			Lofa	2018		IC
				& G ain Palm Oil)		
1	Poliamba	2012	Kara	2012	Kevieng, New Ireland Province,	Certified
			West Coast	2012	P&G	Certified
			Nalik	2012	†	Certified
			Noatsi	2012	†	Certified
			Madak	2012	†	Certified
			North (Smallholders)	2012	†	Certified



			South (Smallholders)	2012		Certified
			West (Smallholders)	2012		Certified
2	Tetere	2011	Tetere	2011	Gudaicanal, Slomon Island	Certified
			Ngalimbiu	2011		Certified
			Mbalisuna	2011	-	Certified
			West Zone (Smallholders)	2011		Certified
			Central Zone (Smallholders)	2011		Certified
			MBA East (Smallholders)	2011		Certified
			MBA West (Smallholders)	2011		Certified
3	Sangara, Sambiripa	2013	Sangara	2013	Higaturu, Popondetta, Oro,	Certified
	& Mamba		Sumberipa	2013	P&G	Certified
			Ambogo	2013		Certified
			Embi	2013		Certified
			Mamba	2013		Certified
			Sorovi (smallholders)	2013		Certified
			Igora (smallholders)	2013		Certified
			Saiho (smallholders)	2013		Certified
			Aeka (smallholders)	2013		Certified
			llimo (smallholders)	2013		Certified
4	Gusap	2010	Dumpu	2010	Madang, P&G	Certified
			Surinam	2010		Certified
			Jephcott	2010		Certified
			Gusap	2010		Certified
			Paddox	2010		Certified
			Ngaru	2010		Certified
			Madang VOP (smallholders)	2010		Certified
			Morobe VOP (smallholders)	2010		Certified
5	Hagita	2013	Giligili	2013	Milne Bay, P&G	Certified
			Hagita	2013		Certified
			Waigani	2013		Certified
			Sagarai	2013]	Certified
			Padipadi	2013		Certified
			Mariawatte	2013		Certified
			East Gurney	2013		Certified
			West Gurney	2013		Certified
			East Sagarai	2013		Certified
			West Sagarai	2013	1	Certified





6	Mosa	2008	Bebere	2008	West New Britain	Certified
	Kumbango	piura	Kumbango	2008		Certified
	Namumdo		Togulo	2008		Certified
	Waraston		Dami	2008		Certified
			Waisisi	2008		Certified
			Kautu	2008		Certified
			Karausu	2008		Certified
			Moroa	2008		Certified
			Bilomi	2008		Certified
			Loata	2008		Certified
			Haella	2008		Certified
			Garu	2008		Certified
			Daliavu	2008		Certified
			Sapuri	2008		Certified
			Malilimi	2008		Certified
			Rigula	2008		Certified
			Nomundo	2008		Certified
			Navarai / Karato ME	2008		Certified
			Volupai . Lotomgam / Natupi / Goruru	2008		Certified
			Lolokoru	2008		Certified
			Silovoti	2008		Certified
			LSS Hoskin (1,877 Smallholders)	2008		Certified
			VOP East (1,815 Smallholders)	2008		Certified
			VOP Central (1,958 Smallholders)	2008		Certified
			VOP West (1,277 Smallholders)Kaulong / Akamie / Pusiki / Repamira / Sakapei / KDC ME (21 large smallholders)	2008		Certified
			LSS Kapiura (847 Smallholders)	2008		Certified
			VOP Kapiura (551 Smallholders)	2008		Certified

Sime Darby has achieved 34 management units in Malaysia, 25 management units in Indonesia, 10 management units in P&G that RSPO certified. Total management unit in Sime Darby Plantation Bhd are 34 in Malaysia, 25 in Indonesia and 10 in P&G. In the year of 2016 & 2017 there are three Mill that are no longer operating, and for the supplying base (Estate) is diverted to a mill that is still operating and has been certified RSPO. The mills are:

- 1. Angsana Mini Mill, PT Sajang Heulang: Mill stop operate since 2016 and the supply bases is transfer to Angsana POM, PT Ladangrumpun Subur Abadi.
- 2. Selabak Mill, PT Swadaya Andhika: Mill stop operate since 2017 and the supply bases is transfer to Rantau POM, PT Laguna Mandiri





	3. Pekaka, SOU 34: Mill stop operate since 2017 and the supply bases is transfer to Lavang, SOU 31 There was change of the Time Bound Plan (TBP) under Sime Darby on April 2019 cause the Sime Darby postpone the others certification process and this TBP has been approve by Head of Sustainability Minamas. In 27 June 2019, SDP inform to RSPO about confirmation of disposal of Indonesian Subsidiary – PT Mitra Austral Sejahtera. Sime Darby has informed the Time Bound Plan progress, MUTU has consider that Sime Darby still comply with the RSPO requirement
1.10.2	for partial certification. Progress of Associated Smallholders and Outrowers for Certifiable Standard
	Teluk Siak POM – PT Aneka Inti Persada palm oil mill does not received from other non certified RSPO associates outgrowers.





2.0	ASSESSMENT PROCESS
2.1	Assessment Team
S-1.3	1. Andi Pratama Pasaribu (Lead Auditor). Indonesian citizen. Bachelor degree, majoring social economy. He has several of work experiences (more than 5 years) as the operational staff since 2008. He has been followed the Training of Lead Auditor Indonesian Sustainable Palm Oil (ISPO) which was held by ISPO Commission in 2013 and Training of Lead Auditor Roundtable on Sustainable Palm Oil (RSPO) by Proforest and Daemeter in 2016. He has been attended several kinds of training related to sustainability palm oil audit such as High Conservation Value (HCV) Training, Lead Auditor ISO 9001:2008, Lead Auditor ISO 14001:2005, auditor OHSAS, lead auditor RSPO supply chain by BMTRADA etc. He has some experiences of RSPO audit in Indonesian palm oil in aspect of best management practices, land legality, environmental, social and worker welfare aspect. During this assessment has verify legal, social, worker welfare and supply chain aspect.
	2. Mohamad Amarullah (Auditor). Indonesian Citizen. Master of Wood Science and Technology and Bachelor of Forestry, majoring in Forest Product Technology. Has experiences as an Agronomist and Research Assistant in Indonesia and Malaysia from 2008 to 2014. Has been attended several trainings such as Lead Auditor of ISPO, RSPO, ISO 17021, ISO 17065, ISO 9001, ISO 19001, ISO 14001, HCV, etc. Has been conducted several ISPO audit scheme as an Auditor since 2014 in BMP, environment, conservation and OHS aspect. Fluent in Bahasa, Malay and English. During this assessment has verified BMP, long term management plan, transparency and OHS aspect.
	3. Steve Mualim (Auditor). Indonesia citizen. Master of Environmental and Natural Resources Management. Has experience as an environmental management consultant in 2012 and Sustainable palm oil assurance auditor since 2013. Has been attended several trainings i.e.: ISCC in house training, palm oil GHG emission, HCV management, ISPO lead auditor, RSPO lead auditor, labor and human rights issues, ISO 19011, and ISO 9001:2008. Has been conducted several audits for RSPO, ISPO and MSPO scheme since 2013 for best management practices, conservation, and environmental management. Fluent in Bahasa and Chinese Mandarin. At the time of audit has appointed to verify social, transparency, HCV and environmental aspect. During this assessment has verified environment, conservation and GHG aspect. 4. Rindu Galih Rezza Rachmansyah (Trainee Auditor). Indonesian citizen, Bachelor of Agriculture department of plant and pest disease (Agrotechnology). He has 1 year experience as Field Expert in Pesticide Company and 3 years experience in Industrial Forest Management, Forest Rehabilitation and Reclamation on BUMN Indonesia as Assistant. Training which had attended including Training Lead Auditor ISO 9001, ISO 14001, ISO 17021, ISO 19011, Training Lead Auditor ISPO, Training Lead Auditor RSPO, RaCP and NPP awareness for RSPO, OHSAS 18001: 2007. He has been involved in several audit activities related to sustainable palm oil certification since 2017 covering Best Management Practices aspect, OHS aspect social aspect and worker welfare aspect. During this assessment he support verify worker welfare and OHS aspect.
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
S-1.3	Number of auditors: 3 auditor and 1 auditor trainee Number of days for ASA-1.3 at site: 5 days Number of working days for ASA-1.3 at site: 15 working days
2.2.2	Assessment Process
S-1.3	The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT. Aneka Inti Persada to the requirements of Indonesian National Interpretation of RSPO Principles and Criteria 2013, endorsed September 2016 and Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 Revised June 2017 (Module D for CPO Mill).
	Auditor team traveling on Monday, 26 August 2019 using direct flight from Jakarta to Pekanbaru and picked up by management in Airport. It take time approximately 2 hours from Pekanbaru (Sultan Syarif Kasim Airport) to site of PT Aneka Inti Persada. Opening meeting has been held on the same days in meeting room of General Manager Office PT



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Aneka Inti Persada. It attended by auditor team and management representatives. Document verification conducted in the same place. Closing meeting held on Friday 30 August 2019. There is no diverging opinion that delivered by auditee during the closing meeting.

The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.

Some opportunities for improvement of the results ASA-1.3 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (ASA-1.4).

Improvement of findings from ASA-1.2 assessment findings were observed by auditors at this ASA-1.3 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-1.3.

The assessment program please find Appendix 2.

2.2.3 Locations of Assessment

ASA-1.3 Number of units in this certification activity is 3 (three) estates, which supply the raw material (FFB) to Teluk Siak POM. In conducting the assessment, the team of auditors use the clause 4.7.1 on RSPO Certification System For Principle and Criteria (Endorsed June 2017) "The CB's procedures shall include the sampling methodology (see 4.7.2) for initial certification, surveillance and re-certification audits, where there are more than four estates or associated smallholders, otherwise all estates must be visited as part of the assessment". The team of auditors determined that the sampling locations regarding to the standard are 1 (one) Palm Oil Mill (Teluk Siak POM) and 3 (Three) estates (Teluk Siak, Aneka Persada, and Pinang Sebatang Estates).

Teluk Siak POM

- **Sterilizer Station.** Observation and Interview with workers related to personnel understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- Press Station. Observation and Interview with workers related to personel understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- **Nut & Kernel Station.** Observation and Interview with workers related to personnel understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- **Clarification Station.** Observation and Interview with workers related to personnel understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- **Boiler Station.** Observation and Interview with workers related to personnel understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- **Engine Room Station.** Observation and Interview with workers related to personnel understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- Loading Ramp (Grading) Station. Observation and interview with Foreman and 4 FFB Graders and 1 Dump Truck Driver, on their understanding towards technical, OSH, manpower and environment, as well as facilities provided by the company.
- Workshop Station. Observation to maintenance activities and interview with Foreman and 1 Certified Welder, on their understanding towards technical, safety, manpower and environment aspects, included facilities provided by the company.
- **Laboratory.** Observation and interview with 2 **Laborants**, on their understanding towards technical, safety, manpower, conservation and environment aspects, included facilities provided by the company.
- **Hydrant No. 3 Simulation**. Observation towards readines of Emergency team and related devices on fire situations. Hydrant was located in beetwen of Clarification Station, Boiler Station and Kernel Station.
- Chemical store. Observation for OHS and material handling
- **Lubricants store**. Observation for OHS and material handling
- Hazardous waste store. Observation for hazardous waste management and OHS
- Water treatment plant. Observation for water usage monitoring



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- Reservoir. Observation for water sources management
- Water intake. Observation for water sources management
- Effluent pond. Observation for POME management

Teluk Siak Estate

- Boundary Poles No. 30, Block J23 Division I. Observation of land demarcation marker and it maintenance.
- **Harvesting Activity at Block 1009 & F013.** Observation and Interview with workers related to personnel understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- **Spraying Activity at Block F014.** Observation and Interview with workers related to personnel understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- Replanting at Block E016. Observation related to Land Clearing without burning and Land Cover Crop management.
- Beneficial Plant at G016 & F014. Observation related to IPM.
- Division 2 Block F013. Observation to Fire Monitoring Tower and Barn Owl Box (BOB) area.
- Division 2 Block F014. Observation to Land Application (POME) Area and interview with Foreman and Operator
 (male), on their understanding towards technical, safety, manpower, conservation and environment aspects,
 included facilities provided by the company.
- **Division 2 Block G016**. Observation to **replanting area** (2019); as well as **EFB mulching** with pattern 1.2.3 and dosage 150-200 kg/pam, **terraces** planting pattern, **field drain** with pattern 1:4 and **cover crop** condition.
- **Division 2 Block G015**. Observation to **Intesticide application (Capture Cipermethrin)** activities, and intreview with Foreman, 1 Helper and 2 pesticide applicators (all female), on their understanding towards technical, safety, manpower, conservation and environment aspects, included facilities provided by the company.
- **Division 3 Block G016**. Observation to **manual upkeep** activities, and interview with Foreman and 3 workers whose also a **fertilizer appicators** (all female), on their understanding towards technical, safety, manpower, conservation and environment aspects, included facilities provided by the company.
- Division 3 Block H020. Observation to Peat Subsidence Pole which installed since 2016. Average of subsidency on this block was 2.50 cm/year.
- Division 3 Block J023. Observation to Water Gate and Piezometer. This block has also situated in adjacent with
 oil palm field, owned by Gasib Village communities. It was also found that mounding implementation towards
 open-exposed roots of palms.
- **Daycare**. Observation for workers facilities and worker welfare
- Powerhouse. Observation for waste management and OHS
- **School**. Observation for workers facilities and worker welfare
- Landfill div 1 block H10. Observation for OHS and waste management
- Block spraying system div 3. Observation for OHS and waste management
- **Boundary pole No 30 div 3**. Observation for legal operational areas
- **HCV block J23 div 3 Pingai riparian**. Observation for HCV management
- **HCV 6 block H07 div 3 cemetery**. Observation for HCV management
- Chemical store. Observation for OHS and material handling
- Diesel fuel tank. Observation for OHS and material handling
- **Fertilizer store**. Observation for OHS and material handling
- Workshop. Observation for OHS, workers welfare and waste management
- Landfire facilities store. Observation for landfire facilities
- Emergency response team simulation. Observation for emergency response team
- Workers housing. Observation for worker welfare, facilities, and waste management
- Block F14 land application. Observation for POME managemet andd OHS

Aneka Persada Estate

- Boundary Poles No. 44, Block E23 Division III. Observation of land demarcation marker and it maintenance.
- Chemical Weeding, Block D23 Division III. Observation and interview with Block Spraying System of APE regarding to safety working procedure, PPE usage, implementation of regularly medical check up, payments, complaints mechanism etc.



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- **Harvesting, Block D21 Division III**. Observation and interview with harvester and harvesting supervisor regarding to safety working procedure, PPE usage, payments, complaint mechanism etc.
- Boundary pole No 44 div 3. Observation for legal operational areas
- Watergate block E23 div 3. Observation for water management
- Landfill block F21 div 3. Observation for OHS and waste management
- Block spraying system div 3/4 block E18. Observation for OHS and waste management
- Powerhouse. Observation for waste management and OHS
- Workers housing div III. Observation for worker welfare, facilities, and waste management
- Central clinics. Observation for OHS, waste management
- Diesel fuel tank. Observation for OHS and material handling
- Fertilizer store. Observation for OHS and material handling
- Chemical store. Observation for OHS and material handling
- Landfire facilities store. Observation for landfire facilities
- Emergency response team simulation. Observation for emergency response team

Pinang Sebatang Estate

- Boundary Poles No. 122, Block D02 Division I. Observation of land demarcation marker and it maintenance.
- Riparian of Pingai River at Block D013 & C013. Observation related to riparian and HCV management.
- BSS (Block Spraying System) Housing. Observation and Interview with workers related to personnel
 understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- HCV 6 (Graveyard) at Block D03. Observation related land clearing without burning and land cover crop planting.
- HGU Pole No. 122 at Block D02. Observation related to legal area with HGU stack based on GPS coordinate.
- Oil Storehouse. Observation related to store housekeeping and environment management.
- **Chemical Storehouse.** Observation and Interview with workers related to personnel understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- **Rice Storehouse.** Observation related to store housekeeping and environment management.
- **Fertilizer Warehouse.** Observation and Interview with workers related to personnel understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- Workshop. Observation and Interview with workers related to personnel understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- **Hazardous Waste Temporary Storage.** Observation and Interview with workers related to personnel understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- Housing Complex. Observation related to employee facilities, management of domestic waste, emergency response facilities, provision of clean water and electricity.
- Landfill. Observation related to domestic waste management.
- **Division 4 Block C013**. Observation to water management on lowlying areas which prone to flooded, field drain and close and ended conservation trench (CCT) pattern area.
- Division 4 Block A011. Observation to replanting area in 2019, terraces pattern, BOB, EFB mulching, cover crop condition and manual road maintenance activity; as well as interview with 3 workers (all male), on their understanding towards technical, safety, manpower, conservation and environment aspects, included facilities provided by the company.
- Division 2 Block B005. Observation Scot Harvesting and interview with Foreman and 1 Contractor worker (male), on their understanding towards technical, safety, manpower, conservation and environment aspects, included facilities provided by the company.
- Division 2Block B004. Observation to nursery area and interview with 1 Foreman and 5 chemist team member (all female), on their understanding towards technical, safety, manpower, conservation and environment aspects, included facilities provided by the company.
- Division 2 Block D006. Observation to leaf eating catterpilar census and interview with 2 Census Workers (all female), on their understanding towards technical, safety, manpower, conservation and environment aspects, included facilities provided by the company.
- **Division 2 Block A002.** Observation to **herbicide application (Prima Up and Kenly)** activities, and interview with Foreman and 2 pesticide applicators (all female), on their understanding towards technical, safety, manpower,





conservation and environment aspects, included facilities provided by the company.

Public Consultation

- Transmigration & Manpower Agency of Siak Regency.
- Maredan & Tualang Timur Village
- Local Contractors (Cv Puja Perawang Bestari Mandiri & CV Ivan Jaya)
- Gender Committee PT Aneka Inti Persada
- Labor Union PT Aneka Inti Persada:
 - SPSI (Serikat Pekerja Seluruh Indonesia)
 - SPP-MI (Serikat Pekerja Perkebunan Minamas Indonesia)
 - SBSI-HUKATAN (Serikat Buruh Seluruh Indonesia Hutan Pertanahan Perkebunan Kelapa Sawit)
 - SPP-KS (Serikat Pekerja Perkebunan Kelapa Sawit)
 - FKUI-SBSI (Federasi Kontruksi Umum dan Informal Serikat Buruh Seluruh Indonesia)

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA- 1.3	 The public consultation with stakeholders to PT Aneka Inti Persada done through: Conduct a public announcement on the CB website (www.mutucertification.com) on 09 August 2019. Conducting visits and direct interviews with stakeholders (Manpower & Transmigration Agency of Siak Regency, Province of Riau) on 26 August 2019. Conduct consultations via email questionnaire to NGOs (World Wide Fund for Nature, Wahana Lingkungan Hidup Indonesia, Sawit Watch and Aliansi Masyarakat Adat Nasional) on 13 August 2019. Conducting visits and direct interviews with Local Communities (Maredan & Tualang Timur Village) on 27 August 2019. Conducting Interviews with the local contractor, Gender Committee, Labor Union on 29 August 2019.
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit (<i>ASA-1.4</i>) will be conducted eight (8) month to twelve (12) month after date of annual license (<i>August-2019</i>).

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3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Teluk Siak POM – PT Aneka Inti Persada subsidiary of Sime Darby Plantation Bhd operation consisting of one (1) mill and three (3) oil palm estates.

During the assessment, there were four (4) Nonconformities were assigned against Major Compliance Indicators; two (2) nonconformities were assigned against Minor Compliance Indicators; and five (5) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective action(s) that had been reviewed and accepted by Auditor(s) in form of documentation evidences e.g. (document record/photographic/etc). Those corrective actions taken that consist of four (4) Major non-conformities and two (2) Minor non-conformity(s) had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that Teluk Siak POM – PT Aneka Inti Persada subsidiary of Sime Darby Plantation Bhd complied with the requirements of Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF, July 2016 (Endorsed by the RSPO Board of Governors meeting on 30th September 2016 and RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 revised on 14 June 2017 (Module D for CPO Mill).

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is Continued.

Ref Std.	VERIFICATION RESULT of MUTU-Certification			
DDINCIDLE #4 COMMITMENT TO TRANSPADENCY				

PRINCIPLE #1 COMMITMENT TO TRANSPARENCY

1.1

Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.

1.1.1 & 1.1.2

The company shows list of stakeholder which approved by Chairman of SOU Teluk Siak and Head of Admnistrative on 01 August 2019, that consist of 25 representative of Regency and province Government Agencies, 10 NGO and PT AIP 74 Occupants (previous land owners), 8 Government Insurance and Public Bank. 4 public schools. 9 contractors and 15 supplier (agrochemicals).

Procedure of communication, information request and its delivery is presented in document No. SPO/008/AIP-PI/I/19 (Rev. 07) dated 01 August 2019. There are 29 type of information that could be accessed by public, for example environment management and monitoring report, human rights policy, land title, business permit, OSH program, HCV report, grievance and complaint record, etc. Any information could be requested through direct request, official letter and email. There is no significant point revised on the new procedure. The previous procedure had socialize to public, for example to surrounding villages such as Kuala Gasib, Tualang and Maredan on 13 July 2018. Person in charge on this matter is carried out by Head of Administrative Unit (KTU). Time of responce should be less than one week and less than one month, when approval from Head of Management and/or higher executive (top management) is needed.

For example, based on document request logbook record of PSE, it was noted that during 2019, there were 2 response of information requested by Manpower Agency of Siak Regency for the first and second Quarter P2K3 Report, which has responded less than one week, as shows through Manager Letter No. 025/P2K3-PSE/V/2019/S dated 07 May 2019 and



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No. 047/P2K3/VIII/2019/S dated 20 August 2019, respectively. Furthermore, Based on information from Manpower Agency of Siak Regency, it was known that the company has considered cooperative in providing information, especially on periodic compulsory report. Moreover, as informed by representative from surrounding estate such as Maredan and Tualang Timur Village, it was known that the company has considered cooperative and transparent in providing information, such as job vacancy, CSR, etc.

Status: Comply

1.2

Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.

1.2.1

List of document which could be accessed by stakeholders is presented in document No. SPO/008/AIP-PI/I/18 dated 18 January 2018. There are 29 type of information that could be accessed by public, for example environment management and monitoring report, human rights policy, land title, business permit, OSH program, HCV report, grievance and complaint record, etc. Information could be requested through direct request, official letter and email. The procedure had socialize to public, for example to surrounding villages such as Kuala gasib, Tualang and Maredan on 13 July 2018. The company has monitor and deliver several compulsory report to the respective government agencies on time, for example as follows:

- Report of annual WLTK in 2018 and 1st quarter of P2K3 report had delivered to Manpower Agency on 28 September 2018 and 20 August 2019, respectively.
- Report of 2nd quarter Land Fire Monitoring and annual LPUP had delivered to Agriculture Agency on 01 August 2019 and 04 July 2019, respectively.
- Report of 2nd semester RKL/RPL 2018 and 1st quarter of Hazardous Material report had delivered to Environment Agency on 05 August 2019 and 24 August 2019, respectively.
- Report of annual Land Title Realization report 2018/2019 had delivered to National Land Agency on 13 August 2019.

Status: Comply

1.3

Growers and millers commit to ethical conduct in all business operations and transactions.

1.3.1

PT Aneka Inti Persada is committed to the code of integrity and ethical behavior recorded in SOP Code of Conduct No. 440 / HRM-COC / 07 which was passed on December 17, 2007 and the SOP was made in Indonesian. SOP explained that the company has an ongoing commitment to building long-term mutually beneficial relationships with stakeholders, such as optimally increasing shareholder value. Treat employees equally, do not distinguish between ethnicity, religion and race in all aspects. Providing products and services of the highest standard, honest and ethical, paying attention to customer complaints. Make a positive and beneficial contribution to improving the quality of people's lives. Do not carry out political activities and are not affiliated with political parties and do not make any contribution regarding political activities and are not permitted to give, offer or accept anything of value that can be categorized as a bribe to or from customers, angry & service providers or government officials and other parties so that they can influence the desired decision.

Based on interviews with local workers and contractors, it was found that the company had socialized the code of ethics at the time of signing the contract for the contractors, while for the workers, the company had conducted the socialization at the time of the muster morning. The following are examples of socialization given by the company:

- Code of Conduct socialization on July 06, 2019 which was attended by 177 participants.
- Code of Conduct socialization on February 26, 2019 which was attended by 117 participants.
- Code of Conduct socialization on February 25, 2019 which was attended by 180 participants.
- Code of Conduct socialization on July 9, 2019 to local contractors attended by 9 participants.

Status: Comply

PRINCIPLE #2 COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS



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2.1

There is compliance with all applicable local, national and ratified international laws and regulations.

2.1.1

The company has an updated list of legal requirements as of August 2, 2019, including relevant regulations related to the RSPO and the number of regulations identified as 147 consisting of local, national and international regulations that have been ratified. The list of legal requirements is available in each office of the unit making it easier to access the list. In addition, copies of these legal provisions are always under the supervision of the PSQM Department. Copies of the entire legal requirements are available in softcopy and some legal requirements documents are also in the form of hardcopy.

Worker welfare

- The company has implemented a minimum wage in the wage system and is in accordance with Regulation of Manpower Ministry No. 07 of 2013 concerning Minimum Wages
- The company has a structure and wage scale for each level of workers and is in accordance with Regulation of Manpower Ministry No. 01 of 2017 concerning Wage Structure and Scale
- The company has reported regularly the Labor Obligation Report annually and is in accordance with Regulation of Manpower Ministry No. 18 of 2017 concerning Mandatory Reporting of Workers

Occupational Health & Safety (OHS)

- The company has workers with licenses / certificates for jobs that require special expertise in accordance with the requirements in the legislation, including Steam Operators, Electrical Operator, Transport & Lift Operators, Production & Power Operators and others.
- The Company Has been providing PPE to every estate workers in free of charge to prevent work accidents. This has been in accordance with Law No. 1 of 1970 and Minister of Manpower Regulation No. 8 of 2010.
- The company already has fire emergency response facilities as well fire emergency response teams for estate and mill that have been routinely trained by the company.
- The company has carried out routine health checks (general and special examinations) for all workers (ordinary workers and high-risk workers) every year in accordance with applicable laws and regulations.

BMP aspect

- The company has no more to use paraguat dichlorida since 2016.
- The company has only planted DxP seeds produced by recognized seeds producers in Indonesia, i.e. DxP Marihat, DxP Socfin and DxP Dami.
- Estate management has conducting zero burning method during land clearing for replanting purposes. Furthermore, water management and subsidency monitoring has adopted on peat areas.
- Estate management has implementing early warning system and integrated pest management.

PT. Aneka Inti Persada operated 1 (one) mill (Teluk Siak POM) and 3 (three) estates (Teluk Siak, Aneka Persada and Pinang Sebatang Estate). Total operating area is 11,555.31 Ha. The company has had permit for their operational activity i.e.

- Land title No. 3 dated on 28th July 1999 that covered **11,134 Ha** area. Valid until 28th July 2034. Located in Maredan, Tualang, Pinang Sebatang and Kuala Gasib village, subdistrict of Siak, District of Bengkalis, Riau Province.
- Plantation permit (SPUP) No. HK.350/185/Bun.5/III/2001, dated 16th March 2001 that covering **11,134 Ha** area and mill with capacity **30 ton FFB/hour**.
- Location permit for 448 Ha area located in Bencahlesung Village, Subdistrict of Tenayan Raya, Pekanbaru that released since 3 January 2019.

Based on that permit, there is a discrepancy of **421.31 Ha** that had not land title and plantation permit. Hence, the company has shown the progress of land title as describe in indicator 2.2.1.

2.1.2; 2.1.3; 2.1.4

The company has a legal requirement mechanism with document No. 701 / TQEM-ESH / 10 which explains that the PIC responsible for identifying and evaluating regulations is PSQM, PSD Department and EHS Department. The company has an updated list of legal requirements as of August 2, 2019, including relevant regulations related to the RSPO and



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the number of regulations identified as 147 consisting of local, national and international regulations that have been ratified.

All existing legal requirements cover a variety of operational activities in plantations and factories, for example:

- Constitution No. 13 of 2003 concerning Manpower
- Decree of Manpower Ministry No. 100 of 2004 concerning Provisions for Implementing Specific Time Work Agreements
- Regulation of Agriculture Ministry No. 11 of 2015 concerning ISPO that has been carried out by PT Aneka Inti Persada
- Constitution No. 32 of 2009 concerning Environmental Protection and Management
- Constitution No. 34 of 2014 concerning Plantations

The company has a legal requirement mechanism with document No. 701 / TQEM-ESH / 10 which explains that the PIC responsible for identifying and evaluating regulations is PSQM, PSD Department and EHS Department. In addition, there is also an update regarding the frequency of updates in accordance with the development of law in Indonesia once a year. In identifying and inventorying legal requirements, the company does it as follows:

- Regularly contact government agencies and non-governmental organizations to find out the latest regulations that apply both internationally, nationally and locally
- Actively visiting related websites
- Updated every 1 year

The company evaluates legal compliance once a year to ensure company compliance with applicable legal regulations. An evaluation of the compliance with the latest legal regulations was carried out on August 2, 2019 with the result that all 147 regulations have been implemented.

Status: Comply

2.2

The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.

2.2.1 & 2.2.2

PT. Aneka Inti Persada operated 1 (one) mill (Teluk Siak POM) and 3 (three) estates (Teluk Siak, Aneka Persada and Pinang Sebatang Estate). Total operating area is 11,555.31 Ha. The company has had permit for their operational activity i.e:

- Land title No. 3 dated on 28th July 1999 that covered **11,134 Ha** area. Valid until 28th July 2034. Located in Maredan, Tualang, Pinang Sebatang and Kuala Gasib village, subdistrict of Siak, District of Bengkalis, Riau Province.
- Location permit for 448 Ha area located in Bencahlesung Village, Subdistrict of Tenayan Raya, Pekanbaru that released since 3 January 2019.

Total area that manage by CH is 11,555.31 Ha consist of 9,660.94 Ha for planted and 1,894.37 Ha.

The company has had procedure of boundary poles maintenance (SOP No. SPO/PEM-PTK-BPN/III/17). Boundary pole monitoring conducted every semester. Based on official map of HGU, there is 128 boundary poles installed. The last monitoring report of boundary poles semester I/2019 in each estate has shown as follows:

- Teluk Siak Estate managed and monitored 52 poles. All poles are in good condition. Based on field visit to boundary pole no. 30 block J23 Division VI is well maintained.
- Aneka Persada Estate managed and monitored 39 poles. All poles are in good condition. Based on field visit to boundary pole no. 44 block E23 Division III is well maintained.
- Pinang Sebatang Estate managed and monitored 37 poles. All poles are in good condition. Based on field visit to boundary pole no. 122 block D02 Division I is well maintained.

2.2.3, 2.2.4 & 2.2.5

According to the public consultation with village representatives from Maredan and Tualang Timur Village known that there is no significant issues regarding to land dispute until this audit, even though some HGU's area is occupied by local people. Based on hectare statement as per July 2019, there is 1,170.20 Ha. There is a memorandum of understanding

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between the company and the occupants on 6 January 2018 to not interfere each other.

2.2.6

The company had policy Sime Darby Responsible Agriculture Charter, 2016. These Policy related to Prohibition of Contractually Army using, The main point was explained in these policy, consist of point that the company will not using of Contractually Army in conflict resolution and will not tolerance of anarchism in conflict resolution process. Based on field visit observation during the audit process and stakeholder consultation with village representatives Maredan and Tualang Timur, there is no indication of Contractually Army usage in PT Aneka Inti Persada.

Status: Comply

2.3

Use of the land for oil palm does not diminish the legal rights, or customary rights, of other users, without their free, prior and informed consent.

2.3.1

Based on document verification of High Conservation Value Identification and Social Impact Assessment in PT Aneka Intipersada, stakeholder consultation with the head of village, informal leader and community representation from village surround in Maredan and Tualang Timur known that there is no customary right inside the operational area that has been granted land title. There is no land acquisition/compensation process since previous assessment. The acquisition/compensation process has been done in the early period of plantation development. The land acquisition/compensation documentation process was filed in each estate.

During the audit, the auditor was scheduled to meet with the previous landowner from Maredan village. However, an interview cannot be conducted because the person concerned cannot attend.

2.3.2

Based on document verification and information from Plantation Service Department staff of Minamas Plantation, known that since previous assessment, there was no new acquisition/compensation process in the company's operational area. The document are in place. It consist Statement Letter of Land Handover that signed by previous land owner.

2.3.3

All land acquisition process has been conducted and witnessed by village representatives and local government staf. Entire process and document presented in Bahasa.

Status: Comply

PRINCIPLE #3 Commitment to long-term economic and financial viability

፯ 1

There is an implemented management plan that aims to achieve long term economic and financial viability.

3.1.1

Long term managemen plan was arranged by estate and factory unit, issued by Area Controller of Siak (AC-Siak) and Head of Sustainability and Safety dated December 2018. The company has longterm management plan for period 2019 to 2023 which already covers projection on FFB production, extraction of product (OER and KER), production of CPO and PK, production cost, revenue, replanting, forecast of product price, gross income, estate operational cost, mill operational cost, other coat, net profit, benefit cost ratio, etc. For example, long term budget for FFB production, CPO production, Kernel Production, CPO price and Kernel price in 2021 are 159,678 ton; 36,726 ton; 7,984 ton; IDR 7,857.14/kg and IDR 4,714.29/kg, respectively. Estate and mill management informed that there is no plan extension of estate operational areas and increment of mill processing capacity in the near future, which currently were about 11,555.31 ha and 45 ton FFB/hour (as per permit 60 ton FFB/hour), respectively. Furthermore, it was stated that those longterm business plan mentioned above are subjected to be changed and reviewed annually by the respective management such as Mill or Estate Manager, General Manager (GM), Senior GM (Head Region), Head Plantation Officer (HPO) and Chief Finance Officer (CFO) through considering actual trends and dynamic situation which predicted could be changed in the future. Moreover, it was known that there were no presence of peat areas and smallholder development project. Plantation Service department (PSD) and Sustainability and Safety Department are together with Estate and Factory Management has responsibility to



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ensure that all technical implementation has in accordance with procedure, which aims to reach optimum output for budget fulfillment purposes through monitoring, training and socialization.

3.1.2

Estate management shows long range replanting program, issued by Manager, GM, Operational Controller, Area Controller Siak and CEO of Riau Utara and Aceh. For example, TSE and PSE replanting program for period 2021 are 149.88 ha and 225.54 ha, respectively. Meanwhile, progres of replanting program for example during period January to July 2019 in APE was 279.29 ha, located on Division 1 Block A017 (110.45 ha), Division 1 Block A018 (107.99 ha) and Division 4 Block F019 (60.85 ha). Based replanting plan and realization document review, it was known that program is proceed inline with longterm replanting schedule. Replanting in APE and PSE were completed for 100 % and 99.53 %. respectively. Record of realization were available onsite.

Status: Comply

PRINCIPLE #4 Use of appropriate best practices by growers and millers

Operating procedures are appropriately documented and consistently implemented and monitored.

4.1.1

Oil Palm Agronomy Procedures

There were no revision on the current procedure of oil palm agronomy and processing. The company has procedure (SOP) of oil palm Agronomy for Minamas Plantation Group which presented in document of Agricultural Reference Manual Policy No. 110/EST-ARM/13 dated 01 September 2013 which issued by the Head of Plantation Upstream Indonesia. The SOP describes techniques on palm material preparation, nursery, planting and replanting, land preparation, harvesting management, field upkeep, manuring, by-product application (EFB and POME), canopy management, water management and management in peat soil, strandard of ripeness, ablation, palm protections, weeds control, LCC planting and rainfall recording. Based on Agronomy SOP's document reviews, field observation and interview with Foreman, Harvesters and Loosefruit Picker in all Estates, it could be concluded that the harvesters was able to explain and demonstrate the harvesting process in accordance with SOP, such as ripeness criteria, frond stacking and the use of personal protection equipment (PPE). Furthermore, based on field observation and interview with Foreman and Pesticide Applicators from all estates, it could be concluded that the workers were able to explain and demonstrate its job in accordance with the SOP, such as considering wind flows during spraying process, pesticides and weeds target, prohibited areas to be sprayed (for example conservation area and riparian zone, which were marked with yellow or red mark on the palm trunks), PPE's to be used as well as its management.

Oil Palm Processing Procedure

Procedure for oil palm processing from FFB acceptance to dispatch of CPO and PK were presented in document of Minamas Plantation palm oil mill quidelines Part I and Part II, policy No. 130/POD-FAC/07 and No. 110/POD-FAC/07 Chapter I, Sub-chapter 1.1 which describes POM technical guidelines, such as stations processing, stocking, waste control and management, water treatment and laboratory analysis. There were also another policies related with oil palm processing, for example: Policy No. 14x/PTK-TRP/2004, No. SOP-SLF-01/2010 and No. 721/TQEM-PKA/08 Sub-chapter 6.2 which describes about FFB transportation, FFB acceptance and FFB grading on the mill, respectively. Based on field observation to all processing station in Teluk Siak (TSF), it could be concluded that all processing activities has satisfactory implemented in accordance with the procedures.

Safety Aspect Procedure

Safe working practices for mill is already mentioned in the Mill procedures such as Minamas Plantation palm oil mill quidelines Part I and Part II, Policy No. 130/POD-FAC/07 and No. 110/POD-FAC/07. According to field observation to estate and mill, as we II as interview with the respective workers, it could be concluded that in general the workers has understood the basic of safe working practices such as using a set of personal protection equipment (PPE), meaning of risk symbols, agrochemicals and hazardous materials handling, etc. furthermore, procedure of specific safe working practices towards pesticides application is presented in the following documents:

- No. LF/SOP.ESH/04 dated 11 January 2011 about agrochemicals handling.
- ARM Policy No. 110/EST-ARM/13 Chapter 15 dated 01 September 2013 about plant protection.

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- Material Safety Data Sheet (MSDS) of pesticide products.
- Hazard Identification Risk Assessment Control (HIRAC).

Based on procedure documents review, it could be concluded that the oil palm agronomy, processing and safety procedures are still relevant with current situation and covers all main aspects from the field to the factory. All procedures are available in Bahasa. Furthermore, based on observation to estate and factory office, it was known that all procedures were available, as well distributed by SQM officers.

4.1.2

Update and procedure documents distribution control to the respective units of PT AIP were conducted by Group Sustainability Quality management (GSQM) - Sustainability. For monitoring and consistency purposes of procedure implementation, some mechanism had been carried out by Minamas management, which presented in several documents, for example as follows:

- Monthly Estate/Factory Manager reports which presented in Factory Manager Process Control report, Estate
 Performance Index and Management Committee Meeting. All unit management are able to shows Manager reports
 for period January to July 2019.
- Estate Performance Index period 2018/2019 by Head of Plantation Operation which describes several work quality such as harvesting, extraction rates, product quality, field upkeep quality, etc.
- Annual RSPO internal audit by GSQM-Sustainability Department had conducted in 19-27 June 2019. Internal audit
 mentioned that there were 6 major, 1 minor raised to major and 11 minor of P&C; and 3 NCR on SCCS findings which
 all were fully complied by PT AIP on 26 August 2019. Furthermore, there is 1 OFI noted. Internal audit results has
 signed by internal Auditors and all Managers of PT AIP.
- Semester performance qualitative report by Head Office team.
- Minamas Management Committee Meeting (MCM). For example, MCM for PSE and TSE are presented in document Ref. No. PSE/MM-B/07/012 dated July 2019
- Annual Mill Advisory Visit Report which presented in document Ref. No. MINAMAS/TSF/01/2019 with date of visit was on 18-19 June 2019. Mil rating was 81-82 which classified as good.
- Annual Plantation Adivisory Visit report by Plantation Advisory Depertment from Head Office in Malaysia dated 28 March 2019, with date of visit was on 19-20 February 2019 and 05-06 March 2019 for mature and immature area, respectively. Report has describes summaries and mentioned critical point(s) found and noted during advisory audit. All findings were need to be response and follow up by the respective Manager through action plan and time frame, immediately. Progress were reported directly by Manager to the respective Advisor(s) and upper ordinate or authority (Head Office Management). Field verification and evaluation later on to be conducted by the Advisor(s) on the coming assessment. Estate rating in 2019 was 8.13 which classified as good.

Observation results has documented and delivered via online to head affice management for personal performance scoring purposes.

Furthermore, performance of contractor against company procedure has been conducted through some other ways, for example as follows:

- Regarding technical matters, there were Official Report of Working Progress Monitoring or Checking.
- Regarding Safety matters, there were daily monitoring that conducted by Foreman.

4.1.3

Estates and Factory management operational activities has monitored, documented and regularly reported, for example as follows:

- Production report by Assisstant GSQM which describes FFB received, FFB processed, CPO and PK production, bulking and its stock in storage and bulking for RSPO certified.
- Monthly Factory Manager report which describes general data, production quality, production loss, FFB quality, EFB and POME application, delivery, losses analysis, production cost, manpower, etc.
- Monthly and semester FFB production report which describes production per Block, rotation, bunch weight, etc.
- Manuring report which describes program vs actual fertilizers application.



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- Daily harvesting notes and Foreman notes which informed date of harvesting, harvester name, block location of harvesting, rotation, FFB number and volume.
- Daily work plan which informed type of works, location, number of manpower and other remarks.

The above records or report has informed raw data, analysis and mentioned summary notes. Furthermore, Estate and Factory operational records has also recorded on program namely System Application Product and Processing (SAP) which updated on daily basis. All critical parameter points describes were need to be response and follow up by the respective PIC through action plan immediately. Progress of action plan were reported and submitted directly to the upper ordinate. Later on, each (priority) points were discussed, analysed and presented in monthly meeting by Manager. For example, critical issues and evaluation identified during mill advisory on TSF regarding low OER due to young area crop is presented as follows:

- SOU team need to focus to deliver all the crop on the same day of harvesting.
- Recommended to grade all crop to determine the crop quality.
- To continue assessment till end of reception hours.

4.1.4

Teluk Siak Factory (TSF) has implementing Integrated Preserved Supply Chain Certification System, which only receive FFB from its own estates, e.g. Teluk Siak Estate (TSE), Pinang Sebatang Estate (PSE) and Aneka Persada Estate (APE). There is no cooperation of FFB supply with other Group companies, other companies, as well as with smallholders.

Status: Comply

4.2

Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.

4.2.1

Procedure (SOP) of soil fertility management is presented in document policy No. 110/EST-ARM/13 Part 8 about manuring. The SOP mentioned that manuring recommendation must be based on leaf and soil sampling analysis. Leaf sampling and soil sampling analysis should be carried out once and every five years, respectively. Both analysis has carried out by Minamas Research Centre (MRC) in Teluk Siak, Riau. Parameter measured on leaf analysis are macronutrient (N, P, K, Ca, Mg and Mn) and micronutrient (Fe, B, Zn and Cu) content (in %) while in soil analysis are nutrient retention (pH, % Organic-C, CEC), available nutrient (N-total, P-Total, available-P, K-dd and Mg-dd), soil properties (texture, drainage class, rooting depth), etc. Visual assessment of palm vigour land field condition by Agronomist was also carried out every 6 months to monitoring nutrient status change. Records of leaf and soil sampling are available. According to manuring recommendation program in 2018/2019 and 2019/2020, it could be concluded that calculation of fertilizer rates were derived from leaf and soil analysis. Furthermore, actual time of application has follows the schedule recommended by MRC Agronomist team. As mentioned in Indicator 4.1.2 and 4.1.3 it was informed that monitoring on procedure application were carried out by GSQM Department and Plantation Advisory visit. Based on field observation to all Estates, it was found several strategy had implemented which aims to enhance soil fertility in both areas such as:

- Manuring as recommended by Agronomist team. Based on interview with fertilizer applicators in Division 3 Block G016 TSE, it was known that the workers were able to explained and demonstrate technical matters in fertilizer application such as dosage, placement, time of application, prohibited areas to be applied, as well as PPE to be used. Record of fertilizer application were available on estate site.
- By-products application, for example as seen in Division 2 Block G016 TSE and Division 3 Block A011 PSE for empty fruit bunch (EFB) mulching; and in Division 2 Block E014 TSE for land application by palm oil mill effluent (POME).
- Planting of legume cover crops (LCC) such as *Mucuna bracteata* and maintaining soft grasses on immature and terraces areas as seen in replanting areas in all estates. This legumes has used to enhance nutrient N and K content on the soils, at the same time could prevent soil erosion.
- To keep soil moisture through selective weeding, by-products application and LCC maintenance.

4.2.2

Estate management has monitor the used of fertilizers and satisfactory recorded on Manuring Recapitulation and monthly Estate Manager Report. Manuring record for period 2018 and 2019 in all estates were available. Records of fertilizer



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applied has also presented in monthly management committee meeting (MCM) which prepared by Estate Manager. The report has informed Block of application, type and volume of fertilizer applied. Fertilizer recommended in 2018 to 2019 are Kieserite, MOP, AC, HGFB, ZnSO₄, CuSO₄ and RP. Based on document review, it was informed that manuring recommendation for period 2018 is fully completed and application for 2019 was inline with the schedule. For example, actual fertilizer application up to June 2019, it could be concluded that Kieserite application is mostly completed. While the rest were only about half from the schedule in Semester 1. The rest of application will be conducted on the second semester 2019 (July to December 2019). Furthermore, based on interview with manuring Foreman and fertilizer applicators from all estates, it was stated that applicators has trained periodically by Foreman and Assistant Manager. Object of training were fertilizer placement, time of application, correct dosage, PPE used and areas where fertilizer is prohibited to be applied such as riparian, HCV, abnornal palms, etc.

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Procedure of soil fertility management (4.2.1) mentioned that manuring recommendation must be based on leaf and soil sampling analysis. Leaf sampling and soil sampling analysis should be carried out once and every five years, respectively. Both analysis has carried out by MRC in Pekanbaru, Riau. Leaf and soil sampling were not conducted on the projected replanting areas (about 2 years before replanting). Parameter measured on leaf analysis are macronutrient (N, P, K, Ca, Mg and Mn) and micronutrient (Fe, B, Zn and Cu) content (in %) while in soil analysis are nutrient retention (pH, % Organic-C, CEC), available nutrient (N-total, P-Total, available-P, K-dd and Mg-dd), soil properties (texture, drainage class, rooting depth), etc. Visual assessment of palm vigour land field condition by Agronomist was also carried out every 6 months to monitoring nutrient status change. Records of leaf and soil sampling are available. According to manuring recommendation program in 2018/20189 it could be concluded that calculation of fertilizer rates were derived from leaf and soil analysis. Furthermore, actual time of application has follows the schedule recommended by MRC Agronomist team. Estates management are able to shows leaf sampling unit (LSU) analysis results which presented in several documents as follows:

- LSU APE: Head of MRC Letter No. MRC/Mgr.P&PN/Mgr.Lab/003/III/2019 dated 01 March 2019 with test report No. P20/2019 dated 26 March 2019.
- LSU TSE: Head of MRC Letter No. MRC/Mgr.P&PN/Mgr.Lab/005/V/2019 dated 20 May 2019 with test report No. P87/2019 dated 24 June 2019.
- LSU PSE: Head of MRC Letter No. MRC/Mgr.P&PN/Mgr.Lab/005/V/2019 dated 20 May 2019 with test report No. P86/2019 dated 24 June 2019.

Furthermore, soil sampling unit (SSU) analysis is presented in document of semi detail soil survey report of PT AIP period 2016 to 2021 dated June 2016 which carried out by MRC team from Pekanbaru.

As mentioned in Indicator 4.1.2 and 4.1.3 it was informed that monitoring on procedure application were carried out by GSQM Department and Plantation Advisory visit. Based on field observation to all sampled Estates, it was found several strategy had implemented which aims to enhance soil fertility in both areas, such as: manuring as recommended by Agronomist, by product application (EFB in all estates and land application in TSE), proper planting of legume cover crops (LCC) such as *Mucuna bracteata* and maintaining soft grasses on immature and terraces areas. This legumes has used to enhance nutrient N and K content on the soils, at the same time could prevent soil erosion. Futhermore, for keeping soil moisture on the field purposes, esttae management has conducting selective weeding, by-products application and LCC maintenance.

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Apart from chemical fertilizers, organic fertilizers which came from by-products (EFB and palm oil mill effluent) has also applied for nutrient cycle purposes. By-products application was documented in monthly Estate Manager report chapter monthly work realization, realization of manuring report and by-product realization report. EFB dosage recommended were varies about 150 to 200 kg/palm/year in replanting areas and about 250-300 kg/palm/year in mature areas, which depends on field condition. Furthermore, POME applied were about 700-750 m³/ha/year which devided into 3 rotation. For example, based on field visit to immature area in Division 2 Block G016 TSE and Division 3 Block A011 PSE, it was found that EFB were mulched on palm circle with pattern 30 cm from palm base, 2 circle 1 layer. Furthermore, based on observation to land application area in Division 2 Block F014 TSE, it was known that that there was no leaking of POME pipe and applied on the permitted Block as crosschecked on the land application permit. Record of land application was available. For example, application in July 2019 was 9,080 m³, which covers area for about 3.47 ha.



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Palm residue after replanting could be considered as nutrient cycle on the field, as it has same perspective as prunned fronds placement on the inter palm and/or inter rows, eventhough these matter are not included as a part of nutrient cycle strategy, but more to agronomy technical practice. However, ammount of volume on those matters are very seldom to be calculated by estate management.

Observation to replanting area is conducted to Division 2 Block G016 and Block E016 Teluk Siak Estate, as well as to Division 4 Block A011 Pinang Sebatang Estate. As per field overview, it was known that there no indication of burning-related activities. Thus, it was indicates that palm residues were lays on the field.

Status: Comply

4.3

Practices minimize and control erosion and degradation of soils.

4.3.1

Information of fragile soils presence in PT AIP has refers to Soil Suitability Map which derived from Semi Detail Soil Survey Report of PT AIP for period 2016-2021 dated June 2016. The report is conducted by PT Anugerah Sumber Makmur or Minamas Research Centre (MRC) in Teluk Siak. Soil Suitability Map was available in scale 1:40,000, with summary that almost 85 % of PT AIP were classified as suitable to slightly suitable for oil palm cultivation, and the rest for about 15 % was classified as marginal (S3) with limitation on rooting soil properties, which may due to presence of peat and lowlying area. In detail, distribution of peat soil is presented as follows:

- TSE: Typic Haplosaprist for about 869.57 ha.
- PSE: Typic Haplosaprist for about 126.31 ha.
- APE: Typic Haplohemist and Typic Haplosaprist for about 621.68 ha and 35.60 ha.

According to the explanation above, it was known that about 1,680.16 ha or approximately 17 % of PT AIP were covered by peat soils, where about 98 % from peat soils were has saprist decomposition level while the rest was hemist. Thus, there is no fragile soils within PT AIP operational areas. Main limitation for oil palm cultivation is mostly due to presence of peat soil which lead to very low soil fertility, drainage problem (water availability) and erosion matters.

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According to soil survey report in June 2016, it was known that there is no area with slope more than 40 % in PT AIP. About 72.82 % were varies from flat to rolling, while the rest was classified as hilly. Thus, in general there is no serious limitation due to slope category. To overcome limitation on hilly areas, terraces planting pattern had already implemented, especially on replanting areas in PSE and APE. This is verified during field observation. Furthermore, several strategy which also implemented is presented as follows:

- Adoption of individual planting platform and/or terraces planting pattern on rolling to hilly areas.
- To suppress surface run-off and leaching through U-shape and parallel to the contour line pruned fronds placement
 on flat to undulating and hilly contour areas, respectively.
- Adoption of field drains with pattern 1:4 on flat lowlying prone flood area.
- Measuring erosion rate on hilly area.
- Selective weeding which aims to enhance organic matter and retaining soil moisture.
- Manuring management through leaf and soil nutrient analysis, which recommended by Agronomist from MRC team
 towards nutrient balance calculation method, maximizing fertilizer use efficiency (to choose suitable fertilizers type,
 time of application and placement).
- For soil and water conservation, planting of land cover crop such as Mucuna bracteata has already adopted on immature areas.

4.3.3

Program of road maintenance has found on annual budget plan which is included on Budget of transportation cost and reported on Manager Monthly Management Committe Meeting. Road maintenance activities were consist of manual maintenance such as cover crop clearance, surface reparation through gravels, road grader and compaction. For example, up to July 2019, it was know that APE has conducting road maintenance totalling for about 68,690 m with total cost for about IDR 160,756,133. Road maintenance map were available. However, based on field observation to Division 4 Block A011 PSE, it was known that estate management has conducting manual road maintenance to avoid water



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clogged on the road. However in general, road conditions were satisfactory and easily passable by FFB, CPO and PK transporter unit (oil tank and dump-truck).

4.3.4

Procedure on peat management has presented in document ARM Minamas Plantation Chapter 10. which mentioned that in order to minimize peat subsidency and peat overdrain, water level management on 50-70 cm, water table monitoring through piezometer, peat subsidence poles monitoring, watergate installation and drains or canals desilting were compulsory to be conducted. Estate management is able to shows record on water table monitoring which conducted every week which recapitulate in monthly basis. Based on field visit to Peat subsidence pole in Division 3 Block H020 TSE which installed since 2016, it was known that subsidency rate was about 2.50 cm/year. Thus, the figure was still bellow threshold as mentioned in Minister of Environment Regulation (PermenLH) No. 7 in 2006 (35 cm per five years or about 7 cm/year).

4.3.5

Drainability study of PT AIP is derived from SEIA replanting report on September 2015. Estate management has identified and delineate prone flooded locations within estate operational areas. Monitoring of water level and water table, as well as peat subsidency rates in the current management input is considered satisfactory and in accordance with applicable regulations in Indonesia. However, technical information towards peat area viability for longterm oil palm planting is not available. Thus, raised NCR No. 2019.01 with minor category.

As mentioned in Indicator 4.3.1 and 4.3.2, it was known that there is no fragile soil in PT AIP operational areas and only 15 % has classified as marginal with limitation on rooting soil property, which may due to presence of peat and lowlying area. Furthermore, there were hilly areas which covers about 27.18 % from company operational areas. To overcome soil limitations, estate management has implementing several strategy such as as follows:

- Adoption of proper water management included water table and peat subsidency rates monitoring.
- Adoption of terraces planting pattern on hilly areas.
- To suppress surface run-off and leaching through U-shape and parallel to the contour line pruned fronds placement on flat to undulating and hilly contour areas, respectively.
- Adoption of field drains and close and ended conservation trench (CCT) with pattern 1:4 on flat lowlying prone flood area, as observed to Division 2 Block D006 PSE.
- Measuring erosion rate on hilly area.
- Selective weeding which aims to enhance organic matter and retaining soil moisture.
- Soil texture and nutrient recovery through by-products (EFB and POME) application.
- Manuring management through leaf and soil nutrient analysis, which recommended by Agronomist from MRC team towards nutrient balance calculation method, maximizing fertilizer use efficiency (to choose suitable fertilizers type, time of application and placement).
- For soil and water conservation, planting of land cover crop such as Mucuna bracteata has already implemented on immature areas.

Those strategy mentioned above are verified during field observation to all Estates and it has considered satisfactory, in accordance with company procedures.

4.3.5 Status: Non-Conformity No. 2019.01 with Minor category

4.4

Practices maintain the quality and availability of surface and ground water.

4.4.1

Water sources identification and management plan are listed on water management document. These document describe the water source identification, Mill water usage monitoring & eficiency, and catchment area protections. Field visits on block J23 Div 3 Teluk Siak Estate for examples, found that companies managed Pingai riparian by marked the buffer zone (throughout ±50 m bothsides on riparian), perform revegetation with vetiver grass, and no chemical activities signboard placement. Company also conducted regularly water quality testing every semester for Pingai and Gasib river. Based on workers interview on Teluk Siak and Pinang Sebatang estate and housing residence shown that drinking water



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for them originated from refill water and Teluk siak also provides clean water access for workers housing.

4.4.2

Company has perform identification and shown the maps for water sources areas (including riparian) with 1:75000 scale. HCV identification document shown there is some river flow on estate such as Pingai and Gasib river, meanwhile another water sources that identified was water reservoir and lowland peat areas.

Company provided procedures for these water courses protection/conservations listed on Buffer zone protection on Policy 724/TQEM-SPM/09, 2010 policy. Field visit during surveillance audit, for examples on Pingai riparian acquired information that company shown proper ways to maintain and protect the catchment area for example manual weeding and marking the chemical boundary border. Based on interviews with spraying workers, found that workers already understand the boundary marks of conservation areas.

Company shown compliance related this pome application based on current permit for examples regular POME testing and annual soil testing on land application areas. Waste water quality testing document review shown for January-June 2019 all of waste water testing parameters is compliant to the standards quality and mill effulent management and monitoring has been reported to related institutions per 3 month regularly.

All palm oil mill effluent are managed on waste water treatment plant before it distributed to Teluk siak estate as land application for nutrient cycle. Regarding this POME application, company have land application permit based on Head Of Environmental Agency, Siak regent decree No 06/BLH-S/KPTS/IV/2015 valid until 2020.

4.4.4

Observations on Teluk Siak Factory water threatment plant found monitoring for raw and process water usage was done by officer periodically, and flowmeters on inlet serves normally. Certificate holder are able to show water usage monitring for period January - July of 2019 with an average water usages are 1.33 m³/ mt FFB process. From these records, it is known that the average use of mill water does not exceed the established budget (1.41 m³/ mt FFB process). Data of water usage from January -July 2019 2018 is obtained from daily water usage record by WTP operator throughdirect flowmeter observation.

Status: Comply

4.5

Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.

The company has committed to implement integrated pest management (IPM) which presented in procedure of ARM Policy No. 110/EST-ARM/13 Chapter 15 about plant protection which covers early warning system, census and analysis. biological and chemical pest population management and monitoring. Estate management has a program of integrated pest management and its realization which presented in monthly committee meeting report, for example as follows:

Census and Analysis

Estates menegement are able to shows census results for leaf eating caterpillar (LEC), termites, oryctes, rats and ganoderma. For example, record of census is presented as follows:

- Based on observation to Cipermethrin application in Division 2 Block G015 TSE, it was known that the application was implemented throughconsidering census analysis dated 26 August 2019 which shows oryctes incidence for about 6.10 %. Moreover, there also identified oryctes incidence more than 5 % in Block F008-F010 and G014.
- As per oryctes census result in PSE dated 04 July 2019, it was detected that oryctes attack which more than threshold limit (>5 %) was spotted in Division 1 Block C005 and C006, for rea covers about 1.77 ha. Thus, chemical control through insecticide spraying by "Capture" with dosage 377 gr/cc/palm is recommended and applied on the following days. As per monitoring census for 14 days after application, the results shows that Oryctes incidence in was bellow the threshold.
- Based on observation to leaf eating caterpillar census in Division 2 Block D006 PSE and interview with 2 census workers, it was known that the workers were able to explained and demonstrate several technical matters such as

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LEC species, sampling method, selecting frond No. 17 as palm sample, threshold limit, recording and reporting. As census record dated 28 August 2019, it was known that LEC incidence on that particular block was very low.

Biological Method for Pest Population Control

- The company has conducting beneficial plants for leaf eating caterpillar and bagworm population control. New planting of beneficial plants has confirmed during field observation along main road and collection road, especially on replanting areas.
- The company has adopting barn owl (*Tyto alba*) for rat population control. Estate management mentioned that 1 BOB was projected to covers about 20 to 30 ha. For example, based on observation to BOB in Division 2 Block F013 TSE and Division 4 Block A011 PSE, it was found presence of *Tyto alba* which marked through rat bones.

In order to avoid P&D (include weeds) resistance and prophylactic uses of pesticide, estate management had substitute and/or rotate the use of pesticides for the same target, for example, in term of broad leaf control such as *Ageratum conyzoicus*, *Boreiva alata* and *Mikania micranta*, the use of Kenlly 20 WG (Methyl metsulfuron) could be substitute with Ken Up 480 SL (Isoprophyl amine glyphosate). Moreover, biological control has also adopted as mentioned above.

4.5.2

The company has conducting several trainings which aims to maintain workers knowledge and skills towards P&D management, for example as follows:

- Training of pesticide application in Division 3 TSE has conducted on 16 January 2018, attended by 7 pesticide applicators.
- Training of LEC census in Division 2 TSE has conducted on 17 July 2019 attended by 7 workers.
- Traing of pest management control in PSE has conducted on 12 July 2019, attended by 12 workers.
- Training and socialization of BSS, MSDS and HIRAC for Agrochemicals Applicators in APE has conducted on 06 July 2019. The training is given by MRC Assistant, attended by 2 Staff, 3 Foreman and 16 pesticide applicators. Material of training, picture documentation and attendance list were available.

Based on field observation and interview with Foreman and pesticide applicators from all estates, it could be concluded that the workers were able to explain and demonstrate its job in accordance with the SOP, such as justification of pesticide usage, considering wind flows during spraying, pesticide mixing, pesticides and its target, prohibited areas to be sprayed (for example conservation area and riparian zone, which were marked with yellow/red poles and/or yellow/red mark on the palm trunks) as well as PPE's to be used as well as its management. Pesticide applicators has also mentioned that pregnant and breastfeeding women are strictly prohibited to works related with agrochemicals.

Status: Comply

4.6

Pesticides are used in ways that do not endanger health or the environment

4.6.1

Procedure ARM Policy No. 110/EST-ARM/13 Chapter 15 about plant protection mentioned that the use of agrochemical should be based on census analysis evaluation when the level of incidence is more than threshold limits. In order to avoid P&D (include weeds) resistance and prophylactic uses of pesticide, estate management had substitute and/or rotate the use of pesticides for the same target, for example, in term of broad leaf control such as *Ageratum conyzoicus*, *Boreiva alata* and *Mikania micranta*, the use of Kenlly 20 WG (Methyl metsulfuron) could be substitute with Ken Up 480 SL (Isoprophyl amine glyphosate). Moreover, biological control has also adopted. According to observation to agrochemicals warehouse and record of pesticide application, list of pesticide used in 2018/2019 for PT AIP is presented as follows:

Pesticides	Active Substance	Target
Herbicides		
Kenlly 20 WG	Methyl Metsulfuron	Broadleaf
Trendy 20 WG	Methyl Metsulfuron	Broadleaf
Ally 20 WDG	Methyl Metsulfuron	Broadleaf
Becano 500 SC	indaziflam	Narrowleaf
Ken Up 486 SL	Isoprophyl Amine Glyphosate	Broadleaf and narrowleaf
Kenlon 480 EC	Triklopir Butoksi Ethyl Ester	Broadleaf and narrowleaf

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Lifeline 280 SL	Ammonium Glufosinat	Broadleaf and narrowleaf
Basta 150 SL	Ammonium Glufosinat	Broadleaf and narrowleaf
Insecticide		
Capture 50 EC	Cipermethrin	Leaf eating caterpillar and oryctes
Kencepat 75 SP	Acephate	Leaf eating caterpillar

Those pesticides mentioned above were listed in Pesticide and Fertilizer Directorate through http://pestisida.id/simpes_app/rekap_formula_nama.php?s_kategori=umum. Furthermore, according to pesticide used record in 2018/2019 and observation to Pesticide Store in all estates, it was known that there is no paraquat on the stock.

Based on field observation and interview with Foreman and Pesticide Applicators in Division 2 Block G015 TSE, Division 2 Block A002 PSE and Division 3 Block D023 APE, it could be concluded that the workers were able to explain and demonstrate its job in accordance with the SOP, such as justification of pesticide usage, considering wind flows during spraying, pesticide mixing, pesticides and its target, prohibited areas to be sprayed (ex. Riparian and HCV area), PPE's to be used and its management. Pesticide applicators has also mentioned that pregnant and breastfeeding women are strictly prohibited to works related with agrochemicals.

4.6.2

Record of pesticide usage in all estate were available and presented in Estate manager report. For example, up to July 2019, record of pesticide usage which presented in volume of active substance (kg or litre) per hectare in allEstates is summarized in the following Table:

Pesticide	LD-50	PSE	TSE	APE
Lifeline 280 SL	LD ₅₀ ORAL: 1,480 mg/kg in Rats LD ₅₀ DERMAL: 2,000 mg/kg in Rabbits	0.08	ı	1.12
Kenlon 480 EC	LD ₅₀ ORAL: 1,480 mg/kg in Rats LD ₅₀ DERMAL: 2,000 mg/kg in Rabbits	1.20	1.20	1.20
Garlon 480 EC	LD ₅₀ ORAL: 1,480 mg/kg in Rats LD ₅₀ DERMAL: 2,000 mg/kg in Rabbits	-	1.20	-
Becano 500 SC	LD ₅₀ ORAL: 1,480 mg/kg in Rats LD ₅₀ DERMAL: 2,000 mg/kg in Rabbits	0.50	I	0.50
Ken Up 486 SL	LD ₅₀ ORAL: 1,480 mg/kg in Rats LD ₅₀ DERMAL: 2,000 mg/kg in Rabbits	0.72	0.72	0.72
Ally 20 WDG	LD ₅₀ ORAL: 5,000 mg/kg in Rats LD ₅₀ DERMAL: 2,000 mg/kg in Rabbits	-	0.00	1
Trendy 20 WG	LD ₅₀ ORAL: 5,000 mg/kg in Rats LD ₅₀ DERMAL: 2,000 mg/kg in Rabbits	0.59	1.73	ı
Kenlly 20 WG	LD ₅₀ ORAL: 5,000 mg/kg in Rats LD ₅₀ DERMAL: 2,000 mg/kg in Rabbits	0.00	0.00	1.20
Capture 50 EC	LD ₅₀ ORAL = 1,800 mg/kg in Rats LD ₅₀ DERMAL = 2,000 mg/kg in Rats	0.22	0.15	0.44
Kencepat 75 SP	LD_{50} ORAL = 1,800 mg/kg in Rats LD_{50} DERMAL = 2,000 mg/kg in Rats	-	0.11	0.37

According to the Table above, it was known that monitoring of pesticides usage per application areas (in ha) is properly maintained by estate management.

4.6.3

Program and realization of pest management was presented in monthly report which describes EWS and census analysis, biological control and pesticide application, for example as follows:

Census and Analysis

Estates menegement are able to shows census results for leaf eating caterpillar (LEC), termites, oryctes, rats and ganoderma. For example, record of census is presented as follows:

Based on observation to Cipermethrin application in Division 2 Block G015 TSE, it was known that the application
was implemented throughconsidering census analysis dated 26 August 2019 which shows oryctes incidence for about



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6.10 %. Moreover, there also identified oryctes incidence more than 5 % in Block F008-F010 and G014.

- As per oryctes census result in PSE dated 04 July 2019, it was detected that oryctes attack which more than threshold limit (>5 %) was spotted in Division 1 Block C005 and C006, for rea covers about 1.77 ha. Thus, chemical control through insecticide spraying by "Capture" with dosage 377 gr/cc/palm is recommended and applied on the following days. As per monitoring census for 14 days after application, the results shows that Oryctes incidence in was bellow the threshold.
- Based on observation to leaf eating caterpillar census in Division 2 Block D006 PSE and interview with 2 census
 workers, it was known that the workers were able to explained and demonstrate several technical matters such as
 LEC species, sampling method, selecting frond No. 17 as palm sample, threshold limit, recording and reporting. As
 census record dated 28 August 2019, it was known that LEC incidence on that particular block was very low.

Biological Method for Pest Population Control

- The company has conducting beneficial plants for leaf eating caterpillar and bagworm population control. New planting of beneficial plants has confirmed during field observation along main road and collection road, especially on replanting areas.
- The company has adopting barn owl (*Tyto alba*) for rat population control. Estate management mentioned that 1 BOB was projected to covers about 20 to 30 ha. For example, based on observation to BOB in Division 2 Block F013 TSE and Division 4 Block A011 PSE, it was found presence of *Tyto alba* which marked through rat bones.

In order to avoid P&D (include weeds) resistance and prophylactic uses of pesticide, estate management had substitute and/or rotate the use of pesticides for the same target, for example, in term of broad leaf control such as *Ageratum conyzoicus*, *Boreiva alata* and *Mikania micranta*, the use of Kenlly 20 WG (Methyl metsulfuron) could be substitute with Ken Up 480 SL (Isoprophyl amine glyphosate). Moreover, biological control has also adopted as mentioned above.

4.6.4

The company has list of pesticides included on WHO Class 1A and 1B and/or listed on Stockholm or Rotterdam is presented in company Policy No. 724/TQEM-SPMS/09 dated 27 August 2010. Meanwhile, company commitment on zero use of those pesticides is presented in "Sime Darby Responsible Agriculture Charter" dated September 2016. Based on pesticide used records in 2018/2019 for PT AIP which presented in Indicator 4.6.1 and 4.6.2, it could be concluded that there is no pesticides listed in WHO Appendix 1A, 1B and/or listed in Stockholm or Rotterdam Convention as well as paraquat. Moreover, all pesticides used by PT AIP were listed on www.pestisida.id by Department of Agriculture, Republic of Indonesia.

4.6.5

Procedure of pesticide handling, use and application were presented in several documents, such as document No. LF/SOP.ESH/04 dated 11 January 2011 about agrochemicals handling, document No. 394/IT-LB3-23/11 dated 27 September 2011, ARM Policy No. 110/EST-ARM/13 Chapter 15 dated 01 September 2013 about plant protection, Material Safety Data Sheet (MSDS) of pesticide products and Hazard Identification Risk Assessment Control (HIRAC) for estate. In general, procedures has covers guideline of storage and handling of pesticides, handling of accident and first aid, risk identification, pesticides spills and leaks handling, PPE, physical and chemical properties, reactivity and material stability, toxicology and ecology information, pesticide wastes handling and transportation. The Company has conducting several trainings which aims to maintain workers knowledge and skills towards pesticide usage, handling and its management, for example as follows:

- Training of pesticide application in Division 3 TSE has conducted on 16 January 2018, attended by 7 pesticide applicators.
- Training and socialization of BSS, MSDS and HIRAC for Agrochemicals Applicators in APE has conducted on 06 July 2019. The training is given by MRC Assistant, attended by 2 Staff, 3 Foreman and 16 pesticide applicators. Material of training, picture documentation and attendance list were available.

According to document verification, statement from estate manager, interview with pesticide applicators and field observation to agrochemicals warehouse, it could be concluded that the company has no use of pesticides which required a special training for its applicators (ex. Paraquat) as arranged by Ministry of Agriculture Regulation (Permentan) No. 24 year 2011. Furthermore, based on field observation and interview with pesticide applicators Division 2 Block G015 TSE,



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Division 2 Block A002 PSE and Division 3 Block D023 APE, it could be concluded that the workers were able to explained and demonstrate several technical skills such as PPE used, spraying techniques and prohibited application areas such as HCV and riparian areas which marked with yellow/red paint on palm trunks. Moreover, based on field observation to Pesticides Store in all Estates, it was found that all MSDS were available and match with pesticide stocks, symbols of risk and hazardous level, instruction and PPE used were displayed properly. There are block spraying system (BSS) House as pesticide mixing and PPE's place which available in all estates.

4.6.6

Procedure of pesticide storage is presented in document No. RA012 (Rev. 01) dated 21 February 2018. Furthermore, work instruction on pesticide application has follows technique presented in Material Safety Data Sheet (MSDS) of pesticide products and Hazard Identification Risk Assessment Control (HIRAC) for estate. Which covers guideline of storage and handling of pesticides, handling of accident and first aid, risk identification, pesticides spills and leaks handling, PPE, physical and chemical properties, reactivity and material stability, toxicology and ecology information, pesticide wastes handling and transportation. Training and socialization of BSS, MSDS and HIRAC for Agrochemicals Fertilizer Applicators has conducted on 06 July 2019. The training is given by MRC Assistant, attended by all Agrochemical Applicators. Material of training, picture documentation, and attendance list were available.

Estate management mentioned that used pesticide containers could be reused for the same purposed such as for mixing containers, or to be delivered to Hazardous Waste Store which will be collected by permitted collector namely PT Primanru Jaya. Used pesticide containers has stored on the Permitted Store. This matter is further detailed on Indicator 5.3.2. Based on field observation and interview with pesticide applicators in all estates, it could be concluded that the workers were able to explained and demonstrate several technical skills such as PPE used, spraying techniques and prohibited application areas such as HCV and riparian areas which marked with yellow/red paint on palm trunks. Furthermore, based on field observation to pesticides Store in all Estates, it was found that all MSDS were available and match with pesticide stocks, symbols of risk and hazardous level, instruction and PPE used were displayed properly. Furthermore there are block spraying system (BSS) House as pesticide mixing and PPE's place. Moreover, observation to central housing complex shows that there was no use of used pesticide containers for household purposes.

4.6.7

Work instruction on pesticide application No. 722/PSQM-PSS/10 dated 13 December 2010 about pesticide application has follows technique presented in Material Safety Data Sheet (MSDS) of pesticide products, Procedure No. PM 0800 dated 01 April 2010 about Block Spraying System (BSS), Procedure No. 394/IT-LB3-23/11 dated 27 September 2011 about Hazardous materials management and Hazard Identification Risk Assessment Control (HIRAC) for estate. All reference mentioned in the former has covers guideline of storage and handling of pesticides, handling of accident and first aid, risk identification, pesticides spills and leaks handling, PPE, physical and chemical properties, reactivity and material stability, toxicology and ecology information, pesticide wastes handling and transportation. The Company has conducting several trainings which aims to maintain workers knowledge and skills towards safe pesticide application. For example, training and socialization of BSS, MSDS and HIRAC for Pesticide Applicators has conducted on 08 April 2019. The training is given by MRC Assistant, attended by all Pesticide Applicators. Material of training, picture documentation, and attendance list were available.

Based on field observation and interview with Foreman and Pesticide Applicators in Division 2 Block G015 TSE, Division 2 Block A002 PSE and Division 3 Block D023 APE, it could be concluded that the workers are able to explain and demonstrate its job in accordance with the SOP, such as justification of pesticide usage, considering wind flows during spraying, pesticide mixing, pesticides and its target, prohibited areas to be sprayed (for example conservation area and riparian zone, which were marked with yellow poles and/or yellow mark on the palm trunks) as well as PPE's to be used and its management. Pesticide applicators has also mentioned that pregnant and breastfeeding women are strictly prohibited to works related with agrochemicals. Furthermore, based on field observation to Pesticides Warehouse in all estatets, it was found that all MSDS were available and match with pesticide stocks, symbols of risk and hazardous level, instruction and PPE used were displayed properly. Moreover, there are block spraying system (BSS) House as pesticide mixing and PPE's place in both estates. As observed to housing complex, it was known that there was no use of used pesticide containers and other agrochemicals for household purposes.

As observed, upkeep team has brings food to the field. However, luch activities has conducted on different or non-sprayed area. Clean water and soap were available on site.



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4.6.8

Based on field observation and information form estate management, it was informed that there were no pesticide application through aerial method by plane. All pesticides has applied through spraying both manually and mechanically.

4.6.9

The Company has conducting several trainings which aims to maintain workers knowledge and skills towards safe pesticide application. For example, training and socialization of BSS, MSDS and HIRAC for Pesticide Applicators has conducted on 08 April 2019. The training is given by MRC Assistant, attended by all Agrochemical Applicators. Material of training, picture documentation, and attendance list were available. Based on field observation and interview with pesticide applicators in all estates, it could be concluded that the workers were able to explained and demonstrate several technical skills such as PPE used, spraying techniques and prohibited application areas such as HCV and riparian areas which marked with yellow paint on palm trunks.

4.6.10

Certificate holder has established ex agrrochemical waste management listed on procedures toxic and hazardous waste management on 2018. These procedure stated that all ex chemicals containers were kept on temporary hazardous storage on estate/mill. Training for workers and staff regarding hazardous & toxic material handling has been conducted on July and August 2019 respectively for Teluk siak and Aneka Persada estate workers.

Based on interview with spraying team found that workers recognized how to properly disposed waste materials and workers have been trained by company about waste and hazardous materials handling. Field visit on TSE, APE. and PSE block spraying system storage acquired information that company has managed agrochemical containers by rinse them on isolated placed and regularly submitted to third parties contractors. Evidence for ex agrochemical disposal to related licensed third parties i.e hazardous manifest are available and able to seen on indicator 5.3.2.

4.6.11The company already has an updated list of pesticide operators in August 2019 for each estate, as follows:

Unit	Women Worker	Man Worker	Total
Pinang Sebatang	1	26	27
Estate			
Teluk Siak Estate	8	24	32
Aneka Persada	18	42	60
Estate			
Total	27	172	199

The company has a routine medical surveillance record (health check) for all workers working with chemicals / high-risk workers in each unit. Health checks are carried out routinely every year, the following are inspection activities carried out by the company on 15-20 July 2019 with the number of workers being examined as many as 346 workers (sprayers, fertilizers, generator operators, workshop workers, factory operators and others). The examination carried out is an examination of cholinesterase, audiometric and spirometry. Based on the results of the inspection, it is known that there no negligence / health problems that must have further examination and transfer of work temporarily, all of the workers al in good health condition.

In addition to conducting routine inspections and obtaining results, the company also conducts socialization to workers who have participated in routine inspections related to the results of these inspections. This is in line with the results of interviews with spray and fertilizer workers who stated that they were aware of the results of the examination that had been carried out directly from the company doctor when the results of the inspection were obtained by the company. In addition, workers stated that in their daily work as sprayers during the past year, there had never been any occurrence of skin irritation due to these activities.

4.6.12

The company has a policy on female workers on December 1, 2014 which explains that pregnant women are prohibited from carrying out work related to chemicals (spraying and fertilizing) and for workers who have just given birth /



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breastfeeding for 1 year are prohibited from carrying out activities related to chemicals. In addition, the company has procedures for prohibiting pregnant or nursing women from working in chemicals-related work. The procedure is stated in:

- Clinic SOP No. Policy RSPO / 5.3 / PLB3 & BB3. In the procedure there is an agreement against female workers dated July 1, 2010 covering: (1) Provision of H1 (menstrual leave); (2) Provision of H2; (3) The policy prohibiting pregnant women from working as a spray and fertilizer team; (4) Prohibition of women workers who are breastfeeding from working in the field of work related to chemicals; (5) Policy on the protection of women workers from the treatment of sexual harassment.
- Internal Memorandum to all field assistants and supervisors who stated that "It is not permissible for Pregnant Women and Women Workers who are breastfeeding to work using pesticides / chemicals.

The company has an updated list of pesticide operators in August 2019 for each estate with a total of 199 workers who are pesticide operators and 172 of them are female workers. The company has collaborated with PUSKESMAS to carry out routine inspections (*posyandu*) for women workers every month on each unit. This is done to ensure that no female workers who are pregnant and breastfeeding work in jobs related to chemicals.

Based on H1 monitoring data and letter of transfer of work from spray to manual care it is known that spray workers should not be undertaken by pregnant and lactating mothers. The results of interviews with the chair of the gender committee and spray workers are known that pregnant women will be transferred to light care jobs such as company office estate maintenance.

Status: Comply

4.7

An occupational health and safety plan is documented, effectively communicated and implemented.

4.7.1

There is no change of safety policy, which presented in Head Plantation Upstream Indonesia dated December 2011. The Company is committed to provide a safe working environment for all employees and visitor, as well as strive to facilitate a proper protection for workers and company assest which aims to avoid accident and damage incidence. The policy is available in Bahasa. Socialization has been conducted to all employees include contractor and visitor through safety briefing before starting activities on the sites. This is confirmed during audit. Based on interview with workers in estates and mill, it was informed that safety briefing is conducted daily during muster morning. Socialization of occupational health and safety (OSH) is conducted annually.

The company has an OHS Work Program every year that has been known and approved by the Senior Assistants and Managers of each unit. In 2019 the established OHS work program is updating the P2K3 structure & emergency response annually, HIRAC evaluation annually, implementing PPE on a monthly basis, safety briefing at muster morning every day, P2K3 meetings every month, checking OHS equipment (extinguisher, first aid, preventive maintenance), periodic health checks, safety induction every year and other activities.

The company has implemented the OHS work program planned for 2019, including:

- P2K3 routine meeting to discuss about the OHS application and problems encountered
- OHS inspection and monitoring to determine awareness and adherence to the use of workers' PPE
- Checking / monitoring the preparedness of emergency response infrastructure such as extinguisher, Hydrant, first
 aid and others that is carried out routinely every month.

The effectiveness of the OHS work program is always monitored and evaluated by the P2K3 organization by holding regular meetings to discuss related to the implementation, effectiveness and problems faced to get the solution.

4.7.2

The company has conducted a risk assessment for each operational activity in the plantations and mills, the results of the assessment are reported in the Hazard Identification, Risk Assessment & Control (HIRAC) document. The document informs about the types of activities, sub-activities, potential / actual aspects of the environment / hazard, conditions, potential / actual environmental impacts / OHS risks, likelihood, severity, initial risk level, significant aspects, types of



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existing controls, influence, the level of risk after control and others. The last evaluation of HIRAC was carried out on August 1, 2019, the result was that there were no additions to the activities / work and the current risk control was still significant. The work / activities listed in the HIRAC document include harvesting, spraying, fertilizer, the work of each process station in the factory such as a sterilizer, clarification, nut kernel and others.

The company has an OHS inspection procedure that is carried out every month to find out sources of danger and monitoring of emergency response equipment owned. In addition, the company has a work accident investigation procedure that is used to find out the initial identification of the accident, cause of the accident, analysis and actions taken. Based on the results of the document review, it is known that all accidents that occur in the company have been investigated and reported to the relevant agencies.

4.7.3

The company management is able to shows Operators/Workers License monitoring as well as its extension when come to expired. this is confirmed during field observation and License/Certificate monitoring record. Training related to OHS matter has conducted annually for refreshment during safety townhall and technical training. According to interview with wotkers from estate and mill, it could be concluded that there were no issues related to workers knowledge on technical safety matters.

Based on observations at Teluk Siak Factory, workers were found to have used PPE that had been damaged in the form of helmets, safety shoes, and masks at boiler stations, sterilizer stations, clarification stations and nut kernel stations. Based on the results of a review of monitoring documents on the use of PPE on July 1, 2019 and August 5, 2019, it is known that there are workers who still use damaged PPE such as helmets and safety shoes. The company has a Personal Protective Equipment Procedure (PPE) No. 739 / TQEM-ESH / 10 Revision 02 dated 10 November 2016 which states that PPE must be replaced as soon as it is found to provide no guarantee of protection. The company has not been able to ensure that the replacement of damaged PPE that has been identified has been carried out in accordance with the procedures that are owned. **Non-Conformity No. 2019.02 with Major Category**

4.7.4

The company has appointed workers who are designated as responsible for the company's OHS which are listed in the P2K3 organization in each plantation and factory unit. The following are P2K3 organizations that have been owned by companies in each unit, including:

- P2K3 for Pinang Sebatang Estate legitimation shows through Decree of Manpower Agency Head of Riau Province No. KEP.179/Disnakertrans-PK/SK-P2K3/VIII/2018 dated 01 August 2018, with OSH Secretary was OSH Expert.
- P2K3 for Teluk Siak Factory legitimation shows through Decree of Manpower Agency Head of Riau Province No. KEP. 138/Disnakertrans.PK/VII/2018 dated 18 July 2018, with OSH Secretary was OSH Expert.
- P2K3 for Aneka Persada Estate legitimation shows through Decree of Manpower Agency Head of Riau Province No. KEP. KEP.230/Disnakertrans-PK/SK-P2K3/XI/2017 dated 06 November 2017, with OSH Secretary was OSH Expert.
- P2K3 for Teluk Siak Estate legitimation shows through Decree of Manpower Agency Head of Riau Province No. KEP. KEP. 204/Disnakertrans-PK/SK-P2K3/X/2017 dated 16 October 2017, with OSH Secretary was OSH Expert.

For the P2K3 secretary at Aneka Persada Estate and Teluk Siak Estate already have competency as a OHS Expert, however the Letter of Appointment as OHS Expert from the Ministry of Manpower is not intended for PT Aneka Inti Persada. This is because the person concerned has just been transferred from another unit so that his appointment as an OHS Expert is still for that unit. The company has shown proof of arrangement for the change of appointment as the OHS Expert of PT Aneka Inti Persada on August 15, 2019, but until now it is still in the process at the Ministry of Manpower. **(OFI)**

The company regularly holds meetings to discuss OSH problems found in the field and carried out by P2K3 organizations every month. At each meeting the company always documented it well in the form of minutes of the meeting. The P2K3 meetings to discuss related to the implementation, effectiveness and problems faced to get the solution.

4.7.5

The Company have procedure of emergency is presented in several documents, i.e. Policy No. 712/TQEM-KRKD/10



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about emergency response and mitigations, No. 716/TQEM-PK/10 about fire preventition, and No. 717/TQEM-PK/10 about hazardous materials leakage. The procedure has covers identification which may caused emergency situation due to fire, hazardous and hazardous waste materials, natural disaster, etc. emergency team which appointed to overcome thoses situation were available as mentioned in OHS Committee. The company is able to shows investigation of accident recor for period 2018/2019, as well as its follow up documents, such as Official Report of Accident, Investigation report, medical and recommendation record, medical certificate, etc. Manday lost due to accident were still paid by the company as verified to the salary payroll. Based on observation to estate and mill operational areas, it was known that the company has provide proper First aid kit box, in accordance with applicable regulation. Based on interview with all workers, it could be concluded that in general they are understood on facing emergency procedure and familiar with workers related with emergency situation such as Assistant, Paramedics and First Aid facilities, Fire Fighter Team, etc.

4.7.6

The company has registered all workers in the BPJS Health and Employment program, this is indicated by the existence of proof of payment on a regular basis every month to the BPJS for the insurance. Proof of payment that can be presented is proof of payment BPJS Health and Employment period July and August. In addition to ensuring that workers are registered in the BPJS program, the company also ensures that contractors and workers are registered in the program. This is evidenced by proof of payment BPJS contractor workers for the payment period in July and August 2019. Based on the evidence of the improvement given above it can be concluded that the **Non-conformity No. 2018.04 is closed.**

The company routinely reports work accidents to relevant agencies in accordance with applicable regulations for claims made for work accidents. The following is the documentation of the report made by the company, namely: Reporting of Work Accident Cases Phase I, II and III to the BPJS Employment for workers with cases of injured fingers slashed by a cutting machine (grinder) on July 22, 2018. The workers claim process has been completed and received compensation from the BPJS Employment through the Bank transfer mechanism.

Evidence of the policy is still valid is that workers and their families still get free health services at company clinics and hospitals according to BPJS services that are registered. The guarantee for workers, including accidents, is also still entirely borne by the company and BPJS Employment.

4.7.7

The company has a record of work accidents using the Lost Time Accident (LTA) matrix as a reference to find out and calculate the total workday loss, severity rate and frequency rate of all accidents that occur in the company. The following is a recording of work accidents that occurred during the past year (January 2018 - July 2019) using the LTA matrix, including:

Unit	Year		
Offic	2018	2019	
Total Incident	4	1	
Lost Time	24	-	
Severity Rate	7,85	-	
Frequency Rate	1,31	-	

Based on the above table it is known that during the period January - December 2018 there were 54 accidents that occurred with a total loss of working days is 102 days for all units. Whereas in 2019 (until July 2019) there were no workplace accidents (Zero Accidents).

4.7.3 | Status: Non-Conformity No. 2019.02 with Major category

4.8

All staff, workers, smallholders and contractors are appropriately trained.

4.8.1 & 4.8.2

The identification of training needs for each worker has been included in the 2019 Training Matrix document available in the estate and factory. The matrix explains the training needs for each job, including:

• Clerks harvest requires training on crop quality, Collective Labor Agreement socialization, emergency response training, first aid training, PPE socialization and others.



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- Mechanics require training in work procedures, first aid, PPE, OHS, ISPO, RSPO socialization and others.
- Nurses need first aid training, PPE, accident investigation, ISPO, RSPO, social impact management and others.

The company has a training program in 2019 for each plantation and factory unit aimed at all workers (permanent and contract worker). The following is the training plan for 2019, namely training in harvesting, transportation, fertilizer, spray, manual maintenance, warehouse staff, workshop, fire, P2K3 socialization, pest and disease training and other trainings.

The company has documented all training activities / realization carried out in accordance with the plan established in 2019, the realization of the training include:

- Harvesting training on 06 July 2019 attended by 19 workers
- Safety Town Hall on 26 February 2019 attended by 117 workers
- First aid training on 13 August 2019 attended by 39 workers
- PPE socialization for contractors worker on 30 January 2019 attended by 6 participants

The company has documented the training records for each worker in accordance with the training that he has participated in every year. The following are examples of training records for each worker that has been shown by the company, including:

- Aneka Persada Estate workers training records that have followed first aid training, harvesting, and socialization of company policies in 2018-2019.
- Teluk Siak Estate workers training records that have followed first aid, HCV, OHS training, spraying, and socialization
 of company policies in 2018-2019.
- Pinang Sebatang Estate worker training records which have followed OHS, first aid training, harvesting, and socialization of company policies in 2018-2019.
- Teluk Siak Factory worker training records which have followed boiler operator training, OHS and company policy socialization in 2018-2019.

Based on the results of interviews of workers and contractor workers, it is known that all workers interviewed can explain and demonstrate their duties and responsibilities properly, in accordance with procedures / job descriptions owned and the training given by the company.

Status: Comply

PRINCIPLE #5 Environmental responsibility and conservation of natural resources and biodiversity

5 1

Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continuous improvement.

5.1.1

Until ASA 1.3 there is no changes related to estate operational areas development, mill capacity expansion, and etc. Aspects of plantation and mill management that have environmental impacts were identified and listed on EIA document. Current EIA are conducted on 1995, covered 12,000 ha plantation areas and maximum mill capacity are 60 mt FFB/hour, this document approved by Agriculture Department based on decree No 007/ANDAL/BA/II/1995.

5.1.2 & 5.1.3

Environmental management plan and monitoring plan for PT. Aneka Inti Persada are listed on RKL/RPL document. Related to next year replanting activites plan, company have established another environmental impact assessment addendum on 2015 by independent consultant.

Implementation for environmental management / monitoring has been listed on RKL/RPL semester report. Based on semester report shown that company has managed all potential impact such as water quality, soil erossion, land fire monitoring, wild life presence, air quality and noise.

Result of monitoring for 1st semester 2019 shown that potential impact caused by operational acitivites have been reduced



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meanwhile noise parameter on some point in Teluk Siak Factory are still exceed standard quality. Action plan for this exceeding noise test result has been implemented by providing ear muff/ear plug for high risk workers. Review for the monitoring/management plans has been developed on August 2019 and as output certificate holder will inserted replanting activities monitoring when replanting has been conducted on estate in coming year.

Status: Comply

5.2

The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced

5.2.1

Certificate holder has been conduct HCV assessment for the entire area of operations, done by the RSPO Approved Assessor on 2010. The process of HCV identification conducted by using HCV identification guides in Indonesia on June 2008. These identifications indicates there is HCV 1,6, and 5 presence on TSE, APE, and PSE. Each HCV areas have been mapped, and covered areas with totally 252.78 ha. The HCV identification was conducted by a competent HCV team and has engaged stakeholders through public consultation on January 2010. HCV identification results also explain the presence of Rare, Threatened, or Endangered (RTE) species according updated IUCN-Redlist 3.1 (2017) such as Macaca nemestrina and Cuora amboinensis.

5.2.2 & 5.2.3

HCV identification results also explain there is an endangered species according IUCN-Redlist. To provide protection against such species, management unit has established HCV management plan and implemented such as hunting ban signboard placement, patrolling, rehabilitation of riparian as wild species habitat. Field visit on block J233 div 3 TSE shown that condition of HCV areas has been covered by natural vegetation.

Relaled to RTE species, company have RTE species protections procedures established on August 2019. Evidence for workforce educations related to RTE species are available for examples HCV / RTE socialization on August 2019 for Aneka Persada Estate workers. Housing visit and residence interview on TSE and APE also found there is no RTE / wild species reared by workers.

5.2.4

Company have established 2019 HCV management plan based on 2018 monitoring output. Regularly patrols record shown company has been monitored illegal hunting, and other illegal activities. Records for regular patrols on APE, TSE, and PSE are available and verified by auditors. For examples patrols result periods June 2019 on TSE on block H016, F016 (Pingai riparian) found *varanus salvator*, and crow bird, meanwhile signboard and HCV marking zone on block H020 TSE are still maintained well. Results of monitoring for year 2018 shown HCV areas are still maintained well, and this thing has been cross checked by auditors during field visit on ASA1.3. meanwhile regarding replanting areas on some estate during 2019, company has incorporated monitoring for HCV that bordering to replanting activities, for examples regular patrols for riparian on teluk siak estate and pinang sebatang estate.

5.2.5

HCV identification results showed there are local community right that included as HCV areas i.e Gasib river. PT Aneka Inti Persada has established an joint management agreement with the villages representatives to protect HCV area, for example, a letter of agreement on 26 November 2018 between PT AIP representatives with Village Chief of Lubuk Dalam to protect the Gasib riparian areas . Field visit on Gasib riparian shown that the company has conduct management regarding this HCV 5 areas, and this areas still maintained well.

Status: Comply

5.3

Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.

531

Register of waste (included toxic and hazardous waste) products produced from mill and estates are identified and listed on identification and management of pollution source document for example :



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- Mill source of waste / contamination: chimney boiler, chimney generator, St. Clarification, St. Nut and Kernel, St. Boiler, Workshop, Chemical Warehouse, Laboratorium, Office and Process of Mill.
- Types of waste / pollution: Air pollution, Noise, Ground, Sludge, Solid, EFB, Shell, Fiber, Boiler ash, Plastics, Domestic waste, Used oil, Used filter, agrochemical container, POME, etc.

This waste register also explained action to managed those waste/pollution produced by estate or mill for examples that all of toxic and hazardous waste are stored in temporary hazardous store before it disposed to licensed collectors.

5.3.2

Inventory for chemicals usage and it used containers are available on chemicals storehouse / temporary hazardous storage. All ex chemicals containers were kept on temporary hazardous storage at Teluk siak Factory, and company has a permit for all hazardous and toxic waste storage issued by decree head of Environmental Agecny, Siak regency No 12/BLH-S/KPTS/2014, valid until 2019.

Based on document review and interview with management, shown all ex pesticide containers and ex fertilizer sack on estates are managed by washing in block spraying system store and regular submitted to temporary hazarodus waste store. Document review shown that company has disposed all toxic and hazardous waste to PT Primanru Jaya (licensed collector by decree of national environmental minister) on, for examples manifest AWE0001118for ex pesticides containers and fertilizer inner sack. Observation during audits at temporary hazardous&toxic waste storage shown that all of hazardous waste are compliant with the periods in permit.

Company has procedures related ex chemicals containers, listed on procedures hazardous and non hazardous waste management on 23 October 2017. This procedures also explained that all of hazardous waste including ex chemical containers must be sent and stored to hazardous waste store maximum 1 month after waste being produced on estate. Field visit shown there is still hazardous waste were stored in estate (Pinang Sebatang estate) for more than one month, for examples used filters and used lubricants containers. Company are not able to shown proper ways to managed hazardous waste based on current procedures. **Non-Conformity No. 2019.03 with Major Category.**

5.3.3

Certificate holder has implemented waste management /utilization based on management plan. Field visit to Teluk Siak Factory shown that condensate water has been transferred to Fat pit tank, then flowed to effuent Cooling Pond; Fiber and shell has been utilized as a boiler fuel, housing trash has been collected in the garbage then disposed to the landfill area. Field visit on land application activities block F014 Teluk Siak Estate shown that company has utilized POME as nutrient cycle based on permit which it belongs.

Field visit on Teluk Siak Factory found there is leakage on effluent pond, regarding this company has provides buffer pond to prevent pome leakage to water bodies. Regarding this company are encourage to maintained effluent pond based current procedures and and this become **OFI**.

Related to domestic waste, field visit on TSE and PSE found that all domestic settlements waste are not disposed off using open fire and companies managed settlements/housing domestic waste by provide landfill on each estate.

5.3.2 | Status: Non-Conformity No. 2019.03 with Major category

5.4

Efficiency of fossil fuel use and the use of renewable energy is optimised.

5.4.1

Company shown commitment to reducing fossil fuel by renewable energy usage. Certificate holder has assess and estimated the direct energy use such as fuel usages and electricity generated by Mill operational avtivities for 2018 -2019 periods. Shell and fiber usage have been monitored per month and for examples realization of fossil fuel usage during July 2019 are 13565 litre.

During Januaray-July 2019, renewable energy usage for boiler resulting average energy eficiency about 120.19 KwH/mt CPO, meanwhile direct energy usage by fossils fuel are 1.22 litre/mt CPO.



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Status: Comply

5.5

Use of fire for waste disposal and for preparing land for replanting is avoided except in specific situations, as identified in the ASEAN guidelines or other regional best practice.

5.5.1

Zero burning policy is presented in document No. 110 / EST-ARM / 13 dated 01 September 2013 about land preparation. As informed from representative of Maredan and Tualang Timur Village, it was known that there is no burning activities for land clearing in PT AIP. Land preparation is conducted mechanically by heavy equipments. This is observed through observation to replanting areas 2019 in Division 2 Block G016 TSE and Division 4 Block A011 PSE.

5.5.2

There is no use of fire for pest management purposes. Estate management prefer to control pest population by biological method instead of chemicals. This matter is further explained in Criteria 4.5 and 4.6. Based on replanting record, it was known that replanting is carried out through zero burning method.

Status: Comply

5.6

Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.

5.6.1 & 5.6.2

The Company has identified the sources of pollution / emissions resulting from the Mill and Estate activities.

- Source of pollution / emission: replanting, fertilizer application, pesticide used, transport of FFB & CPO, machinery and mill operation, and housing.
- Waste / pollution management: Implement zero burning techniques on the replanting activities, EFB applications,
 POME applications on the estate, Utilization of fibre and shell as boiler fuel.

Fossil fuel reducing have been implemented by fiber and shell usage. Realization of renewable energy have been monitored on monthly report for fiber and shell usage. Waste water has been monitored every months and monitoring periods January-June 2019 shown that all of waste water testing parameters is compliant to the standards quality.

Monitoring for emission and pollutants (air emission, ambient, odor, noise, vibration) from estate and mill was done periodically every 6 month, covered on RKL/RPL implementation report and reported to environmental agency peridically. 1st semester 2019 testing result also indicates all parameters related to emission are still comply with standard quality for examples Teluk Siak boiler opacity are <20% (threshold <30 %).

5.6.3

Calculation of GHG and its monitoring has conducted by PSQM. GHG emission calculated using RSPO palm GHG calculator v 3.0.1. Summary of GHG emmison for Teluk Siak Factory period January-December 2018 are listed as follows: Summary of Net GHG Emissions

Product	tCO₂e/tProduct
CPO	4.48
PK	4.48

Production	t/yr
FFB processed	146277
CPO produced	31712
PK produced	6202

Extraction	%
OER	21.68



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KER	4.24		
Description		ŀ	На
Planted area		9	9670.91
Planted on peat		1	127.26
Conservation	Area	(\	252.78

Summary of Field Emissions and Sinks

	Own Crop			3rd party	/	
Description	tCO2e	tCO2e/ha	tCO2e/t FFB	tCO2e	tCO2e/ha	tCO2e
Land Conversion	132558.1	13,71	0.91	0	0	0
*CO ₂ Emissions from Fertilizer	30404.87	3.14	0.21	0	0	0
**N ₂ O Emissions	12686.43	1.31	0.09	0	0	0
Fuel Consumption	3189.7	0.33	0.02	0	0	0
Peat Oxidation	61548.95	6.36	0.42	0	0	0
Sinks						
Crop Sequestration	-90536.48	-9.36	-0.62	0	0	0
Conservation Sequestration	-2317.99	-0.24	-0.02	0	0	0
Total	147533.58	15.26	1.01	0	0	0

Summary Oil Mill Emissions and Credits

Remarks	tCO ₂ e	tCO₂e/t FFB
Emissions sources		
POME	24749.34	0.17
Fuel consumption	1145.02	0.01
Grid electricity	0	0
Credits		
Export of grid electricity (housig)	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	25894.36	0.18

Palm Oil Mill Effluent (POME) Treatment

Divert to compost (%)	0
Divert to anaerobic digestion (%)	100

POME Divert to Anaerobic Digestion

Divert to anaerobic pond (%)	100
Divert to methane capture (flaring) (%)	0
Divert to methane capture (electricity	0
generation) (%)	

Based on document review for examples: pesticides usages monitoring, diesel fuel monitoring, HCV identification and etc found that accurate data has been put into the RSPO palm GHG Calculator. Meanwhile this calculation are using option applied full version due to new development after November 2005.

Status: Comply



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PRINCIPLE #6 Responsible consideration of employees and of individuals and communities affected by growers and mills

6.1

Aspects of plantation and mill management, including replanting, that have social impacts are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate the continuous improvement.

6.1.1, 6.1.2, 6.1.5

There is no changes for SIA since last assessment and company has no any associates smallholder scheme for this certification scopes. PT Aneka Inti Persada has established Social Impact Assessment on 2010 by involving the participation of local communities and stakeholders. Records of meetings in the preparation of SIA documents are well documented. SIA has covered all the potential social impacts caused by company operations. Aspects of study in the document include infrastructure, social economy, social culture, local wisdom, workers facilities, environmental society health and company operations. Evidence for local community participation on social impact assessment were avaible i.e focus group discussion on November 2009 for local comunity of Tualang village, Pinang Sebatang, Meredan village, Kuala Gasib, and Lubuk dalam villages.

Based on consultation with Meredan and Tualang community found that local community has been involved when company conduct SIA, and interview with local community shown that major impacts has been identified and managed by company.

6.1.3 & 6.1.4

Company developed a management plan to follow-up on an annual evaluation/review supported by budget and responsible officers in its implementation. This plan has been informed the positive and negative impact including management plan time frame and the person in charge for the activity, such as: community perception, workers facilities, local employment opportunities, industrial relations. PIC for social management and monitoring are PSQM and assistant on each unit.

From the results of interviews with the surrounding community Meredan and Tualang community acquired information that the community were involved in social impact review and can express their opinions freely by questionairre.

PT Aneka Inti Persada has documented the management plan for social impacts on August 2019 – August 2021. The document describes the sources of impact interna/external, management, timelines, expected results and evaluation. Management review is conducted annually for examples on August 2019.

Based on document review shown that there is addition parameters on 2019-2021 social management/monitoring plan, this new parameters were inserted based on consultation with affected internal parties, i.e regarding workers facilities, workers welfare, and replanting activities.

Status: Comply

6.2

There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.

6.2.1

Procedure of consultation and communication is presented in document No. SPO/006/AIP-KKM/VIII/19 (Rev. 07) dated 01 August 2019. The procedure mentioned that process of communication and consultation could be conducted through direct conversation, via phone, official letter, email and/or other communication media. There is no significant point revised on the new procedure. The previous procedure had socialize to public, for example to surrounding villages such as Kuala Gasib, Tualang and Maredan on 13 July 2018. The company shows list of stakeholder which approved by Chairman of SOU Teluk Siak and Head of Admnistrative on 01 August 2019, that consist of 25 representative of Regency and province Government Agencies, 10 NGO and PT AIP 74 Occupants (previous land owners), 8 Government Insurance and Public Bank, 4 public schools, 9 contractors and 15 supplier (agrochemicals).



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6.2.2

PIC on communication and consultation is conducted by Head of Administrative (KTU), which presented in appointment Letter from the respective Managers or SOU Chairman, as follows:

- TSE and PSE: Manager Letter dated 18 October 2017.
- APE: Chairman SOU 17 Teluk Siak Letter No. IST/PT.AIP/I/2019/S dated 03 January 2019.
- TSF: Manager TSF Letter No. 106/TSF/VII/2019 dated 08 July 2019.

Based on interview with representative of Tualang Timur and Maredan Village, it was known that company representative of PT AIP from each estates and mill were familiar with village sociaties. Communication so far was considered satisfactory.

6.2.3

The company shows list of stakeholder which approved by Chairman of SOU Teluk Siak and Head of Admnistrative on 01 August 2019, that consist of 25 representative of Regency and province Government Agencies, 10 NGO and PT AIP 74 Occupants (previous land owners), 8 Government Insurance and Public Bank, 4 public schools, 9 contractors and 15 supplier (agrochemicals).

For example, based on document request logbook record of PSE, it was noted that during 2019, there were 2 response of information requested by Manpower Agency of Siak Regency for the first and second Quarter P2K3 Report, which has responded less than one week, as shows through Manager Letter No. 025/P2K3-PSE/V/2019/S dated 07 May 2019 and No. 047/P2K3/VIII/2019/S dated 20 August 2019, respectively. Furthermore, Based on information from Manpower Agency of Siak Regency, it was known that the company has considered cooperative in providing information, especially on periodic compulsory report. Moreover, as informed by representative from surrounding estate such as Maredan and Tualang Timur Village, it was known that the company has considered cooperative and transparent in providing information, such as job vacancy, CSR, etc.

Status: Comply

6.3

There is a mutually agreed and documented system for dealing with complaints and grievances, which is Implemented and accepted by all affected parties.

6.3.1 & 6.3.2

The company has procedure of complaint handling and resolution in document of SOP Penanganan Keluhan Karyawan and SOP Penanganan Keluhan Masyarakat that described regarding on complaint handling from internal or external stakeholder. This procedure approved since 20 March 2017 (last revised). In case of any complaint submitted, unit management shall responded within 2 weeks where Estate Manager as unit head are the personnel incharge to replied the issue's submitted.

Based on the results of interviews with the elders or village representatives known that the company has a mechanism to gathering all complaints and suggestions from the community by providing an advice box in estate office. The suggestion box can be filled by all citizens who write down the name or not. The contents of the advice box are monitored by the safety officer on a monthly basis. Through the document verification known that there is no complaint or dispute submitted for at least one year back. For complaint from internal stakeholder usually submitted verbally through their field supervisor or staff. Until this audit, there were no records of complaints that had not yet been processed.

Status: Comply

6.4

Any negotiations concerning compensation for loss of legal or customary 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.

6.4.1 & 6.4.2

The Certificate Holder has Procedure of Land Occupation Compensation (Policy No. 343/PSD-OKUP/10) was revised based on from related parties.. These procedure explained that the process of land occupation compensation will begun by identification process of land. The measuring result with GPS identification and Technical Feasibility Survey by the

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Department of Minamas Research Centre (MRC) will follow up with negotiation for land release by the owner. The Manager of Plantation Services-Region and Estate Manager will handle these process and witnessed by the head of village and related parties.

The Procedure of Land Occupation Compensation as guidance for land compensation process. The documents requirement in land compensation shall signed by land owner, management unit representative, Head of sub District, Notary and Head of Village. These documents shall included of photograph, Map, Letter of land release by the owner, Official Report was signed by related parties consist of land owner and management unit representative, witnessed by Head of Village and Sub District. The process of payment for land or land compensation shall completed with receive and photograph as documentation evidence.

6.4.3

The Certificate Holder has been documented all of land compensation process. The documentation consist of Map, Negotiation result (minutes of meeting), Land Release Letter, Payment Receive was filled in estate office based on land location. Based on SOP Communication and Community Consultation (006/AIP/KKM/13, Revision 2, May 04, 2013), the documentation of land compensation process are limited access and should approved by Plantation Service Department and Manager of Estate if any related parties will access this document. Theses document can access with letter of Information Request from another parties to the company.

Based on document verification, information from management representation and stakeholder consultation with community representation from several village surround (Maredan, Lubuk Dalam and Tualang Timur Village), there was no information of land compensation processed by the PT Aneka Intipersada since period of Recertification till ASA 1.3 on October 2018.

Status: Comply

6.5

Pay and conditions for employees and for employees of contractors always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.

6.5.1 & 6.5.2

The company has work regulations that have been applied in the companies listed in the Collective Labor Agreement (CLA) for 2018-2020. The Collective Labor Agreement has been agreed by the plantation companies which are incorporated in the Sumatran Plantation Company Cooperation Agency (BKS-PPS) with the Trade Unions of the Members of the Indonesian Agricultural & Plantation Trade Union Workers Union (PP.FSP.PP.SPSI) agreed on April 9, 2019. The PKB was also registered with the Ministry of Manpower in accordance with Decree No. B.319 / PHIJSK / X / 2018 dated October 26, 2018 concerning the Signing of PKB. In the CLA explained about the Environmental Applicability of the Collective Labor Agreement, Organizational Recognition, Work Acceptance, Working Time, Wages, Working Volume, Assistance to sick days, absenteeism, payment of meal and mandatory money, overtime work hours and overtime work wages, Provisions - Provisions Regarding Premiums, Assistance Withheld by the State, Allowances for Religious Holidays and Bonuses, Social Security and Social Assistance, Work Equipment, Occupational Safety and Health, Old Age Security, Workers brought in from outside the region, Termination of Employment, How to resolve disputes employment and strikes.

Based on the interview with labour union, gender committee, the CLA has been socialized by company to worker every year and labour union has been re-socialized. Collective Labour Agreement is currently sufficient as the basis of employment in the company, workers' rights, obligations listed are quite clear and has been knowing by every workers.

There has been change in workers policy such as minimum wage from 2018 to 2019, wage structure & scale in 2019, and the others. The workers policy change always been socialized to workers in the muster morning days after the change has been ratified.

The deduction/penalty it written in the company memorandum and has been socialized by company to workers. Based on the interview with harvesting workers, labour union and the others workers it has been know about deduction in the company memorandum and it has been socialized to workers.



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Based on the results of a review of employment documents at the company, it is known that the company still has workers with contract worker status and has a separate work agreement in accordance with the laws and regulations.

The company has set a minimum wage that refers to the stipulation of the minimum wage set by the government, namely the Regency / City Minimum Wage in Riau Province in 2019 of IDR. 2,707,384.96 in accordance with Riau Governor Decree No. 949 / XI / 2018 dated November 21, 2018 and came into force on January 1, 2019. In addition to referring to government regulations, the company also sets minimum wages that are higher than stipulations, based on mutual agreement with GAPKI Riau Branch, BKS-PPS and SPSI on February 13, 2019 which stipulates that the Riau Province Plantation Sector Minimum Wage is IDR. 2,820,000 and applies as of January 1, 2019.

In addition to setting the minimum wage from the government, the company also has a minimum wage setting based on these regulations, namely:

- Inter Office Mail No. 029 / HRM-i3 / III / 2019 dated March 26, 2019 regarding the 2019 Wage permanent worker for PT Aneka Inti Persada amounting to IDR. 2,820,000 (basic salary of 2,679,000 and the amount of rice in the amount of IDR. 141,000), valid since January 1, 2019 and if absentee workers will be subject to a discount of IDR. 107,160, - / day.
- Inter Office Mail No. 013 / HRM-i3 / IV / 2019 dated April 1, 2019 concerning Wages permanent worker and Salary Structure in 2019 PT Aneka Inti Persada, which took effect on January 1, 2019 with the lowest wage (basic salary) with a G1 group of IDR. 2,732,060, and the highest wage (basic salary) with group A8 of IDR. 3,578,800.

Based on the results of the review of employee wage documents in the estate and factory, it is known that the company has implemented provisions relating to the minimum wage for all existing workers. This is reinforced by the results of interviews with harvest workers, sprayers and factory operators who stated that the wages given were in accordance with the minimum wage stipulations of the government.

Based on the results of document review and interviews with trade unions and gender committees, it is known that during the last year there have been no cases of violations or issues of violations related to the provision of wages or unfair conditions to workers. Complaints received by the union and the company from the workers more related to the condition of housing that is damaged and it has been handled guite well by the company by providing a guick response in fixing it.

Based on the review of the August 2019 list of workers' documents, it is known that the company has 45 PKWT (Specific Time Work Agreement) status workers in Pinang Sebatang Estate (42 of them harvesters) and 18 workers in Aneka Persada Estate (16 of them harvesters). Refer to Law No. 13 of 2003 and GAPKI Decree dated 8 February 2013 concerning the Activity Flow of the Work Implementation Process in the Palm Oil Plantation Business Sector where harvest work is permanent work in plantation operations and may not be carried out by workers with PKWT status. The company has not been able to prove that the labor recruitment system is in accordance with Minister of Manpower Decree No. 100 of 2004 concerning Provisions for the Implementation of Specific Time Work Agreements and Law No. 13 of 2003 concerning Manpower. **Non-Conformity No. 2019.04 with Major Category**

6.5.3

The company has an inventory of welfare facilities in the form of housing for its workers in each unit according to their needs. The following are housing facilities available in each unit, including: Employee Homes (G1, G2 and G6), Water Storage Tanks, Electrical Installation, Employee Hall, Polyclinic, Employee / Guest Mess, Mosque, Mosque, Church, School, School Bus and others.

Based on audit result obtained the fact that:

- The results of interviews with labor union representatives obtained information that there were workers 'complaints related to the condition of clean water provided by the company in the employees' house at Division 1 Aneka Persada Estate and Division 1 Pinang Sebatang Estate were considered to be inappropriate for use.
- Evaluation documents for compliance with regulations for the period of August 2, 2019, indicate that the company
 has evaluated and established clean water quality standards referring to Ministry of Health Regulation No. 32 of 2017.
 Compliance records show that the compliance status of the regulations has been declared fulfilled.
- The results of the review of clean water testing documents throughout the estate reveal that the company conducts



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clean water testing using river water quality standards in accordance with Government Regulation No. 82 of 2001 concerning River Water Quality.

The company has not been able to prove that the availability of clean water used by workers in housing has been appropriate and in accordance with the clean water quality standards specified in Ministry of Health Regulation No. 32 of 2017 concerning Environmental Health Standard Quality Standards and Water Health Requirements for Sanitary Hygiene, Swimming Pools, SPA (Solus Per Aqua), and Public Bathing. Non-Conformity No. 2019.05 with Minor category

6.5.4

The company has made it easier for workers and their families to obtain food sources by providing employee cooperatives that sell the daily needs of workers and provide access to vegetable traders to sell in the workers' housing area. In addition there are also workers who open small business stalls to sell daily necessities in each housing.

Based on interviews with workers, trade unions and gender committees, it is known that workers have no difficulty in getting food sources because the company has provided cooperatives that sell daily necessities and there are vegetable vendors who are given access to sell at home. In addition, workers can buy these needs into markets around the area of the company with access that is not too difficult.

Status: Non-Conformity No. 2019.04 with Major category 6.5.3 | Status: Non-Conformity No. 2019.05 with Minor category

6.6

The employer respects the right of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.

6.6.1 & 6.6.2

PT Aneka Inti Persada has a policy that respects the rights of all employees to form and join the Trade Union community, which is contained in SOP Guidelines for Sustainable Plantation Management No. Policy 724 / TQEM-SPMS / 09 dated 27/08/2010 Policy and Objectives Chapter of the Indonesian Plantation Upstream Policy Section on Social Policy page 13 Point 5 explaining that the company is expected to respect the rights of all employees to form and join the Union community Workers in accordance with their choices and negotiate together.

The company already has five (5) active labor unions in each unit. The labor union already has a legal basis for organizing in accordance with applicable government regulations and has been registered with the Siak Regency Manpower Office as an official union. These unions include:

- SPSI (Serikat Pekerja Seluruh Indonesia)
- SPP-MI (Serikat Pekerja Perkebunan Minamas Indonesia)
- SBSI-HUKATAN (Serikat Buruh Seluruh Indonesia Hutan Pertanahan Perkebunan Kelapa Sawit)
- SPP-KS (Serikat Pekerja Perkebunan Kelapa Sawit)
- FKUI-SBSI (Federasi Kontruksi Umum dan Informal Serikat Buruh Seluruh Indonesia)

The company has documented all activities of the union meeting with its members and the company management to discuss labor issues or other issues, one of which was the meeting on 14 August 2019 between labor union representatives and company management who discussed transportation output from the contractor as well as the estate unit target work in Division 1 at Teluk Siak Estate which was attended by 6 participants.

Based on interviews with labor union representatives, it was found that the company gave workers full freedom to carry out the formation and election of labor union management. The company also ensured that the election had no interference in its implementation and for the current management were workers with the status of foreman below that in order to avoid conflicts of interest.

Status: Comply

6.7

Children are not employed or exploited.



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6.7.1

PT Aneka Inti Persada has a Sustainable Plantation Management Guideline (No Policy 724 / TQEM-SPMS / 09) which regulates Social Policy. In point 6 it states that Plantation Upstream Indonesia does not utilize underage workers (children). In addition, the company has a Memorandum from Head Plantation Operations No: POD-UM-052 / III / 2010 dated March 24, 2010 regarding child protection policies, in which companies prohibit the use of underage workers according to the Indonesian Labor Law.

Based on the results of the document review, it is known that the youngest worker currently born in 1999 joined the company in 2019, so there are no workers younger than 18 years working in the company. This is consistent with the results of interviews with labor union representatives, harvesting, spraying and maintenance workers. It is known that there are no workers who come to work under the age of 18 because the minimum age for workers is 18 years and has an identity card.

Status: Comply

6.8

Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.

6.8.1; 6.8.2 & 6.8.3

The company has a policy of non-discrimination and equal opportunities in employment. The policy on equal opportunities and treatment for obtaining employment opportunities is contained in the SOP for Sustainable Plantation Management Guidelines issued by Minamas Plantation Indonesia (No. Policy: 724 / TQEM-SPMS / 09) page 13 which includes company policies on equal opportunity and treatment in employment opportunities stated in point 1 which states that: All Staff / Employees must be treated fairly and fairly in matters relating to recruitment, progress, conditions and description of work, regardless of race, degree, ethnicity, gender, skin color, imperfection (disability), sexual orientation, organizational membership, political views, religion and age. Specifically, this policy aims not to discriminate against sex, race or ethnicity, disability, sexual orientation, age or trust; but to develop a global workforce that has the ability based on objective assessment.

To ensure the implementation of the auditor's review of the employee registration document, it is known that the workers recruited have diverse educational, ethnic and religious backgrounds. Also based on field observations it is known that workers come from a variety of ethnicities, religions, races, and genders.

Based on interviews with workers, trade unions and gender committees, it is known that the recruitment of workers is based on the needs of the company regardless of ethnic, religious, racial and group background. All prospective employees are entitled to the opportunity to work according to their scientific background and company needs. During 2018-2019 there were no issues regarding discrimination against workers. In addition, the results of interviews with the village community around the company also found that so far there had not been any acts of discrimination within the company or its surroundings. The company also always provides equal opportunities to the surrounding community to work in the company in accordance with the provisions and requirements set.

Status: Comply

6.9

There is no harassment or abuse in the work place, and reproductive rights are protected.

6.9.1; 6.9.2 & 6.9.3

The company has a policy on the prevention of sexual harassment and violence that is listed in the SOP for Sustainable Plantation Management Guideline No. Policy 724 / TQEM-SPMS / 09 dated 27/08/2010 Policy and Purpose Chapter, Plantation Upstream Indonesia's Policy Section on Social Policy point 4, namely developing and implementing policies to protect female workers from crime and sexual harassment and protect the rights that are related to reproduction.

The policy has been socialized to workers every year by the company and socialization is routinely carried out by gender committees in each unit when "posyandu" and monthly gender meetings are held. Policy socialization has been carried out by the company, for example the policy socialization on July 26, 2019 to female workers in Aneka Persada Estate.



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The company also has a gender committee in each unit that is still active today. The current gender committee consists of the chairperson, secretary, maternal & child health section, work safety section, domestic violence section and women's role section.

The company has a SOP on Community Complaints Handling (PKM, Rev. 01, in August 1, 2016) which is equipped with a Community Complaints Handling Flow Chart. In addition there is also the SOP for Grievance Handling for workers (RSPO / 6.5 / PKK, dated July 28, 2009) Employee Complaints Handling Flow Chart. The SOP explains the mechanism for handling existing complaints, and in the SOP it has been explained that the confidentiality of the reporter will be guaranteed. Complaints can be submitted to the assistant directly or through their respective supervision and if women workers want to submit their complaints it can also be through a gender committee.

Based on interviews with the gender committee it is known that socialization is always carried out, the mechanism for submitting complaints / reporting related to sexual harassment / violence, and socialization regarding the rights of workers, especially women. The socialization is usually carried out in conjunction with meetings of the gender committee with workers, at the housewife meeting and at the "posyandu" conducted for women workers and housewives. In addition, in the past year there have never been any issues / incidents related to sexual harassment that occurred in the company's operational areas.

Status: Comply

6.10

Growers and mills deal fairly and transparently with smallholders and other local businesses.

6.10.1, 6.10.2, 6.10.3 & 6.10.4

Until the Surveillance 1.3 assessment was conducted, the company did not have a partnership with smallholders or FFB suppliers to purchase FFB so the company did not have information related to the current FFB prices. All FFB processed in the Teluk Siak Factory are FFB derived from the main estate, namely Teluk Siak Estate, Aneka Persada Estate and Pinang Sebatang Estate.

The company does not have an agreement with plasma farmers or with FFB suppliers, but the company has a partnership with a contractor to cooperate in the operations of plantations and factories, one of which is Work Agreement No. PSE / LKL / Transport TBS & JJK / AIP-PSE / 2019 / VII / 165 dated July 15, 2019 for the work of Transport TBS and Empty Length of the Agreement between PT Aneka Inti Persada and CV Ivan Jaya which is valid until December 31, 2019. In the agreement This explains the prices, obligations, rights and other provisions.

Based on the results of interviews with contractors, it is known that the company has routinely paid the completion of workers in accordance with the time specified in the agreement and so far there has never been a delay in this regard.

Status: Comply

6.11

Growers and millers contribute to local sustainable development wherever appropriate.

6.11.1

The company has a CSR program in 2018-2019 for the surrounding community that has been prepared for each work unit. The CSR program is divided into various fields, namely Education, Environmental, Health, Economic, Religious and Social and Cultural. The preparation of CSR programs has been based on the results of identifying community needs by conducting questionnaires in order to find out what is needed by the community. The last questionnaire was conducted in October 2018 for the villages of Tualang and Maredan with 64 people as correspondences.

The company has made a contribution to the local development of the surrounding village communities by realizing the CSR program, including:

- Community development in Tualang Timur Village to develop local community productivity in the activity of making dishes using palm frond sticks which are still running from 2017 to the present.
- Community development of the Koto Gasib Village by providing catfish seeds to the community to help develop catfish pond businesses in the village.



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• Scholarship program for high school students / equivalent and students around the plantation in accordance with the requirements determined by the company (selection) that has been carried out in May 2019.

Based on the program and realization presented above, it is known that the company has implemented the CSR program in accordance with its objectives and can be shown proof of its realization in the form of photos, minutes and other evidence. Based on the results of interviews with the surrounding village community, it is known that so far the company has carried out CSR activities in each village and the village community has felt that it is sufficient to assist the development and growth of the village community. In addition, there are also many villagers working in the company and information related to job vacancies is always given to the surrounding community when the company needs workers.

6.11.2

PT Aneka Inti Persada until the Surveillance-1.3 assessment did not have a scheme smallholders and there were no plantation areas owned by smallholders within the company. In addition, the company only receives fruit from three (3) main estates, namely Teluk Siak Estate, Pinang Sebatang Estate, and Aneka Persada Estate.

Status: Comply

6.12

No forms of forced or trafficked labour are used.

6.12.1; 6.12.2 & 6.12.3

The company has a policy regarding forced labor or labor trafficking, namely through a Social Policy signed by the Head of Plantation Upstream Indonesia, December 2011. It is not allowed to use forced labor or underage workers (children). Based on employee data in 2018, workers come from the surrounding community and outside the area with recruitment within the company in accordance with procedures owned by the company.

Based on the results of the study of work contract documents and a list of workers, it is known that there are no foreign workers who work at the level of implementing workers up to the manager's position. Foreign workers only exist at the top management level. In addition, there are no workers from trade or illegal workers or contract substitution because all workers have a working relationship with the company. This is in line with the results of interviews with harvest, fertilizer, spray and factory operator workers who stated that so far no use of forced labor, child labor, or family members who helped employees. All workers have work ties with the company.

Based on site visits and interviews with management, workers and trade unions, it is known that there are no illegal, foreign or forced laborers employed by the company.

Status: Comply

6.13

Growers and millers respect human rights

6.13.1

The company has a policy to respect human rights through Memorandum number: TSE/153/VII/2015/S from the Chairman of SOU 17 on July 31, 2015. The human rights policy contains:

- Trying to protect the rights of every employee to live, maintain life, improve living standards, form a harmonious and religious family.
- Provide opportunities for each employee to communicate and obtain information needed to develop their personal and social environment.
- Give employees the freedom to express opinions form and join trade unions according to choice.
- Communicating and explaining human rights policies so that they can be understood and understood by each employee, including contractors and or other relevant parties.

To communicate the policy, the company did it in the form of socialization that was carried out at muster morning. The following are examples of socialization that have been carried out by companies related to these policies:

- The socialization of the Company Policy (human rights policy) on July 06, 2019, which was attended by 177
 participants.
- The socialization of the Company Policy (human rights policy) on February 26, 2019 which was attended by 117



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participants.

- The socialization of the Company Policy (human rights policy) on February 25, 2019 attended by 180 participants.
- The socialization of the Company Policy (human rights policy) on July 09, 2019 to local contractors attended by 9 participants.

Based on the results of interviews with representatives of trade unions, harvest workers, spray and maintenance it is known that the workers are aware of policies related to the company's human rights and so far there are no actions / issues related to human rights violations within the company. This is evidenced by the absence of complaints related to human rights issues from workers and from the surrounding community.

Status: Comply

PRINCIPLE #7 Responsible development of new plantings

7.1

A comprehensive and participatory independent social and environmental assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and operations.

7.1.1, 7.1.2 & 7.1.3

Based on document verification and information from unit management, there is no new land expansion and new planting area. The company only conduct replanting activities that was carried out since 2013. However, EIA is already presented in criteria 5.1 and SIA already presented in criteria 6.1.

Status: Comply

7.2

Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.

7.2.1 and 7.2.2

Based on document verification and information from unit management, it could be concluded that up to audit ASA 1.3, there were no new land expansion and new planting area in PT AIP. Hence, this Indicator is not applicable. However, information on the current PT AIP soil properties and its suitability class is presented in semi detailed soil survey report which conducted by MRC team in June 2016. The study informed that almost 85 % of PT AIP were classified as suitable to slightly suitable for oil palm cultivation, and the rest for about 15 % was classified as marginal (S3) with limitation on rooting soil properties, which may due to presence of peat and lowlying area. About 1,680.16 ha or approximately 17 % of PT AIP were covered by peat soils, where about 98 % from peat soils were has saprist decomposition level while the rest was hemist. Thus, there is no fragile soils within PT AIP operational areas. Main limitation for oil palm cultivation is mostly due to presence of peat soil which lead to very low soil fertility, drainage problem (water availability) and erosion matters. Furthermore, there were no area with slope more than 40 %. About 72.82 % were varies from flat to rolling, while the rest was classified as hilly. Thus, in general there is no serious limitation due to slope category. To overcome limitation on hilly areas, terraces planting pattern had already implemented, especially on replanting areas in PSE and APE. This is verified during field observation.

Status: Comply

7.3

New plantings since November 2005, have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values.

7.3.1 & 7.3.2

Company has conducted Disclosure of Liability and LUCA for PT Aneka Inti Persada, that has been submitted to the RSPO on July 2015. During 2016-2019, company shown intense communications with RSPO compensation panel related LUCA progress for PT. Aneka Inti Persada. Until ASA1.3 based on company communication with RSPO shown that LUC analysist for are still on review process.

Company are not able to shown evidence that RaCP for PT Aneka Inti Persada has been approved by RSPO. Therefore this become **Non-Conformity No. 2019.06 with Major Category.**

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7.3.3

Interview with management shown that intial land clearing for PT AIP was conducted on November 1992. Since the last assessment (2018), there has been no new land clearing or expansion of operational areas undertaken by the management unit

7.3.4 & 7.3.5

The results of document review, field visits and interviews found that CH did not expand or conduct new planting since the last assessment (2018). HCV management plan for existing operational areas are able to seen on criteria 5.2.

Status: Non-Conformity No. 2019.06 with Major category

7.4

Extensive planting on steep terrain, and/or on marginal and fragile soils, is avoided.

7.4.1 and 7.4.2

Based on document verification and information from unit management, it could be concluded that up to audit ASA 1.3, there were no new land expansion and new planting area in PT AIP. Hence, this Indicator is not applicable. However, as mentioned in Indicator 4.3.1 and 4.3.2, it was known that there is no fragile soil in the current PT AIP operational areas and only 15 % has classified as marginal with limitation on rooting soil property, which may due to presence of peat and lowlying area. Furthermore, there were hilly areas which covers about 27.18 % from company operational areas. To overcome soil limitations as mentioned in Indicator 7.4.1, estate management has implementing several strategy such as as follows:

- Adoption of proper water management included water table and peat subsidency rates monitoring.
- Adoption of terraces planting pattern on hilly areas.
- To suppress surface run-off and leaching through U-shape and parallel to the contour line pruned fronds placement on flat to undulating and hilly contour areas, respectively.
- Adoption of field drains and close and ended conservation trench (CCT) with pattern 1:4 on flat lowlying prone flood area, as observed to Division 2 Block D006 PSE.
- Measuring erosion rate on hilly area.
- Selective weeding which aims to enhance organic matter and retaining soil moisture.
- Soil texture and nutrient recovery through by-products (EFB and POME) application.
- Manuring management through leaf and soil nutrient analysis, which recommended by Agronomist from MRC team towards nutrient balance calculation method, maximizing fertilizer use efficiency (to choose suitable fertilizers type, time of application and placement).
- For soil and water conservation, planting of land cover crop such as Mucuna bracteata has already implemented on immature areas.

Those strategy mentioned above are verified during field observation to all Estates and it has considered satisfactory, in accordance with company procedures.

Status: Comply

7.5

No new plantings are established on local peoples' land without their free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.

Based on document verification and information from unit management, there is no new land expansion and new planting area. The company only conduct replanting activities that was carried out since 2013.

Status: Comply

7.6

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 free, prior and informed consent and negotiated agreements.



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7.6.1 - 7.6.6

Based on document verification and information from unit management, there is no new land expansion and new planting area. The company only conduct replanting activities that was carried out since 2013.

Status: Comply

7.7

Use of fire in the preparation of new plantings is avoided other than in specific situations, as identified in the ASEAN guidelines or other regional best practice.

7.7.1 and 7.7.2

Based on document verification and information from unit management, it could be concluded that up to audit ASA 1.3, there were no new land expansion and new planting area in PT AIP. Hence, this Indicator is not applicable.

Status: Comply

7.8

New plantation developments are designed to minimise net greenhouse gas emissions.

7.8.1 & 7.8.2

Based on documents review, interview and field visits, shown that certificates holders did not expand /develop any new operational area since January 2015 and there is no more land clearing activity since the last assessment (2018). GHG emission calculations for exisiting operational areas result are able to seen on Indicator 5.6.

Status: Comply

PRINCIPLE #8 Commitment to continuous improvement in key areas of activity

8.1

Growers and millers regularly monitor and review their activities and develop and implement action plans that allow demonstrable continuous improvement in key operations.

8.1.1

Worker Welfare

- The company has set minimum wage regulations for all workers based on the stipulation of minimum wages by the Governor of Riau for 2019 which applies to all levels of status of workers ranging from permanent workers and contract workers.
- The company facilitates workers with proper housing, electricity facilities, and the availability of clean water in every publicly available housing.
- The company is also committed to avoiding acts of discrimination, sexual harassment, child labor or any violation of human rights in the work environment.

The company does not specifically conduct internal audits for its contractors, but the company routinely monitors the contractors regarding the fulfilment of current regulations such as the fulfilment of BPJS Health and Employment.

Internal Audit RSPO

Annual RSPO internal audit by GSQM-Sustainability Department had conducted in 19-27 June 2019. Internal audit mentioned that there were 6 major, 1 minor raised to major and 11 minor of P&C; and 3 NCR on SCCS findings which all were fully complied by PT AIP on 26 August 2019. Furthermore, there is 1 OFI noted. Internal audit results has signed by internal Auditors and all Managers of PT AIP.

Based on document review and observation to the field, it was known that there is no new innovation regarding BMP aspects.

Status: Comply



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3.2 Summary of Assessment Report of Supply Chain Requirement

3.2.1. General chain of custody requirements for the supply chain

Clause	Requirement
5.1	Applicability of the general chain of custody requirements for the supply chain
E 4 4	

511

The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.

General Chain of Custody applied in mill/supply bases and bulking. Supply bases:

- Teluk Siak Estate (TSE)
- Aneka Persada Estate (APE)
- Pinang Sebatang Estate (PSE)

Mill are only received and processed the FFB until dispatch. The facility uses an independent third party during this process namely CPO transporters from the factory to bulking and renting storage tank services on bulking.

Status: Comply

5.1.2

Traders and distributors require a license obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.

Facility only received and processed FFB from the certified sources.

Status: Comply

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Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.

Teluk Siak POM – Sime Darby Plantation, subsidiary of Sime Darby Plantation Bhd has registered in RSPO membership 1-0008-04-000-00 since 7 September 2004. Teluk Siak POM has been registered in IT platform palm trace RSPO https://palmtrace.rspo.org/web/rspo/member-directory which information as follows:

- Member Name: Teluk Siak POM
- Account UID: RSPO AC1000000326
- Core Product: Palm Oil
- Member ID: RSPO PO1000000317
- Type of Business: Oil Mill

Status: Comply

5.1.4

Processing aids do not need to be included within an organization's scope of certification.

There is no processing aids in Teluk Siak POM.

Status: Comply
5.2 Supply chain model

5.2.



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The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.

Until this assessment, Teluk Siak POM consistently implemented Identity Preserved module when they only received raw material from certified area which is Teluk Siak, Aneka Persada and Pinang Sebatang Estate. During this certification period, there was no record of FFB from noncertified source processing in Teluk Siak POM. Therefore, mill implemented Module D – Identity Preserved.

Status: Comply

5.2.2

The site can use one (1) or a combination of supply chain models as audited and certified by the CB.

Until this assessment, Teluk Siak POM consistently implemented Identity Preserved module when they only received raw material from certified area which is Teluk Siak, Aneka Persada and Pinang Sebatang Estate. During this certification period, Teluk Siak POM consistently implemented Module D – Identity Preserved.

Status: Comply

5.3 Documented procedures

5.3.1

The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified.

There is no change procedure since previous assessment.

Facility has had Standard Operation Procedure for Manual RSPO Supply Chain (No. SCCS-Std/RSPO/PSQM/02 dated 2 January 2018). This procedure's objectively is guidelines for estates and palm oil mills to establish and ensure effective implementation on sustainable supply chain and traceability of certified sustainable materials (Fresh Fruit Bunch/FFB; Crude Palm Oil/CPO and Palm Kernel/PK).

This procedure covering of supply chain scope, responsibilities, certification system (general requirement chain of custody, documented procedures, purchasing and goods in, outsourcing activities, sales and goods, registration of transaction, training, record keeping, conversion factor, claims, complaint, management review) and identity preserved implementation.

According to clause 5, the personnel in charge of the supply chain system is:

- Factory Manager: the mill manager is responsible for maintaining and storing all documents, records and notes of the raw material usage; verification of the product status to the vendee; holding proper SCCS training.
- Assistant of PSQM: checking the FFB quality and the raw materials as well as monitoring the product delivery and load/unload.
- Foremant/assistant of Lab: analyzing and testing the quality; maintaining and distributing the result of product and raw material analysis and test.
- Assistant/Senior assistant/Manager of Bulking: Ensuring the transport of CPO and PK product from POM to bulking.
- Production clerk: recording the administration of the receipt certified FFB and the non-certified one.

According to the document verification, this current procedure is still comply with RSPO Supply Chain Certification Standard (last revised on 14 June 2017).

Status: Comply

5.3.2

The site shall have a written procedure to conduct annual internal audit

There is no change procedure since previous assessment.

According to the internal audit procedure (SCCS-IA/RSPO/PSQM/04) dated 1 March 2018, GSQM staff scheduled and conducted internal audit for supply chain annually at least 2 months before external audit by CB's. The result of internal audit and all correctives action shall documented in annual management review meeting. Facility shall ensure this document are in



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place.

Unit management has conducted internal audit RSPO on 19 – 27 June 2019. During that audit identify 21 (twenty one) nonconformance and 1 (one) opportunity for improvement (OFI). Unit has taken action for those nonconformance where all NC's has been closed out in 22 August 2019. There was a record of management review meeting on 1 July 2019 and 22 August 2019.

	Status:	Comply
--	---------	--------

5.4 Purchasing and goods in

5.4.1

The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier

Teluk Siak POM – PT. Aneka Inti Persada only received and processed FFB from its own certified estates (Teluk Siak, Aneka Persada and Pinang Sebatang Estate). Teluk Siak POM only act as producer of RSPO certified oil palm products.

Status: Comply

5.4.2

The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents

Teluk Siak POM – PT. Aneka Inti Persada only received and processed FFB from its own certified estates (Teluk Siak, Aneka Persada and Pinang Sebatang Estate). Teluk Siak POM only act as producer of RSPO certified oil palm products.

Status: Comply

5.5 Outsourcing activities

5.5.1

In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mill cannot outsource processing activities like refining or crushing.

Facility does not outsource processing activities like refining or crushing. All CPO product sold through the rent bulking (PT. Dumai Paracitra Abadi) and all PK product sold directly to buyer.

The facility uses an independent third party during this process namely CPO transporters from the factory to bulking and renting storage tank services on bulking. Those transporter and bulking engage in a contract and fulfil the RSPO Supply Chain Certification Standard.

Status: Comply

5.5.2

Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:

- a. The site has legal ownership of all input material to be included in outsourced processes;
- b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.
- c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.
- d. d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance

The facility uses an independent third party during this process namely CPO transporters from the factory to bulking and renting storage tank services on bulking. Those transporter and bulking engage in a contract and fulfil the RSPO Supply Chain



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Certification Standard. Those third parties has signed the statement to provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.

Status: Comply

5.5.3

The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.

The facility uses an independent third party during this process namely CPO transporters from the factory to bulking and renting storage tank services on bulking. All record of names and contact details of all contractors are in place. Those record consist name of contractor, address, contact number, personnel in charge etc.

Status: Comply

5.5.4

The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products

The facility uses an independent third party during this process namely CPO transporters from the factory to bulking (PT. Mitra Angkutan Sejati) and renting storage tank services on bulking (PT. Dumai Paricitra Abadi). All record of names and contact details of all contractors are in place. Those record consist name of contractor, address, contact number, personnel in charge etc. There is no new transporters since previous assessment.

Status: Comply

5.6 Sales and goods out

5.6.1

The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer

Based on document verification and interview with related staff informed that facility sold their palm product to several buyer. Detail of transaction are in place. It document consist data of transaction ID, seller, selling reference, seller address, buyer, buyer reference, type of product, supply chain model, volume, transaction type, status and shipping date. For example, there is a selling record of 299,38 tonnes CSPK from Teluk Siak POM – PT. Aneka Inti Persada (Sime Darby Plantation Bhd) to Mandau Crushing Plant (PT. ADEI Plantation & Industry) on 30 July 2019. All transaction record are in place and well-documented.

Status: Comply

5.7 Registration of transactions

5.7.1

Supply chain actors who:

- are mills, traders, crushers and refineries; and
- take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable

Facility has shown their transaction document that consist registration in IT platform. It also can be downloaded at RSPO palm trace. During the audit, auditor has verified the sales information in RSPO Palm Trace that informed there is certified CSPO/CSPK sold as certified product, conventionally and book & claim.

Status: Comply

5.7.2

The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:

Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement /



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Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures.

- Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.
- Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.
- Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.

Based on document verification, facility has documented record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis. All of these transactions are recorded in the RSPO IT Platform. Based on interviews with related staff, information was obtained that data related to sales was the authority of the Global Trading Management in Jakarta Office.

Shipping Announcement:

Transaction ID	Transaction Date	Buyer Reference Number	Product	Volume	Supply Chain Model	Quality	Transactio n Type	Status
TR-0833a1f7- d0fd	21-05-2019		CSPO	1.000	IP		Shipping	Confirmed
TR- 5a124645- 1650	06-05-2019		CSPK	341,75	IP		Shipping	Confirmed
TR- 68441488- 4048	26-04-2019		CSPK	532,89	IP		Shipping	Confirmed
TR- 9698b34e- 73b7	22-04-2019	P/GHN/031 9/CPO0307 8	CSPO	999,07	IP		Shipping	Confirmed
TR- 169bb152- 9209	22-04-2019	P/GHN/031 9/CPO0305 6	CSPO	998,05	IP		Shipping	Confirmed
TR- 2d272db2- dec5	22-04-2019	P/GHN/021 9/CPO0304 5	CSPO	498,08	IP		Shipping	Confirmed
TR- be95a772- f3ee	22-04-2019	P/GHN/021 9/CPO0302 3	CSPO	1.247,73	IP		Shipping	Confirmed
TR- 848e50bc- 96f9	22-04-2019	P/GHN/021 9/CPO0301 5	CSPO	1.494,27	IP		Shipping	Confirmed
TR-f3a9966b- a86b	22-04-2019		CSPO	1.001,92	IP		Shipping	Confirmed
TR- 5b95001e- f3b9	20-03-2019		CSPO	800	IP		Shipping	Confirmed
TR- e893486b- 22df	15-02-2019		CSPK	593,61	IP		Shipping	Confirmed
TR- 321a35b4-	15-02-2019		CSPK	605,61	IP		Shipping	Confirmed

Credit Allocation:

Stock Transactions

Stock Transaction ID	Date	Product	Supply Chain Model	Transaction Type	Volume
ST-TR-5a13efe8-ac72	23-08-2019	CSPK	IP	Remove From Certified Stock	5,084.23
ST-TR-0d512c31-650f	30-08-2019	CSPO	IP	Credit Allocation	32,810

^{*}Volume in MT

All transaction record are listed in palm trace.

	Status: Comply
5.8	Training
5.8.1	



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The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff

Facility has provided annual training of supply chain to the related task who involved in supply chain implementation. The last training conducted on 19 August 2019 in meeting room Teluk Siak POM.

Based on interview with security officer, weighbridge operator and supervisor logistic known that all personnel involved has been well-known regarding on supply chain implementation.

Status: Comply

5.8.2

Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed

Based on interview with security officer, weighbridge operator and supervisor logistic known that all personnel involved has been well-known regarding on supply chain implementation.

Status: Comply

Record keeping

5.9 5.9.1

The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements

Daily records of FFB received, CPO processed, CPO production, PK production, dispatch and selling (selling of certified/non certified and other certification scheme), balance stock always recorded in logistic department and recap by Trading Department Head Office in Jakarta. Those all information can be accessed real time. The document is up to date with current RSPO Supply Chain Certification Standard requirement.

Status: Comply

5.9.2

Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock

According to the Manual RSPO Supply Chain (No. SCCS-Std/RSPO/PSQM/02 dated 2 January 2018), stated that all record are kept for minimum 2 years in accordance to the national regulation and RSPO Supply Chain Certification Standard (last revised on 14 June 2017). Based on document verification, facility has showed their delivery notes, weighbridges ticket and other supply chain document on August 2017.

Status: Comply

5.9.3

The organization shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.

Facility estimated their palm product which is written in annex of initial assessment certificate and monitored in three-monthly bases. If any overproduction, facility will inform the CB to extend their volume.

Product	Estimation of Certified Product (MT)	Actual Production 12 Month before audit (August 2018 – July 2019) (MT)	Projected production of the next license period (MT)
FFB	184,982	143,915	154,000
CPO	41,524	32,533	32,340
PK	8,763	7,166	7,700

Source: production data 12 month before audit (August 2018 – July 2019)

Status: Comply



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5.10	Conversion factors

5.10.1

Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its Derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries

Facility only performs FFB processing up to CPO and PK. Based on RSPO SCCS Manual, it is explained that the conversion factors of CPO and PK are based on actual extraction.

Status: Comply

5.10.2

Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if

Facility only performs FFB processing up to CPO and PK. Based on RSPO SCCS Manual, it is explained that the conversion factors of CPO and PK are based on actual extraction.

	Status: Comply
5.11	Claims

5.11.1

The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.

Facility did not using logo.

	Status: Comply
5.12	Complaints

The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.

Facility has had Standard Operation Procedure for Manual RSPO Supply Chain (No. SCCS-Std/RSPO/PSQM/02 dated 2 January 2018) that consist the procedure for Receiving and Settlement of Complaints. The person responsible for handling complaints is the Manager or the representative, such as an assistant and administration chief. The response to complain about the product must be followed up at least 14 days.

Until this ASA-1.3, there is no complaint on the certified product sold submitted.

	Status: Comply
5.13	Management review

The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken

There is no change procedure since previous assessment.

According to the internal audit procedure (SCCS-IA/RSPO/PSQM/04) dated 1 March 2018, GSQM staff scheduled and conducted internal audit for supply chain annually at least 2 months before external audit by CB's. The result of internal audit and all correctives action shall documented in annual management review meeting. Facility shall ensure this document are in place.



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Unit management has conducted internal audit RSPO on 19 – 27 June 2019. During that audit identify 21 (twenty one) nonconformance and 1 (one) opportunity for improvement (OFI). Unit has taken action for those nonconformance where all NC's has been closed out in 22 August 2019. There was a record of management review meeting on 1 July 2019 and 22 August 2019.

Status: Comply

5.13.2

The input to management review shall include information on:

- Results of internal audits covering RSPO Supply Chain Certification Standard.
- Customer feedback.
- Status of preventive and corrective actions.
- Follow-up actions from management reviews.
- Changes that could affect the management system.
- Recommendations for improvement.

According to the internal audit procedure (SCCS-IA/RSPO/PSQM/04) dated 1 March 2018, GSQM staff scheduled and conducted internal audit for supply chain annually at least 2 months before external audit by CB's. The result of internal audit and all correctives action shall documented in annual management review meeting. Facility shall ensure this document are in place.

The last internal audit of supply chain has been conducted on 8 – 17 May 2019. Management review meeting has been conducted on 31 May 2019 when all NC's were closed. The internal review also consist of:

- Status of preventive and corrective actions.
- Follow-up actions from management reviews.
- Changes that could affect the management system.
- Recommendations for improvement.

There is no specific issues on supply chain arises.

Status: Comply

5.13.3

The output from the management review shall include any decisions and actions related to:

- Improvement of the effectiveness of the management system and its processes.
- Resource needs.

It documented in management review document as written in preventive action.

Status: Comply



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3.2.2. Module D - CPO Mills: Identity Preserved Requirements

Clause	Requirement
D1	Definition

D.1.1

A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable.

General Chain of Custody applied in mill/supply bases and bulking. Supply bases:

- Teluk Siak Estate (TSE)
- Aneka Persada Estate (APE)
- Pinang Sebatang Estate (PSE)

Mill are only received and processed the FFB until dispatch. The facility uses an independent third party during this process namely CPO transporters from the factory to bulking and renting storage tank services on bulking.

	Status: Comply
D.2	Explanation

D.2.1

The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (CB) in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit 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

Current certificate:

Name of Mill	Capacity	Supply Chain Madal	Α	nnual Volume (Ton	ines)
	(tonnes/hour)	Supply Chain Model	FFB	СРО	PK
Teluk Siak POM	45	Mass Balance	184,982	41,524	8,763

Facility has propose the estimate volume of CPO and PK for the next certification period as follows:

Name of Mill	Capacity	Supply Chain Madal	Annual Volume (Tonnes)			
Name of Will	(tonnes/hour)	Supply Chain Model	FFB	СРО	PK	
Teluk Siak POM	45	Mass Balance	154,000	32,340	7,700	

Status: Comply

D.2.2

The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).

Teluk Siak POM - Sime Darby Plantation, subsidiary of Sime Darby Plantation Bhd has registered in RSPO membership 1-0008-04-000-00 since 7 September 2004. Teluk Siak POM has been registered in IT platform palm trace RSPO

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https://palmtrace.rspo.org/web/rspo/member-directory which information as follows:

Member Name: Teluk Siak POMAccount UID: RSPO AC1000000326

Core Product: Palm Oil

Member ID: RSPO_PO1000000317

Type of Business: Oil Mill

For example: there is some record of shipping announcement on palm trace

Transaction ID	Transaction Date	Buyer Reference Number	Product	Volume	Supply Chain Model	Quality	Transactio n Type	Status
TR- 542b2b3d- 56f9	08-08-2019		CSPK	299,38	IP		Shipping	Confirmed
TR- 1213a73c- 9d40	18-07-2019	9100052876	CSPK	448,19	IP		Shipping	Confirmed
TR- 0caab41a- a7e1	01-07-2019	9100051496	CSPK	300,3	IP		Shipping	Confirmed
TR-e8b98fa5- cbe3	01-03-2019		CSPK	508,5	IP		Shipping	Confirmed
TR- b544302e- 562d	01-03-2019		CSPK	296,6	IP		Shipping	Confirmed
TR-6fa143a4- da22	18-09-2018		CSPK	499,13	Segregation		Shipping	Confirmed
TR- 2447d6d6- 1f45	18-09-2018		CSPK	649,25	(Segregation)		Shipping	Confirmed
TR-768f4eb5- 9b50	18-09-2018		CSPK	299,13	Segregation		Shipping	Confirmed
TR- e9eb79a6- 473d	25-04-2018		CSPK	597,79	IP		Shipping	Confirmed
TR- d517d55a- 2c48	21-03-2018		CSPK	545,85	IP		Shipping	Confirmed
TR- 4e96d542- 3022	22-02-2018		CSPK	493,3	IP		Shipping	Confirmed
TR- 1d9c6c9c- 871c	25-01-2018		CSPK	549,3	IP		Shipping	Confirmed
TR-42201f96- b5a1	16-01-2018		CSPK	521,55	IP		Shipping	Confirmed

Stock Transactions

Stock Transaction ID	Date	Product	Supply Chain Model	Transaction Type	Volume
ST-TR-5a13efe8-ac72	23-08-2019	CSPK	IP	Remove From Certified Stock	5,084.23
ST-TR-0d512c31-650f	30-08-2019	CSPO	IP	Credit Allocation	32,810

^{*}Volume in MT

D.3 Documented procedures

D.3.1

The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall

- a. Complete and up to date procedures covering the implementation of all the elements in these requirements;
- b. 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 site's procedures for the implementation of this standard.

There is no change procedure since previous assessment.

Facility has had Standard Operation Procedure for Manual RSPO Supply Chain (No. SCCS-Std/RSPO/PSQM/02 dated 2



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January 2018). This procedure's objectively is guidelines for estates and palm oil mills to establish and ensure effective implementation on sustainable supply chain and traceability of certified sustainable materials (Fresh Fruit Bunch/FFB; Crude Palm Oil/CPO and Palm Kernel/PK).

This procedure covering of supply chain scope, responsibilities, certification system (general requirement chain of custody, documented procedures, purchasing and goods in, outsourcing activities, sales and goods, registration of transaction, training, record keeping, conversion factor, claims, complaint, management review) and identity preserved implementation.

According to clause 5, the personnel in charge of the supply chain system is:

- Factory Manager: the mill manager is responsible for maintaining and storing all documents, records and notes of the raw material usage; verification of the product status to the vendee; holding proper SCCS training.
- Assistant of PSQM: checking the FFB quality and the raw materials as well as monitoring the product delivery and load/unload.
- Foremant/assistant of Lab: analyzing and testing the quality; maintaining and distributing the result of product and raw material analysis and test.
- Assistant/Senior assistant/Manager of Bulking: Ensuring the transport of CPO and PK product from POM to bulking.
- Production clerk: recording the administration of the receipt certified FFB and the non-certified one.

According to the document verification, this current procedure is still comply with RSPO Supply Chain Certification Standard (last revised on 14 June 2017).

Status: Comply

D.3.2

The site shall have documented procedures for receiving and processing certified FFBs

According to the supply chain procedures, mill manager assisted by related staff documented all goods in and goods out. All record recap in daily, weekly and monthly report of mill manager. Auditor has randomly verify delivery note of FFB from estate, weighbridge ticket, delivery note CPO/PK from mill to the buyer etc. All procedures of available in mill unit.

Certified and non-certified FFB received period of August 2018 to July 2019 (twelve month)

Name of Mill	Capacity (tonnes/hour)	Actual FFB received period of August 2018 to July 2 (Tonnes)			
	(tonnes/nour)	Certified	Non Certified	Total	
Teluk Siak		143,989	-	143,989	
POM	45	Actual FFB processed period of August 2018 to Jul (Tonnes)			
		143,915	-	143,915	

Notes: mill consistently processed certified FFB.

Status: Comply

D.4 Purchasing and goods in

D.4.1

The site shall verify and document the tonnage and sources of certified FFBs received.

In accordance with supply chain procedure as explained in clause D.3.1 above, facility has demonstrated the documentation of record keeping and processing of certified FFBs. Mill only received FFB from his own certified-estates (Teluk Siak, Aneka Persada and Pinang Sebatang Estate).

Name of Mill	Capacity	Actual FFB received period of August 2018 to July 2019
Name of Willi	(tonnes/hour)	(Tonnes)



RSPO ASSESSMENT REPORT

		Certified	Non Certified	Total
Toluk Siak		143,989	-	143,989
Teluk Siak POM	45	Actual FFB pro	cessed period of	August 2018 to July 2019
I OW			(Tonnes)
		143,915	-	143,915

Notes: mill consistently processed certified FFB.

Status: Comply

D.4.2

The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.

Facility estimated their palm product which is written in annex of initial assessment certificate and monitored in three-monthly bases. If any overproduction, facility will inform the CB to extend their volume.

Name of Mill	Capacity	Annual Volume According to Certificate (Tonnes)				
Name of Will	(tonnes/hour)	FFB	CPO	PK		
		184,982 41,524		8,763		
Teluk Siak			for 12 month befo 18 – July 2019 (Tor	, -		
POM	45	143,915	32,533	7,166		
		Estimated Volume (Tonnes)				
		154,000	32,340	7,700		

Source: production data 12 month before audit (August 2018 – July 2019)

Status: Comply

D.5 Record keeping

D.5.1

The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.

Based on document verification informed that facility only received FFB from certified area. However, until the audit known

that all CSPO product dispatch as conventional.

	CPO Production (MT)			Cert CPO Dispatch (MT)			
Period	Cert	Non Cert	Total	RSPO	Other scheme	Conventional	Total
August 2018 to July 2019	32,533	1	32,533	-	ı	32,411	32,411

	PK Produ	ction (MT)		Ce	rt PK Dispa	tch (MT)	
Period	Cert	Non Cert	Total	RSPO	Other scheme	Conventional	Total
August 2018 to July 2019	7,166	•	7,166	1,853	-	5,084	6,937

Status: Comply

D.6 Processing

D.6.1



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The site 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 product including during transport and storage to strive for 100% separation.

Teluk Siak POM – PT. Aneka Inti Persada only received and processed FFB from its own certified estates (Teluk Siak, Aneka Persada and Pinang Sebatang Estate). Teluk Siak POM only act as producer of RSPO certified oil palm products. Until this audit, there is no record of FFB received from other sources above. Based on interview with management representatives during the audit, there is no option for mill to accept non certified FFB until now.

Status: Comply



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3.3 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client				
ASA-1.3	PT Aneka Inti Persada (Sime Darby Plantation Bhd) do not use RSPO trademark and CB Logo.				
		$\sqrt{}$			
	Trademark License Number of Sime Darby Plantation Bhd is "RSPO-1106024"				
	Status: Comply				
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use	X or√			
ASA-1.3	PT Aneka Inti Persada (Sime Darby Plantation Bhd) do not use RSPO trademark and CB Logo.				
		$\sqrt{}$			
	Trademark License Number of Sime Darby Plantation Bhd is "RSPO-1106024"				
	Status: Comply				
3.	Implementation of Certificate and Trademark is not used on product	X or√			
ASA-1.3	PT Aneka Inti Persada (Sime Darby Plantation Bhd) do not use RSPO trademark and CB Logo.				
7.071 110	1 17 mond mil 1 droudd (emilo Barb) i idindion Brid, do not doo nor e madomark and eb boger	$\sqrt{}$			
	Trademark License Number of Sime Darby Plantation Bhd is "RSPO-1106024"	,			
	Status: Comply				
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or√			
ASA-1.3	PT Aneka Inti Persada (Sime Darby Plantation Bhd) do not use RSPO trademark and CB Logo.				
		$\sqrt{}$			
	Trademark License Number of Sime Darby Plantation Bhd is "RSPO-1106024"				
	Status: Comply				



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3.4 Summary of RSPO Partial Certification

Compliance of the uncertified management units of Sime Darby Plantation Bhd against the rules for partial certification was determined through Self-Assessment in accordance with RSPO Certification System clause 4.2.4. A summary of findings is as stated below

Sime Darby Plantation Bhd Time Bound Plan is explained in table section 1.10. Sime Darby has achieved 34 management units in Malaysia and 24 Management Units in Indonesia that RSPO certified. Total management unit in Sime Darby Plantation Bhd are 34 in Malaysia, 25 in Indonesia and 1 in Liberia. Sime Darby Plantation Bhd has informed the Time Bound Plan progress through representative's office in Indonesia. MUTU has considered that Sime Darby Plantation Bhd is comply with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by the Sime Darby Plantation Bhd Indonesian representative on April 2019 by the Head of PSQM.

MUTU has verified partial certification for un-certified unit's subsidiary of Sime Darby Plantation Bhd based on their Time Bound Plan. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

- There are significant land conflicts in PT Mitra Austral Sejahtera, there is still an issue that remains unresolved social
 i.e. from Serikat Petani Kelapa Sawit (SPKS), but improvements are ongoing. Based on confirmation letter from Sime
 Darby Plantation on 27 June 2019 inform that PT Mitra Austral Sejahtera is dispose from Indonesian Subsidiary of
 Sime Darby Plantation.
- PT Budidaya Agro Lestari waiting for land title process.
- The company has follow RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There is no labour disputes that are not being resolved through an agreed process
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and
 that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared
 above

2.1 Un-Ce	2.1 Un-Certified Units or Holdings					
Section	Requirement	Concerns to Discuss, if any				
2.2.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Company Group/Holding Statement: Companies are already doing internal audits. There are internal audit reports for each company. Auditor Verification: Internal Audit report available for uncertified management unit for example PT Sandika Natapalma – Karya Palma Estate				
		Progress Update for PT MAS. Engagement with RSPO. SDP is submitting a monthly basis report to RSPO on the case. Five monthly update/responses have been submitted to RSPO to-date. The lasts report was submitted on 28 May 2018. On April 2019, the secretariat update the developments of PT MAS Complaint. The				



		informed that the complaints Panel has directed to proceed with the legal review and Dr Kurnia Warman will be engaged to perform the said legal review. Based on confirmation letter from Sime Darby Plantation on 27 June 2019 inform that PT Mitra Austral Sejahtera is dispose from Indonesian Subsidiary of Sime Darby Plantation.
i.	 No replacement after dates defined in NIs Criterion 7.3 of: Primary forest. Any area identified as containing High Conservation Values (HCVs). Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	Company Group/Holding Statement: HCV assessment has been conducted for uncertified units i.e. Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011). Auditor Verification: Sime Darby Plantation Bhd sent disclosure of liability including LUCA analysis to RSPO Secretariat on 2 December 2014 and 2 nd revision on 24 June 2016. The companies ensuring reporting of disclosure of liability progress to RSPO and according to the CB's correspondency with RSPO Remediation and Compensation.
i.	Any new plantings since January 1st 2010 must comply with the RSPO New Plantings Procedure.	Company Group/Holding Statement: A new mill will be set up in Liberia and planned for commissioning in February 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress. *Note: RSPO NPP Announcements for SDP can be found at http://www.rspo.org/certification/new-planting-procedures/public consultations/page/14
		 Auditor Verification: Karya Palma Estate (PT Sandika Natapalma) and Baturus Estate (PT Budidaya Agro Lestari) any new planting after January 1st 2010 and due to not conduct NPP. RSPO NPP process has been completed in 2011 for a new mill in Liberia.
ii.	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	Company Group/Holding Statement: Sime Darby (Liberia) Plantation Inc. Status: Box G - Close for Monitoring Further details please refer to: http://www.rspo.org/members/complaints/status-of-complaints/view/46





		PT Mitra Austral Sejahtera (Sime Darby Bhd) Further details please refer to: http://www.rspo.org/members/complaints/status- of-complaints/view/29 Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There are land conflict in PT Bina Sains Cemerlang, this issue was raise on 22 April 2017 and still being process to resolve.
iii.	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	Company Group/Holding Statement: No stakeholder comments or complaints received. Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There are no labour dispute in company unit.
iv.	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	Company Group/Holding Statement: None noted. No stakeholder comments or complaints received. Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There is any legal non-compliance for company under SDP waiting for land title process, ie: PT Sime Indo Agro 1,652 Ha PT Aneka Inti Persada 421.31 Ha PT Bina Sains Cemerlang 308.25 Ha PT Bersama Sejahtera Sakti 765 Ha PT Langgeng Muaramakmur 1,162 Ha PT Paripurna Swakarsa 1,120 Ha PT Swadaya Andika 63 Ha PT Bahari Gembira Ria 1,639 Ha PT Guthrie Pecconina Indonesia 4,133 Ha PT Perkasa Subur Sakti 1,286 Ha



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- 3.5 Identification of Findings, Corrective Action, Observations, Opportunity for Improvement and **Noteworthy Positive Components.**
- 3.5.1. Identification of Findings, Corrective Actions and Observations at ASA-1.2

NCR No. :	2018.01	Issued by :	Haikal Ramadhan Kharismansyah
Date Issued :	19 October 2018	Time Limit :	17 January 2019
NC Grade :	Major	Date of Closing :	6 November 2018
Standard Ref. & :	4.6.3		
Requirement	Any use of pesticides shall be minimized as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in Indonesia Best Practice guidelines		

Evidence observed (filled by auditor):

Cypermetrin Trend (litre)

o j por mount	i irona (iia o)		
Estate	2015/2016	2016/2017	2017/2018
PSE	No Data	1.543	11.414
APE	3.555	7.296	1.559
TSE	No Data	No Data	7.805

^{*}TSE July – September 2018 = 2.045 liter

Crop protection summary for September 2018 (For Oryctes attacks).

PSE: total attack area of 3.565.89 Ha TSE: total attack area of 843.67 ha APE: The area of attack is 83.00 Ha

There is no information about the status of the attack (Light, Heavy, Above the control threshold, etc.) as the basis for determining the control to be taken.

- Manual catching of larvae in division II APE with total 83.105 larvae (July September 2018)
- Inter Office Mail from the Head Minamas Research Center on July 14, 2018 on prevention of Oryctes beetle attacks on immature plants with cypermethrin and karbosulfan which include: Severe attack = Insecticide spraying is carried out until the plant is 24 months old (Immature-2); Low Oryctes population = Guided by census data; Replanting with high attack history = prophylactic must be done immediate

ARM Minamas Plantation section 15 concerning plant protection: Use of Pheromone Oryctes for low infestations; Severe attacks = Spraying insecticides is carried out until the plants are 24 months old

Non-Conformance Description (filled by auditor):

However, it has not been able to show enough evidence that Oryctes control has been carried out in an integrated control (a combination of chemical, biological, physical and mechanical controls) to minimize the use of pesticides.

Root Cause Analysis (filled by organization audited):

The evidence of Oryctes control has not been entirely submitted due to lack of understanding of the management unit regarding the documents that must be presented.

Correction (filled by organization audited):

- Collecting data from integrated Oryctes control activities (a combination of chemical, biological, physical and mechanical controls)
- Publish integrated pest control policies for horn beetles by the North Aceh Agronomy Riau

RSPO - 4006a/1.0/26072018 Page **75** Prepared by Mutuagung Lestari for Teluk Siak Factory – PT Aneka Inti Persada subsiadary of Sime Darby Plantation Bhd



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Corrective Action (filled by organization audited):

- The management unit will continue to monitor integrated Oryctes control.
- Specify the horn beetle monitoring and control officer specifically

Assessor Evaluation and Conclusion (filled by auditor):

Verification on 28 October 2018

Certificate Holder provides proof of improvement in the form of:

- Documentation of Oryctes controlling

Biology: Application of metharizium in field B014. Metharizium multiplication data from MRC which states that as of September 2018 33.85 Kg of Metharyzium fungus have been used for trials, 150 Kg of Application in APE, and the remaining stock is 97 Kg

Manually larvae control: APE Up to October 2018 in number of 107,255

Mechanic: In certain areas a flooding system is carried out so that the oryctes larvae die. For example G015 TSE and B011 PSE blocks

Oryctes Infestation Map of APE, TSE, and PSE. light infestations coloured with green and severe infestation coloured with red

PT AIP Integrated Pest Management Policy. Issued by Agronomy RUA which emphasizes basically management unit is concerned with integrated pest management and uses a combination of various controls to overcome the problem of Oryctes

Proof of improvement has been received but needs additional information in the corrective action section. Nonconformity has not been fulfilled. OPEN

Verification on 6 November 2018

Additional evidence for improvement in the form of Decree of the controlling and observer pest officer of PT Aneka Inti Persada for TSE, APE, and PSE. In the job desk it is stated that one of the tasks is to ensure reporting of control and observation activities every month.

Based on root cause analysis, correction, and corrective actions nonconformity are stated to be fulfilled

Verified by	Haikal Ramadhan	Kharismansyah
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NCR No. :	2018.2.	Issued by :	Haikal Ramadhan Kharismansyah	
Date Issued :	19 October 2018	Time Limit :	17 January 2019	
NC Grade :	Major	Date of Closing :	8 November 2018	
Standard Ref. & :	4.6.6			
Requirement	Storage of pesticides shall be according to recognized best practices. All pesticides containers shall be properly managed according to the existing regulations and or instructions enclosed on the containers (see criterion 5.3).			

Evidence observed (filled by auditor):

- Based on field visit to the central warehouse of Aneka Persada Estate are known to have pesticides with the trademark Lentrek which is stored not in the original container (Stored in 5 supremo jerry cans of the size of 20 liters)
- The active ingredient supremo is Glyphosate while Lentrek is made from Chloryphos

This is not in accordance with the SOP of Agronomic Practices - Oil Palm; Section Pesticides and their Management (No. Policy 10x / PTK-PST / 2004 part 4 point d which states that pesticides must be stored in original packaging containers that are tightly closed and do not leak with labels containing complete and clear information

Non-Conformance Description (filled by auditor):

However, the storage of pesticides carried out by a certificate holder has not been fully consistent in accordance with



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established best practices.

Root Cause Analysis (filled by organization audited):

The unidentified transfer of lentrek pesticides to other pesticide containers. Transfer because the original container of the pesticide is leaking.

Correction (filled by organization audited):

- Shows the chronological report on the transfer of the leaked lentrek pesticide container which was transferred to the supremo pesticide container.
- Make and replace the label lentrek pesticides, to provide information about the types of pesticides stored in the packaging.
- Lentrek's Pesticide Stock in the warehouse has expired and is planned to write off, which first requests approval from the headquarters
- After being approved for release from stock then transfered to temporary hazardous waste shelter

Corrective Action (filled by organization audited):

- Monitoring stock of pesticides in warehouses regularly every 1 month
- Ensure that each pesticide is equipped with a clear identity

Assessor Evaluation and Conclusion (filled by auditor):

Verification on October 29, 2018

Certificate Holder provides proof of improvement in the form of

- Identify the number of lentrek pesticides as much as 119 liters (overwritten in 6 Supremo jerry cans)
- Lentrek's identity is in the form of the name of the active ingredient, trademark, and stock code
- Minutes of the transfer of lentrek pesticides to the supremo's jerry cans on March 2, 2018 because the original lentrek container had leaked.

Based on the description, it can be concluded that nonconformities have not been fulfilled. Need additional information on the root cause analysis, correction, and corrective action. OPEN

Verification on November 6, 2018

Improvements have been made to the root cause analysis, corrections, and corrective actions but have not yet been able to show evidence:

- 1. Letter of request for approval of lentrek pesticide removal stock to central management
- 2. Monitoring pesticide stock for October 2018 Aneka Persada Estate

Nonconformity have not been fulfilled. OPEN

Verification on November 8, 2018

Evidence sent by the company:

- 1. Letter from the Acting Manager of APE to the Siak Controller Area (APE / 275 / X / 2018) dated October 24, 2018 concerning the request for the removal of assets / Flexible inventory of 400 EC 200 L.
- 2. Letter from Riau Utara Regional CEO No 019 / CEO-RUA / XI / 2018 dated November 7, 2018 to Head of Plantation Indonesia about the proposed removal of Inventory from Aneka Persada Estate (Lentrek 400 EC 200 L)
- 3. Monitoring the stock of Aneka Persada Estate pesticides for the period January October 2018

Based on the root cause analysis, corrective actions, and corrections nonconformity are stated to be fulfilled and will be observed again in the following assessment.

Verified by : Haikal Ramadhan Kharismansyah



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NCR No.	2018.3.	Issued by :	Trismadi Nurbayuto
Date Issued	19 October 2018	Time Limit :	17 January 2019
NC Grade	Major	Date of Closing :	29 October 2018
Standard Ref. &	4.7.2		
Requirement	All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.		

Evidence observed:

The CH has HIRAC document dated 18 January 2018. Based on field observation to several location as follows:

- Observation to the APE chemical store doesn't have apron to be used in chemical mixing activity. Interview with the
 chemical store officer, explained that so far the apron had not been provided by the CH. Therfore based on document
 verification sighted that the potential hazard and risk control from chemical mixing activity in the mixing area were not
 identified.
- Observation to the APE Fertilizer store there are fertilizer loading activity, one of them using PPE's (helmet, rubber boot, and gloves) and the other only use PPE's (rubber boot and gloves). While in the HIRAC document sighted that respiratory risk have not been identified.
- Based on field observation there are fertilizer placed outside of the warehouse, however the potential hazard and risk control of this activity have not been identified.

Non-Conformance Description:

The CH has not identified all potential hazards and risk controls of all activities.

Root Cause Analysis:

- A chemical warehouse officer doesn't understand the chemical hazard, at this time an officer is appointed (warehouse clerk) in accordance to Inter Office Mail from Estate Manager No APE/280/X/2018 dated 5 October 2018.
- Lack of knowledge about potential hazard to respiratory tract.
- There are work instruction No 02/PGU/VII/2014 about fertilizer placed at outside the warehouse, however this activity have no been identified on HIRAC.

Correction:

- Apron issuance for warehouse officer and re socialization of HIRAC and work instruction No 02/PGU/VII/2014.
- Safety briefing to all fertilizer loader regarding to HIRAC and PPE's usage.
- Evaluation of HIRAC dated 18 January 2018, it has been included potential hazards of Chemical Mixing activity, Fertilizer Loading activity and outside of Fertilizer placed.
- PPE's usage monitoring has been conducted before working by supervisor and safety officer.
- Warning letter for loaders and field assistant regarding to failing of OHS implementation.

Corrective Action:

- PPE's usage monitoring before each work activity.
- ESH assessment every month by Safety Officer and also quarterly by PSQM staff.
- HIRAC evaluation will be conducted by safety officer on quarterly OHS meeting and also every year by PSQM.

Assessor Evaluation and Conclusion:

Verification on 23 October 2018

The CH was shown several evidences, such as:



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- 1. Attendance list and minute of meeting of safety briefing dated 20 October 2018 to 17 fertilzer loaders.
- 2. PPE's issuance (helmet, shoes, apron, respiratory mask, glasses, and rubber gloves) to warehouse officer.
- 3. PPE's usage inspection before working to all warehouse officer dated 20 October 2018.
- 4. The HIRAC revision dated 19 October 2018, point 6 about chemical mixing activity, point 7 about loading & unloading fertilizer activity, point 8 outside of fertilizer warehouse placed activity. All activity has been identified potential hazard and risk controls.
- 5. Warning Letter No Div II/269/X/2018/S dated 22 October 2018 to fertilizer loader.

Verification on 29 October 2018

The CH was shown several evidences, such as:

- 1. Minute of meeting HIRAC and Warehouse management procedure dated 26 October 2018.
- 2. Form ESH assessment and inspection.
- 3. Policy No 7301/PSQM-ESH/11 dated 7 July 2011 about OHS guidance for HIRAC. Point 5.1.7 the HIRAC evaluation will be conducted every year.
- 4. EHS continuous improvement program (SPO/037/PP K3L/I/18 dated 18 January 2018). Point 6.2. The unit manager has responsible to evaluate the effectiveness of ESH continuous improvement program.

Auditor Conclusion:

Based on above evidence, this NC has been closed out.

NCR No.	2018.4.	Issued by	:	Trismadi Nurbayuto
Date Issued :	19 October 2018	Time Limit		Next Surveillance
NC Grade :	Minor	Date of Closing	:	27 August 2019
Standard Ref. & :	4.7.6			
Requirement	All workers shall be provided with medical care and covered by accident			
	insurance.			

Evidence observed (filled by auditor):

The CH has shown Social Insurance payment record for several contractor, such as:

- 1. Social insurance payment of PT Mitra Karya Jaya Perdana (Replanting contractor) on October 2018 with total 12 workers.
- 2. Social insurance payment of CV Pancuran Jaya (Rewind Electro Motor contractor) on October 2018 with total 10 workers.
- 3. Social insurance payment of PT Mitra Angkutan Sejati (CPO & PK transporter) on September 2018 with total 51 workers
- 4. Social insurance payment of PT Karunia Mandiri Sejahtera Abadi (FFB transporter) on September 2018 with total 28 workers.

However, the CH didn't to shown social insurance payment record for other contractors, such as:

- 1. Muklan Siregar (FFB transporter)
- 2. Jonarius T (FFB transporter)
- 3. CV Puja Perawang Bestari Mandiri (FFB transporter)
- 4. CV Citra Persada (Nursery upkeep).

Non-Conformance Description (filled by auditor):



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There have no been system to ensure that all workers has been provided with medical care and covered by accident insurance.

Root Cause Analysis (filled by organization audited):

There is no comprehensive monitoring on the completeness of "BPJS Ketenagakerjaart" for contractor employees.

Correction (filled by organization audited):

Proof of payment for "BPJS Ketenagakerjaan" contractor employees.

Corrective Action (filled by organization audited):

The Company will be monitored contractor employees regarding "BPJS Ketenagakerjaan" and others periodically by the Section Head of Administration.

Assessor Evaluation and Conclusion (filled by auditor):

Verification on August 27, 2019

The company has shown evidence of corrections that are adjusted to determine the root cause, corrective and corrective actions for the non-conformity. The following are proofs of the improvement, namely:

- Monitoring list of ownership and registration of contractor employees related to "BPJS Ketenagakerjaan" that has been carried out by the Section Head of Administration for Teluk Siak Estate, Aneka Persada Estate, and Pinang Sebatang Estate.
- Proof of payment of the "BPJS Ketenagakerjaan" for the April and May 2019 periods for CV Puja Perawang Bestari Mandiri workers.
- Proof of payment of the "BPJS Ketenagakerjaan" for the April and May 2019 periods for CV Citra Persada workers.
- Proof of payment of the "BPJS Ketenagakerjaan" for the April and May 2019 periods for contractor workers from Muklan Siregar.
- Proof of payment of the "BPJS Ketenagakerjaarl" for the April and May 2019 periods for contractor workers from Jonalis Tambunan.
- Proof of payment of the "BPJS Ketenagakerjaar" for the April and May 2019 periods for contractor workers from Dadang.
- Proof of payment of the "BPJS Ketenagakerjaar" for the April and May 2019 periods for contractor workers from Liana.
- Proof of "BPJS Ketenagakerjaart" card for each contractor, namely CV Citra Persada, CV Puja Perawang Bestari Mandiri, Jonarius Tambunan, Muklan Siregar, Dadang, and Liana.

Based on the evidence of the improvement given above it can be concluded that the **non-conformity No. 2018.04 is** said to have been fulfilled.

Verified by : Mohamad Amarullah

NCR No. :	2018.5.	Issued by :	Rizliani Aprianita Hsb
Date Issued :	19 October 2018	Time Limit :	17 January 2019
NC Grade :	Minor upgared to	Date of Closing :	08 November 2018
	Major		
Standard Ref. & :	5.1.2		
Requirement	Environment management plan document to prevent negative impacts, its		



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implementation report and revision (if the identification of impact requires changes in current company's practices) shall be available. The company's management shall appoint the responsible person(s) for the implementation of the document.

Evidence observed (filled by auditor):

The company showed the RKL-RPL Implementation Report for semester 2 of 2017 and semester 1 of 2018.

- Verification of RKL-RPL implementation report documents for semester 2 of 2017 is known that not all impacts have been managed according to the directions of the RKL-RPL matrix such as work opportunities, community income, public health, etc.
- Verification of reporting documents for RKL-RPL implementation in semester 1 of 2018, it is known that the company
 has made revisions by adding a discussion on the impact of work opportunities, community income, public health, etc.
 However, there is not enough evidence that the revised RKL-RPL implementation report has been submitted to the
 relevant agency.
- Based on the review of the semester 2 2017 and semester 1 of 2018 of RKL-RPL implementation report document, known that the preparation of the RKL-RPL implementation documents has not been in accordance with regulation no. 45 of 2005. For example, there has been no record of visualization of the implementation of management and monitoring of social aspects.

Non-Conformance Description (filled by auditor):

Based on the explanation above, it was concluded that there was no mechanism / system for monitoring negative impacts in accordance with the direction of the RKL-RPL matrix and its arrangement in accordance with Ministerial Decree No. 45 of 2005.

Root Cause Analysis (filled by organization audited):

- The management unit does not understand that the reporting of negative impacts must refer to the 2015 AMDAL Addendum where there are 12 impacts that must be managed and monitored.
- The absence of PICs who have participated in the training in preparing the RKL-RPL report.
- No refresh training of RKL-RPL Report Preparation SOP refers to Minister of Environment Decree No. 45 of 2005 which carried out periodically.

Correction (filled by organization audited):

- Identify RKL-RPL Report arrangement. The company will arrange the RKL-RPL report in accordance with the
 identification of the arrangement of the RKL-RPL report. It will be adjusted to the RKL-RPL report for the period JulyDecember 2018 which will be reported in February 2019. This is because it has now entered the period JulyDecember 2018.
- Refreshing the SOP training on the arrangement of the RKL-RPL report.

Corrective Action (filled by organization audited):

- The management unit will consistently carry out management and monitoring according to the latest RK-RPL matrix.
- Appoint PSQM Staff to prepare RKL-RPL Reports appointed by the Chair of the SOU as responsible PIC and verified by GM Mill / Estate.
- PSQM Dept. will evaluate the suitability of the report every semester.

Assessor Evaluation and Conclusion (filled by auditor):

Verification on October 29 2018

The company showed evidence of improvement in the form of:

- Handover of the semester 2 2017 RKL-RPL and the first semester 2018 reports submitted to the relevant agency on October 24, 2018.
- Revision in chapter II of the Report on the Implementation of RKL and RPL.



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Verification on November 5, 2018

The company showed some evidence of correction as follows:

- Minutes and attendance list for the arrangement of RKL / RPL by PSQM staff to 17 participants consisting of staff, managers and Area Controllers on November 1, 2018.
- Records of the results of the questionnaire / survey results on October 4, 2018.
- Identification of RKL-RPL report compilation in accordance with Minister of Environment Decree No. 45 of 2005
- Guidelines for preparing reports on the implementation of RKL / RPL in accordance with Minister of Environment Decree No. 45 of 2005 by PSQM-ESH RUA Staff on November 1, 2018. Consists of Introduction, Implementation (type of impact, source of impact, environmental management measures / monitored parameters) monitoring method, and time period) and evaluation (trends, critical levels, structuring), and conclusions.
- Program for handling negative impacts 2018-2020 period
- Certificate of socialization of the preparation of the RKL-RPL report, in the name of M. Tri Yuana on March 2016

Based on the root cause analysis, and corrective actions, nonconformity are stated to be fulfilled and will be observed in next assessment.

Verified by	: Rizliani Aprianita Hsb
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NCR No. :	2018.6.	Issued by :	Rizliani Aprianita Hsb
Date Issued :	19 October 2018	Time Limit :	17 January 2019
NC Grade :	Major	Date of Closing :	14 November 2018
Standard Ref. & :	5.2.1		
Requirement	` '	planted area and t	vation Value (HCV assessment) that the relevant wider landscape-level hall be available

Evidence observed (filled by auditor):

CH has conducting HCV assessment in 2010, conducted by consultant Polito, with total HCV and potential HCV identified was 499.75 ha, as mentioned in the previous Audit assessment. The assessment of HCV has been included the identification of protected area, flora and fauna, and also the status of its preservation (indicator 5.2.2). Participatory evidence is contained in the Annex to the HCV Assessment document, namely a list of attendees of HCV public hearings on January 5, 2010 attended by 21 participants.

Non-Conformance Description (filled by auditor):

Based on review of HCV identification document, it was found that the area that became the scope of the study was the HGU covering an area of 11,134 ha. While the area that becomes the scope of the certification is 11,555.31 ha. Based on this explanation, it was concluded that there was not enough evidence that HCV assessment has been carried out to the entire scope of the certification area.

Root Cause Analysis (filled by organization audited):

The map in the HCV report is printed according to the hectares of HGU covering 11,134 ha. However, the scope of the HCV study was carried out for an area of 12,000 ha.

Correction (filled by organization audited):

In the HCV Report Chapter III, it was stated that the area of PT AIP was 12,000 ha (document attached).



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- Make a statement letter from the Director of PT AIP that the scope of the Pollito HCV report is 12,000 Ha so that the entire PT AIP area is included in the report as stated in the report Chapter III Points 3.
- Show a map of the HCV report that describes the entire operations of PT AIP.

Corrective Action (filled by organization audited):

PSQM and related units conduct a review to ensure that the area in the HCV report is in accordance with the total area in the field.

Assessor Evaluation and Conclusion (filled by auditor):

Verification on November 14, 2018

Based on the root cause, corrections and corrective actions that were submitted, it was concluded that the non-conformity was declared fulfilled.

Verified by	: Rizliani A
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NCR No. :	2018.7.	Issued by :	Rizliani Aprianita Hsb		
Date Issued :	19 October 2018	Time Limit :	17 January 2019		
NC Grade :	Major	Date of Closing :	27 November 2018		
Standard Ref. & :	5.2.2				
Requirement	or affected by the plant	ation and mill operati	species and or other HCVs are present ons, an appropriate measures that are shall be implemented through a		

Evidence observed (filled by auditor):

The results of the document review, management interviews and field visit show:

- The company has established Gasib river as a HCV 5 covering 28.5 ha located at Aneka Persada Estate. Regarding this, the company shows the HCV management program that was set on January 5, 2018. But the management plan is not in accordance with the HCV 5 management plan recommendations in the HCV identification document.
- The company does not have an HCV 1.1 management and monitoring program in APE.
- Based on the results of the field visit to HCV 1.1 in block A016 APE it was found that there was no sign board and HCV boundary markings in accordance with management recommendations from the assessor.

Non-Conformance Description (filled by auditor):

There is not enough evidence that the HCV 1.1 and HCV 5 management programs are in accordance with management recommendations in the HCV identification document. In addition, the company also has not been able to demonstrate the implementation of the management plan to maintain or increase the value of HCV 1.1 & HCV 5.

Root Cause Analysis (filled by organization audited):

Not yet comprehensively comprehending the management of HCV areas listed in the HCV identification document.

Correction (filled by organization audited):

- The company has developed a program for managing & monitoring HCV 5 & HCV 1.1 areas according to management recommendations on HCV documents.
- Marking and install signboards on HCV 1.1 at block A016 and HCV 5 at block H021 and H023.
- Make agreement with surrounding communities for management and monitoring of HCV 5 accordance with

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recommendation on HCV identification document.

Corrective Action (filled by organization audited):

- A refreshing HCV management and monitoring training will be conducted by PSQM which is planned to be held in December 2018 attended by all estate staff, safety officers, foremen, and replanting contractor.
- The company also assigns special officers to conduct HCV management and monitoring.

Assessor Evaluation and Conclusion (filled by auditor):

Verification on October, 29 2018

The company showed some evidence of correction as follows:

- The HCV5 management program in the APE period 2018/2019, for example at riparian of Gasib and Pingai river, conducted signboard installation that informs the HCV location, patrolling and flora and fauna observation every month.
- Management Program for HCV1.1 areas in APE 2018/2019, for example in slope areas> 40% in block A016 by monitoring erosion poles, monitoring HCV area boundaries, installing signboards, and socializing to employees.
- The results of monitoring animals at the Gasib River riparian in Block H021, APE Division III on September 2018 identified 28 species of wildlife and 16 types of plants and their protection status.
- The results of monitoring animals at the Gasib River riaprian in Block H021, APE Division III on October 2018 identified 28 species of wildlife and 16 types of plants and their protection status.

Verification on September, 27 2018

The company showed evidence of correction in the form of:

- Minutes of joint agreement on management and monitoring of HCV 5 dated 26 November 2018 which was attended by 17 participants including the Head of Lubuk Dalam Village, head of sub village and head of the neighborhood. Also attached photos of the implementation of a joint agreement on management and monitoring of HCV 5.
- List of participants who will carry out HCV management and monitoring training planned to be held in December 2018 consisting of senior assistants, administration head, safety officers, foremen and replanting contractors.
- Decree on Appointment of HCV area management officers at Aneka Persada Estate, which is carried out by senior assistants and APE assistants. For example, a senior assistant appointment letter as one of the HCV officers based on no. inter-office mail APE / 289 / X / 2018 / S dated 31 October 2018.

Based on the evidence of the correction, nonconformities are stated to be fulfilled.

Verified by :	Trismadi N & Rizliani A Hsb
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NCR No.	:	2018.8.	Issued by :		Rizliani Aprianita Hsb	
Date Issued	:	19 October 2018	Time Limit :	:	Next Surveillance	
NC Grade	:	Minor	Date of Closing :	:	28 November 2018	
Standard Ref. &	:	5.2.5				
Requirement	Where HCV areas overlapped with an identified local community's land, there shall be evidence of a negotiated agreement that optimally safeguard their HCVs and the local community's rights					
Evidence observed (filled by auditor):						

The results of the document review, management interviews and field visit show:



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- The company has established Gasib river as a HCV 5 covering 28.5 ha located at Aneka Persada Estate. Regarding this, the company shows the HCV management program that was set on January 5, 2018. But the management plan is not in accordance with the HCV 5 management plan recommendations in the HCV identification document.
- The company does not have an HCV 1.1 management and monitoring program in APE.
- Based on the results of the field visit to HCV 1.1 in block A016 APE it was found that there was no sign board and HCV boundary markings in accordance with management recommendations from the assessor.

Non-Conformance Description (filled by auditor):

CH has established Gasib river as a HCV 5 covering 28.5 ha located at Aneka Persada Estate. The results of interviews with management and field visits in block E23 revealed that there were HCV 5 areas controlled by the community. However, CH has not shown evidence of a negotiated agreement to protect HCV and the rights of local communities optimally.

Root Cause Analysis (filled by organization audited):

The HCV 5 area has been controlled by the community, this includes the occupational area. So that the management of PT. AIP has not made an agreement to protect HCV 5.

Correction (filled by organization audited):

- Make a mutual agreement with the community and the village apparatus regarding efforts to protect HCV 5 riparian
 of Gasib River.
- installing HCV 5 signboard

Corrective Action (filled by organization audited):

Carry out management & monitoring and efforts to protect HCV 5 riparian of Gasib River regularly.

Assessor Evaluation and Conclusion (filled by auditor):

Verification on November 27, 2018

The company showed evidence of correction in the form of a Minutes of joint agreement on the management and monitoring of HCV 5 (Gasib River riparian) on November 26, 2018 which was attended by 17 participants including the Head of Lubuk Dalam Village, head of subvillage and head of the neighborhood. Also attached photoes of the implementation of a joint agreement on management and monitoring of HCV 5. In the minutes of the agreement document explain the management and monitoring plan carried out by the company together with the community. Some management and monitoring plans carried out include:

- Conduct observations of flora and fauna.
- Installation of information boards to maintain HCV 5
- Together with the community and the villages to monitor the water quality of the Gasib River
- Etc.

However, the company has not yet shown evidence that it has installed the Signboard HCV 5 in accordance with the corrective actions submitted. Based on this explanation, nonconformity is still open.

Verification on November 28, 2018

The company has shown evidence of installing HCV 5 signboards which also contain prohibition to electrocute, poisoning fish and hunting bans at block H021 and H023 in Aneka Persada Estate.

Based on the explanation above, it was concluded that nonconformity had been fulfilled.

Verified by : Rizliani A. Hsb.



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NCR No.	2018.9.	Issued by :	Rizliani Aprianita	
Date Issued	: 19 October 2018	Time Limit :	17 January 2019	
NC Grade	: Major	Date of Closing :	6 November 2018	
Standard Ref. &	: 6.1.3			
Requirement	Plans for management and monitoring of social impacts to avoid or reduce negative impacts and promote positive ones, based on social impact assessment, through consultation with the affected parties, shall be available, documented and timetabled, including responsibilities for implementation.			

Evidence observed (filled by auditor):

Based on the SIA 2010 report, it is known that the negative impacts caused by operational activities such as:

- Conflict due to differences in culture, patterns and perspectives on land use and so on.
- Human resources gaps between migrants and local residents
- Gap in the level of natural resource utilization between local communities and migrants
- Decreased yield of natural resources for the surrounding population

In this regard, the company shows a program to deal with negative impacts based on the SIA report in 2010, however the negative impacts managed in this document do not match the negative impacts managed in the SIA document.

Non-Conformance Description (filled by auditor):

Based on the explanation above, it can be concluded that the company has not been able to show plans for management and monitoring of social impacts in accordance with the impacts caused in the SIA document by involving the participation of the affected, scheduled, documented parties and those responsible for implementation.

Root Cause Analysis (filled by organization audited):

Lack of knowledge regarding to Social Management and Evaluation Plan.

Correction (filled by organization audited):

Has been revised negative impact management program PT AIP period 2018-2020 in accordance negative impacts listed in the document SIA. The preparation of these programs based on the results of consultation with local communities by 64 respondents from three villages. The company will also consult the local communities by using a questionnaire in December 2018.

Corrective Action (filled by organization audited):

- Will be updated programs mitigate the negative impacts of PT AIP periodically every 2 years in accordance with the socio-economic development of PT AIP by Staff PSQM and head of administration.
- Making SOPs for the Preparation of Negative Impact Management Programs as a reference for understanding social management and monitoring programs.
- Conducted SOP socialization of the Preparation of the Negative Impact Management Program for PIC related to the handling of the negative impacts carried out

Assessor Evaluation and Conclusion (filled by auditor):

Verification on 30 October 2018

The company has shown proof of improvement in the form of PT AIP's Negative Impact Management Program for the period 2018-2020 which explains the mitigation of the following:

Interaction with transmigran communities.



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- Working change
- Increased accessibility
- Determination & management of HCV
- Replanting
- Labor intensive activities
- Potential of fires

However, the program has not included PICs that are responsible and timed for mitigating impacts. In addition there are still some data needed related to the corrective and corrective actions given (questions in the column above). Based on this, the non-conformity No. 2018.09 declared not yet fulfilled.

Verification on 2 November 2018

The company has shown evidence regarding to PT AIP's negative impact handling program for the 2018-2020 period that has been scheduled and has a PIC responsible for this. The preparation of the program was based on the results of consultations with surrounding communities with 64 respondents from 3 villages. The company will also consult with the surrounding community by using a questionnaire in December 2018.

Verification on 6 November 2018

The company has shown a mechanism and SOP socialization of the Preparation of the Negative Impact Management Program to the relevant PIC for the 2018-2020 period. Based on this explanation, this discrepancy is stated to be fulfilled and will be observed again in the previous assessment.

Verified by	:	Rizliani Aprianita
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NCR No.	:	2018.10.	Issued by :	Rizliani Aprianita	
Date Issued	:	19 October 2018	Time Limit :	Next Surveillance	
NC Grade	:	Minor	Date of Closing :	3 January 2019	
Standard Ref. &	:	6.1.4			
Requirement		The documented plan for management and monitoring of social impacts, shall be reviewed at least on two-yearly basis. If necessary, the plan should be updated. There shall be evidence that the review process includes participation of all affected parties.			

Evidence observed (filled by auditor):

The CH has documented the recapitulation of socio-economic questionnaires in three villages conducted on 06th October 2018 with 64 respondents.

Non-Conformance Description (filled by auditor):

However, there is not enough evidence that the document contains a review / evaluation of the social impact management and monitoring plan.

Root Cause Analysis (filled by organization audited):

Not yet in accordance with the review / evaluation of the social impact management and monitoring plan based on the 2010 SIA document which was due to not understanding the negative impacts managed in the SIA document.

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Correction (filled by organization audited):

- Revision of questions in the form of the socio-economic questionnaire has been carried out by adjusting the program for handling negative impacts of the SIA document in 2010
- There have been re-interviews with the surrounding village communities (Tualang Timur Village, Pinang Sebatang Village, Maredan Village, Lubuk Dalam Village, and Kuala Gasib Village) through the questionnaire form on 15-17 December 2018

Corrective Action (filled by organization audited):

Review the contents of the material on the socio-economic questionnaire form regularly (once every two years) by adjusting the program to handle the negative impact of PT AIP

Use the SOP for the Preparation of the Negative Impact Management Program as a reference for reviewing previous programs and compiling the next program

Assessor Evaluation and Conclusion (filled by auditor):

Verification 03 January 2019

The company has sent proof of repairs in the form of recapitulation and sampling of the results of the socio-economic questionnaire conducted on the 15-17 December 2018 with 50 respondents from 5 surrounding villages (TualangTimur, Kuala Gasib, Pinang Sebatang, Lubuk Dalam and Maredan). The results of the company recapitulation were used as material for consideration for the evaluation of the SIA program. Based on this, the non-conformity No. 2018.10 is stated to have been fulfilled and will be observed in the next assessment.

Verified by	:	Rizliani Aprianita
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NCR No.	:	2018.11.	Issued by :	Rizliani Aprianita	
Date Issued	:	19 October 2018	Time Limit :	17 January 2019	
NC Grade	:	Major	Date of Closing :	7 January 2019	
Standard Ref. &	:	6.5.2			
Requirement		Collective Labor Agreement/Company Regulation, in accordance with the manpower regulations, shall be available in understandable language; and explained by the management or Labor Union to the worker			

Evidence observed (filled by auditor):

Based on the results of field visits and interviews with 2 (two) harvesters in Block 109 Division 1 Teluk Siak Estate, it was found that the harvesters were assisted by their wives to pick loose fruit. In addition, the results of interviews with the harvest foreman stated that 20 harvesters were assisted by his wife to pick loose fruit without a work agreement with the company. While the results of interviews with management stated that all this time the family gank ban had been socialization to all employees, including the socialization of the family gank ban on 20th September 2018 on Aneka Persada Estate which was attended by 25 harvesters.

Non-Conformance Description (filled by auditor):

Based on the explanation, it is known that the company has not been able to show a mechanism / system to ensure that all workers have work agreements in accordance with applicable regulations.

Root Cause Analysis (filled by organization audited):

• Picker workers do not have work agreements with CH



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Harvester worker need help for lose fruits picker workers to complete the job quota

Correction (filled by organization audited):

- All picker workers registered as workers from CV. Puja Perawang Bestari Mandiri
- Make a work agreement with CV. Puja Perawang Bestari Mandiri as the manager of all the picker workers on TSE
- For PSE the CH use the C1R2 harvesting system as a reference that CH no longer use picker workers
- For APE companies using "non-dol" (no longer uses picker workers) harvesting systems

Corrective Action (filled by organization audited):

- The Division Assistant will ensure that all workers are registered as personnel under the CV. Puja Perawang Bestari Mandiri who already has work agreement with CH
- The CH also shows work contracts along with proof of BPJS payments belonging to pickers workers.
- The CH issues an Internal Office Memo related to the prohibition of bringing family or other people to the field who do not have work ties with the CH.
- Socialization of the memorandum to assistants and workers in the field (attached file)
- Workers' statement not to bring family and workers who do not have work ties with the company to all harvest workers
- For harvest work system that has used the C1R2 system and the non-picker system has not used workers with picker workers and the whole harvest worker has been a permanent employee
- For harvest workers who are still using picker workers, each harvester will be accompanied by picker workers from CV Puju Perawang Bestari Mandiri

Assessor Evaluation and Conclusion (filled by auditor):

Verification 03 December 2018

The CH has completed a root cause analysis, corrective action, corrective action and shows proof of improvement for this non-conformity in the form of a work agreement between the company and CV Puja Perawang Bestari Mandiri & a list of pickers workers at the Teluk Siak Estate. However, more information is needed regarding this matter.

Verification 07 January 2019

The company has shown proof of improvement in the form of:

- Internal Office Memorandum for the prohibition of bringing family or other people to the field who do not have work ties with the company.
- Socialization of the Internal Office Memorandum to workers and assistants of PT AIP.
- Proof of BPJS payments for loose quotation workers paid by CV Puja Perawang Bestari Mandiri.
- Proof of payment of gross wages quoted in December 2018
- Statement not to use workers without work ties in the CH operational area

Based on the evidence, then the non-conformity No. 2018.11 is stated to be fulfilled and will be observed again in the next assessment.

Verified by : Rizliani Aprianita



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3.5.2. Identification of Findings, Corrective Actions and Observations at ASA-1.3

NCR No.	:	2019.01.	Issued by :	Mohamad Amarullah
Date Issued	:	30 August 2019	Time Limit :	Next surveillance
NC Grade	:	Minor	Date of Closing :	21 November 2019
Standard Ref. & Requirement	:	Drainability assessm		ed prior to replanting on peat to necessary drainage for oil palm

Evidence observed (filled by auditor):

- Based on Semi Detail Soil Survey Report dated June 2016 review, it was known that around 17 % or about 1,680.16 ha of PT Aneka Inti Persada (PT AIP) certified areas are covers by peat soils which dominated by *Typic* Haplosaprist type.
- Based on replanting realization review and information from estatet management, it was known that replanting in PT AIP has been carried out since 2013, and some of it were conducted on peat areas.
- Drainability study on peat-replanting areas which aims to determine long-term viability on peat area and its drainability system needed/required is not available.

Non-Conformance Description (filled by auditor):

The company is not be able to show a report on gravitational drainage capacity assessment or drainability study on peat areas prior to replanting activities in PT AIP.

Root Cause Analysis (filled by organization audited):

The company has been late in making drainability assessment before replanting.

Correction (filled by organization audited):

To immediately carry out drainability assessment towards gravity etc., conducted by MRC team.

Corrective Action (filled by organization audited):

Unit management shall making coordination with MRC team on drainability assessment, at least five years before replanting activities started.

Assessor Evaluation and Conclusion (filled by auditor):

Verification 21 November 2019

Unit management shows document No. MRC/Mgr-SDP/Mgr-Est/00157/XI/2019 dated 06 November 2019 about Drainability Assessment of PT Aneka Inti Persada. The report is distributed to Estate Manager of Teluk Siak and Aneka Persada. Report summary mentioned that based on calculation of 2 recycle planting, the area of study were available to be replanted, as long as water management is consistently taken as top priority on peat management strategy.

Based on description of root cause analysis and corrective action plan, as well as correction evidence given, it could be concluded that NCR No. 2019.01 is considered closed.

Verified by :	Mohamad Amarullah
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NCR No. :	2019.02.	Issued by :	Mohamad Amarullah
Date Issued :	30 August 2019	Time Limit :	30 November 2019
NC Grade :	Major	Date of Closing :	18 October 2019

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Standard Ref. & :	4.7.3
Requirement	Records of Occupational Health and Safety (OHS) program (see 4.8) and Personal
	Protective Equipment (PPE) training in accordance with the result of hazard
	identification and risk analysis shall be available to all workers.

Evidence observed (filled by auditor):

- Based on observations at Teluk Siak Factory, workers were found to have used PPE that had been damaged in the form of helmets, safety shoes, and masks at boiler stations, sterilizer stations, clarification stations and nut kernel stations.
- Based on the results of a review of monitoring documents on the use of PPE on July 1, 2019 and August 5,
 2019, it is known that there are workers who still use damaged PPE such as helmets and safety shoes.
- The company has a Personal Protective Equipment Procedure (PPE) No. 739 / TQEM-ESH / 10 Revision 02 dated 10 November 2016 which states that PPE must be replaced as soon as it is found to provide no guarantee of protection

Non-Conformance Description (filled by auditor):

The company has not been able to ensure that the replacement of damaged PPE that has been identified has been carried out in accordance with the procedures that are owned.

Root Cause Analysis (filled by organization audited):

The unit does not have a replacement PPE stock if the PPE given to the worker has been damaged.

Correction (filled by organization audited):

Replace damaged PPE, based on the results of a monthly check on PPE conditions.

Corrective Action (filled by organization audited):

- Provide replacement PPE stock.
- Add a clause to the PPE SOP (point 6.5) Management of the department must provide the appropriate PPE (standard and additional PPE / special PPE if necessary) as a replacement stock of ± 5% of the number of employees according to their respective jobs to replace the PPE if the PPE is known used does not provide comfort, either for visitors, government, etc. under its responsibility which can be exposed to danger.

Assessor Evaluation and Conclusion (filled by auditor): Verification on October 14, 2019

The company has determined the root cause, corrective and corrective actions to meet the identified nonconformities. In addition, the company has provided evidence of improvement as an effort to fulfill the nonconformities, including:

- Documentation of the provision of new PPE to all Teluk Siak Factory workers in September 2019.
- Minutes of the transfer of new PPEs to all Teluk Siak Factory workers in September 2019.
- Revision of Personal Protective Equipment SOP (document No. 739 / TQEM-ESH / 10)

Based on the evidence of improvements provided, there is still some information needed by the auditor regarding the determination of corrective and corrective actions provided. **Then nonconformities No. 2019.02 declared unfulfilled.**

Verification on October 18, 2019

The company has provided evidence of improvement and completeness of the required additional information including:

- SOP for Personal Protective Equipment Revision 3 with document No. 739 / TQEM-ESH / 10, which took effect on September 1, 2019.
- The latest PPE stock data as of October 14, 2019 at Aneka Persada Estate, amounting to more than 5% of the needs
- Latest PPE stock data as of October 14, 2019 at Pinang Sebatang Estate, amounting to more than 5% of needs
- The latest PPE stock data as of October 14, 2019 at Teluk Siak Estate, amounting to more than 5% of needs
- The latest PPE stock data as of October 14, 2019 at the Teluk Siak Factory, amounting to more than 5% of the

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needs

Based on the evidence of improvement sent above, the non-conformity No. 2019.02 declared to have been fulfilled and its consistency will be re-observed in the next assessment.

Verified by :	Mohamad Amarullah
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1			
NCR No.	2019.03.	Issued by :	Steve Mualim
		-	
Date Issued	30 August 2019	Time Limit :	30 November 2019
NC Grade	Major	Date of Closing :	20 October 2019
110 01440			
Standard Ref. &	5.3.2		
Requirement	There shall be evidence	that all chemicals a	nd their empty containers are
- toquironiont	disposed of responsibly	mat an enemious a	ina their empty containers are
	uisposed of responsibly		

Evidence observed (filled by auditor):

Company has procedures related ex chemicals containers, listed on procedures hazardous and non hazardous waste management on 23 October 2017. This procedures also explained that all of hazardous waste including ex chemical containers must be sent and stored to hazardous waste store maximum 1 month after waste being produced on estate.

Field visit shown there is still hazardous waste were stored in estate (Pinang Sebatang estate) for more than one month, for examples used filters and used lubricants containers.

Non-Conformance Description (filled by auditor):

Company are not able to shown proper ways to managed hazardous waste based on current procedures.

Root Cause Analysis (filled by organization audited)

Hazardous Waste producing unit is not consistent in sending Hazardous Waste that has been collected at Transit Warehouse to Hazardous Waste temporary storage with permission (more than 30 days) because there is no PIC assigned to monitor Hazardous Waste shipments.

Correction (filled by organization audited):

Send all Hazardous Waste that has been collected in the Transit Warehouse to the licensed Hazardous Waste temporary storage (mill).

Corrective Action (filled by organization audited):

Appoint the officers of each Hazardous Waste producing unit to monitor / ensure Hazardous Waste collected at Transit Warehouse does not exceed 30 days.

Assessor Evaluation and Conclusion (filled by auditor):

Verification on October 20, 2019

The company has determined the root of the problem, corrective and corrective actions to meet the identified nonconformities. In addition, the company has provided evidence of improvement as an effort to fulfill the discrepancy, including:

- A transit warehouse card for pesticide packaging for each estate
- Hazardous waste transit warehouse cards for used filters, used oil, used drums for each estate
- A transit warehouse card for B3 waste of herbicide packaging for each estate
- Letter of appointment for the officer responsible for hazardous waste management in the APE, PSE and TSE
- Hazardous waste logbook and balance sheet at the temporary storage area of hazardous at Teluk Siak Factory, which explains that the Hazardous waste found by the auditor team at the time of the audit was sent and stored at Hazardous Waste temporary storage

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Based on the evidence of improvement sent above, the non-conformity No. 2019.03 has been declared fulfilled and will be re-observed for its consistency in the subsequent assessment.

Verified by	:	Steve	Mualim
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NCR No.	:	2019.04.	Issued by	:	Andi Pratama Pasaribu
Date Issued	:	30 August 2019	Time Limit	:	30 November 2019
NC Grade	:	Major	Date of Closing	:	05 November 2019
Standard Ref. &	:	6.5.1			
Requirement		Documentation of pay and conditions for employees based on the existing manpower regulations shall be available.			

Evidence observed (filled by auditor):

- Based on the review of the August 2019 list of workers' documents, it is known that the company has 45 PKWT (Specific Time Work Agreement) status workers in Pinang Sebatang Estate (42 of them harvesters) and 18 workers in Aneka Persada Estate (16 of them harvesters).
- Refer to Law No. 13 of 2003 and GAPKI Decree dated 8 February 2013 concerning the Activity Flow of the Work Implementation Process in the Palm Oil Plantation Business Sector where harvest work is permanent work in plantation operations and may not be carried out by workers with PKWT status.

Non-Conformance Description (filled by auditor):

The company has not been able to prove that the labor recruitment system is in accordance with Minister of Manpower Decree No. 100 of 2004 concerning Provisions for the Implementation of Specific Time Work Agreements and Law No. 13 of 2003 concerning Manpower.

Root Cause Analysis (filled by organization audited):

Difficult to find harvest workers who are skilled and ready to use to harvest in the mature area.

Correction (filled by organization audited):

Evaluating / selecting PKWT workers to be appointed as permanent employees (SKU) as harvest workers with the following details:

- APE of 16 PKWT harvest workers (12 people were proposed to become permanent Harvesting worker and 4 contract workers were not renewed because it was unfit to work according to the results of the health check)
- PSE out of 42 PKWT workers (23 PKWT Harvest status and have been selected to 17 proposed permanent Harvesting worker and 6 PKWT harvest stops because of unfit to work) and the remaining 19 PKWT details (1 org PKWT mechanical contract status is not renewed, 2 persons PKWT maintenance contract is not extended, 1 PKWT is not extended because the age is more than 35 years, 1 person has resigned and 14 PKWT scout harvesting to be educated as harvesters)

Corrective Action (filled by organization audited):

Preparing harvest workers through selection of scout harvesting maintenance work

Assessor Evaluation and Conclusion (filled by auditor):

Verification on November, 05 2019

The company has determined the root of the problem, corrective and corrective actions to meet the identified nonconformities. In addition, the company has provided evidence of improvement as an effort to fulfill the discrepancy, including:

- Procedure for Adding Permanent Employees
- Proposing 12 harvest workers with PKWT status to become Permanent workers after they have passed the selection in APE

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- Proposing 17 harvest workers with PKWT status to become Permanent workers after they have passed the selection in PSE
- Documents on PKWT employee inspection results in APE and PSE which have been declared fit to work
- Documents on PKWT employee inspection results in APE and PSE which have been declared unfit to work
- Removal of harvest PKWT workers who are deemed not yet competent to be employed first in scout harvesting
 jobs

Based on the evidence of improvement sent above, the non-conformity No. 2019.04 has been declared as fulfilled and will be re-observed for its consistency in next assessments.

Verified by : Andi Pratama Pasaribu

NCR No. :	2019.05.	Issued by :	Andi Pratama Pasaribu
Date Issued :	30 August 2019	Time Limit :	Next Surveillance
NC Grade :	Minor	Date of Closing :	
Standard Ref. & : Requirement	6.5.3 Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where such public facilities are unavailable or inaccessible.		

Evidence observed (filled by auditor):

Based on audit result obtained the fact that:

- The results of interviews with labor union representatives obtained information that there were workers 'complaints related to the condition of clean water provided by the company in the employees' house at Division 1 Aneka Persada Estate and Division 1 Pinang Sebatang Estate were considered to be inappropriate for use.
- Evaluation documents for compliance with regulations for the period of August 2, 2019, indicate that the
 company has evaluated and established clean water quality standards referring to Ministry of Health Regulation
 No. 32 of 2017. Compliance records show that the compliance status of the regulations has been declared
 fulfilled.
- The results of the review of clean water testing documents throughout the estate reveal that the company conducts clean water testing using river water quality standards in accordance with Government Regulation No. 82 of 2001 concerning River Water Quality.

Non-Conformance Description (filled by auditor):

The company has not been able to prove that the availability of clean water used by workers in housing has been appropriate and in accordance with the clean water quality standards specified in Ministry of Health Regulation No. 32 of 2017 concerning Environmental Health Standard Quality Standards and Water Health Requirements for Sanitary Hygiene, Swimming Pools, Solus Aqua, and Public Bathing.

Root Cause Analysis (filled by organization audited)

Correction (filled by organization audited):

Corrective Action (filled by organization audited):

Assessor Evaluation and Conclusion (filled by auditor):





Verified by

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NCR No.	2019.06.	Issued by :	Steve Mualim	
Date Issued	30 August 2019	Time Limit :	Next Surveillance	
NC Grade	Major	Date of Closing :		
Standard Ref. & : 7.3.1 Requirement There shall be evidence that no new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since November 2005. New plantings shall be planned and managed to best ensure the HCVs identified are maintained and/or enhanced				
	(HCVs), since November	2005. New plantings sl	more High Conservation Values nall be planned and managed to	
July 2015. During 2016-2 LUCA progress for PT Al for are still on review prod Non-Conformance Desc	(HCVs), since November best ensure the HCVs ide (see Criterion 5.2). d by auditor): s conducted disclosure of liabil 2019, company shown intense P. Until ASA1.3 based on com	2005. New plantings stantified are maintained a iity and LUC analysis in a e communications with F pany communication wit	more High Conservation Values hall be planned and managed to and/or enhanced accordance with RSPO template on RSPO compensation panel related h RSPO shown that LUC analysist	

Corrective Action (filled by organization audited):

Correction (filled by organization audited):

Assessor Evaluation and Conclusion (filled by auditor):

Verified by

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3.5.3. Opportunity for Improvement

No	Ref. Std.	Description
1	2.1.1	The company has the opportunity to ensure the establishment of a LKS Bipartite has been carried out and authorized by the relevant agencies.
2	4.7.5	The company has the opportunity to ensure that the P2K3 structure change has been approved.
3	6.5.2	The company has the opportunity to ensure that Collective Labor Agreement has been authorized by the Ministry of Manpower.
4	5.3.3	Management of Teluk Siak Factory Pond WTP

3.5.4. Noteworthy Positive Components

No	Description		
1	Management's commitment to apply the principles of sustainable palm oil development.		
2	Have competent human resources to implement the principles of sustainable palm oil development.		
3	Has obtained BLUE PROPER for the period 2017 - 2018.		
4	Has received an ISPO certificate in 2015.		
5	Has received the Zero Accident award in 2018 for PT Aneka Inti Persada		



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3.6 Summary of Arising Issues from Public and Auditor Verification

Public Issues	Auditau Varificatian	
(Institution/ NGO/Community)	Auditor Verification	
 Manpower and Transmigration Agency of Siak District The minimum wage applied today is the Sectoral Minimum Wage for Plantations in 2019 The Collective Labour Agreement used is still using the BKSPPS for the period 2018-2020, but it's not yet to approved by Manpower Ministry. 	The CH has implemented minimum wages and other labor regulations in accordance with applicable regulations and is explained in the 2.1.1 and 6.5.1 indicators	
 The CH has a wage scale for workers The CH has routinely registered workers with contract workers status if there are additional contract workers 	The rights and obligations of workers are listed in the Collective Labour Agreement and have been further explained in criterion 6.5	
 available. Mandatory reports has been reported by the company The CH has 6 labour unions which have been registered by the Manpower and Transmigration Agency 	The establishment of the "LKS Bipartite" is still in the process of communication between the workers, the union and company management.	
 The CH has included workers in the "BPJS Kesehatan dan Ketenagakerjaan" program Over the past year there have been no issues related to 	Mandatory reports to relevant agencies are explained in criteria 1.1	
child labor, discrimination and human rights violations in the CH environment The CH still doesn't have "LKS Bipartite"	The entire labour union has been registered and is currently active in the company only 5 unions	
	Based on the results of interviews and document studies, it is known that to date there have never been violations of human rights, child labor and discrimination in the CH environment	
 Labour Union of PT Aneka Inti Persada The CH has implemented a determination related to minimum wages Providing work tools and PPE has been provided free of charge by the CH The CH has included all workers in the BPJS Employment and Health program Payment of overtime is in accordance with related regulation The complaints mechanism is known by the workers and the complaints are always addressed by the CH Over the past year there have been no issues related to 	The CH has implemented minimum wages and other labor regulations in accordance with applicable regulations and is explained in the 2.1.1 and 6.5.1 indicators Based on the results of field visits and interviews with workers it is known that the company has provided PPE for all workers free of charge and routine replacement is done every 6 months. The CH has carried out socialization related to the	
child labor, discrimination and human rights violations in the corporate environment	complaints mechanism and has been well known by workers	
 The problem of workers' facilities for now is the availability of clean water that is not yet clearly known whether the clean water provided by the company has been declared suitable for use. Regarding the lack of approval of the Collective Labour Agreement by the Ministry of Manpower, the union feels that the Collective Labour Agreement is currently sufficient as the basis of employment in the company. The workers' 	Regarding of Collective Labour Agreement it has been describe in indicator 6.5.2	





Public Issues (Institution/ NGO/Community)	Auditor Verification
rights and obligations listed are quite clear and there are no problems in this regard. The trade union has also learned about the ratification of the Collective Labour Agreement which has delayed approval.	
Village Representatives from Meredan and Tualang Timur Village (Focus Group Discussion)	
The company had a good relationship with local communities. There is no land dispute case until this audit.	That's has been a good point.
Local Contractor	
 MKJP: MKJP has appointed as replanting project operator in PT. Aneka Inti Persada since 2012. All activity is using mechanization (by using heavy weight). MKJP appointed to not using fire during the replanting, avoiding the conservation area and manage the water surface/water conservation. MKJP also appointed to comply with OHS and worker welfare regulation. Their operator has provide with appropriate PPE and registered in BPJS Kesehatan and BPJS Ketenagakerjaan also. 	As described in indicator 6.10
 CV Puja Perawang Bestari Mandiri CV Ivan Jaya The contractor has a work agreement with the company with duration per 3 months. So far, the agreement renewed before it expired. The company's required all contractor fulfill the regulation especially in worker welfare regulation (minimum payment, registering their worker in health and worker insurance, OHS regulation etc). There is no issue regarding to payment. The company has paid timely. 	As described in indicator 6.10
 Gender Committee of PT Aneka Inti Persada The CH has supported the formation of gender committee organizations in each unit The routine activities of the gender committee are the activities of the posyandu, the women recitations, and grand recitations CH have implemented good gender policies including giving H1 and H2 leave rights to female workers, prohibiting workers who are pregnant and breastfeeding from working with chemicals, availability of daycare in each residential area for workers children There are no issues or complaints from workers related to 	According o document verification and interview with workers, there was no issues related to violation of the rights of woman. From the results of interviews with workers, the company has implemented of Company Policies such as reproductive rights and prohibition of pregnant woman to spray. It refer to criterion 6.9





Public Issues (Institution/ NGO/Community)	Auditor Verification
harassment, human rights violations or discrimination related to gender The complaint mechanism is known by workers	





4.0	4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY				
4.1	Formal Sign-off of Assessment Findings				
	Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.				
	Signed on behalf of:				
	PT Aneka Inti Persada Head PSQM	Mutuagung Lestari Lead Auditor			
	Alagendran Maniam Tuesday, 5 November 2019	Andi Pratama Pasaribu Tuesday, 5 November 2019			



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Appendix 1. List of Stakeholder Contacted in the RSPO Certification Process

No	Institution/NGO/Community	Address	Phone/Email	Form of	Date of	Response	
NO	· ·		r none/Linan	Communication	Contact	Yes	No
1	World Wide Fund for Nature, Wahana	Jakarta	-	Questionnaire via Email	13-08-2019		1
2	Lingkungan Hidup Indonesia	Jakarta	-	Questionnaire via Email	13-08-2019		V
3	Sawit Watch	Bogor	-	Questionnaire via Email	13-08-2019		√
4	Aliansi Masyarakat Adat Nasional	Jakarta	-	Questionnaire via Email	13-08-2019		√
5	Manpower & Transmigration Agency	Siak Regency of Riau Province	-	Interview	26-08-2019	√	
6	Environment Agency	Siak Regency of Riau Province	-	Interview	26-08-2019		√
7	Plantation Agency	Siak Regency of Riau Province	-	Interview	26-08-2019		√
8	National Land Agency	Siak Regency of Riau Province	-	Interview	26-08-2019		√
9	Labor Union PT Aneka Inti Persada: SPSI (Serikat Pekerja Seluruh Indonesia) SPP-MI (Serikat Pekerja Perkebunan – Minamas Indonesia) SBSI-HUKATAN (Serikat Buruh Seluruh Indonesia – Hutan Pertanahan Perkebunan Kelapa Sawit) SPP-KS (Serikat Pekerja Perkebunan – Kelapa Sawit) FKUI-SBSI (Federasi Kontruksi Umum dan Informal – Serikat Buruh Seluruh Indonesia)	PT Aneka Inti Persada	-	Interview	29-08-2019	\	
10	Maredan & Tualang Timur Village	Siak Regency of Riau Province	-	Interview	27-08-2019	✓	
11	Local Contractors (Cv Puja Perawang Bestari Mandiri & CV Ivan Jaya)	Siak Regency of Riau Province	-	Interview	29-08-2019	√	
12	Gender Committee PT Aneka Inti Persada	PT Aneka Inti Persada	-	Interview	29-08-2019	√	
13	 Security officer → 3 person Weighbridge operator → 1 person Logistic staff → 1 person Head clerk → 1 person FFB truck driver → 1 person Pesticide applicator and 	PT Aneka Inti Persada	-	Interview	26 to 30-08- 2019	✓	



supervisor → 7 person (2 male and 5 female) • Harvester and supervisor (using C1R2 gank) → 4 person • Contractor of land clearing (heavy weight operator) → 4 operator and 1			
supervisor.			



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Appendix 2. Assessment Program

DATE	26 – 30 August 2019		
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR	
Monday, 26 August 2019			
08.30 – 10.20	Jakarta → Pekanbaru		
10.20 – 12.00	Pekanbaru → Site	All Auditor	
10.20 – 15.00	Stakeholders consultation to Government of Siak Regency		
12.00 – 14.00	BREAK	All Auditor	
14.00 – 17.00	Opening Meeting Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Determine of Field Visit, Transparency and Confidentiality Clarification)	All Auditor	
Tuesday, 27 August 2019			
08.00 – 12.00	Public consultation with previous land owner and local communities surrounding the plantation area		
08.00 – 12.00	 Field Observation Teluk Siak Estate BMP, safety, worker welafre and complaint mechanism Hazardous Waste Material (B3) management; Worker facilities (housing, health clinic, clean water, etc), Land fill, Fire fighting facilities, Storage, ect. Legal Operation & Conservation Area 	All Auditor	
12.00 – 14.00	BREAK	All Auditor	
14.00 – 17.00	 Field Observation to Teluk Siak Factory Process Station, Safety Aspect and Worker Welfare (Grading – despatch) ETP; WTP; Hazardous Waste Warehouse; Drainage; Collecting place of fiber, Water Discharge, Hazardous Warehouse; Workshop, Chemical Store. Supply Chain 	All Auditor	
Wednesday, 28 August 201			
08.00 – 12.00	Field Observation Pinang Sebatang Estate BMP, safety, worker welafre and complaint mechanism Hazardous Waste Material (B3) management; Worker facilities (housing, health clinic, clean water, etc), Land fill, Fire fighting facilities, Storage, ect. Legal Operation & Conservation Area Field Observation Aneka Persada Estate BMP, safety, worker welafre and complaint mechanism Hazardous Waste Material (B3) management; Worker facilities (housing, health clinic, clean water, etc), Land fill, Fire fighting facilities, Storage, ect.	All Auditor	
12.00 – 14.00	Legal Operation & Conservation Area BREAK	All Auditor	
14.00 – 17.00	Document Review	All Auditor	
Thursday, 29 August 2019			
08.00 – 12.00	Public consultation with Gender Committee, Labour Union and Local Contractors Document Review	All Auditor	
12.00 – 14.00	BREAK	All Auditor	
14.00 – 17.00	Document Review	All Auditor	





Friday, 30 August 2019		
08.00 – 10.00	Closing Meeting	
10.00 – 12.00	Site → Pekanbaru	All Auditor
16.30 – 18.00	Pekanbaru → Jakarta	