

Sustainability Information Document

Noble Plantations Pte Ltd.

October 2017

Background Information on Noble Plantations

Noble Plantations Pte Ltd. (further referred to as Noble Plantations) is an oil palm grower and has been a member of the Roundtable on Sustainable Palm Oil (RSPO) since October 31, 2011.

Noble Plantations entered into the palm oil business as a grower in June 2010 by acquiring a controlling share in PT Henrison Inti Persada (PT HIP) in the Sorong Regency, West Papua Province. PT HIP is developing a plantation with a landbank of 32,546 ha, of which 12,047 ha have been planted, and it is now operating one crude palm oil (CPO) mill (coordinates: 131°33'41" E - 01°04'32" S). We do not purchase fresh fruit bunches (FFB) from independent suppliers.

During 2013, Noble Plantations began development at PT Pusaka Agro Lestari (PT PAL) in the Mimika Regency, in Papua Province. PT PAL has a landbank of 38,159 ha of which 7,096 ha has been planted. A CPO mill is planned for completion by mid-2019.

Thus, the total landbank of Noble Plantations is more than 70,705 ha (ACOP, 2016), with a total planted area of 19,260.1ha (Table 1). This includes the smallholder scheme with an area of 2,352.24 hectares. These two locations are the only landholdings of Noble Plantations. The location of the concessions is publicly available and shown in our RSPO Annual Communications of Progress (ACOP) 2014 and in the Summary Reports of the SEIA and HCV Assessments (see section **Relevant Documents**).

Table 1. Landbank data of Noble Plantations for period in end of September 2017

| No | Remark | PT HIP | PT PAL | Total |
|----|--|-----------|-----------|-----------|
| 1 | Total landbank/area controlled/managed (ha) | 32,546.30 | 38,159.60 | 70,705.90 |
| 2 | Landbank or planted area on peatland (ha) | 0.00 | 0.00 | 0.00 |
| 3 | Land title/user right (HGU/Hak Guna Usaha) (ha) | 22,751.52 | 30,494.99 | 53,246.51 |
| 4 | Number of estate/management units | 4.00 | 4.00 | 8.00 |
| 5 | Land controlled/managed for oil palm cultivation (ha): | 12,186.76 | 6,319.01 | 18,505.77 |
| | - Oil palm planted area (ha) | 11,149.09 | 5,758.81 | 16,907.90 |
| | - Nursery (ha) | 63.64 | 0.55 | 64.09 |
| | - Area for infrastructure (ha): | 974.13 | 559.65 | 1,533.78 |
| | 1. Mill | 5.23 | 0.00 | 5.23 |
| | 2. Housing/Emplacment, including office | 69.84 | 18.46 | 88.30 |
| | 3. Road | 899.06 | 541.19 | 1,440.25 |
| 6 | Conservation area inside HGU (ha) | 3,988.18 | 8,305.04 | 12,293.22 |
| 8 | Plasma/scheme smallholders planted area (ha) | 898.19 | 1,454.05 | 2,352.24 |
| 9 | Land designated and managed as HCV areas (HCV assessment) (ha) | 4,696.98 | 3,941.81 | 8,638.70 |
| 10 | Conservation set-aside area, including HCV area (ha) | 1,805.92 | 4,512.57 | 6,318.49 |
| 11 | Total HVC area (ha) | 6,502.81 | 8,454.38 | 14,957.19 |

Social and Environmental Sustainability

As a member of the RSPO, we have followed the RSPO New Planting Procedure (NPP) at both sites. This process requires a High Conservation Value (HCV) assessment as well as a Social Impact Assessment (SIA) to be conducted and a management plan implemented. Assessments are executed by certified RSPO assessors, whose work is then reviewed by an independent certifying body compliant with RSPO requirements. HCV areas are not developed and, are protected by our in house conservation teams.

Our objective is to have all our operations RSPO certified by 2020.

At Noble Plantations we understand that conservation is a practical matter and can only be achieved by a permanently established and integrated programme, which is part and parcel of our plantation operations. We not only protect the habitats that are threatened by human activities, but restore those that have been damaged.

A fully staffed and operational Conservation Department has a mutual interest with local people in conserving the forest, and ensuring that the harvest of forest products in the areas concerned remains sustainable.

Organization

Sustainability is the responsibility of Technical Director and Manager for Compliance and Sustainability.

To ensure palm oil sustainability, in February 2015 we conducted activities with an RSPO Consultant, the main purpose of which was to assist PT Henrison Inti Persada in implementing the RSPO system through a series of training and mentoring activities, as follows:

- Provide an understanding of, and a commitment to, the implementation of RSPO Principles and Criteria by the management and employees.
- Create a team for implementing RSPO system.
- Compare existing conditions to the requirements of the RSPO.
- Understand the requirements and regulations related to the RSPO implementation.
- Understand how to apply the Principles and Criteria of RSPO.

Traceability to Plantation Level

PT HIP uses the Identity Preserved (IP) supply chain model. The mill uses fruit bunches only from plantations that are owned by the company and will be certified by RSPO. All of the fruit bunches are traceable to plantation level for all operations, including smallholdings which are managed as an integral part of the group operations. This makes it possible to certify the group and the smallholdings at the same time.

The mill at PT PAL is still in under construction, and is planned for 2019. PT PAL has a time-bound commitment by which 100% of FFB will be traceable as at PT HIP.

Environmental Aspects

1. Deforestation

Since November 2005, no new plantings have replaced primary forest, and since July 2010 new plantings have not replaced any area required to maintain or enhance High Conservation Values (HCVs) (see section **Relevant Documents**, SOP New Non-Compliant Land Clearance Guidelines, Doc. No. HIP-SOP-COM-1603-001, Procedure 6.3 (p.5)). This applies also to all of our smallholdings.

Noble Plantations has a Conservation Department responsible for establishing and monitoring conservation areas inside and outside of estate boundaries, to detect encroachment or disturbance by local people or by workers. The department is also responsible for informing local people that they are not allowed to grow crops, clear vegetation, erect buildings, hunt, or disturb conservation areas (see **Relevant Document**, SOP Conservation and Environmental Guidelines, in the Responsibilities).

The GIS Department uses remote sensing high resolution images and drones to help monitor oil palm and conservation activities, and to produce maps.

2. Biodiversity

The landscape approach has been used to ensure biodiversity is protected. Conservation and environmental protection include:

- a. Conservation of habitats or ecosystems that contain representative communities of plants and animals, especially those that are rare, threatened or endangered (RTE).
- b. Conservation of forest areas that have high carbon stocks, to minimize the release of greenhouse gases that might be caused by conversion to oil palm.

Noble Plantations is committed to not endangering species of conservation concern, with reference to international and national system of classification as stated in the executive summary of HCV assessment. Both plant and animal species are classified based upon Government Regulation (PP No. 7/1999), CITES and Red List of IUCN.

3. Conservation of High Conservation Value Areas

New plantings are planned and managed to ensure that HCVs are identified and maintained, and where necessary, enhanced (see section **Relevant Documents**, SOP New Non-Compliant Land Clearance Guidelines).

At PT HIP, a comprehensive HCV assessment, management and monitoring plan was conducted in July 2010 for the whole concession area, with stakeholder consultation, before conversion, or new planting was done, as required by RSPO Principles & Criteria (P&C) and Noble Plantations's SOP. At PT PAL the assessment was done in September 2011.

The total land area that has been set aside for forest and HCV conservation is 12,093 ha. The HCV assessments performed after November 2005 are publicly available on the RSPO website. For the references please see:

- <https://www.rsपो.org/certification/new-planting-procedures/public-consultations/noble-plantation-pt-henrison-inti-persada>
 - RSPO Notification of Proposed New Planting
 - Summary Report of Planning and Management
 - Summary Report of SEIA and HCV Assessment

- <http://www.rsपो.org/certification/new-planting-procedures/public-consultations/noble-plantation-pte-ltd-pt-pusaka-agro-lestari-papua-province-indonesia-new-planting-assessment>
 - RSPO Notification of New Planting_PT PAL_December 2011
 - RSPO NPP_SEIA_HCV Summary Report_PT PAL_December 2011
 - RSPO NPP_Summary of Management Plan_PT PAL_December 2011

Management plans have been compiled for preservation and enhancement of HCV areas identified by the assessments (see section **Relevant Documents**, SOP New Non-Compliant Land Clearance Guidelines).

Noble Plantations is committed to using only licensed HCV assessors who are licensed by the HCV Resource Network's Assessor Licensing Scheme (ALS). The HCV assessments for PT HIP and PT PAL were executed by licensed assessors selected from the RSPO list of approved assessors. We hired Nyoto Santoso from IPB-Bogor with License number ALS14013NS, who has been a Licensed assessor since 23 December 2014.

The aforementioned statements apply to all of our smallholders.

4. Maintenance of High Carbon Stock

An independent carbon stock study, using a methodology approved by the RSPO (Carbon Assessment Tool for New Oil Palm Plantings-RSPO, December 2012), has been carried out by Noble Plantations.

The average carbon stock is 58.69 ton C per hectare at PT HIP, and 68.08 ton C per hectare at PT PAL.

To ensure our operational practices adhere to the RSPO P&C, we continue to work closely with internationally renowned experts to map and assess the change in land use/cover stratification. Noble Plantations is committed to applying High Carbon Stock (HCS) approach, as defined by HCS Approach Toolkit, to all of its landholdings, and refraining from developing in any HCS areas (see section **Relevant Documents**, SOP Conservation and Environment Guidelines).

The Carbon Stock Assessment for PT Pusaka Agro Lestari was carried out in November 2013 and The Study of Carbon Stock for PT Henrison Inti Persada was carried out in July 2014.

To further minimize the impact of plantation development on the carbon stock in the study area, Noble Plantations is actively conserving HCV areas as previously identified.

5. No Planting on Peat Soils

No new development takes place on peat soils including all of our scheme smallholders (see section **Relevant Documents**, SOP Conservation and Environment Guidelines).

Noble Plantations has no peat soils according to “*Peta Indikatif Penundaan Pemberian Izin Baru Pemanfaatan Hutan, Penggunaan Kawasan Hutan dan Perubahan Peruntukan Kawasan Hutan dan Areal Penggunaan Lain (Revisi XII)*”, Ministry of Natural Environment and Forestry, dated 31 July 2017.”

Noble Plantations has received a letter from the Government stating that there is no indication of peat soil and primary forest in the oil palm plantation area:

- PT Pusaka Agro Lestari obtain the letter of technical review from Ministry of Environmental and Forestry, No. S.174/BPKH.X-3/2017, dated 10 August 2017.
- PT Henrison Inti Persada obtain the letter of technical review from Ministry of Environmental and Forestry, No. S.156/BPKH.XVII-1/2017, dated 18 September 2017.

6. Zero Burning, Fire Management and Monitoring

Noble Plantations is committed to a strict policy of zero burning during land clearing for new planting or replanting (see section **Relevant Documents**, SOP New Non-Compliant Land Clearance Guidelines). This policy applies also to all of our smallholders.

Noble uses an early warning system to detect the occurrence of fire (land, building and mill). Equipment and procedure for fire prevention are being prepared. The company has established Firefighting Teams and followed Fire-fighting training class D and C to comply with the requirements of government regulations. In both the estates and mill, simulation of firefighting has been carried out, so that if fire occurs, the staff would know how to extinguish it.

According to weather data (rainfall and rain days), there is rain somewhere in the plantation almost every day and the average rainfall during the past four years is 3,040 mm/year, with 180 rain days. Our risk is low, and there have been no fires both in estate and mill. Routine fire patrols are carried out together with the community and Conservation Department.

We submit a report “*Laporan Upaya Pencegahan dan Penanggulangan Kebakaran*” every six months to the local authorities as a part of our compliance with applicable laws and regulations.

The aforementioned statements apply to all of our scheme smallholders.

7. Reduction of Greenhouse Gas Emissions

We have identified the sources of all greenhouse gas (GHG) emissions from our operations in accordance with RSPO P&C 5.6 and 7.8, and are committed to reduce these emissions. To maintain our commitment in land use change activities, we strictly avoid areas with high carbon stock and apply a zero burning policy. This commitment applies to all of our scheme smallholders.

Methodology used to calculate GHG emissions is RSPO Palm GHG Calculator version 3.0.1, dated 30 October 2016.

Noble Plantation has calculated GHG emissions from land use change for 2016 is 366,484.13 tCO₂e/year. The total amount of GHG emissions stands at 82,917.65 tCO₂e/year.

8. Water Management Plan

We are developing a comprehensive “Water Management Plan” for our operations in order to fulfil the requirements of the RSPO P&C 4.4 and specifically for 4.4.1. We are committed to improving both water supply and water quality in our programme.

Scope

- Supplying water to our workers for domestic use
- Protection of water courses and wetlands, including securing and maintaining appropriate riparian and other buffer zones.
- Monitoring of effluent, especially BOD, and compliance with legal requirements.
- Monitoring of mill water use per ton of FFB.

Implementation of Water Management Plan

Water is supplied to the worker’s accommodation from the river, for washing, and from rainwater collected from the roof for consumption.

In monitoring water quality, we comply with the Regulation of Health Minister No. 492 of 2010. We send six samples of water that employees consume to a third party laboratory for measurement of the quality.

Protection of water courses and wetlands

A forested buffer zone (riparian zone) is maintained next to the rivers. The size of these riparian zones is 200 meters on each side of the rivers if the width of the river is more than 15 meters wide; 100 meters if the width of the river is more than 5 meters wide; and 50 meters if the width of the river is below 5 meters wide (see **Relevant Document**, SOP New Non-Compliant Land Clearance Guidelines).

The water supply is protected by prohibiting the spraying of chemicals and use of fertilisers in the riparian zones (SOP Conservation and Environmental Guidelines). The Conservation Department has implemented enrichment planting of forest trees in the riparian zones, and does routine inspections to ensure the riparian zones remain protected.

Monitoring of effluent

Palm Oil Mill Effluent (POME) is treated in aerobic and anaerobic ponds, to ensure that Biological Oxygen Demand (BOD) levels are safe before being discharged to the water body. The quality of river water is monitored by taking samples for analysis each month, from both downstream and upstream of the discharge point.

The quality of palm oil mill effluent is monitored by taking samples from a trap pit each month. The Company monitors the quality of effluent waste in every pond.

The quality of mill effluent is monitored monthly in cooperation with an accredited laboratory (PT Unilab - Jakarta), with test results meeting all parameters as set by the regulation *Peraturan Menteri Negara Lingkungan Hidup No. 5/2014 Appendix III (Table 2)*.

Table 2. Analysis of palm oil mill effluent (POME) for first half of 2017

| Parameter | Units | Standard | Jan | Feb | Mar | Apr | May |
|-------------|-------|----------|------|------|------|------|-----|
| TSS | mg/L | 250 | 14 | 37 | 8 | 50 | 78 |
| BOD | mg/L | 100 | 42 | 46 | 32 | 46 | 71 |
| COD | mg/L | 350 | 174 | 171 | 153 | 144 | 253 |
| Oil and Fat | mg/L | 25 | <1.8 | <1.8 | <1.8 | <1.8 | 12 |
| N | mg/L | 50 | 5 | 36 | 36 | 41 | 70 |
| pH | | 6 - 9 | 9 | 9 | 9 | 9 | 9 |

The Company has permits for mill effluent from Bupati Sorong (*Izin Pembuangan Limbah Cair kepada PT Henrison Inti Persada*). Monitoring of POME is carried out regularly by external and internal parties and reported to the Environmental Agency (*Dinas Lingkungan Hidup Kabupaten Sorong*) every three months.

Monitoring of mill water use per ton of FFB (Fresh Fruit Bunches)

The use of water by the mill to process FFB is recorded. The target is 1 tonne of water per tonne FFB, so all values for the past three years are within the target (Table 3).

Table 3. Use of water for processing FFB

| | 2014 | 2015 | 2016 |
|--------------------------------|--------|--------|--------|
| Water consumption (ton) | 40,132 | 44,411 | 52,268 |
| FFB processed (ton) | 53,266 | 89,732 | 93,127 |
| Water used/tonne FFB processed | 0.75 | 0.49 | 0.56 |

9. Pesticide and Fertilizer Use

To fulfill the requirements of RSPO P&C 4.6, Noble Plantations is committed to minimise the use of chemicals, including pesticides and chemical fertilizers, and has a time-bound plan for phasing out their use. Noble Plantations has committed to the following:

1. Pesticides are used in ways that do not endanger health or the environment.
2. Use of only approved and registered pesticides permitted by the relevant authorities (*Buku Pestisida Pertanian dan Kehutanan, Kementerian Pertanian Republik Indonesia*).
3. No use of chemicals that are categorized as World Health Organization Class 1A or 1B, or listed by the Stockholm or Rotterdam Conventions, and paraquat.

The time-bound plan of agrochemical use

| Agrochemical | Year | Status |
|--|------|----------------|
| No use of paraquat | 2018 | No longer used |
| No use of World Health Organisation (WHO) Class 1A and 1B pesticides | 2018 | Stopped |
| No use of chemicals listed under the Stockholm and Rotterdam Conventions | 2018 | Stopped |

Pesticides currently (first half/January-June 2017) in use:

- Herbicides* 2,4-D Dimethylamine (Ken-Amine 865 SL)
2,4-D Dimethylamine (Santamin 865 SL)
Metsulfuron methyl (Amiron – M20 WG)
Glufosinate ammonium (Fascinate 150 SL)
Glyphosate (Glisat 480 SL and Wintag 490 SL)
Triclopyr (Kenlon 480 EC)
- Fungicides* Mancozeb (Dithane-M45 80 WP)
- Rodenticides* Brodifacoum (Norat 0.005 BB) to be stopped in 2018
- Insecticides* Deltamethrin (Decis 25 EC)

Fertilizer currently in use:

1. Urea
2. Compound NPKMg 12.12.17.2
3. KCl/MOP
4. HGF Borate
5. Rock Phosphate

10. Integrated Pest Management (IPM)

Noble Plantations is developing an Integrated Pest Management system (IPM) which fulfills the requirements of RSPO P&C 4.5.1. The Integrated Pest Management system includes cultural, biological, and physical methods to minimize the use of chemicals.

There is an Early Warning System (EWS) that includes a census for leaf-eating caterpillars, rats, ganoderma disease, rhinoceros beetles, and others.

Beneficial plants are cultivated, such as *Turnera subullata* (*Bunga pukul delapan*) and *Antigonon leptopus*, as hosts to parasitic wasps which can keep insect pests under control,

Nesting boxes are provided for barn owls to help control rats.

Chemicals may be used, with control over the kind of chemical used, dosage, area and rotation.

SOCIAL ASPECTS

1. Human Right

Noble is a signatory to and fully supports the UN Global Compact. This is a strategic policy initiative for businesses that are committed to aligning their operations and strategies with ten universally accepted principles. These include principles relating to human rights, freedom of association and effective recognition of the right to collective bargaining, elimination of forced and compulsory labour and abolition of child labour; to environmental challenges and responsibilities; and to Anti-Corruption measures (see **Related Document**, Code of Business Conduct and Guidelines - Noble Group, point 5.e. page 3).

Noble seeks to identify, access and manage human rights impacts within our spheres of influence and activities in line with the following policy aims:

Employees

We are committed to respecting the human rights of our employees as established in the Fundamental ILO Conventions or Free and Fair Labour Principles. These include: providing equal opportunities and treatment to obtain employment. Pay and conditions for employees and contract workers must always meet at least legal or industry minimum standards. We respect the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Children under the age of 18 (~~eighteen~~) years are not employed or exploited. We prohibit any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age. We prevent sexual and all other forms of harassment and violence in the work place, while protecting the reproductive rights of all, with no form of forced or trafficked labour to be used.

Suppliers and Contractors

To establish and maintain appropriate procedures to evaluate and select major suppliers and contractors, based on our human rights and sustainability policies, and to monitor their performance where appropriate.

We are moving towards application of the Fundamental ILO Conventions or Free and Fair Labour Principles through engagement and collaboration where necessary.

Local Communities

We respect the cultures, customs and values of the people in communities in which we operate. We endeavour to contribute, within the scope of our capabilities, to promote the fulfillment of human rights through improving economic (including to ensure food security for local communities), environmental and social conditions and serve as a positive influence in communities in which we operate. And we have open dialogue with stakeholders and participate in community engagement activities.

Society

We participate where appropriate in public affairs in a non-partisan and responsible way to promote internationally recognized human rights.

We are committed to play a positive role, within our spheres of influence, in capacity-building for the realization of human rights within countries of operation.

We promote the realisation of environmental sustainability and development through our core business and through our participation in other multi-stakeholder activities where appropriate.

We will uphold the highest standards in business ethics and integrity and where appropriate support efforts of national and international authorities to establish and enforce high ethical standards for all businesses.

2. Undertaking of Free, Prior and Informed Consent (FPIC)

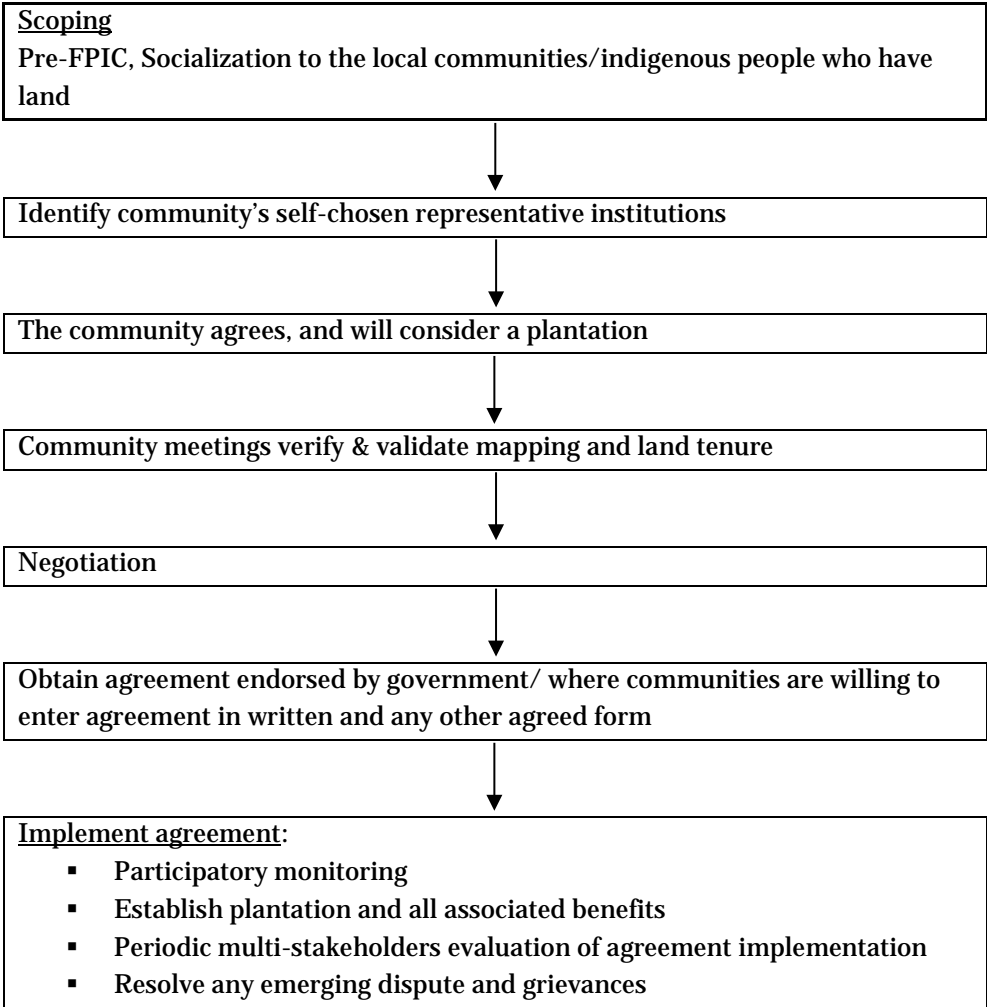
We acknowledge our responsibility to uphold the right of indigenous peoples to their traditional lands through undertaking Free, Prior and Informed Consent (FPIC), which forms the foundation of

achieving social and environmental sustainability. Free, Prior and Informed Consent (FPIC) is the right of indigenous peoples and other local communities to give or to withhold their consent to any project affecting their lands, livelihoods and environment.

We are committed to obtain the FPIC in advance of any development, and to follow international best practices as required by:

1. UN Declaration on the Rights of Indigenous Peoples (2007): "Right to distinctive relationship with land; right to own, use, develop and control their lands, territories and other resources."
2. ILO Convention 169 (1989) on Indigenous and Tribal Peoples: "Respect and safeguard rights to lands and natural resources traditionally occupied and used; respect for customs of inheritance; no forced removals; compensation for loss and injury."

FPIC Flowchart:



3. Employees

The number of employees in the first half 2017 was 3,267 . Percentage of temporary employees stood at 5.39 % while the percentage of female employees was 30.92 %.

Pay and conditions for employees and for contract workers are always in accordance with legal or industry minimum standards.

4. Occupational, Health and Safety

Health and safety at work of all our employees is paramount, as stated in our Environmental, Health and Safety Policy. It is our policy to provide and maintain a working environment for our employees that is, so far as is reasonably practicable, safe and adequate, without risks to health at work. Employees include permanent, part-time and temporary staff. The sustainability of our assets and the environment in which we operate is a key consideration in how we do business at present and in the future. The frequency and severity of accidents is recorded and reported routinely (Table 4).

Table 4. Frequency and Severity of Accidents for first half 2017

| | |
|--|--------------|
| Total work hours, all Departements (hours) | 1,661,848.29 |
| Total accidents needing first aid | 2 |
| Total work accident handled by clinic | 6 |
| Total work accident reported to BPJS TK | 1 |
| Time lost because of accidents (days) | 70 |
| Fatalities | 0 |
| FR - (Frequency Rate) * | 3.61 |
| SR - (Severity Rate) | 42.12 |

* Frequency = (Total accidents x 1,000,000)/work hours

** Severity = (Time lost x 1,000,000)/ work hours

5. PPE and Pesticide Training

The Company provides personal protective equipment (PPE) appropriately according to the results of a hazard identification survey for every work place. Training in the use of pesticides has been given, including in the use of limited pesticides, and the calibration of spraying equipment.

6. Certification

RSPO

Noble Plantations is working towards obtaining RSPO certification for the mill and supply base by the end of 2020. PT HIP did Pre-assessment for RSPO certification on 13-17 December, 2016. Now we are going through the process of completing Land Use Change Analysis (LUCA).

ISPO (Indonesian Sustainable Palm Oil)

PT HIP has obtained ISPO Certification from the ISPO Commission, Ministry of Agriculture, on April 2017. The certificate was presented by the Director General of Plantations at an International Conference on ISPO in Jakarta.

SERTIFIKAT ISPO



Sertifikat ini diberikan kepada:

PT. Henrison Inti Persada

Alamat Kantor Pusat:
Wisma Pondok Indah 2, Suite 201 Jl. Sutan Iskandar Muda Kav V-1A, Kelurahan Pondok Pinang, Kecamatan Kebayoran Lama, Jakarta Selatan, Indonesia
Alamat Lokasi Kebun dan Pabrik Pengolahan:
Jl. Sorong Klamono Km. 42, Kampung Gisim Darat, Distrik Klamono, Kabupaten Sorong, Provinsi Papua Barat, Indonesia

Telah memenuhi Peraturan Menteri Pertanian Nomor 19/Permentan/OT.140/3/2011 tentang Pedoman Perkebunan Kelapa Sawit Berkelanjutan Indonesia (Indonesian Sustainable Palm Oil/ISPO) melalui skema penilaian sertifikasi mutu

Unit yang disertifikasi:
Kebun : Kebun Klamono, Kebun Klasafet, Kebun Klaga, Kebun Kiawilis
Pabrik : PKS PT. Henrison Inti Persada
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Nomor Urut Sertifikat:
SGS-ID-ISPO-0013
Tanggal Penerbitan Sertifikat:
4 April 2017

Tanggal Berakhirnya Sertifikat:
3 April 2022



7. Smallholders

Plantation Companies that have a business licence for an oil palm plantation are required by law to provide smallholdings (referred to as “Plasma”) for the local community with an area of at least 20% of the total planted area that is managed by the company (Law Number 39 of 2014, Article 58).

Our smallholders are grouped into cooperatives, with business use licences (HGU) in the names of the cooperatives (Tables 5 and 6). The smallholdings are managed as an integral part of the group operations. The companies organise various programmes for the smallholders (Table 7). All smallholders are involved in programmes.

Table 5. Plasma cooperatives at PT HIP

| Plasma Cooperative | Members (households) | Area of HGU (ha) | Area already planted (ha) |
|--------------------|----------------------|------------------|---------------------------|
| Pawbili Klagilim | 46 | 340.18 | 217.02 |
| Klagima Sinifagu | 55 | 445.16 | 445.16 |
| Klimagasi Sinagi | 39 | 305.60 | 183.64 |
| HIP Total | 140 | 1,090.94 | 898.19 |

1st Phase: 140 Members, 2nd Phase: - (in process)

Table 6. Plasma cooperatives at PT PAL

| Plasma Cooperative | Members (household) | Area of HGU (ha) | Area already planted (ha) |
|------------------------|---------------------|------------------|---------------------------|
| Buh Bau Yamane | 323 | 1,556.38 | 717 |
| Owaipuwe | 84 | 337.29 | 337 |
| Komorawe Mitra Pusaka* | 415 | 2,137.47 | 297.05 |
| Makime* | 225 | 1,235.87 | 103 |
| PAL Total | 1.047 | 5,267** | 1454.05 |

1st Phase: 458 Members, 2nd Phase: 561 Members (in process)

* For Komorawe 102 members and Makime 31 members still have to be registered

** PAL plasma HGU includes 824, 10 ha conservation area.

The companies organise various programmes for the smallholders. All smallholders are involved in programmes.

Table 7. Programmes organised by the companies for the smallholders

| No. | Support Programmes | Details of Support Programmes |
|-----|------------------------------|--|
| 1. | Plasma Programmes | Socialise to the clans to develop plasma |
| | | Data participants of smallholders |
| | | Legally establish cooperative |
| | | Socialise and sign agreement with the clans |
| | | Endorsement participants of plasma |
| | | Training of good agriculture practice and cooperative |
| | | Invites participants to work in the plasma area |
| | | Giving result of plasma (money from FFB price) |
| | | Socialise of plasma cost in every month |
| 2. | Implementation of programmes | Training for plasma cooperative, conducted 2x per year |
| | | Training of best agriculture practice, 1x per year |
| | | Socialise of plasma cost, carried out every month |
| | | Attend the monthly meeting of FFB price |

The boundaries of the smallholdings have been made available to the RSPO as part of estate maps, but not all may be publicly available because of the confidentiality constraints.

8. Grievances and Complaints System for Relevant Stakeholders

There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties. This is in accordance with RSPO P&C 6.3. The purpose of the system is to resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested, as long as that information is supported with adequate initial evidence. It is open to all affected parties.

If any employee reasonably believes that some policy, practice, or activity of Noble is in violation of law, or the spirit or intent or ethics of the law, a written complaint must be immediately filed.

Grievances from employees can be submitted by:

- Direct submission, whereby employees, either individually or in groups to convey their grievances, face to face, to their direct supervisor, or higher, or directly to the HR Department or to another specific department by filling out a Grievance Form. Facts and evidence are attached to the Grievance Form. It is to be analyzed immediately, clarified, documented and answered.
- Indirect submission, whereby employees either individually or in groups convey their grievances through a trade union or bipartite representative, or through a suggestion box.

Grievances must be processed as soon as possible by consultation. The Company and employees shall endeavour to ensure that the problem does not become an industrial dispute or result in termination of employment.

Noble will not retaliate against employees who disclose or threaten to disclose to a supervisor or a public body, any activity, policy, or practice of Noble that the employee reasonably believes is in violation of a law, or a rule, or regulation mandated pursuant to law or is in violation of a clear mandate of public policy concerning the health, safety, welfare, or protection of the environment.

Noble has a procedure to provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO and ISPO criteria (RSPO P&C 1). Noble recognizes the importance of open and transparent methods for communication and consultation between the Company, local communities and other affected or interested parties.

External stakeholders, especially indigenous people, who wish to submit a complaint or grievance can make contact by telephone, and letter (email/facsimile), or directly meet with the Company representative, as a group or individually. They may fill out a Form of Communication and Consultation that shows the kind of complaint, the date, and how the problem arose, with action taken and recommendation for follow-up. The Company will respond in a timely manner.

Noble will completely resolve any problems that arise to maintain a good relationship between all parties. All communication are recorded in a logbook.

Relevant Documents

ACOP, 2014 (Approved Code Of Practice, 2014)

<https://www.rspo.org/file/acop2014b/submissions/noble%20plantations%20pte%20ltd-ACOP2014b.pdf>

ACOP, 2015 (Approved Code Of Practice, 2015)

<https://www.rspo.org/file/acop2015/submissions/noble%20plantations%20pt.e%20ltd-ACOP2015.pdf>

ACOP, 2016

To be made available on the RSPO website <https://www.rspo.org/members/830/Noble-Plantations-Pte-Ltd>

Summary report of EIA, SIA, HCV assessment results in PT. HIP in 2014

<http://www.rspo.org/file/HIP%20-%20R14E26%20-%20RSPO%20Summary%20Report%20of%20Assesment.pdf>

Summary report of EIA, SIA, HCV assessment results in PT. PAL in 2014

http://www.rspo.org/_v2/file/2%20%20RSPO%20NPP_SEIA_HCV%20Summary%20Report_PT%20PAL_December%20'11_revisi%203-final-signed.pdf

The HCV management and monitoring plans for PT. HIP

<http://www.rspo.org/file/HIP%20-%20R14E26%20-%20RSPO%20Summary%20Management%20&%20Monitoring%20Plan.pdf>

The HCV management and monitoring plans for PT. PAL

http://www.rspo.org/_v2/file/3%20%20RSPO%20NPP_Summary%20of%20Management%20Plan_PT%20PAL_December%20'11_revisi%202-signed.pdf

Conservation Recap

http://www.thisisnoble.com/images/responsibility/1-NPL-D16H17_ConservationRecap_July2016.pdf

Standard Operating Procedures (SOP) New Non-Compliant Land Clearance Guidelines, PT. HIP

<http://www.thisisnoble.com/images/responsibility/2-HIP-SOP-COM-1603-001-PedomanPembukaanLahanBaruNon-Compliance.pdf>

Standard Operating Procedures (SOP) New Non-Compliant Land Clearance Guidelines, PT. PAL

http://www.thisisnoble.com/images/responsibility/3-PAL-D16I15_SOP-Compliant-Land-Clearing-Guidelines.pdf

Standard Operating Procedures (SOP) Conservation and Environment Guidelines, PT. HIP

<http://www.thisisnoble.com/images/responsibility/4-SOP-Conservation-Environment-Guidelines.pdf>

Standard Operating Procedures (SOP) Conservation and Environment Guidelines, PT. PAL

http://www.thisisnoble.com/images/responsibility/5-PAL-D16I16_SOP-Conservation-Environmental-Protection.pdf