

Roundtable on Sustainable Palm Oil Certification
RSPO

[] Stage-1 [] Stage-2 [✓] Surveillance [] Re-Certification

Name of Management Organisation : SIAIS Palm Oil Mill, PT AUSTINDO NUSANTARA JAYA AGRI SIAIS subsidiary of PT AUSTINDO NUSANTARA JAYA AGRI

Plantation Name : Lembah Subur Utara Estate, Lembah Subur Tengah Estate and Lembah Subur Selatan Estate.

Location : Pardomuan Village, Angkola Selatan Sub District, Tapanuli Selatan District, Sumatera Utara Province, Indonesia

Certificate Code : **RSPO-MUTU/046**

Date of Certificate Issue : 25 September 2014 **Date of License Issue :** 25 September 2015

Date of Certificate Expiry : 24 September 2019 **Date of License Expiry :** 24 September 2016

| Assessment | Assessment Date | PT. Mutuagung Lestari Auditor | Reviewed by | Approved by |
|------------|-----------------------|---|----------------|--------------------|
| ASA-1 | 29 June - 3 July 2015 | Sandra Purba (Lead Auditor); Octo Nainggolan; I Wayan S; Fuji Lestari; Andi Pratama | Taufik Margani | Tony Ariifarachman |

| Assessment | Approved by MUTUAGUNG LESTARI on: |
|------------|-----------------------------------|
| ASA-01 | 15 September 2015 |

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Figure 1. Location Map of PT Austindo Nusantara Jaya Agri SIAIS

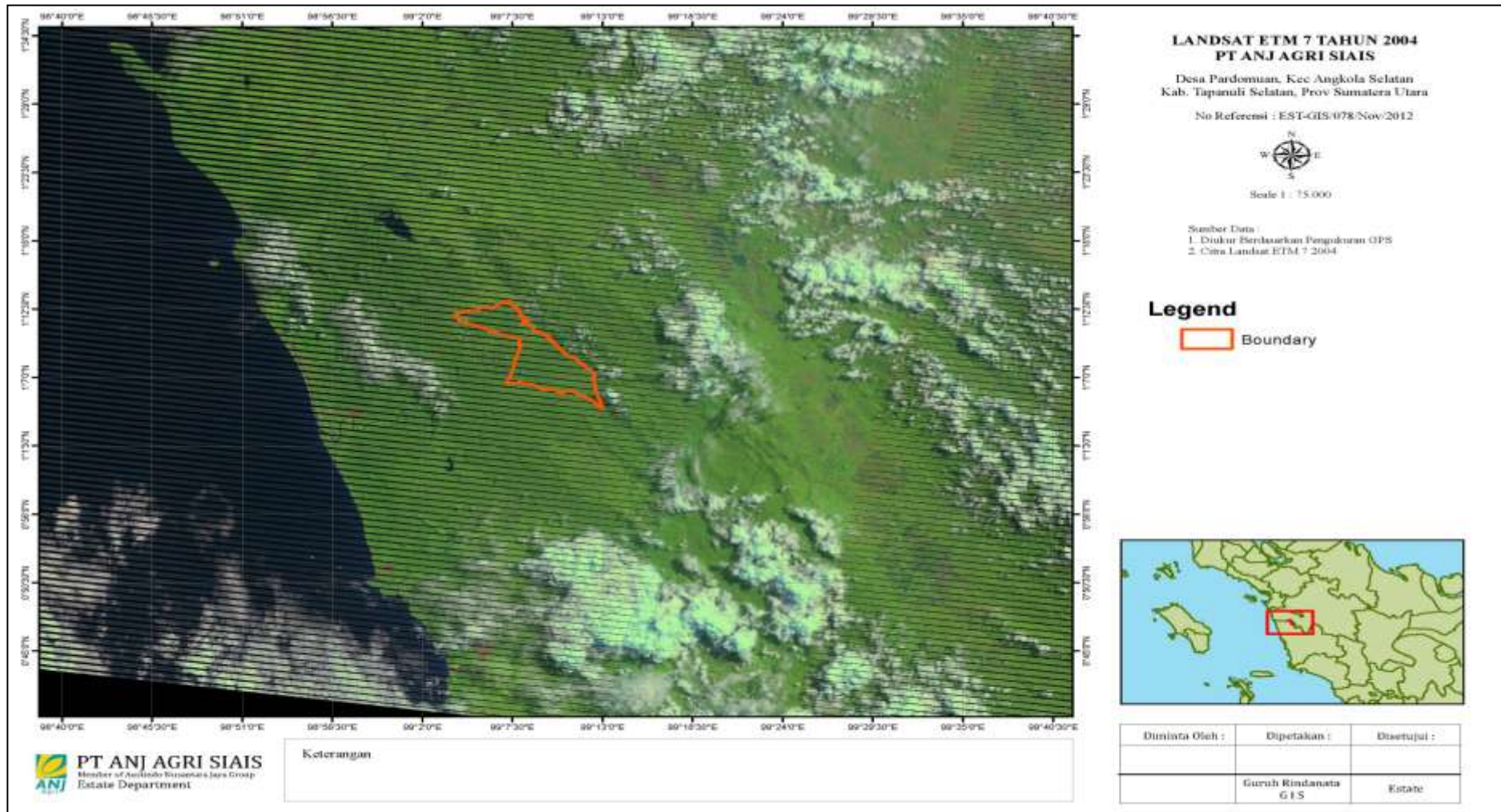
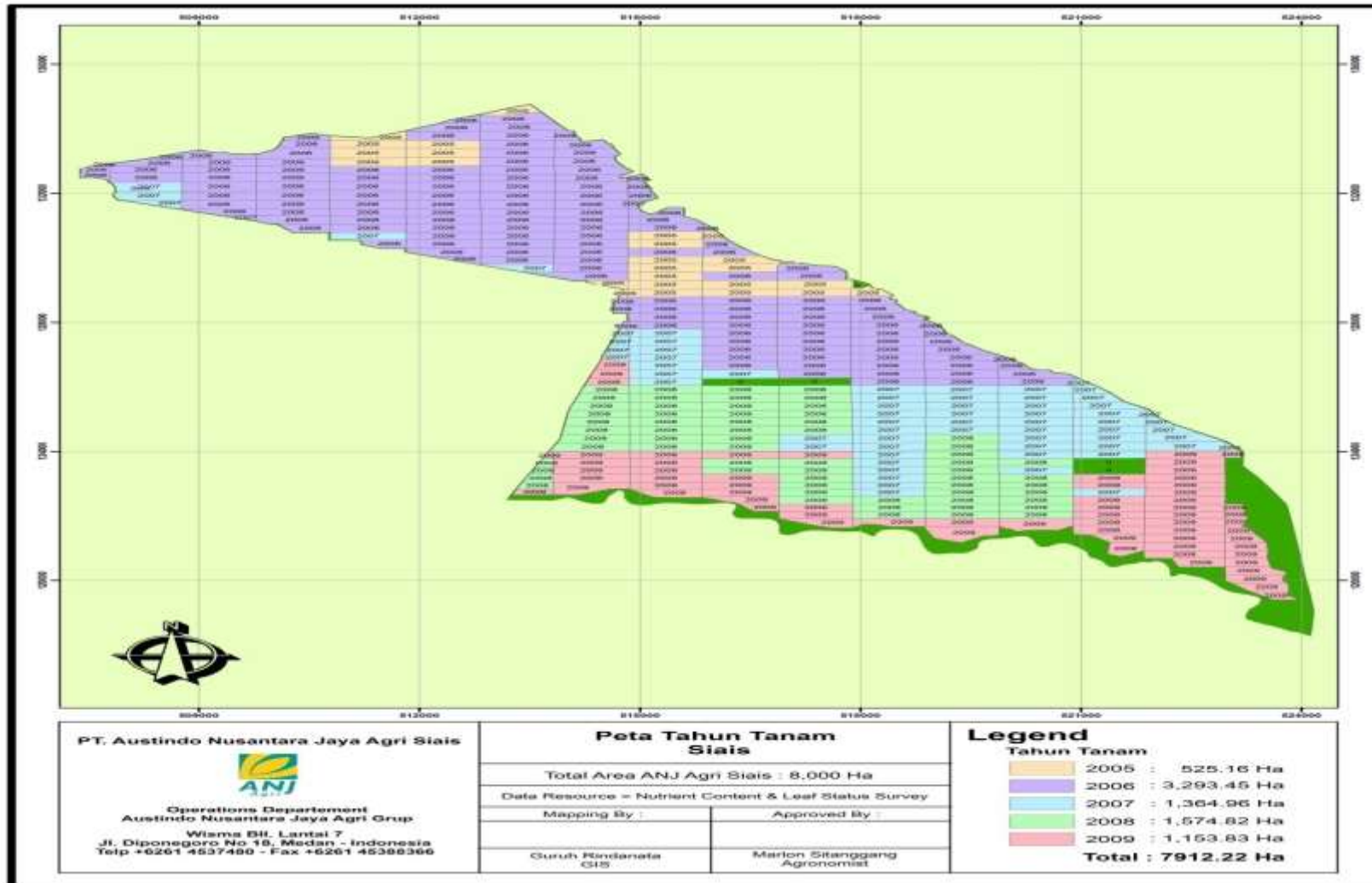


Figure 2. Operational Map of PT Austindo Nusantara Jaya Agri SIAIS



Abbreviations Used

| | | |
|-----------|---|--|
| ANJA | : | PT Austindo Nusantara Jaya Agri |
| BOD | : | Biological Oxygen Demand |
| CSR | : | Corporate Social Responsibility |
| CPO | : | Crude Palm Oil |
| EFB | : | Empty Fruit Bunch |
| ESH | : | Environment and Safety and Health |
| FFB | : | Fresh Fruit Bunches |
| HCV | : | High Conservation Value (Nilai Konservasi Tinggi) |
| HGU | : | Hak Guna Usaha. (<i>Land Use Permit</i>) |
| HIRARC | : | Hazard Identification Risk Assessment and Risk Control |
| IPM | : | Integrated Pest Management |
| LSUE | : | Lembah Subur Utara Estate |
| LSTE | : | Lembah Subur Tengah Estate |
| LSSE | : | Lembah Subur Selatan Estate |
| NAB | : | Nilai Ambang Batas (<i>threshold value</i>) |
| NC | : | Non Conformance |
| OER | : | Oil Extraction Rate |
| OHS | : | Occupational Health and Safety |
| P&C | : | Principle and Criteria |
| PK | : | Palm Kernel |
| PKO | : | Palm Kernel Oil |
| PKS / POM | : | Pabrik Kelapa Sawit (<i>Palm Oil Mill</i>) |
| PPE | : | Personal Protection Equipment |
| RSPO | : | Roundtable on Sustainable Palm Oil |
| SEIA | : | Social and Environmental Impact Assessment |
| SIA | : | Social Impact Assessment |
| SCCS | : | Supply Chain Certification System |
| SOP | : | Standard Operating Procedure |
| WWTP | : | Wastewater Treatment Plant |

| 1.0 | SCOPE of the CERTIFICATION ASSESSMENT | | | | | | | | | | |
|--------------------|---|---|--|------------|--|----------|-----------|-------------------|------------------|--------------------|-----------------|
| 1.1 | Assessment Standard Used | <ul style="list-style-type: none"> <i>RSPO Principles and Criteria (P&C) for Sustainable Palm Oil Production Generic Standard - 2013</i> <i>RSPO Supply Chain Certification Standard November 2014 for CPO Mill.</i> | | | | | | | | | |
| 1.2 | Organisation Information | | | | | | | | | | |
| 1.2.1 | Organisation name listed in the certificate | PT.AUSTINDO NUSANTARA JAYA AGRI – ANJA Siais Mill (PT.Austindo Nusantara Jaya Agri Siais) | | | | | | | | | |
| 1.2.2 | Contact person | Antoperis Tarigan | | | | | | | | | |
| 1.2.3 | Organisation address and site address | <ul style="list-style-type: none"> PT.AUSTINDO NUSANTARA JAYA AGRI: Wisma BII Lt. 7 - Jalan Diponegoro No. 18, Medan. Estates and Mill Location: Pardomuan Village, Sub District of South Angkola, Distirct of South Tapanuli, Province of Sumatera Utara | | | | | | | | | |
| 1.2.4 | Telephone | (62-21) 453 7480 | | | | | | | | | |
| 1.2.5 | Fax | - | | | | | | | | | |
| 1.2.6 | E-mail | antoperis.tarigan@anj-group.com | | | | | | | | | |
| 1.2.7 | Web page address | www.anjagri.com | | | | | | | | | |
| 1.2.8 | Management Representative who completed the application for certification | Foreign Investment | | | | | | | | | |
| 1.2.9 | Registered as RSPO member | Mulkan Nasution (General Manager) | | | | | | | | | |
| 1.3 | Type of Assessment | | | | | | | | | | |
| 1.3.1 | Scope of Assessment and Number of Management Unit | 1 (one) unit of palm oil mill (ANJA Siais POM) and 3 (three) units FFB supply base: Lembah Subur Selatan Estate, Lembah Subur Tengah Estate and Lembah Subur Utara Estate. | | | | | | | | | |
| 1.3.2 | Type of certificate | Single | | | | | | | | | |
| 1.4 | Locations of Mill and Plantation | | | | | | | | | | |
| 1.4.1 | Location of Mill | | | | | | | | | | |
| | Name of Mill | Location | <table border="1"> <thead> <tr> <th colspan="2">Coordinate</th> </tr> <tr> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>N 01° 10' 29.29"</td> <td>E 99° 09' 22.85"</td> </tr> </tbody> </table> | Coordinate | | Latitude | Longitude | N 01° 10' 29.29" | E 99° 09' 22.85" | | |
| Coordinate | | | | | | | | | | | |
| Latitude | Longitude | | | | | | | | | | |
| N 01° 10' 29.29" | E 99° 09' 22.85" | | | | | | | | | | |
| | ANJ Agri Siais Mill | Pardomuan Village, Sub District of South Angkola, Distirct of South Tapanuli, Province of Sumatera Utara. | | | | | | | | | |
| 1.4.2 | Location of Certification Scope of Supply Base | | | | | | | | | | |
| | Name of Supply Base | Location | <table border="1"> <thead> <tr> <th colspan="2">Coordinate</th> </tr> <tr> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>N 01° 11' 44.68"N</td> <td>E 99° 06' 52.45"</td> </tr> <tr> <td>N 01° 09' 51.73" N</td> <td>E 99° 09' 6.66"</td> </tr> </tbody> </table> | Coordinate | | Latitude | Longitude | N 01° 11' 44.68"N | E 99° 06' 52.45" | N 01° 09' 51.73" N | E 99° 09' 6.66" |
| Coordinate | | | | | | | | | | | |
| Latitude | Longitude | | | | | | | | | | |
| N 01° 11' 44.68"N | E 99° 06' 52.45" | | | | | | | | | | |
| N 01° 09' 51.73" N | E 99° 09' 6.66" | | | | | | | | | | |
| | Lembah Subur Utara Estate | Pardomuan Village, Sub District of South Angkola, Distirct of South Tapanuli, Province of Sumatera Utara. | | | | | | | | | |
| | Lembah Subur Tengah Estate | Pardomuan Village, Sub District of South Angkola, Distirct of South Tapanuli, Province of Sumatera Utara. | | | | | | | | | |

| | | | | |
|------------|---|---|------------------------------------|-------------------------------|
| | Lembah Subur Selatan Estate | Pardomuan Village, Sub District of South Angkola, Distirct of South Tapanuli, Province of Sumatera Utara. | N 01° 07' 21.50" | E 99° 09' 40.72" |
| 1.5 | Description of Area Statement | | | |
| 1.5.1 | Tenure | | | |
| | • State | | 9,639.06 | Ha |
| | • Community | | | Ha |
| 1.5.2 | Area Statement | | | |
| | • Total area | | 9,639.06 | Ha |
| | • Mature area | | 7,912.22 | Ha |
| | • Immature area | | - | Ha |
| | • Mill | | 17.91 | Ha |
| | • Emplishment | | 54.11 | Ha |
| | • Infrastructure | | 15.00 | Ha |
| | • Nursery | | - | Ha |
| | • Occupied area | | - | Ha |
| | • HCV | | 1,639.82 | Ha |
| 1.6 | Planting Year and Cycles | | | |
| 1.6.1 | Age profile of planting year | | | |
| | Planting Year | Hectarage (Ha) | | |
| | | LSU | LST | LSS |
| | 2005 | 250.87 | 274.29 | - |
| | 2006 | 1,952.36 | 1,341.09 | - |
| | 2007 | 78.72 | 1,003.10 | 283.14 |
| | 2008 | - | 47.34 | 1,527.48 |
| | 2009 | - | - | 1,153.83 |
| | TOTAL | 2,281.95 | 2,665.82 | 2,964.45 |
| 1.6.2 | New Planting area after January 2010 | | - | Ha |
| 1.6.3 | Planting Cycle | | 1 st Cycle | |
| 1.7 | Description of Mill and Supply Base | | | |
| 1.7.1 | Description of Mill | | | |
| | Name of Mill | Capacity (tonnes/ hour) | FFB Processed (tonnes/year) | CPO |
| | | | | Out put (tonnes) |
| | | | | Extraction (%) |
| | Siais POM | 60 | 240,868.02 | 51,995.42 |
| | | | | 21.59 |
| | | | | 10,129.92 |
| | | | | 4.21 |
| | <i>*Production data source period of July 2014 -June 2015</i> | | | |
| 1.7.2 | Description of Certification Scope of Supply Base | | | |
| | Name of Estate | Total Area (Ha) | Planted Area (Ha) | FFB (tonnes/year) |
| | | | | Yield (tonnes/ha/year) |
| | | | | Supplied to Mill |
| | | | | FFB (tonnes/year) |
| | | | | % |
| | Lembah Subur Utara | 2,315.72 | 2,281.95 | 56,316.14 |
| | | | | 25 |
| | | | | 56,316.14 |
| | | | | 100 |

| | | | | | | | |
|-------|--|--|--|----------------------|---|---------------------|-------------------|
| | Lembah Subur Tengah | 4,065.01 | 2,665.82 | 63,072.27 | 24 | 63,072.27 | 100 |
| | Lembah Subur Selatan | 3,258.33 | 2,964.45 | 63,286.04 | 21 | 63,286.04 | 100 |
| | TOTAL | 9,639.06 | 7,912.22 | 182,674.45 | 23 | 182,674.45 | 100 |
| | **Production data source period of July 2014 -June 2015 | | | | | | |
| 1.7.3 | FFB description from other source | | | | | | |
| | Name of sources | Organisation | Location | | Supplied to Mill FFB (tonnes/year) | | |
| | RIRI | Independent Smallholders (Non RSPO certified) | Tapanuli Selatan, SumateraUtara | | 23,107.21 | | |
| | SDP | | Tapanuli Selatan, SumateraUtara | | 3,968.54 | | |
| | CSR Janji Matogu | | Tapanuli Selatan, SumateraUtara | | 2,813.80 | | |
| | UD Boru Namora | | Tapanuli Selatan, SumateraUtara | | 2,144.60 | | |
| | Transit Tank | Independent Supplier (Non RSPO certified) | Tapanuli Selatan, SumateraUtara | | 26,159.43 | | |
| | TOTAL | | | | | 58,193.57 | |
| | **Production data source period of July 2014 -June 2015 | | | | | | |
| 1.7.4 | Product categories | | | FFB, CPO, PK | | | |
| 1.8 | Estimate Tonnage of Certified Product | | | | | | |
| 1.8.1 | Past Annual Claim Certified Product | | Previous Certificate Claim 25 September 2014 - 24 September 2015 (tonnes/year) | | Actual certified product 25 September 2014 - 30 June 2015 (tonnes/year) | | |
| | • FFB Production | | 170,731.10 | | 111,661.9 | | |
| | • CPO Production | | 37,560.84 | | 29,252 | | |
| | • Palm Kernel (PK) Production | | 7,682.90 | | 2,029 | | |
| | ** Claim certificate period of 25 September 2014 - 24 September 2015 | | | | | | |
| | ** Actual claim period of 25 September 2014 - 30 June 2015 | | | | | | |
| 1.8.2 | Estimate of Certified FFB Claim | | | | | | |
| | Name of Estate(s) | Total Area (Ha) | Planted Area (Ha) | FFB (tonnes/year) | Yield (tonnes/ha/year) | | |
| | Lembah Subur Utara | 2,315.72 | 2,281.95 | 60,258 | 26 | | |
| | Lembah Subur Tengah | 4,065.01 | 2,665.82 | 67,487 | 25 | | |
| | Lembah Subur Selatan | 3,258.33 | 2,964.45 | 67,716 | 23 | | |
| | Total | 9,639.06 | 7,912.22 | 195,461 | 25 | | |
| | *Projected FFB production for July 2015 – June 2016 | | | | | | |
| 1.8.3 | Estimate of Certified Palm Product Claim | | | | | | |
| | Name of Mill | Capacity (tonnes/ hour) | FFB Processed (tonnes/year) | CPO | | Palm Kernel | |
| | | | | Out put (tonnes) | Extraction (%) | Out put (tonnes) | Extraction (%) |
| | PKS ANJA Siais | 60 | 195,461 | 43,002 | 22 | 7,818 | 4.3 |
| | *Projected CSPO and CSPK production for Juli 2015 – June 2016 | | | | | | |
| 1.9 | Other Certifications | | | | | | |
| | ISO 9001:2008 | | | - | | | |
| | ISO 14001: 2004 | | | - | | | |
| | OHSAS 18001:2007 | | | - | | | |

| | | | | | | |
|---|---|-----------------------------|------------------------------|--|--|--------------------|
| | ISCC | | - | | | |
| | Others | | | | | |
| | | | | | | |
| 1.10 | Time Bound Plan | | | | | |
| 1.10.1 | Time Bound Plan for Other Management Units | | | | | |
| | Management Unit | | Estate (Supply Base) | Time Bound Plan | Location | Status |
| | MILL | Time Bound Plan | | | | |
| | ANJA SIAS | 2014 | Lembah Subur Utara | 2014 | South Tapanuli District, North Sumatera Province, Indonesia | Audited |
| | | | Lembah Subur Tengah | 2014 | | Audited |
| | | | Lembah Subur Selatan | 2014 | | Audited |
| | Jangkang PT.Sahabat Mewah Makmur | 2009 | Jangkang | 2009 | East Belitung District, Bangka Belitung Province, Indonesia | Certified 2009 |
| | | | Balok | 2009 | | |
| | | | Ladang Jaya | 2009 | | |
| | | | Sari Bunga | 2009 | | |
| | | | Air Ruak | 2009 | | |
| | PT. ANJ Agri | 2012 | Estate Wilayah Timur | 2012 | Simangambat Julu Village, Simangambat Sub district, Padang Lawas Utara District, North Sumatera Province | Certified Nov 2012 |
| | | | Estate Wilayah tengah | 2012 | | |
| | | | Estate Wilayah Barat | 2012 | | |
| | PT.Kayung Agung Lestari | 2016 | PT.Kayung Agung Lestari | 2016 | Ketapang Distict, West Kalimantan, Indonesia | Stage 01 |
| | - | - | PT.Galempa Sejahtera Bersama | 2019 | Empat Lawang Distict, South Sumatera, Indonesia | NPP |
| - | - | PT.Putera Manunggal Perkasa | 2019 | South Sorong District, West Papua, Indonesia | NPP | |
| - | - | PT.Permata Putera Mandiri | 2019 | South Sorong District, West Papua, Indonesia | NPP | |
| Data source: Progressive timebound plan certification activity of PT ANJ Agri | | | | | | |
| 1.10.2 | Progress of Associated Smallholders and Outgrowers for Certifiable Standard | | | | | |
| | - | | | | | |

| | |
|---------------|--|
| 2.0 | ASSESSMENT PROCESS |
| 2.1 | Assessment Team |
| ASA-1 | <p>1. Sandra Purba (Lead Auditor Witnessed). Bachelor of Forestry, Department of Forest Products Technology, Faculty of Agriculture, University of North Sumatra. Have experience working in oil palm plantations Company. She had attended such training: Training Expert of OHSAS General, Training ISPO Auditor, Awareness RSPO, training ISO 22000-2009 Auditor/Lead auditor, Auditor of Management System Certification (ISO 9001-2008), training of RSPO Lead and training of ISO 14064 and GHG calculation. Currently he worked as an auditor at Certification Body.</p> <p>2. Octo HPN Nainggolan (Lead Auditor Witnessing). A bachelor of Agriculture, majoring of Social Economics of Agriculture (Agribusiness). He has a working experience since 2004 oil palm Plantation Company in Indonesia. Trainings attended namely: Training of Conservation of Natural and Biological Resources in supporting HCV, Basic Plantation Management Program, Plantation Integrated Pest Management training, Followed the Management System Certification (ISO 9001-2008/SNI 19011-9001:2008), Environment Management System (ISO 14001:2004) , RSPO Lead Auditors Training Course, Indonesian Sustainable Palm Oil (ISPO) Lead Auditor training course and supply chain certification system training by BM Trada. Currently, he worked at Professional Certification Body. In the assessment activity, he assessed on legal aspect, best practices, environment aspect, social aspect, workers welfare, FFB Processing and supply chain requirement.</p> <p>3. Andi Pratama Pasaribu (Auditor). Bachelor of Agriculture, Social Economic of Agriculture (Agribussines) department, Jember University. 5 years experience in oil palm plantation and several training were followed Indonesian Sustainable Palm Oil (ISPO) auditor training course, management system ISO 9001-2008, Awareness ISO 22000. In this initial assessment, he assessed Best Practices and integrated pest management aspects.</p> <p>4. I Wayan Sudiantara (Auditor). He is a bachelor of agriculture technique from Bogor Agriculture University. He has experience for composing EIA since 1990 (he has EIA compilation team competence certificate). He has been involved as sustainable forest production management auditor for assessing the performance since 1997 or the scheme of forestry ministry since 2002 (he has auditor certificate from LEI). He was working as the consultant in forestry, he has experience on the ISPO assessment in several company as auditor (he passed the ISPO training). On this program, he shall assess the aspect of enviornment, soil and water conservation.</p> <p>5. Fuji Lestari (Auditor Trainee). Bachelor of Agribusiness Management of Jember Politechnique Institute. She has participated on ISPO Auditor Training, Awareness RSPO, Training ISO 9001:2008. She shall assess the aspect of social and manpower.</p> |
| 2.2 | Assessment Methodology, Assessment Process and Locations of Assessment |
| 2.2.1 | Figure of person days to implement assessment |
| ASA-01 | <p>Number of auditors : 4 auditor</p> <p>Number of days for ST-1 on site : 3 days</p> <p>Number of working days for ST-1 on site : 12 Working days</p> |
| 2.2.2 | Assessment Process |
| ASA-01 | <p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Austindo Nusantara Jaya Agri Siais to the requirements of RSPO Principles and Criteria for Sustainable Palm Oil Production, Generic Standard, 2013 and Supply Chain Requirement for CPO Mill, November 2014</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) <i>interview</i>, aiming to obtain more detailed information and verify the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site. Several opportunities for improvement of the results ASA-01 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (first surveillance). Improvement of findings from main assesment findings were observed by auditors at this ASA-01 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-01.</p> <p>Please find the assessment program on Appendix 2</p> |

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| 2.2.3 | Locations of Assessment |
| ASA-01 | <p>The location sample taken for observation is considered the concerned issue of the company operational. The sampling is determined based on public consultation and document review. The chosen of sample location referred to the formula of $(x= 0,8 \sqrt{y})$ where there are 3 estates of Lembah Subur Utara, lembah Subur Selatan and Lembah Subur Tengah. The visited location during ASA 1 is PT ANJA Siais Mill, Lembah Subur Tengah Estate and Lembah Subur Selatan Estate:</p> <p>Lembah Subur Selatan Estate.</p> <p>Location 1. Block J35/J36. Observation on the road and bridge maintenance.</p> <p>Location 2. Block H39. Observation and interview with the Termit Control Officer. The Officer was able to describe and demonstrate the termit control technique as well as the proper PPE use.</p> <p>Location 3. Block K43. Observation and interview with the sprayers and the spray team foreman. The foreman and sprayers have been equipped with PPE (boots, apron, masker, gloves and helmet). All employees are permanent employees and they have been registered on the labour social assurance. The waging standard system followed the minimum wage standard applied by the regional government. The sprayers have aware of the spraying work technique and they have aware of the conservation and riparian area which should not be sprayed (chemicals in form of fertilizer or herbicide). The spraying workers were able to identify the type of protected species within estate area.</p> <p>Location 4. Block O48. Observation and interview with the harvesters and foreman I. The harvesters have used PPE (helmet and boots). According to the result of interview, the waging system followed the minimum wage standard applied by the regional government. The received facilities by the employees were the settlement, medical station and free education. The harvesters have known and have been able to identify the protected species within the estate area.</p> <p>Location 5. Block O48. Observation on the rat control (barn owl box). Interview with the operational staff, there are barn owl boxes in each block (hectar cover 1:30 Ha).</p> <p>Location 6. National Land Agency Pole No. 64 (block H47, Division 11 of LSS) and No. 68 (Block G47, Division 11 of LSS) No. 36 (Block P63). Observation on the pole position and maintenance. The company has maintained the pole and ensured the coordinate of the pole is in accordance with the the one on the map. According to the observation, the pole is well maintained and in its position.</p> <p>Lembah Subur Tengah Estate</p> <p>Location 1. Block L26. Observation on the subsidence pole. The pole is in good condition and well maintained. Furthermore, it is monitored routinely every semester.</p> <p>Location 2. Block L34. Observation on the watergate as one of the water management infrastructure. The watergate was constructed permanently and there is a piezometer. The monitoring is conducted routinely every week or post the rainfall.</p> <p>Location 3. Block L42. Observation and interview with the harvesters and foreman I. The harvesters have used PPE (helmet and boots). According to the result of interview, the waging system followed the minimum wage standard applied by the regional government. The received facilities by the employees were the settlement, medical station and free education from the company. The harvesters have known and have been able to identify the protected species especially in the estate area.</p> <p>Location 4. Block K25. Observation on piezometer. According to the field visit, the piezometer is well maintained and monitored routinely every 2 weeks.</p> <p>Location 5. Block J25 and J26. Observation on waterstick. According to the field visit, the water stick is well maintained and monitored routinely everyday.</p> <p>Location 6. Central Emplacement. Conducting field visit to emplacement/housing, curch/mosque, sport facility, clinic. Interview with the workers in term of the provided facilities.</p> <p>Location 7. Operational Facility. Conducting field visit to pesticide storage, fertilizer storage and hazardous waste</p> |

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| | <p>storage. The implementation of OHSMS and waste management has been conducted. According to the result of interview with the Officer, they have aware of the task and responsibility.</p> <p>Location 8. Sprayer Washing Station. Observing the spraying workers's washing station. The implementation of OHSMS and hazardous waste management has been conducted in line with the SOP.</p> <p>Location 9. HCV Area (50 Ha) of Aek Sibara Division VII. Field observation over the Aek Sibara conservation area. There were information's signboard and warning's signboard. The management of the area has been conducted such as routine patrol and area protection.</p> <p>Location 10. Central Fire Control Facility. Overlooking the owned fire control facilities and land fire extinguishing simulation at estate.</p> <p>Location 11. Settlement of Division 6. Observing and interviewing the employees live on the settlement. In general, the domestic waste management has been well managed.</p> <p>Location 12. Clinic. Observation and interview with the Clinic Officer. The clinic provides medical service to all employees who experience work accident. The medical waste has been well-managed.</p> <p>Location 13. Water Management Facility (Water Gate blok J-22, Stop Bound). Field observation on the water management program. The water has been managed. There was a piezometer and functioning well. According to the interview with the Officer, the monitoring has been conducted routinely.</p> <p>Location 14. Boundary Pole No. 076, 026 and 027. According to the observation, the pole has been maintained routinely. The pole condition is good, the pole number is readable and easily accessed.</p> <p>Location 15. Paraupan Riparian and Bukit Sembaur Conservation Area. Field observation on the riparian area and Bukit Sembaur conservation area. The company has managed it well. There are available notification's signboard and prohibition signboard.</p> <p>Location 16. ANJA Siais POM, Processing Stage, Chemicals and Effluent Processing Stage (IPAL). Observation on FFB receipt and processing. Interview with the mill workers. The implementation of OHS has been well conducted. The workers are able to describe the stage of each station. The manpower law was well implemented. The workers have known the mechanism to complaint.</p> <p>Village and institutions:</p> <p>Location 1. Focus Group Discussion (FGD) with the village government, traditional figure, community figure and local contractor from the villages nearby estate (Janji Matogu Village, Pardomuan Village and Contractor)</p> <p>Location 2. Interview and consultation with Environment Agency, Manpower Agency, Plantation and Husbandry Agency, National Land Agency of South Tapanuli District.</p> |
| 2.3 | Stakeholder Consultation and Stakeholders Contacted |
| 2.3.1 | Summary of stakeholder consultation process. |
| ASA-01 | <p>Summary of stakeholder consultation process :</p> <ul style="list-style-type: none"> - Consultation of stakeholders for PT Austindo Nusantara Jaya Agri Siais was held through Public Notification thirty days before the assessment conducted on Mutuagung Website dated 8 June 2015. - Public consultation meeting with external stakeholders by interviews conducted by visits to government institution on 30 June 2015. - Public consultation meeting with internal stakeholders by interviews and local stakeholders conducted by FGD methode on 30 June 2015) - Correspondence with NGO (WWF, Sawit Watch and Walhi) by email on 19 June 2015 <p>Numbers of input from stakeholders were clarified by PT Austindo Nusantara Jaya Agri Siais</p> |
| 2.3.2 | Stakeholder contacted |
| | Please find appendix 1 |
| 2.4 | Determining Next Assessment |
| | Next surveillance (<i>Surveillance-02</i>) will be determined nine to twelve months after ANJA Siais is certified |

3.0. ASSESSMENT FINDINGS

3.1. Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of ANJA Siais POM – PT Austindo Nusantara Jaya Agri Siais operation consisting of one (01) mill and three (3) oil palm estates.

During the assessment, there were six (6) nonconformities were assigned against Major Compliance Indicators; four (4) nonconformities were assigned against Minor Compliance Indicators and eight (8) 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 actions that had been reviewed and accepted by Auditors in form of documentation evidence. Those corrective actions taken that consist of six (6) Major non-conformities had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that ANJA Siais POM - PT Austindo Nusantara Jaya Agri Siais complied with the requirements of RSPO Principles and Criteria (P&C) for Sustainable Palm Oil Production, Generic Standard – 2013 dan Supply Chain Certification Standard, November 2014.

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is Continued.

| Ref Std. | VERIFICATION RESULT of MUTU-Certification | |
|--|---|--|
| 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. | |
| | <p>The company has the record of information request which is documented on the logbook of communication and information provision for external (Document No. FRM – SOP Leg 02-02, rev. 01/01, dated April 1st 2013). It is monthly updated and it describes the date, letter number, sender, purpose, terms, date of information response and notification. According to the verification on the record of communication and external information response, there were only 11 letters in term of the assistance request. For example, the fund assistance request for the construction of GPSDI Sukaramai Church (Letter No. 425.2/GPSDDI/2015) dated April 22nd 2015. The company response is a disposition that the company has not been able to assist the church construction.</p> <p>According to the SOP of communication and information response No. SOP-Leg-02 dated April 1st 2013, the follow up of the incoming letter and proposal shall be given to GM and External Relation Manager at least 3 days since its arrival. It will be processed for at least 3 months. If there is no response from the management for more than 3 months, if there is no response from the management then the external relation officer shall directly inform the concerned party that the proposal or request for company participation is refused by the company. The external relation officer is responsible to communicate to the external party in term of the rejection or approval of the proposal orally and written and updating the status updating program on the logbook of communication and provision of information for external.</p> <p>According to the result of verification over the logbook of communication and information provision for external response on March 2015, there was no information request from the stakeholder. There were only 11 letters requesting for assistance such as fund assistance for the wudu area at Mosque of Darul Falah (Letter No. 470/153/03/2015) dated March 18th 2015. The company response is in form of disposition on approval over the fund assistance for IDR</p> | |

2,000,000 (USD 163) and there was a minute of fund assistance handover dated April 26th, 2015. It was signed by both parties.

1. Furthermore, the company also has SOP of documentation system (Document No. SOP-SCD-01, rev.01/03 dated November 10th 2014). According to the SOP, there was a document management which cover the level of document legalization, department code, document code, document identity, document control, record control, completeness of document information and document numbering system. The record's retention control are maintained based on the company's need. The record that has to do with finance and taxation is maintained for at least 10 years. The record that has to do with certification system is kept for the period of certification. For example, RSPO certificate for at least 5 years. However, there is an exception for the ISCC certification that the certification document is maintained for 10 years. The document termination and withdrawal of no longer invalid record is applied as the above mentioned document.

The company has the list of stakeholder for PT ANJ Agri Siais on 2015 that was signed by the Head of Assistant on March 1st 2015. There were 60 stakeholders on the list which cover the name, agency, position and telephone number. The 60 stakeholders are consisted of government officials, village and hamlet's government apparatus, school principal, police, contractor, community, etc.

The list of the stakeholder is annually updated and the meeting shall be routinely held every semester.

The company has well trained Officer to communicate with the External Stakeholders on behalf of Dedy Nainggolan, CSR Officer on behalf of Abdul Haris Margolang and External Affair Staff on behalf of Ayub Siregar.

According to the result of public consultation with the associated agencies and villages nearby estate (Janji Matogu and Pardomuan Village), the company has informed the publicly-accessed information to stakeholders. The agencies and nearby villages confirmed that the company is quite fast on responding information request.

The company informs the agency through the mandatory reports like:

- Registration of Workforce's Mandatory Report for period of March 1st 2015 to February 28th 2016 to the South Tapanuli District's Manpower Agency. It was received on March 1st 2015.
- Evidence of work accident reporting on behalf of M. Ali Pasaribu (Head of Assistant of Mill Maintenance) dated May 18th 2015 via email to BPJS of manpower.
- Evidence of environmental management and monitoring plan report in 1st period (January – March 2015) to South Tapanuli District's Environment Agency dated May 20th 2015. There were reports of effluent, fire prevention and management and hazardous waste.

The company was not able to show the evidence of report sending. For example:

- Evidence of work accident report on behalf of M. Ali Pasaribu (Head of Assistant of Mill Maintenance) to Manpower and Transmigration Agency.
- Evidence of plantation business progress report of semester 2 in 2014 to Plantation Agency.

Hence, there was **Major NC No. 2015.01**

Verification on August 6th 2015

The company has conducted corrective action and has it shown in form of the document of report receipt of plantation business progress of PT ANJ Agri Siais in 1st semester (sent on August 2014) and in 2nd semester (sent on March 2015) of 2014 in letter No. 002/ANJASiais-EA/TH.ip/02-15. Hence, the NC is closed.

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| Major 1.1.1 | 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. | | |

The company has determined the publicly-accessed documents on the SOP of communication and information provision (Document No. SOP-Leg-02, Revision 1 dated April 1st 2013). The SOP described in detail the type of information that can be shared to external. The mean of information provision to the external party included the company document that can be publicly access by external with management approval. The description over the document access is explained as follow:

Internal Information

All information that have to do with the company given to the employees with no condition. For example, the company's policy, company's operational and the documents that have to do with manpower, environment, etc.

External Information

All information that have to do with the company without exception whether oral nor written given to the third parties like government, NGO, media and community. For example, the documents related to social, manpower, environment and OHS.

Classified Information

All information that have to do with the company without any exception which contains important information cannot be shared with all stakeholders since its character and function is considered have a big impact to the business sustainability and company policy. For example, the document related to human resource, legal and cooperation. According to the result of public consultation with the associated agencies and villages nearby estate (Janji Matogu and Pardomuan Village), the company has informed the publicly-accessed information to stakeholders. The agencies and nearby villages confirmed that the company is quite fast on responding information request.

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| Status: Comply |
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1.3

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

The company has the document of business ethic code dated January 1st 2014. According to the document, the company shall comply all the applied laws and regulation in Republic of Indonesia and the company's operational area, especially the substance and essence of the laws.

PT ANJA Siais shall keep the commitment to implement the ethic code as described on the guideline as an act of loyalty as a good citizen. There was a statement of the protection and guardiance over the company's asset. The employees must use the company's fund carefully as if spending their private fund. The company expects that the employees shall not get the benefit of the business travel program financially. The employees are not allowed to approve the report of cost nor business travel nor entertainment for their own spent.

The ethic code was composed in bahasa Indonesia which was understood by all parties. The ethic code has been socialized on:

Training report of ANJ Value Workhsop program dated October 1st – 3rd 2013. The training explained the information on socialization as mentioned within compame ethical code. The training. It was attended by 96 employees.

Auditor has interviewed the company's contractor and informed that the industrialist has maintained the business ethic and cooperation. There was no bribery indication for whole operation.

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| Status: Comply |
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PRINCIPLE #2 COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

2.1

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

According to the SOP in document No. SOP-Leg-01 edition 01/-3 in term of the evaluation of the law compliance, the evaluation shall be conducted annually.

The company has shows evidence over the implementation and obedience of the applied regulation, among others are:

- The implementation of the North Sumatera Governor No. 188.44/0972/KPTS/2014 in term of the minimum wage standard for North Sumatera Province region. The company has paid the worker's wage based on the applied law.
- The company has implemented law in term of BPJS of Health by registering all workers to be BPJS member.
- The company has sent its employees on the restricted pesticide training based on the Agriculture Ministry Regulation No. 24 Year 2011 Clause 9.
- The company has implemented zero burning principle based on Technical Guideline of Zero Burning for Land Management (PLTB) from the Agriculture Ministry year 2011.
- During the initial assessment program, there was no adequate evidence that the company has reported to the change on the processing to the government based on the Agriculture Ministry Regulation No. 98 Year 2013 clause 41. The company has had documents of land legality such as Land Use Title (HGU), plantation business permit and location permit. **See NC No. 2014.01**

Verification on May 28th 2014

The company has reported to changes on plantation business permit processing to:

- South Tapanuli District Plantation and Husbandry Agency on May 26th 2014.
- Regional secretary of South Tapanulis District on May 26th 2014.

According to the ASA-1 assesment, there was no response over the letter and report sent by the company. Therefore, the company has opportunity to follow up the response over the report of structural change to the agency based on the Agriculture Ministry Regulation No. 98 Year 2013 clause 41 to the local government (Plantation Agency and District Secretariat of South Tapanuli District) on May 26th 2014. **#OFI**

- The company has had permit of waste water disposal to the river based on the decree of South Tapanuli Regent No. 596/KPTS/2014 in term of the waste water disposal for PT. Austindo Nusantara Jaya Agri Siais dated November 4th 2014 valid for 3 years.
- The company has had the permit of hazardous waste storage based on the permit from South Tapanuli Regent No. 503/1769/2014 in term of the permit to collect hazardous waste to PT Austindo Nusantara Jaya Agri Siais dated March 7th 2014 valid for 3 years.
- The company has conducted routine reporting of environmental management and monitoring plan to the assoiated agency based on the obligation and matrix of environment document (EIA) owned by the company.

According to the result of public consultation with the associated agencies (National Land Agency, Environment Agency and Manpower Agency), the company has conducted their obligations based on the applied law, the routine reports have been sent to the assoiated agencies.

The company was able to show the list of the applied law and updated for period of 2015. There were several updated laws. For example:

- Statute No. 39 Year 2014 in term of plantation.
- Government Regulation No. 101 Year 2014 in term of the hazardous waste management.
- Forestry Ministry Regulation No. 62 Year 2014 in term of wood utilization permit.
- Environment Ministry Regulation No. 5 Year 2014 in term of effluent quality threshold.
- Decree of North Sumatera Governor No. 188.44/0972/KPTS/2014 in term of minimum wage standard.

However, there were laws which had not yet updated on the list. It was not in line with the SOP composed by the company in term of the evaluation of law compliance in document No. SOP-Leg-01,

For example :

- Manpower Ministry Law No. 26 Year 2014 in term of the implementation of OHSMS.
- Manpower Ministry Law No. 27 Year 2014 in term of the changes over Manpower Ministry No. 19 Year 2012 about the requirements for giving several projects to other company (contractor).
- Agriculture Ministry No. 98 Year 2013 in term of plantation business permit.
- Agriculture Ministry No. 11 Year 2015 in term of ISPO.

See CAR No. 2015.02

Verification on August 6th 2015

The company has sent the evidence of corrective action over the list of the updated regulation on 2015 and the report of evaluation of law compliance on 2015. According to the document, all updated law and regulations for the estate and mill operations were described. Hence, NC is closed.

The company has the SOP of evaluation of law compliance in document No. SOP-Leg-01 edition 01/03 dated March 30th 2015. It was signed by the External Affairs Director. According to the document, the scope, objective, identification and implementation were described. The Department of Legal is responsible to compose and update the must-complied law and regulations. The list can be evaluated by the Department of Legal annually.

There was a flowchart of the law compliance evaluation on the attachment of the SOP.

Evidence of the implementation over the SOP was shown by the list of relevant regulation for the estate and mill operational on 2015.

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| Minor 2.1.3 | Status: Comply |
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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.

There was no change over the company's legal document in term of the land use right as follow:

Document of Land Ownership:

- Decree of Head of RI National Land Agency No. 123/HGU/BPN/2004 in term of the Land Use Title over the land on the South Tapanuli District of North Sumatera for **8,000 Ha** which is valid for 35 years. The Land Use Title (HGU) was granted to PT Ondop Perkasa Makmur from Jakarta on October 28th 2004.
- Land Use Title Certificate No. 1 Year 2004 dated November 11th 2004 for **8,000 Ha as stated in cadastral letter no 1 year 2004.**

Recently, the company managed **9,639.06 Ha** of land. There is 1,639.06 Ha which is under process for the Land Use Title (HGU). The process is now reaching the cadastral measurement stage. The company has sent the full file/document and proposal of Land Use Title (HGU) process follow up on behalf of PT Ondop Perkasa Makmur No. 017/LP/Siais/EM/IV/2015 dated June 22nd 2015.

Document of Land Ownership:

There were document of permits such as plantation business permit for cultivation consisting of 2 documents follow:

1. Plantation Business Permit (Cultivation)

- Decree of South Tapanuli Regent No. 525.26 /1527/ K/2003 in term of the plantation business permit for cultivation for PT ONDOP PERKASA MAKMUR dated September 8th 2003.
- Permit letter from South Tapanuli Regent No. 15.A/IZIN/2010 in term of the plantation business permit for cultivation for PT ONDOP PERKASA MAKMUR dated July 28th 2010 for **± 1,639.06 Ha.**

2. Plantation Business Permit (Processing)

- Permit letter from South Tapanuli Regent No. 14/IZIN/2010 in term of the plantation business permit for processing for PT ONDOP PERKASA MAKMUR. According to the document, PT Ondop Perkasa Makmur was given permit to operate POM with capacity for ± 60 ton of FFB /Hour

According to the legal document review, the company has had document of land ownership, history of ownership and the period of land use right.

The company was able to show the data of National Land Agency pole maintenance in 1st semester of 2015 for LST, LSU and LSS. The maintenance was conducted on 30 LSU poles, 25 LST poles and 38 LSS poles with good condition.

The document was also supported by the information of the pole number, coordinate and the documentation of pole pre and post maintenance.

According to the field visit to LSS boundary pole No. 64 (block H47 of Division 11), 68 (block G47 of division 11) and 36 (block P63), the company has maintained the legal boundary pole. The poles were well maintained and installed based on the legal coordinate.

According to the public consultation with the village government apparatus and the community figures nearby estate such as Pardomuan and Janji Matogu Village, there was no land conflict within PT ANJA Siais operational area recently. The document review informs that all land have been compensated.

There was no significant land dispute within PT ANJA Siais operational area. The company did no use violence to deal with the land conflict.

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| Status: Comply |
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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.

There was no change on the indicator.

According to the result of interview with one of the legal and social staff of PT ANJA Siais and the review over the customary land within PT ANJA Siais operational area, there was no customary.

According to the result of interview during the public consultation with the locals (Pardomuan Village, Janji Matogu Village and Bukkas Malombu Village), there was no customary land within PT ANJA Siais operational area.

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| Status: Comply |
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PRINCIPLE #3 Commitment to long-term economic and financial viability

3.1

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

The company has composed and determined the long term plan on the document of PT ANJA Siais financial projection for period of 2015 – 2018. The document describes:

- Income statement (area mature/immature, FFB production, FFB purchase, yield, extraction of CPO and PK, CPO production, production of kernel, sales CPO, sales kernel)
- Total sales
- Total estate expensive
- Total cost of goods sold
- Operating profit
- Profit before tax
- Profit after tax
- Cash flow (total income before tax, total estate capital, total capex, cash available for debt and shareholder, net cash flow, opening balance and closing balance)

Siais POM was able to show the document of budget for period of 2015. It informed the period of month, workdays, FFB process for 283,500,000 ton, CPO production for 61,571,250 ton and PK production for 12,757,500 ton.

According to the data of year of planting and field observation, the year of planting on PT ANJA Siais was on 2005, 2006, 2007, 2008 and 2009. Hence, there was no need of replanting program for the next 5 years.

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| Status: Comply |
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PRINCIPLE #4 Use of appropriate best practices by growers and millers

4.1
Operating procedures are appropriately documented and consistently implemented and monitored.

PT. ANJ Siais has had agronomy procedure documented on the SOP of Agronomy which was legalized on August 1st 2013 based on the letter No. 07/AGR/IM/IA/08/13. It was signed by the Chief Executive Officer and Estate Director. SOP of Agronomy is consisted of 28 part consisted of the procedure of blocking, land clearing, nursery, planting, manuring, soil and leaf analysis, harvest, IPM, FFB census to replanting program. The procedure of FFB processing stage at mill is also consisted procedure from FFB receipt station, grading, processing stage to CPO and PK dispatch.

In order to assess the consistency of the procedure execution, the company has owned internal control mechanism within the internal audit quality assurance conducted by Quality Assurance Departement. The mechanism is annually held. There were records of the latest internal audit which was held on February 2015. For example:

1. Internal quality audit for PT ANJ Agri Siais Mill (Document No. 01/QA MILL/ANJA-SIAIS/Februari/2015).
2. Internal quality audit of harvest and FFB transport program (Document No. 01/QA /ANJA-SIAIS/Feb/2015).

According to the result of interview with the estate manager, the internal audit program is the procedure to control the company operational that is conducted annually. The function of internal audit is for the evaluation for the management to assess the consistency of implementation of SOP of operational and operational staff performance.

The daily activity recording (like harvesting activity) is conducted by the division clerk daily. For example, the record in term of harvest rotation and FFB receipt from each block. Currently, the harvest rotation in division integrated in Lembah Subur Selatan Estate such as division IX, X, XI and XII between 8 t 9 days. According to the information from manager, each division has harvest target for 3 to 3.5 application for each month. The normal harvest rotation is between 8 – 10 days.

The harvest plan is documented on the work plan (muster chit). The output shall be then recorded by the harvest clerk on the book of FFB and loosen fruit receipt in harvest collecting point. Each FFB from fruit collecting point which have been recorded shall be sent to POM by the harvest clerk by referring to the signed local FFB covering letter by the foreman/assistant. The final record of harvesting activity shall be recorded on the daily activity form (FKH) recorded by the division clerk. For example:

1. Data of harvest rotation.
2. Book of FFB and loosen fruit receipt at the fruit collecting point (Form – SOP – AGR 022 – 01). The data of date, block, estate, name of harvester, fruit collecting point number, FFB, loosen fruit, FFB quality (ripe, under ripe and over ripe), EFB, contract basic and exceeding basic.
3. Daily activity form (FKH) in the document (FRM – SOP – TD Suite Grup) is consisted of data of date, block, foremanship, harvester's name, job code, mandays and quantity of FFB. For example, in block L48, Division X the harvesting activity was recorded on behalf of Arpan Saputra who achieved 59 bunches.

In general, according to the document observation, the harvesting activity in LSS estate has folowed the harvesting estimation. In average, the foremanship is consisted of 15 harvesters and 2 foremen within one division. The need of harvester follows the harvest estimation. Therefore, the harvesters always get the basic calculation. The basic harvesting calculation for June 2015 is year of planting 2007: 88 – 91 FFB, year of planting 2008: 89 – 91 FFB, year of planting 2009: 90 – 97 FFB.

During the audit program, the auditor visited block O48 of Lembah Subur Tengah and block L42 of Lembah Subur Utara for the harvesting activity. According to the result of interview, the employees and foreman have been able to demonstrate the harvest program based on the SOP. For example, determining the mature fruit criteria, harvesting technique and frond stacking. Furthermore, the harvesters have been able to explain the waging and premium system. They also have used proper PPE.

The company has several FFB trade agreement with the third parties. For example, the FFB trade with the 2nd party on January 2nd 2015 on behalf of Sulkan Arifin – BTI (Contract No. 001/ANJA-SIAIS/SP/TBS/I/2015), Abdus Somad Pulungan – SDP (Contract No. 002/ANJA-SIAIS/SP/TBS/I/2015), Syarifuddin Dalimunthe – UD. Riri (Contract No. 003/ANJA-SIAIS/SP/TBS/I/2015), Ahmad Hasibuan dan Simon Lubis – KT. Janji Matogu (Contract No. 005/ANJA-SIAIS/SP/TBS/I/2015) and Baginda Pulungan – UD. Boru Namora (Contract No. 006/ANJA-SIAIS/SP/TBS/I/2015) which is valid till December 31st 2015. All incoming FFB to POM have been documented in the daily and monthly incoming FFB recapitulation.

According to the document review on the trade clause 2 of FFB source on verse 2.1 and 2.2, the origin of the accepted/bought FFB by the company was described. However, the company was not able to show adequate evidence which record the origin of all FFB from the third party like the name of smallholder's name, location and other legal documents. **See NCR No. 2015.3**

Verification on August 6th 2015

The company has shown the evidence of corrective action in form of the document of data collecting for the smallholder who supply the FFB to Siais POM. There are 9 FFB supplier from villagers which supply the FFB to Siais POM. The company also showed the evidence of land ownership in form of the abstract of title from the Chief of Village. For example, the abstract of title from the Chief of Pardomuan and Chief of Sikuik-kuik Village on August 4th 2015. It described that 5 Villagers who are the FFB suppliers to Siais POM and have the land in the Pardomuan and Sikuik-kuik Village. The letter described the name of land owner, address and hectare of land.

Hence, the NC is closed.

Mayor
4.1.4

Status: Comply

4.2

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

According to the document review, the company has implemented SOP-based agricultural practice. For example:

1. The soil and leaf sampling to analyze the need of soil nutrient is conducted regularly. The result of soil and leaf analysis will be considered to formulate manuring recommendation for guiding the field practice. It complied the SOP of leaf sample (SOP-AGR-23) and SOP of fertilizer and manuring (SOP-AGR-11). There was a document of the soil and leaf analysis result which was held in row on 2013 and 2014. It can be found on criteria 4.2
2. The manuring has been executed based on the manuring recommendation. According to the report of manuring in the Monthly Management Report for Lembah Subur Tengah Estate on May 2015, the applied dosage has complied the recommended dosage. It complied with SOP of fertilizer and manuring (SOP-AGR-11).
3. The use of organic fertilizer in form of the EFB based on the recommendation of Research and Development Departement for 40 ton/Ha/year. It is recorded, the EFB application as much as 332 ton on Division VIII, Lembah Subur Tengah Estate.

By the time of audit, the anorganic manuring in 1st semester of 2015 in LST and LSS has been done. During the field visit, the Operational Staff showed the evidence of conducted manuring activity. For example, manuring of Zinc in block O48 of Division X of Lembah Subur Selatan Estate. The applied fertilizer were fairly distributed on the circle.

The company has attempted to maintain and improve the soil fertility referring to the technical culture and the in line SOP. The implementation of all activity is monitored by well documented administration reporting system and it is all reported to the Managers of Estates.

The record of fertilizer use is one of the operational document which is routinely documented by the Division Clerk based on the daily report of Manuring Foreman. The record of fertilizer use in each block is adjusted with the manuring recommendation composed by the Department of Research and Development (R&D) annually. All manuring reports

including the type and amount of fertilizer used and the manured block are recorded in daily activity form and recapitulated into estate administration system. It made easier for unit management to monitor the updated operational programs.

Several records of the fertilizer use that is documented by the division clerk.

Lembah Subur Selatan

The manuring recommendation was composed by the Department of Research and Development (R&D) of ANJ annually based on the result of soil and leaf analysis. The use of fertilizer is recorded on the document of manuring work program year 2015 for period of 1st semester. For example, the urea fertilizer recommendation in block L43 of Divisi X of LSS for 1.50 kg and it has been realized in line with the recommendation on May 6th 2015 (total applied of 4,886 kg in block L43).

Lembah Subur Tengah

Data of fertilizer use in Lembah Subur Tengah is documented on the document of Monthly Management Report. For example, the fertilizer use was recorded for 412.18 ton (urea) and 582.19 ton (MOP) during May 2015. The data is recorded and updated by the division clerk daily to be input in MMR as manager's monthly report. Specific for organic fertilizer, it is recorded the application of 332 ton of EFB for 8.70 Ha (dose of 40 ton/Ha/year) in Division VIII.

During to the ASA-1 program, there was no daily and monthly company fertilizing program. According to the document observation and result of interview with the management, auditor concluded that the company has documented manuring program perfectly.

The soil and leaf analysis was conducted by the third party of PT. Nusa Pusaka Kencana Analytical & QC Laboratory (Asian Agri Grup). The soil analysis is conducted once every 5 years and the leaf analysis is conducted annually. The latest soil analysis was conducted on April 21st 2013 as written on the document of Soil Analysis Report (Ref No. 018/RD-EXT/S/MAR/14). The result was released on April 30th 2013. The analyzed parameters were N, C-Organic, C/N Ratio, H₂O, KCl, Mg, K, total H₂SO and HClO₄. The latest leaf analysis (foliar analysis report) was conducted on May 5th 2014 based on the document of Ref. No. 132/RD/EXT/L/MEI/14 and the result of analysis was released on may 9th 2014. The analyzed parameters were Ash, N, P, K, Mg, Ca, B, Cu and Zn.

The function of routine soil and lead analysis was to determine the chemicals ingredient of leaf and soil more accurately. Based on the data, the ingredients needed by the plants to optimally produce whether from organic or anorganic manuring can be known.

PT. ANJ Siais has used anorganic fertilizer generated by the processing stage at mill. For example, EFB. The EFB application is adjusted with the type of soil and the manuring recommendation. According to the result of semi-detail soil analysis which was conducted by Faculty of Agriculture of North Sumatera Province (USU) Medan on 2007, the soil type on the LSS was peat soil. Hence, the organic nor POME application were not recommended. Meanwhile, the LST Estate applied 332 ton of EFB for 8.70 Ha (dose of 40 ton/Ha/year) in Division VIII.

Status: Comply

4.3

Practices minimize and control erosion and degradation of soils.

PT ANJA SIAIS has made marginal soil map in form of the slope class more than 40% and the peatland area in scale 1:65,000 with the distribution as follow:

Distribution of land slope within PT ANJA SIAIS area

| Slope class | Hectarage (ha) | % |
|-------------|----------------|-------|
| 0 – 8% | 7,824.19 | 81.17 |

| | | |
|--------------|--------------|------------|
| 8 – 15% | 40.33 | 0.42 |
| 25 – 40% | 220.30 | 2.29 |
| >40% | 1,544.18 | 16.29 |
| Total | 9,639 | 100 |

The peatland of PT ANJA SIAIS is 5,665.22 Ha. Meanwhile, the rest is the mineral soil (3,973.78 Ha).

PT ANJA SIAIS has had the marginal land management strategies. For example:

- a. The land with slope class more than 40% is determined as conservation area.
- b. In order to manage the are with high slope but less than 40%, the company has had SOP of soil and water conservation revision 1 dated August 1st 2013 (SOP – Agr – 05). According to the SOP the classification of the land slope and its management strategies are described. The management strategy is as below:
 - Individual terrace on slope more than 15%
 - Continous terrace on the slope and very slope area.
 - Trench digging on the lowland.
 - Planting of Vetiver grass and Guatemala grass. According to the field visit, the company has planted Vetiver grass and Guatemala grass at the main road edge and main trench edge.

The company has managed peatland area by implementing water management including the map. According to the field verification on block L34 of LST, the company has implemented the water management program by digging main drainage, branch drainage, stop bund, installing tools to measure the water level, installing the tools to measure the subsidence rate, cleaning the trench regularly. The water level is maintained between 50 Cm – 70 Cm.

Lembah Subur Selatan

The program and realization of road maintenance which was recorded on the Management Plan till May 2015 was 19,100 meter (realization for 64,300 meter). According to the evaluation from the estate manager, the realization of road maintenance was over the budget due to the high rainfall rate. It has been reported to the General Manager.

Lembah Subur Tengah

There is a document of Monthly Management Report on May 2015. There is a report of road maintenance realization till May 2015 for 9,750 meter. The road maintenance was conducted by using road grader and compactor. The document was supported by the map of plan and realization of road maintenance on 2015.

According to the field observation, all road and bridge passed during the audit is in good condition and can be passed by estate operational vehicle. The company has had road maintainance program and has been well implemented. All the activity is well documented in the company administration system and company reporting.

According to the document observation, PT. ANJA Siais has composed SOP of peatland (Document No. SOP-AGR-004 revision 02 dated January 28th 2005). It describes the construction of drainage system (main drain, collecting drain and field drain).

Based on the SOP, the company has composed the peatland management program. For example:

- Watergate construction and measuring the ground water level.
- The construction and maintenance of Stop Bund on 2015. According to the field observation on block J35 and J36, there is a maintenance for the broken stop bound. Once it was repaired, the water quantity in the collection drain was returned to 60 – 70 cm below the surface. Previously, due to the broken stop bound at drainage, the water level lies below the level set on SOP of peatland.
- There was a main drain flushing as observed on the block L37 of division VIII of LST. The objective was to

maintain the trench depth to deal with the next rain season. According to the information from LST Manager, if there is no routine trench flushing for at least once a year, the drain is intended to be shallow due to sedimentation and dirty because of wild water plant.

According to the result of field visit to block L26 to block L37 of Lembah Subur Tengah Estate, the company has implemented the water management program by digging main drainage, branch drainage, stop bund, installing tools to measure the water level, installing the tools to measure the subsidence rate, cleaning the trench regularly. The water level is maintained in a range of 50 Cm – 70 Cm. According to the result of interview with the operational staff and based on the document review of water level monitoring on May 2015, the water level monitoring is conducted weekly. Meanwhile, based on the observation on the subsidence pole on block L26 which was installed on 2013 shows a peatland subsidence for 4.5 cm/year. The peatland subsidence monitoring with the subsidence pole that is routinely (each semester) conducted by the Watagate Officer.

During the observation on block J26 and J25, there were water level monitoring stick which was not properly installed due to the zero level is not on flat position with soil surface. The company is able to re-evaluate the implemented water management program. **#OFI**.

The oldest planting year in the company operational area was planted on 2005 (15 years). Hence, the company did not have the document of peatland subsidence level assessment.

According to the SOP of marginal land management (No. SOP –OPR-006 rev.00 dated June 1st 2009), there is the description of marginal soil type (lateritic soil, sulfic acid soil, sandy soil, saline soil and peatland). The management strategy is based on the type of marginal soil. The company has attempted to do the best agricultural technique on the marginal soil. For example:

1. LCC Planting. The LCC was planted to reduce the evaporation and to maintain the soil humidity. There was no longer LCC planting during the assessment program since there is no longer new planting. However, according to the document, there is LCC planting (*Legume cover crop*) in 2008 at block P42 of Lembah Subur Tengah Estate.
2. Frond stacking. Frond stacking is aimed to reduce the evaporation and to maintain the soil humidity. The method of U-shape implementation is found in harvesting block O48 and L42 during the harvesting program observation.
3. EFB application on mineral soil with dose of 40 ton/Ha/year. The objective is to maintain the soil humidity and to add organic ingredient that the soil need.
4. Water management. The objective is to reduce or neutralize the acidity during the rain season by open the watagate.

According to the document observation and field visit, the auditor concludes that the company has attempted to improve the soil fertility on the marginal soil consistently in order to optimize it's the production.

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

4.4

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

According to the result of field visit to Block L26 to block L35 (along the main drain cannal), there are two types of water management in PT ANJA SIAIS. For example:

- a. The water management in peatland area through: digging main drainage, branch drainage, stop bund, installing tools to measure the water level, installing the tools to measure the subsidence rate, flush the trench regularly. The water level is maintained in a range of 50 Cm – 70 Cm. According to the result of interview with the operational staff and based on the document review of water level monitoring on May 2015, the water level monitoring is conducted weekly.
- b. River water management through: marking the riparian area by installing the boundary pole, installing the signboard which warn the prohibition to hunt, electrocute and poisoning, installing HCV signboard, planting king grass and

guatemala grass at the edge of river, manual maintenance for the planted palm oil plants on the riparian area. Conducting monthly routine patrol along the Riparian area of Sibara-Bara River and monitoring the river water quality routinely (each quarter).

In order to ensure the waterway and wetland area protection including riparian area, the company has identified HCV within the operational area. Furthermore, the company has the SOP of HCV and riparian area management on the document No. SOP-SDD-02 of 1st edition dated April 1st 2013. It has been approved by the President Director of PT ANJA Sia's. The SOP described the procedure to manage HCV area, riparian area like determining the width of riparian:

- Big river, width of waterway >20 m. width of the riparian is 100 m off the right and left of the river.
- Medium river, width of waterway >10 m. width of the riparian is 50 m off the right and left of the river.
- Small river, width of waterway >5m. width of the riparian is 25 m off the right and left of the river.
- Tributary, width of waterway >1 m. width of the riparian is 10 m off the right and left of the river.

During the ST-2 assessment, the effluent quality test was not consistently conducted by the company. **See NCR No. 2014.03**

Verification on May 26th 2014

PT ANJA Sia's has shown the evidence of effluent quality test which is conducted monthly. The sample is taken from the inlet and outlet pond, upstream and downstream of the river for period of March – May 2014. It describes the result of the test which comply with the quality threshold. All evidence of the test were well maintained and well kept. Hence, NC is closed.

According to the field observation on the Sibara-Bara River, the company has attempted to preserve the waterway by marking the riparian area like installing the boundary of riparian area as well as the HCV signboard and signboard which warn the people to do any illegal activities on the riparian area like electrocuting, hunting and poisoning. Furthermore, the company has planted king grass and guatemala grass at the riparian area and the company has conducted routine patrol along the Sibara-Bara River (good vegetation to prevent illegal logging). The company also conducted river water quality monitoring routinely (each quarter). The planted riparian area with the palm oil plants shall not be sprayed with pesticide nor fertilizer. There is a red paint on the palm oil plants and the signboard which inform the pesticide and fertilizer application. For example, at block L34 of Lembah Subur Tengah Estate.

The company has the record of effluent quality of monthly test result in WWTP. It covered the cooling pond, pond-4 (upstream and downstream), pond-9 (upstream and downstream) from the Sucofindo Laboratory. According to the result of the test over the BOD parameter, the BOD of effluent generated by mill does not exceed the applied quality threshold (Decree of Environment Ministry 51 year 1995).

The company has the record of water consumption for the POM. The water sources of POM was flown from Paraupan River. The water is pumped and then flown to the water treatment plant. There are 4 flowmeter units (all are well-functioned). The data of water consumption was shown on the document of water usage for period of 2015.

According to the document review, the water consumption for period of January – May 2015 for the processing stage was 1.33 - 1.46 m³/ton of FFB and the dirty water consumption for cleaning program was 1.37 – 1.52 m³/ton of FFB. However, the company was not able to show the evidence of evaluation and follow up action over the water consumption efficiency on the mill which exceeded the budget (1.2 m³/ton of FFB). **See NCR No. 2015.4**

Verification on August 18th 2015

The company has shown the evidence of water consumption evaluation which exceeded the composed budget and the company has composed plan to repair the waterway and to evaluate the water consumption.

Hence, **NCR is closed with observation.**

According to the field observation and document review, the auditor concludes that company has had the program to

preserve the waterway. The program has been well implemented and has been routinely monitored.

Status: Comply

4.5

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

The company has SOP of IPM (Document No. SOP-OPR-026 dated July 1st 2009). The objective of the SOP was to give the guideline of the implementation of IPM and to reduce the chemical application by using natural predator or biological control.

There is IPM program as written on the management plan for period of 2012, 2013 and 2014. According to the document, the IPM programs conducted by the company are the planting of *Turnera subulata* and *Antigonon leptopus* and development of *Barn Owl Box*.

According to the result of interview with the Assistant of Division, the IPM activity was conducted with the stages as follow:

- Pest and Disease detection. It was conducted daily based on the result of monitoring of employees, foreman, staff to the manager that is delivered directly. The result of detection is usually recorded on the foreman daily report.
- Pest and Disease census. It was conducted based on the result of pest and disease detection. The general census is conducted by the pest and disease census Officer. The company has determined the census team based on the type of pest and disease. For example, rat census team, palm oil frond leaf eater caterpillar census team, termit census team, *Asiatic rhinoceros* beetle census team and so on.
- Pest and Disease control. Determining the stage of control based on the result of pest census. For example, the biological control is used when the attack rate above 5%. Meanwhile, the attack of termit and asiatic rhinoceros beetle shall be immediately controlled.

According to the observation on the document of pest and disease census during 2015, there was no rat nor palm oil frond leaf eater caterpillar attack above the threshold (>5%) during period of 2015. Meanwhile, the chemical and biological control over the termit and *Asiatic rhinoceros* beetle has been executed.

According to the document review and field observation, the company has installed barn owl box in each block. However, due to the low rat population, there are several inactive barn owl boxes. For example, there are 31 unit of barn owl boxes at division X of LSS Estate but according to the barn owl box monitoring result every month, there are only 4 active barn owl box units. One of the observed barn owl box is at block O48 and inactive.

The company has routinely held IPM training and well documented. For example:

- Training of limited pesticide use held by PT Sygenta and North Sumatera Province Pesticide Commission on March 5th 2013. The training was held on the meeting room of main office as well as its practice. The training materials were the regulation and permit of pesticide, type of the restricted pesticide, label of awareness, prevention over poison, theory and practice of calibration and OHSMS. The training was attended by 116 participants. According to the result of interview with the sprayer team of division XI, block K43 of LSS, the employees were able to describe and demonstrate the safety work technique. Furthermore, the employees have used proper PPE and they have known the prohibition of pesticide application at the riparian area.
- Socialization of MSDS dated July 2nd 2015 in pondok absen of block J44/45 of Division XI Lembah Subur Selatan based on the document of training report. The program was participated by 7 employees consisted of foreman and maintenance workers.
- IPM training on June 5th 2015 at the Club House of PT. Anja Siais. It was attended by 50 participants consisted of employees and foremen as IPM Officer. The training materials were the introduction of pest type and the method of its integrated management, therefore, the foremen and employees could focus and aware of the symptoms and interference/loss caused by pest attack.

According to the result of interview with the pest and disease control Officer and the pesticides sprayers (termit), they have aware of the method to control plant pest and disease. Hence, it can be concluded that PT ANJA Siais has held IPM training and the workers were able to demonstrate the technique to control pest and disease control effectively.

Status: Comply

4.6

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

According to the document review and auditor observation to the agrochemicals storage, the company used 11 type of pesticides consisted of 6 type of herbicides, 3 type of rodenticides and 2 type of insecticides. All type of used pesticides were the allowed and registered ones in Indonesia since it has been registered in Fertilizer and Pesticide cCommission of Agriculture Ministry

The company has recorded and documented the use of pesticide including the use of active ingredient pesticide on the document of chemicals use toxicity per Block for period of May 2015. The document was recorded and recapitulated routinely (monthly) by the Assistant of Division and was approved by the Estate Manager. It was then reported to the GM. All type of pesticides toxicity have been calculated and recorded. The company did not use preventive pesticide. The company use it only for the mass attack of pest which cannot be controlled by using biological nor mechanical actions.

In term of the use of pesticide type 1A and 1B WHO as well as paraquat, the company has a policy that is described on the internal memo from the GM dated May 30th 2013 on the reference letter No. 44/GMO/Siais/IM/V/2013 in term of the decrease of paraquat use. The policy also explains that the management ask for all staff to reduce the use of restricted pesticide.

Data of paraquat use of PT. ANJA Siais in last several years is as follow:

| Year | Number of Use (liter) |
|------------------|-----------------------|
| 2010 | 4,657.20 |
| 2011 | 4,535.07 |
| 2012 | 7,414.71 |
| 2013 | 3,687.04 |
| 2014 | 3,752 |
| 2015 (till June) | 2,900 |

According to the data, there was an increase of the paraquat dichloride use for 64.96 liter (1.76%). However, it has been considered as the record of nonconformity on the internal audit of sustainability which was held by the Department of Sustainability. The evaluation has been shown to the auditor as well as its corrective action. For example, by determining the limit of monthly paraquat use. The company has opportunity to evaluate the plan and realization of paraquat use based on the internal memo of General Manager dated May 30th 2013 in term of the decrease of paraquat pesticide use. **#OFI**

The company has had SOP of agrochemicals and pesticide containers waste (No. SOP-EHS-011, rev 01/01 dated November 30th 2009). According to the SOP, there was a mechanism on ex-pesticide containers and the management of rinse water of ex containers of chemicals and pesticide. The safety equipments attached on the SOP were boots, masker, rubber gloves. There was an evidence of PPE monitoring and handover to the sprayers on May 2015. The given PPE were the boots, masker, gloves, apron, costum and glassess. The spraying worker who received PPE were Rosliana Siregar and Lenni Sartika Harahap. According to the result of interview, the PPE has been given and shall be replaced once it broken. The company has the permitted hazardous waste storage. The company cooperated with CV. Amindy Barokah (licensed hazardous waste collector) to manage the hazardous waste.

During the ST-2 assessment program, the procedure of pesticide waste management was not totally in line with the government regulation No. 18 year 1999. For example, the hazardous waste which can be used by the company. **See NCR No. 2014.04**

Verification on June 23rd 2014

The company has sent the evidence of corrective action on June 23rd 2014 in form of the internal memo No. 29IGMO/SiaiSIM/Vv/2014 in term of hazardous waste management.

PT ANJA Siais showed the evidence of documentation in form of the photographs of the pesticide containers used for the buoy that was moved to the hazardous waste storage of Siais POM on June 23rd 2014 as well as the official record on June 17th 2014.

According to the result of field visit during the ASA-1, there was unmanaged pesticide containers yet such as:

1. There was Regent and Amiphosate at the settlement of Division-6 (Next to foreman-1 house)
2. Gramoxone Pesticide container used for the reckless purpose in front of the chemicals storage.

It was not in line with the SOP of agrochemicals and pesticide waste management in document No. SOP-EHS-011 in 1st edition of 1st revision dated November 30th, 2009 and internal memo No. 29/GMO/SiaiS/IM/V/2014 in term of the hazardous waste management on June 23rd 2014. **See NCR No. 2015.5**

Verification on August 6th 2015

The company has conducted corrective action and shown the evidence of it in form of the official record of hazardous waste management to the employees on July 11th 2015. It was attended by 45 participants. The socialization taught the definition of hazardous waste, type of hazardous waste and method to control it. The company showed the declaration letter from the employees of division 8 of LST and supervisor of contractor that they will not use hazardous waste containers too. However, the company was not able to show the evidence that the hazardous waste found on the settlement and storage were managed. Evidence of withdrawal and storing of hazardous waste and the record of hazardous waste balance sheet over the regent, amiphosate dan gramoxone. The official record and photographs are available.

Verification on August 20th 2015

The company has shown the evidence of corrective action in form of the official record of hazardous waste handover from civil and LST to the hazardous waste storage and hazardous waste balance sheet. The containers like regent, amiphosate and gramoxone stored at the hazardous waste were described on the document. Hence, the NC is closed.

There was a MSDS for all pesticide stock at storage of pesticide. The MSDS was taped on the wall.

The company has involved the workers on the restricted pesticide use training for type of Gramoxone at PT ANJ Agri Siais dated March 5th 2013. There was a training certificate which was issued by the fertilizer and pesticide monitoring commission on behalf of Rosliana Siregar and Lenni Sartika Harahap (No. 521.4/320.32/PLA.S/IV/2013). The certificate was issued on April 15th 2013 for 5 years since the date of issuance. According to the certificate, the mentioned workers are allowed to use Gramoxone based on the applied terms.

The company has programmed the training for the sprayers and manurer for at least once a year as written on the program and realization of EHS estate on 2015 (FRM-SOP EHS 52-064, rev.01/01 dated September 1st 2012). It was composed on January 5, 2015 by the EHS Officer and was approved by the Head of EHS and General Manager on January 5th 2015. There were evidence of the training programs as written on the training report. For example:

- Training of chemicals/pesticide use on March 5th 2013. It was taught by Sygenta and pesticide commission as well as the field practice like the application, PPE use and calibration. The training materials were the regulation and permit of pesticide, type of the restricted pesticide, 5 key laws, label awareness, prevention over poison, theory and practice of calibration, pesticide and OHSMS. The training was attended by 138 participants consisting of spraying worker and spraying foremen. The photographs and attendance list are available.

- The OHS training on April 25th 2015. The training materials was the OHS for Spraying Worker. The training program was held to refresh the Worker's knowledge gram hazard and the use of proper PPE based on SOP-EHS-001. The training was attended by 118 participants consisted of sprayers and foremen. The photographs and attendance list are available.

According to the result of field visit and interview, the spraying workers have participated on the chemicals use training and they have aware of the procedure to apply the pesticide.

- The company has held limited pesticide use training. It was held by PT Syngenta and Pesticide Commission of North Sumatera Province on March 5th 2013. The training was held on the mill meeting room, the main office meeting room and the field application. The training materials were the regulation and permit of pesticide, type of the limited pesticide, label awareness, prevention over poison, theory and practice of calibration and OHSMS. The training was attended by 116 participants. There were examples of cretificate on behalf of Juniadi and Meisa Waruhu (Certificate No. 521.4/320.32/PLA.S/IV/2013).
- Socialization of MSDS dated July 2nd 2015 in pondok absen of block J44/45 of Division XI Lembah Subur Selatan based on the document of training report. The socialization was participated by 7 employees consisting of foreman and maintenance workers.

According to the interview with the pesticide applicators, there were attempts to minimize the risk of pesticide use. For example, by using proper PPE such as apron, masker, gloves, glassess and boots to minimize the pesticide contamination through digesting system, eye and skin. Furthermore, the company has policy to provide milk for the pesticide applicators to eliminate the pesticide effect in the body.

Hence, it is concluded that the company has used proper agrochemicals based on the dosage and species and have them trained as well. According to the interview and document review, there was no pesticide application from air conducted by PT. Austindo Nusantara Jaya Siais.

According to the document review, the company has had the procedure of hazardous waste management such as the pesticide containers on the SOP of agrochemicals and pesticide containers management (Document No. SOP-EHS-011 dated November 31st 2009). The management of pesticide containers consists of on the management of ex-fertilizer sack, ex-pesticide containers, ex-chemicals and paint containers and drum of oil and control over the rinsed water of chemicals wash. For example:

- Fertilizer sack → it is washed then re-used for the loosen fruit holder. The rinsed water of fertilizer sack washing can be used to water the palm oil tree.
- Ex-pesticide containers → it is washed and collected in the hazardous waste storage. It is then delivered/handed over to the licensed hazardous waste collector as the third party. The rinsed water can be used for the next spraying activity.

The company has held medical check up for the spraying workers. The medical check up was conducted in cooperation with Prodia Clinic. The medical check up covered spirometri for once every 2 years, cholinestrase for once in a year and auditometri for once every 2 years. The medical check up for period of 2014 was held on March 25th 2014 for the mill and estate's employees and it is identified that there are 70 high-risk workers.

The company has held cholinestrase for the spraying workers for period of 2015 that is conducted on June 17th 2015 in cooperation with Prodia Clinic. There was a letter from prodia clinic No. 027/PST/E/VI/2015 informing the MCU has been conducted and the MCU result was in process and would be inform within 6 days in maximum to the company. There was a list of name and attendance list of spraying workers who get medical check up. The MCU participants number is 50 workers.

The company has had the policy for not employing the pregnant and breastfeeding women workers on exposed chemical activities.

According to the field observation on the spraying activity in LSS and LST, there was no pregnant nor breastfeeding women workers.

Field visit and interview has been conducted to ensure that the implementation of the company policy. For example, field visit and interview with the Spraying Workers in Block K43, LSS shows that there is no employed pregnant nor breastfeeding women workers as Spraying Workers

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| MAJOR | Status: Comply |
| 4.6.6 | |

4.7

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

The company has determined the policy of occupational environment, health and safety. The policy describes the implementation of all regulations and procedures that have to do with occupational environment, health and safety, minimizing the work accident rate as low as possible, preparing, implementing and evaluating the occupational environment, health and safety working programs, providing the safety workplace and PPE as well as the training program, monitoring the employee's health and providing the health facility and employee's training. The policy was authorized by Geetha Govindan (the President Director) on January 2nd, 2014.

Furthermore, there are other supporting documents. For example:

1. Document of OHSMS Manual in document No. MAN-EHS-001 that was issued on February 1st, 2013.
2. There is a collection of OHS procedure document for each operational program of PT ANJA. For example:
 - Spraying Worker Safety (SOP-EHS-001)
 - Work Accident Reporting (SOP-EHS-23)
 - Medical Check Up (SOP-EHS-24)

During the ST-2 assessment, known that the company has had the policy of labour social assurance membership as the work accident insurance. However, there was no evidence that 98 non-permanent daily workers get work accident insurance. **See NCR No. 2014.05**

Verifikasi pada tanggal 26 Mei 2014

PT ANJA Siais was able to show the evidence of the registration of all daily temporary period workers to the Labour Social Assurance Program on May 16th 2014. The registration and payment evidence to Labour Social Assurance Program via Mandiri Bank is well stored. Hence, the NC is closed. All the policy implementations till ASA-1 assessment are described within this report.

The company was able to show the document of HIRAC that was legalized on June 20th 2015. The document informs the activity, hazard, potential hazard, potential risk, potential risk score (L, S, RFN), risk control, score post control (L, S, RFN) and risk security (elimination, substitution, engineering, administration and PPE). According to the field observation and interview with the spraying workers and harvesting workers of LSS, the workers have aware and understand the potential hazard of their job. The workers were able to describe the must-do things to deal with emergency situation.

The training of OHS has been held for the employees. The company was able to show the record of OHS training as follow:

- Training of OHS statute and permit system in POM dated March 30th, 2015. It was attended by 60 participants.
- Training of first aid refreshment by the company's doctor dated February 12th 2015. It was attended by 28 participants.

- There was no change on the certificate and operator license at mill since the ST-2 assessment. For example, there were 4 certified welding experts (563/09/UPTD-BLK/TS/2013, 563/10/UPTD-BLK/TS/2013, 563/07/UPTD-BLK/TS/2013 and 563/08/UPTD-BLK/TS/2013), 2 Boiler Operator with operator license (11.740-OPK3-PUBT-B.1/V/2011 and 09.753/PNK3-PUBT/OB-I/IX/09)
- There were 20 well trained First Aid Officer. For example, the employee on behalf of Insyapian Pohan with certificate No. 14.16-PK3-P3K/II/2014.

The company has identified the person in charge for OHS. The company has had the OHS Guiding Committee structure which covers the ANJA Siais POM, LSS Estate, LST Estate, LSU Estate, GM Office and Central Workshop. The structure has been legalized based on the Decree of the Head of South Tapanuli's District Manpower Agency No. 566/363/2014 on February 24th 2014. The structure consists of the Chief of OHS Guiding Committee who is Mulkan Nasution, Vice Chief is Isransani and Secretary is Binenson Pasarib (Certificate No. 13.14003/AK3/U/III/2015 dated March 4th 2015) in Decree of Appointment No. 12421/M/DJPPK/III/2015 as the OHS Expert for PT Austindo Nusantara Jaya Agri. Supported by its member in each unit and department:

- POM: 10 workers.
- Member of LSU: 5 people
- Member of LST: 5 people
- Member of LSS: 4 people
- Member of GMO: 14 people
- Member of CWT: 5 people.

The routine meeting to discuss the OHS issues is held monthly. The company was able to show the evidence of assembly in form of the minute of meeting and attendance list. For example, the meeting on June 24th 2015 which was held on the GMO meeting room. It was attended by 17 participants. It discussed the repairment on the bridge, drought season condition, maintaining safety index with the standard for 0.4 by reducing the potential of work accident and preparation of RSPO audit.

The company has reported OHS Guiding Committee Program to concerned government agency. The company was able to show the evidence of OHS Guiding Committee reporting quarterly. For example, the report in 1st quarter of 2015 was reported to the Manpower Agency on April 20th 2015 in letter No. 01/P2K3/-ANJS/IV/2015.

The company has had SOP of emergency response and work accident management. For example:

- SOP of fire control (Document No. SOP-EHS-006, Rev. 01 dated December 1st 2006). It describes the fire control and fire prevention. The preventive actions are conducted by mapping the fire potential area, fire monitoring from the fire tower, maintenance on the fire break, making of fire signboard and fire socialization.
- SOP of Emergency Response (Emergency Action Plan) SOP No. SOP-EHS-018 dated November 2nd 2006. It has been legalized by the President Director.
- SOP of work accident reporting in document No. SOP-EHS-23. It describes the stages and steps that mandatory stages and steps taken if there is work accident at the workplace. The SOP describes the procedure of its handling up to its reporting to the labour social assurance (*Jamsostek*)

According to the field visit to the harvesting and spraying activities in LST and LSS in **Block K43 and Block L42**, the trained First Aid Officer is available on the site. The company was able to show the evidence of first aid training which was taught by the company's doctor on February 12th 2015. It was attended by 28 workers.

The company has registered all employees on the labour social assurance programs. The company was able to show the evidence of labour social assurance payment. For example, the payment for May 2015 has been paid to the labour social assurance on June 16th 2015, detailed as below:

- The permanent workers with monthly based and daily based payment of Mill for 75 workers

- The permanent workers with monthly based and daily based payment of Bulking for 20 workers
- The permanent workers with monthly based and daily based payment of Estate for 1135 workers

There was also a list of employees who were listed as the member of labour social assurance and the list of employees who were recently registered on May 2015.

During the ST-2 assessment, there was not enough evidence that the company has held regular medical check up for Harvester and Manurer. **See NCR 2014.06**

Verification on May 26th 2014

PT ANJA Siais has shown the evidence of medical check up for all workers (Harvesters and Plant Maintenance Worker) conducted on May 6th – 9th 2014. All the document of medical check up are available, therefore, the NC is closed.

According to the ASA-1 assessment, the company has held regular and specific medical check up. The company was able to show the evidence of regular medical check up as follow:

- The regular medical check up was conducted by the company's doctor in form of the physic check up, consultation, blood pressure check and check related to potential working risk. For example, the medical check up for period of Feb/March 2015 for mill was held on February 24th, 2015 for 30 employees of processing stages.
- The specific medical check up for the high risk workers was held by cooperating with Prodia Clinic. The type of medical check up conducted are spirometry for once every 2 years, cholinestrase for once in a year and auditometri for once every 2 years. The latest specific medical check up for period of 2014 was conducted on March 25th 2014 for identified high risk workers of Estate and Mill as many as 70 workers.

The company doctor has evaluated the result of the medical check up. The company was able to show the report of doctor's evaluation. For example, the evaluation of the auditometri check up, it is pronounce that the medical check up result indicated the reduction in hearing ability caused by serumen prop. The company's doctor has conducted re-medical check up by using tuning fork and the result is normal.

Evaluation over the spirometry medical check up mentions that the worker experiences bronchitis which cause the respiratory disorder.

The company has monitored the occurred work accident caused by mill and estate operational activities of PT ANJ Agri Siais. The company was able to show the document of safety index record for one year period. The company also shows the monthly work accident monitoring at mill and estate.

The document of safety index record informed month, total of employee number, total of workhours, report of work accident, LTA, SR and safety index. For example, Safety Index Record for period of 2015 (Jan-May):

- There was 1 case of work accident at mill with no LTA.
- There were 4 work accidents in 3 days with LTA.

For example, the work accident happened to Heri Zamasi on May 17th 2015 in medium category. The LTA caused by the accident was 1 day. The company has investigated the accident on May 17th 2015. The report of investigation describes the chronology, cause of accident and the conducted corrective action. The company has conducted spesific corrective action over the work accident which informs the description of work accident and the conducted corrective action. The company has reported it to the BPJS Manpower on June 18th, 2015.

According to the field visit to the harvesting and spraying activities on LST and LSS like in **Block K43 and Block L42**, the company has provided PPE and all employees have used PPE based on the risk of each station. The workers inform that they have been registered in the BPJS Health Program as a form of medical care and the company has held regular medical check up for the spraying workers. The company has an opportunity to evaluate the implementation of the agreement between them and the contractor in term of the implementation of manpower regulations. **#OFI**

Status: Comply

4.8

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

The company has the training programs as below:

- Mill:

The mill unit has the training programs for period of 2015. It was prepared by the Mill Assistant Head and was approved by the Sr Mill Manager. The program describes type of training, PIC, target and allocated date for training:

| No. | Type of Training | PIC | Target (org) | 2015 | | | | | | | | | | | |
|-----|---|-------------------|--------------|------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| | | | | jan | feb | mar | apr | may | jun | jul | aug | sep | oct | nov | dec |
| 1 | Budget compilation training | Sr. Mill Mgr. | 8 | | | | | | 8 | | | | | | |
| 2 | Administration and store management system training | Head of Assistant | 4 | | | | | | | | 4 | | | | |
| 3 | FFB process management training | Sr. Mill Mgr | 7 | | | | | | | | | 7 | | | |
| 4 | Water treatment and analysis training | External | 4 | | | | | | | 4 | | | | | |
| 5 | Analysis and lab sampling | QA mill | 6 | | | | | | | | | | 6 | | |
| 6 | Preventive Maintenance System | Head of Assistant | 16 | | | | | | | | | | | 16 | |

- Estate:

The company has training programs for period of 2015. The training program is composed by the EHS Officer and approved by the Sr EHS Manager. The training program covers:

| No. | Type of Training | PIC | Target (org) | 2015 | | | | | | | | | | | |
|-----|----------------------------------|-----|--------------|------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| | | | | jan | feb | mar | apr | may | jun | jul | aug | sep | oct | nov | dec |
| 1 | OHS Training | EHS | 100 | | | | | | 50 | | | | | 50 | |
| 2 | Permit system training | EHS | 30 | | | 15 | | | | | | 15 | | | |
| 3 | Fire fighting technique training | EHS | 100 | | | | | | | 50 | | | | | 50 |
| 4 | Incident investigation Training | EHS | 70 | | | | | | | 35 | | | | 35 | |
| 5 | Hazardous Waste Training | EHS | 20 | | | | | | | 20 | | | | | |
| 6 | Emergency Response Training | EHS | 44 | | | | | | | | | | 44 | | |
| 7 | First Aid Training | EHS | 40 | | 40 | | | | | | | | | | |
| 8 | House Keeping Training | EHS | 40 | | 40 | | | | | | | | | | |

The company also has the record of the training programs. For example:

- Mill
There was a training report (Document No. FRM – SDV – 003 dated March 1st 2012, revision 1) in term of the Water Treatment Boiler Training. It was attended by 7 Mill's laboratory and boiler employees of PT ANJA Sia's on May 20th 2015.
- Estate
The company has the record of the training activity. for example:
 - There is a training report for the first aid training dated February 12th 2015. The source is the company's doctor. The training was attended by 28 participants which is proven by documentation attendance and photographs are available.

There was a training report for the trainee workers on May 29th 2015. The training discussed the contract for service, company regulation, socialization of company's policy (sexual harassment prevention, freedom to unite, information request, anti discrimination on the recruitment for workers, worker's minimum age requirements, employee's complaint procedure and protection over the women workers) and safety. The training was attended by 11 workers proven by the attendance list.

According to the result of interview with maintenance contractor with contract for service agreement No. 066/SPK-LST/03/2015 on behalf of CV Abadi Jaya dated July 1st 2015, the company has held training for maintenance program. For example, turner maintenance, yard maintenance, garden construction and manual weeding.

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.

The company has 2 environment documents consisting of the document of EIA (EIA, environmental management and monitoring plan). The scope of Land Use Title (HGU) analysis area is 8,000 Ha and the plan of POM construction with capacity of 45 - 60 Ton of FFB/Hour. The document of environmental management and monitoring effort for 1,639.05 Ha and the hectare of conservation area is 1,246.59 Ha

According to the ST-2 assessment, the reported environmental management and monitoring plan to the environment agency was not enough to describe the attempt of environmental management and monitoring over all environment impacts and parameters covered within the company's EIA document and environmental management and monitoring plan. For example the **impact of peatland fire, community restlessness, job opportunity, increase of income, etc.**

See NCR No. 2014.07

Verification on June 26th 2014.

PT. ANJA Sia's has composed report based on the recommendation of environment impact of peatland, impact of the community's restlessness, job opportunity, increase of income of EIA and environmental management and monitoring plan. There was an evidence of the report of environmental management and monitoring plan on 2014 (January – June) that was received by the Environment Agency of South Tapanuli District on June 20th 2014. NC is closed.

The company has the record of hydrology disturbance impact management (potential flood), reduction of air and environment quality as well as the prevention of land fire and POM fire. According to the field visit, the company was conducting trial for managing EFB and POME as compost.

The company should include the monitoring and management record of peatland fire and hydrology disturbance impacts (potential flood) based on the matrix of management and monitoring stated within environmental document and consult with stakeholder (Environment Agency) in term of the steps to reduce negative impacts which covers the ,management and monitoring plan of composting. **#OFI**

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

According to the decree 44/Menhut-II/2005 in term of the determination of forest area of North Sumatera Province, the estate area is directly bordered with the Siondop Conservation Forest on east and bordered with the limited production forest on north, south and west. The estate area used to be a forest production for Bhara Induk (1980-1995) and Timber Concession Permit (IUPHHK) of PT. Panelika Sejahtera (1995-2003). In general, the estate area is bordered with the Angkola Conservation Forest on east and Batang Gadis National Park on south.

The company has the report of HCV identification on 2013. The public consultation was held on December 21st 2012. It was attended by 33 representative of the locals, village government, Sub District Government, the associated agencies in South Tapanuli Sub District, university and NGO. Total hectare of the high conservation value area is $\pm 7,781.10$ Ha or approximately 80.72% of the company hectareage.

| No. | HCV area | Hectarage (ha) | HCV attribute | Description |
|----------|-----------------------------|----------------|--------------------------------------|---|
| 1 | Aek Lobu | 31.39 | 4.1 | |
| 2 | Sibara-bara | 74.53 | 4.1; 5 | Part of the area is overlapped with Bukit Binasari area |
| 3 | Paraupan | 57.93 | 4.1 | Part of the area is overlapped with Bukit Binasari area and forest covered area of block J/K 34 |
| 4 | Lorong Satu Binasari | 11.47 | 4.1 | Overlapped with Bukit Binasari Area |
| 5 | KTA Napa | 17.70 | 4.1 | Overlapped with Bukit Binasari Area |
| 6 | Aek Rundung | 10.41 | 4.1 | Part of the area is overlapped with Bukit Sembaur Area |
| 7 | Dua Telaga | 8.30 | 4.1 | |
| 8 | Dua Telaga Tengah | 4.64 | 4.1 | |
| 9 | Batang Gadis | 177.08 | 1.1; 1.2; 1.3; 1.4; 2.3; 4.1; 4.3; 5 | |
| 10 | Batang Selai | 20.33 | 1.3; 1.4; 2.3; 4.1 | |
| B | Hilly Area | | | |
| | Binasari | 1,639 | 1.1; 1.3; 4.1; 2.3; 4.1; 4.2 | |
| | Sembaru | 135.48 | 1.1; 1.2; 1.3; 4.1; 2.3; 4.1; 4.2 | |
| C | Forest covered area | | | |
| | Hutan Lestari Block J/K 34 | 30 | 1.1; 1.3; 1.4; 2.3; 3 | |
| | Hutan Lestari Block O/P44/4 | 96 | 1.1; 1.3; 1.4; 2.3 | |
| D | Peatland area | 5,665.22 | 4.1 | |
| | Total | 7,781.22 | | |

According to the result of identification, there are HCV 1.2 (endanger species) and HCV 1.3 (habitat for the endanger species). The critical endangered species (CR) according to *Red List Book IUCN 2012* and which is identified within the company operational area are *Dryobalanops aromatica* (kapur) and *Panthera tigris sumatrae* (harimau sumatera).

The company also has strategies to preserve endanger species with the determine the program within the management plan 2013. The plans among others are signboard construction of HCV and prohibition and flora and fauna inventory. Furthermore, the company also has procedure of HCV and riparian area management. There was a record of handling of law-breaking actions which are illegal logging, illegal hunting, land burning, fish electrocuting, illegal mining, HCV signboard vandalism.

The company has HCV organization structure which was legalized on March 17th 2014. It is led by Mr. Isransani (HCV Head) and is supported by Mr. Ilham R. T. Damanik as HCV Controller, Mr. Taupan Sibarani as HCV Coordinator of LS Tengah and Mr. Budi Purianto as HCV Coordinator of LS Selatan.

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| | Status: Comply | |
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5.3

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

PT ANJA SIAIS has the record of waste source identification documentation. The company has SOP of hazardous waste management (SOP-EHS-012), SOP of agrochemicals and pesticide containers management (SOP-EHS-011) and SOP of medical waste management (SOP-EHS-031)

The company has had permitted hazardous waste storage and has cooperated with the third party (permitted collector and transporter) named CV. Amindy Barokah.

The company has the record of hazardous waste management implementation as well as the management of effluent and air emission. The company also has re-used solid waste like fiber and shell as boiler fuel and EFB as mulch (organic fertilizer) on field (applied on the non-peatland area).

- The company should attach the hazardous waste balance sheet based on the format written on the regulation into the report of hazardous waste management to the concerned agency.
- The company is able to re-evaluate the volume of containment wall compared to the volume of fossil fuel tank at mill.

#OFI

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| | Status: Comply | |
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5.4

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

The company has the record of diesel fuel consumption for the estate and mill operationals. The company has the budget of fossil fuel consumption for 17,246 liter/month. According to the data of diesel fuel consumption at mill, it still below the composed budget for period of 2015.

The company has the record of renewable energy use (shell and fiber) as boiler fuel. There is a result of monitoring in 2015.

The company has an opportunity to:

- Composing the budget of diesel consumption based on product (Liter of diesel/Ton of FFB or Liter of diesel /Ton of CPO)
- Monitoring the consumption of diesel for the FFB transportation from estate to mill and for the electricity.
- Calculating the use of renewable energy efficiency (shell and fiber) as boiler fuel. **#OFI**

According to the document review of diesel fuel consumption data as well as renewable energy consumption (shell and fiber), the comparison of consumption in percentage was 33% for renewable energy and 67% for diesel fuel energy (based on data of consumption on 2015).

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| | Status: Comply | |
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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.

The company did land clearing without burning. According to the result of interview with the representatives of management unit, the company did land clearing mechanically. The company was able to show the evidence of mechanic land clearing with photograph of land clearing activity. Based on field observation known that there is no indication of burning conducted by the company. Interview with the surrounding Villagers revealed that PT ANJA SiaS did do burning for land clearing.

Status: Comply

5.6

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

The company has the record of air emission monitoring in 2nd semester of 2014 (test was conducted by Sucofindo Laboratory on November 2014). The test shows that the test result is still under the regulated threshold. The test covers:

- Boiler Emission
- Mill Generator Emission
- Settlement Generator Emission
- Emission of Blow Down Chamber Sterilizer
- Air Emission
- Air Ambient
- Vehicle Emission

The implementation of mitigation, pollution and emission reduction conducted by PT. ANJA SIAIS are :

1. Identifying the processing stages that emit
2. Documenting the data that have to do with emission sources based on need.
3. Provision, operational, maintenance and repairment's utilities and facilities which cover the prevention over processing and ensuring all systems working well.
4. Managing the emission sources which have potential emission source leakage.
5. Monitoring the emission annually.
6. Calculating the data base line for the emission calculation.

According to the document review, the company has calculated and monitored GHG by using Palm ISPO GHG Calculator Tool V.2 on 2014. However, the company was not able to show the evidence of GHG monitoring reporting to RSPO. **See NCR no. 2015.8**

Minor

Status: NCR 2015.8

5.6.3

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.

The company has the document of environment (EIA and environmental management and monitoring plan) containing environment and social impacts, document of Social Impact Assessment (SIA) that was composed by Sonokeling Akreditas Nusantara. The Social Impact Assessment was conducted on 5 assessment aspects. Those were:

1. Infrastructure,
2. Socio-Economy,

3. Socio-Culture,
4. Environment and Community Sanitation,
5. Company Operationals.

The analysis was supported with matrix of SIA of PT ANJA SIAIS (Internal and External Impacts)

Record of SIA compilation Meeting:

1. Opening Meeting on December 15th 2015 at PT ANJ Meeting Room
2. FGD SIA on December 16th 2012 at Paropan Napa. It was attended by 9 participants.
3. FGD SIA on December 16th 2012 at Binasari. It was attended by 3 participants.
4. FGD SIA on December 16th 2012 at House of Head of Environment. It was attended by 8 participants.
5. FGD SIA on December 18th 2012 at the PT ANJ Balcony. It was attended by 2 participants.
6. Close Meeting dated December 20th 2012 at the PT ANJ Meeting Room.

The company has evaluated and review the implementation of SIA matrix which cover 2 impact sources. 1) Estate management (infrastructure, HR education and training, flood issue, company sanitation) and 2) Community Social Responsibility (education, partnership, social and spiritual event donation, community bodies, guidance for cooperative unit, job opportunity and increase of income)

The company has involved the locals on the Stakeholder Meeting. The meeting is regularly held (each semester). For example, the Stakeholder Meeting dated March 13th 2014. It was attended by 60 participants consisted of the representatives of village administrative government, sub-district government, community figure, media and university.

Stakeholder Meeting on April 28th 2015 at the club house of PT ANJ Agri Siais which was attended by 40 participants consisted of the Plantation Agency, Mining Agency, Environment Agency of South Tapanuli District, Head of National Sport Commission, congressmen and community figures.

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| Status: Comply |
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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.

The company has the SOP of communication and information response (Document No. SOP-Leg-02 revision No. 1 dated April 1st 2013). It contains the internal communication and information provision in term of social, manpower, environment and OHS. The external communication and information provision that contains external communication and information provision over the method to communicate in term of social, manpower, environment and OHS to the media and government. PT. ANJ AGRI SIAIS has held socialization of the procedure of communication and consultation to the local people along with the stakeholder meeting on March 13th 2014.

The PIC of the company who responsible with the external parties to communicate and giving information are:

1. Department of CSR: Abdul H. Margolang
2. External Relation Officer: Deddy Nainggolan
3. Commercial: Sutiowarman

The company has list of stakeholder for PT ANJAS on 2015 of 60 people consisting of the personel of South Tapanuli District Agencies, Regional People's Representatives Assembly (DPRD), South Angkola Sub-District Forum, Journalist, contractor, cooperative unit, village administrative government and community figures.

Accordng to the data of public consultation with the stakeholder (agency, nearby villages and contractor), the communication and consultation between the company and stakeholders are conducted transparently and open. The information requests are well responded by the company.

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| Status: Comply |
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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.

The company has internal memo dated October 11th 2012 in ref No. 77/GM/rs/10-2012 in term of the procedure of employee's complaint monitoring and management. It facilitated all complaints expressed by employees.

The company also has flowchart to deal with the complaints expressed by the employees. For example:

- Listening the complaint carefully.
- Assisting, resolve the complaint in a best way and acceptable
- Ensuring the given enlightenment to be fully accepted.
- Discussion with the Bipartit Cooperative forum if the complaints can not be accepted yet by the complainant.
- Record the complaints of employees on the list of complaint monitoring.

The socialization of the policy is written on the training for the trainee worker. There was a training report for the trainee worker on May 29th 2015. The training discussed the contract for service, company regulation, socialization of company's social policy (sexual harassment prevention, freedom to unite, information request, anti discrimination on the recruitment for workers, no worker underage, employee's complaint procedure and protection over the women workers's reproductive right) and safety. The training was attended by 11 workers proven by the attendance list.

The employees' complaints are recorded on the list of employee's complaint monitoring. There is a list of employees' complaint on 2014. There was a complaint from Hotman Sinaga dated May 13th 2015 in term of the change of foreman to clerk. Hotman Sinaga thought that it was a downgrade.

The complaint has been followed up by the company in form of the description and legitimation over the policy dated May 20th 2015. There was a column of both parties's signature for complaint that is solved.

The company has a procedure of resolution for complaint caused by the impacts of the company's operationals. The procedure is:

1. Mechanism of information provision to the stakeholders is described on the SOP of communication and information provision (Document No. SOP-Leg-02 dated April 1st 2013).
2. Procedure of land dispute is described on the company's policy in term of the procedure to deal with conflict (No. 022/HR&GA/CP/Perbedaan Pendapat/06-09 dated June 1st 2009). According to the policy, the conflict resolution prioritize using the concensus forum, re-negotiation and the last option using through court.

PT. ANJ AGRI SIAIS has held socialization in term of the procedure of transparent system to deal with the complaint from stakeholder to local people through stakeholder meeting on March 13th 2014.

The company has the record of conflict resolution and one of its result the result is the report from the Andalan Smallholder Group to the Regent and Vice of Regent of South Tapanuli on their objection on land clearing on the uncompensated land.

According to the result of interview with the workers, the workers have aware of the procedure of complaint and grievance submission.

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.

The procedure of land dispute resolution was described on the company policy in term of the management of community different opinion (document No. 022/HR&GA/CP/Perbedaan Pendapat/06-09 dated June 1st 2009)

According to the result of public consultation with the villages nearby estate like the community of Janji Matogu Village,

there is no land dispute nor compensation over the loss of traditional and legal rights with the community. They mention that issue related to land compensation has been finished well . It has been verified through public consultation with the agency that indeed there was no land dispute in PT ANJA Agri Siais.

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.

The company was able to show the decree of North Sumatera Governor No. 188.44/67/KPTS/Tahun 2015 in term of the South Tapanuli District sectoral minimum wage. The sectoral minimum wage standard for the plantation is IDR 1,973,800,-/month The company was then issue the circular from HRO of PT ANJA Siais dated February 20th 2015 No. 01/HRO/UPAH/02-15 referred to the Decree of North Sumatera Governor. It describes that the wage of permanent worker with daily based payment for period of 2015 is IDR 1,973,800,-/month.

The company was able to show the list of employee's wage on May 2015. It informed the name, basic salary, premium, overtime, fringe benefit, allowance, gross, deduction, nett of salary and receipt mark. There is also the evidence of employee's payment slip. For example, the payment slip with code 00894, component of wage, effective workdays, basic salary, overtime, overtime payment, annual day off, paid day off, rice allowance, allowance, labour social assurance allowance, BPJS allowance, deduction for labour social assurance, deduction for cooperative unit, deduction for rice, dues for cooperative unit and nett wage. According to the interview with the harvesters (for example at block L42 LSU), the company has paid the employee's wage based on the applied terms.

The company has had the regulation for period of 2013 – 2015. It was legalized by the concerned agency in No. 597-6/DTK-TR/2013 dated November 6th 2013. It explains regulation related to manpower, contract, recruitment for employees, workdays and workhours, day off, leave of absence, permit, waging, OHS aspect, use of company's facilities, management of complaint, premium, health assurance, social assurance and donation and worker's obligations.

According to the document review and public consultation, it is known that the worker on behalf of Arni Basa (LSU of Division 2) was having work accident and was being on the recovery process. However, the company has not paid the wage compensation payment based on the applied company regulation for period of 2013-2015.

1. The wage payment for January which is the second 4 months has not yet been paid for 75% of the wage.
2. The payment of 50% wage for the third 4 months only paid for 2 months.

See CAR No. 2015.06

Verification on August 6th 2015

The company has conducted corrective action and has sent the evidence of calculation letter and employee wage payment from HRO of PT ANJA to the Head of Administration of LSU in No. 15/HRO/ANJA-Siais/VII/2015 dated July 1st 2015. It described the process of the employees who experience work accident and on the recovery process based on the company policy. The payment system is as follows:

- First 4 months for 100% of the wage
- Second 4 months for 75% of the wage
- Third 4 months for 50% of the wage and the payment for the following months is 25% of the wage until the contract termination.

The company has paid the wage based on the terms on July 9th 2015. The company showed the document of cashflow No. B0000838 as the evidence and it has been signed by the mentioned employee. Hence, NC is closed.

The company has the list of utilities and facilities from 2007 until period of 2015. The constructed facilities are:

| | | |
|--------------------------|-----------------------------|---------------------------------|
| 4 units of Manager House | 1 unit of Kindergarten | 1 unit of 22 m composite bridge |
| 30 units of Staff House | 1 unit of Elementary School | 1 unit of 20 m composite bridge |

| | | |
|--|------------------------------------|-----------------------------------|
| 71 units of G2 House for employees | 1 unit of Polyclinic | 1 unit Rice Warehouse |
| 89 units of G6 House for employees | 1 unit of Central Workshop | 1 unit of Gas Tank Storage |
| G10 house for employees (6 semi permanent units) | 1 unit of Daycare | 1 unit of Multifunction warehouse |
| 1 unit of GMO | 1 unit of Mosque | 1 unit of Soccer Field |
| 1 unit of Management Mess | 1 unit of Church | 1 unit of Diesel Fuel Tank Deck |
| 2 units of Logistic Warehouse | 1 unit of food court | |
| 1 unit of Weighbridge | 1 unit of Filing Room | |
| 1 unit of Tennis Court | 1 unit of Premium | |
| 1 unit of GMO Parking Lot | 1 unit of Water storage | |
| 1 unit of Security Post | 1 unit of Knapsack washing station | |
| 1 unit of Diesel Tank House | 1 unit of sack washing station | |
| 1 unit of Hazardous Waste Storage | 1 unit of staff and manager mess | |
| 315 units of Permanent Garbage Bin | 1 unit of employee hall | |

The company also has construction plan for period of 2016 to 2020. For example:

| | |
|---|-------------------------------|
| 6s unit of Staff House | 1 unit of division office |
| 60 units of G2 house for employees | 1 unit water tower |
| 5 units units of G5 house for employees | 1 unit of children playground |
| 5 units of Bachelor Assistant | 1 unit of canteen |
| 1 unit of Austindo Resort | 1 unit of water treatment |
| 135 units of Permanent Garbage Bin | 1 unit of swimming pool |
| 1 unit of GM House | |

The list was composed by the Assistant Manager of Civil Engineering and was witnessed by the Head of Administration on February 25th 2015.

According to the result of interview with the workers, the company has provided all needs of employees. For example, the well-suited house including water and electricity, place of worship, sport facilities, health facilities, educational facilities, etc.

The company has formed employee cooperative unit which sell the daily need of employees and provide loan and save service. The objective of cooperative unit is to improve the access of workers over the properness of food.

The company also formed food court which sell the daily need to the employees as well as the monthly market event on worker's payment day.. The market sell food ingredients like fishes, vegetable, etc.

The company give counseling and coaching to the merchant and canteen industrialist within the company area. There is a training report for the program dated March 18th 2015. It discussed the assistance to the merchant.

According to the result of interview with the workers, known that the workers feel their need of food and daily needs are provided in facilities built by the company. The company was able to show the attempt to monitor and improve the access of workers over the proper food with affordable price

Mayor
6.5.2

Status: Comply

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.

The company has policy of labour union in form of the Internal Memo of General Manager of PT ANJA SIAIS No. 72/GM/srs/09-2012 dated September 24th 2012 in term of the freedom to unite.

The Bipartit cooperative forum has been legalized based on the decree of the Head of South Tapanuli District Manpower Agency No. KEP.560/1519/2014 in term of the legalization of PT ANJA Siais Bipartit cooperative forum dated February 17th 2014 (valid for 2 years).

According to the document of legalization, there was an attachment of the decree of the Head of South Tapanuli District Manpower Agency in term of the legalization of PT ANJA Siais Bipartit cooperative forum, South Angkola Sub-District (No. 560/1519/2014). The attachment contained the membership of the board of Bipartit cooperative forum.

The company has the record of monthly assembly with the Bipartit cooperative forum. For example:

- There was an assembly dated May 21st 2015. The assembly socialized the task and function of Bipartit cooperative forum, routine schedule, Bipartit cooperative forum board restructurization, report from member of Bipartit cooperativ forum and the Head of environment. The assembly was attended by 11 participants. The attendance list and photographs are available.
- There was an assembly dated June 18th 2015. The assembly discussed the minute of meeting of the previous assembly, issues or the input from unit of division and the discussion for the solution of issue, problem or input. The assembly was attended by 10 participants, proven by attendance list and photographs of the acitivity.

The company has the records of minute of meeting of the assembly with the worker representatives.

Auditor has interviewed and consult with labour union. According to the result of consultation, the company has facilitated the events held by labour union. The company freed the workers to unite and join labour union.

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| Status: Comply |
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6.7

Children are not employed or exploited.

PT ANJA Siais has had Internal Memo of General Manager No. 18/GMO/Siais/IM/III/2013 dated March 4th 2013 in term of the prohibition to hire underage workers.

According to the evaluation of database of employees on May 2015, there was no underage worker.

Accordng to the data of public consultation with the stakeholder (agency, nearby villages and contractor), the company did not employ underage workers. It was supported by the field visit conducted by auditor such as field visit to block 048, block L26 and block L42.

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| Status: Comply |
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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.

PT ANJA Siais has the Internal Memo of GM of PT ANJA SIAIS No. 36/GMO/Siais/IM/V/2013 in term of the gender equality and anti discrimination on the recruitment dated May 14th 2013.

According to the evaluation of employee database on May 2015, the employees working on PT ANJA Siais are consisted of several tribes, religion, gender and race. According to the result of interview with the workers, the management of PT ANJA Siais did not discriminate the workers. All workers have equal and fair opportunity.

The company has policy in term of the guideline for recruiting/promoting/mutating/terminating the employees No.

018/HR&GA/CP/05-2009 which has valid since May 2009. According to the result of document verification for the employee database on May 2015, the employees who work for PT ANJA Siais are consisted of several tribe, religion, gender and race.

According to the result of interview with the women workers, the company did not differentiate the rights of men and women workers.

The company does not have migrant workers.

The company has owned working agreement as a requirement for employee's recruitment, such as:

- Contract for service No. 170/HRO-AEP/SPK/05-09 dated May 4th 2009 between the company and the future employee on behalf of Yaaro Waruwu. According to the clause 1 of the contract in term of recruitment and probation period. It covers:
 - The company hired the worker as the permanent daily worker of harvesting of division 2, estate of the first party with 3 months of probation period.
 - If the worker's performance during the probation period for 3 months satisfy the first party, the first party shall promote the worker as daily permanent period harvester.

The company also has evidence of employee's promotion in form of the promotion paper on behalf of Yaaro Waruwu as harvesters of division 2 with the status of permanent employee. The company assessed it based on the requirements for the job.

Status: Comply

6.9

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

The company policy in term of the prevention over sexual harasshment and violence was written on:

1. Internal Memo of General Manager of PT ANJA Siais No. 71/GM/srs/09-2012 in term of the procedure to deal with sexual harasshment and the organization structure of sexual harasshment handling committee.
2. Procedure of sexual harasshment resolution for PT ANJA Siais was legalized on September 24th 2012.

The committee to deal with the sexual harasshment has been formed. There is an internal memo in term of the revision on the sexual harasshment handling committee's organization structure No. 16/GMO/Siais/IM/IV/2014 dated April 10th 2014. According to the memo, there is a list of sexual harasshment handling committee's board.

The company policy in term of the protection over the reproductive rights was legalized on the Internal Memo of General Manager No. 63/GM/srs/09-2012 in term of the protection over the women worker's reproduction rights dated September 6th 2012. According to the memo, the pregnant and breastfeeding women workers are not allowed to work with chemicals.

According to the company regulation for period of 2013-2015 on Chapter VII in term of leave and day off for childbirth and misbirth, clause 22, the day off for childbirth is 90 days dan the day off for misbirth is 45 days.

There was an internal memo No. 22/GMO/Siais/IM/VI/2015 dated June 1st 2015 in term of the menstruation day off (H1). According to the memo, the company allows the women workers to take the day off in 1st and 2nd day of menstruation if they feel sick on the 1st and 2nd day based on the recommendation from doctor or the head of estate policlinic.

The company also has socialized the policies. For example, the report of meeting in term of the company regulation and policy refreshment training dated June 4th 2015 and June 6th 2015. The protection over the reproduction rights was

also taught in the training.

The company has the scheme of sexual harassment resolution procedure legalized by the GM of PT ANJA Sia's dated May 30th 2013. It covers:

Victim >> report to security/foreman/assistant/secretary of GM and midwife >> investigation >> composing written report >> Head of Security >> official record of investigation >> report of the result of investigation official record and the suggested actions >> GM >> decision of management >> internal/police >> contract termination / court.

The sexual harassment handling committee has the record of sexual harassment case reported by the workers. For example:

- There was a resume of official record dated April 22nd 2015. The conclusion was that there was a sexual harassment. The victim felt objection and reported it to the sexual harassment handling committee's. The incident has been solved internally and stated closed with the sign of the concerned parties.

According to the interview with the board of gender committee, the company has implemented policy to protect reproduction right. For example, routine monitoring conducted by company's doctor. According to it, there was no pregnant nor breastfeeding women workers. Furthermore, based on gender's committee information, there was no sexual nor domestic violence.

Status: Comply

6.10

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

The company has an evaluation of FFB price of PT ANJ Agri Sia's compared to the price of North Sumatera Province Plantation Agency for period of June 3rd – 9th 2015. PT ANJ Agri Sia's through the commercial Department on HO of Medan determined the FFB price for period of June 3rd – 9th 2015 for IDR1,255 / Kg. The difference on the daily data for FFB was caused by:

- Delivery cost of CPO for IDR 240/Kg and PK for IDR 490/Kg
- OER of CPO for 19.5% and PK for 4.5%
- CPO and PK sales recording system based on the dispatch and receipt.

The evaluation was composed by the FFB Procurement Manager and was approved by S&C GM Assistance on June 10th 2015.

According to the information from PT ANJA Sia's, the FFB price was published and informed at the gate of estate and POM of ANJA Sia's. The FFB price follow the applied procedure determined internally through Commercial Department of HO in Medan.

There is an SOP of external FFB purchase (Document No. ANJA-F&A-SOP 07 dated 2003, Rev. March 1st 2010). The procedure of FFB price is determined internally through Commercial HO. The determined procedure is as below:

- Weekly, the Commercial Department shall determine the recommended price of FFB for the FFB purchase based on the estimation of market price which cover production and cost including the predicted margin for the external FFB purchase.
- The price is a benchmark in which the profit and external FFB purchase shall be evaluated.
- Based on the annual budget and the determined weekly and monthly FFB purchase target.
- Based on the local market supply, Commercial HO staff is responsible for the daily external FFB purchase.
- The procedure is also provided in form of informative flow chart

According to the information from PT ANJA Sia's, the FFB price was published and informed at the entrance gate of estate and POM of ANJA Sia's. The FFB price follow the applied procedure determined internally through Commercial Department of HO in Medan.

The company has contract with the FFB supplier. According to the agreement, both parties have agreed all clauses in the contract including clause of quality standard and payment. Sample of the contract is as follow:

- Contract for Service No. 003/ANJA-SIAIS/SP/TBS/II/2015 dated January 2nd 2015. It was the contract between the company and the FFB supplier on behalf of Syarifuddin Dalimunthe (UD Riri). According to the agreement, both parties have agreed all clauses including the quality standard and payment requirements.
- Contract for Service No. 005/ANJA-SIAIS/SP/TBS/I/2015 tertanggal 2 Januari 2015. dated January 2nd 2015. It was the contract between the company and the FFB supplier on behalf of Ahmad Hasibuan & Simon Lubis (Janji Matogu). According to the agreement, both parties have agreed all clauses including the quality standard and payment requirements.
- Contract for Service No. 066/SPK-LST/03/2015 tertanggal 2 Januari 2015. dated January 2nd 2015. It was the contract between the company and the FFB supplier on behalf of CV Abadi Jaya. According to the agreement, the value, volume and the price of each project were described transparently. Based on interview with the contractor, the company and contractors have complied the rights and obligations as written on the contract.

The contract for service composed by PT ANJA with the contractor is fair, legal and transparent. It was supported by the contract signing between both parties and each party has the copy of the agreement.

During the ST-02 program, the not all evidence of FFB purchase payment to contractor (UD Riris) for period of March 2014 by PT ANJA Siais was able to be shown. **See NCR No. 2014.08**

Verification on June 23rd 2014

PT ANJA Siais has shown the evidence of payment to the FFB contractor (UD Riris) for period March 2014. All the evidence of payment documentation are available and well maintained. NC is closed.

Verification shall be conducted on ASA-01 program. The company was able to show the evidence of payment for contract for service. For example:

- Contract for Service No. 066/SPK-LST/03/2015 dated March 2nd 2015. It was the agreement between the company and CV Abadi Jaya for March 2015. There was an invoice for IDR 31,671,232 (USD 2,262) – Income Tax for IDR 633,424.64 (USD 45) = IDR 31,037,807.36 (USD 2,216). Evidence of payment for IDR 31,671,232 (USD 2,262) and it was added with others to IDR 37,453,529 (USD 2,675). The payment was conducted via Bank BRI on behalf of Effendi Hulu (CV Abadi Jaya) for IDR 37,453,529 (USD 2,675) dated April 7th 2015.
- The company also has evidence of daily FFB payment transfer. For example:
 - Payment dated May 27th 2015 in detail of 32,265 Kg x IDR 1,240 (price per May 27th 2015) = IDR 40,000,000 (USD 2,857) to Janji Matogu
 - Payment dated May 29th 2015 in detail of 184,655 Kg x IDR 1,240 (price per May 29th 2015) = IDR 228,972,000 (USD 16,355) to UD Riri

According to the result of public consultation with FFB supplier, the company and smallholders has made a contract on the contract for service agreement. The period and payment system is also attached. The smallholders informed that the payment is always conducted on time.

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| Status: Comply |
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6.11

Growers and millers contribute to local sustainable development wherever appropriate.

The company has the record of stakeholder meeting. The meeting discussed the CSR programs, for example:

- The meeting of stakeholder on March 13th 2014.
 - Head of Plantation Agency: PT ANJ was expected to be more transparent on the CSR management.
 - Head of Forestry Agency: the CSR fund were expected not only in form of physical development but also community development.
 - Representatives of Janji Matogu Community: the procedure of CSR program need to be socialized. For example, what kind of proposal must be sent and what can PT ANJ assist.

The meeting was attended by 62 stakeholders proven by the meeting's attendance list and photographs.

- Meeting of stakeholders on April 28th 2015.
 - Secretary of Health Agency: the CSR program of ANJ Agri Siais could be focused on the reduction on the death rate of maternal and baby.
 - Principal of South Angkola, 3 Secondary School: the number of teachers who receive incentive are expected to be added and the rehabilitation of Janji Matogu secondary school due to the temporary building.
 - Headman of Al Abror Islamic School: the physical development is balanced with spiritual development by increasing the activities aimed to improve the spiritual quality.
 - South Tapanuli District's Environment Agency:
 1. The environment program is expected to be focused on the development of Leatherback Sea Turtle which is endangered at the west coast of South Tapanuli.
 2. The embankment was expected to be the water source for dealing with fire as well as for the tourism program.
 3. Sange Leaf was expected to be replanted on the conservation area.

The company has CSR budget for period of 2015 and CSR budget realization for period of 2014. The company prepares the CSR budget for period of 2015 for several aspects such as health, education, economy empowerment, social and spiritual. The company prepared IDR 159,000,000 (USD 11,357) for health aspect, IDR 505,500,000 (USD 36,107) for educational aspect, IDR 32,000,000 (USD 2,285) for the economy empowerment aspect and IDR 492,000,000 (USD 35,142) for social and spiritual aspect.

The company attaches program such as incentive for the teacher of pre-school education center and elementary school, mass circumcision and free medical service for the local people surrounding the company in the CSR program for period of 2015. The programs are the suggested program by the stakeholders on the stakeholder's meeting on March 13th 2014 and April 28th 2015.

The company also has CSR budget realization until April 2015 consisted of health aspect for IDR 13,790,116 (USD 985), educational aspect for IDR 78,210,000 (USD 5,586), unrealized economy empowerment aspect, social and cultural aspect for IDR 38,160,564 (USD 2,725).

The budget realization of CSR program for period of 2014 for aspects of health, education economy empowerment, social and spiritual and infrastructure was IDR 3,268,465,113 (USD 233,461).

The company has held socialization and has given donation to the independent smallholders nearby estate as the company's FFB suppliers. The socialization is written on the company's CSR program and realization.

The company has the activity record of smallholder surrounding estates, for example:

- Socialization to the outgrowers of Rianiate Village, Angkola Sangkunur Sub-District dated February 7th 2014. The socialization was on the palm oil plants cultivation and the FFB processing technique at POM.
- Farmers Day dated November 27th 2014. The program discussed the palm oil plants cultivation from the nursery to harvest program. It was attended by 25 participants consisted of the representatives of outgrowers from Sawmill Village, South Angkola Sub-District.

According to the result of public consultation with the smallholders, the company has socialized the manuring and spraying technique as well as the provision of fertilizer.

The company has attempted to improve the productivity of the smallholders surrounding the company area.

Status: Comply

6.12

No forms of forced or trafficked labour are used.

According to the result of interview and field observation, the company did not employ illegal human trafficking worker or forced worker in any way.

According to the interview with the representatives of management, there was no contract substitution on the worker recruitment process

The company did not use migrant nor temporary workers. All workers employed by the company are the permanent workers from the nearby villages.

Status: Comply

6.13

Growers and millers respect human rights

The company has document of business ethic code dated January 1st 2014. According to the document, the company shall comply all laws and regulations applied on the Republic of Indonesia and on the company operational area, especially the substance and spirit of the regulation.

According to the document of ethic code, there is a paradigm in term of the company's value consisted of integrity, respect among the men and environment and continuous human development. There was a statement that "the company prioritizes the worker's and stakeholder safety and health and equally treat the workers as partner, fair and respect each other.

The ethic code was composed in bahasa Indonesia, understood by all company's workers and has been socialized, for example on:

Training report of ANJ Value Workshsop program dated October 1st – 3rd 2013. It was socialized the company ethic code and was attended by 96 employees.

The company also has internal memo dated June 2nd 2015 ref. No. 23/GMO/Siais/IM/VI/2015 in term of the protection over human rights signed by GM. The internal memo states that based on the statute No. 39 year 1999 on human right and the company's commitment to implement the company's value to respect human and environment. Therefore, the company protected the worker's human right as well as their family within the scope of company operational.

The company has had policy in term of human rights protection.

The company has an opportunity to improve the performance by doing socialization about policy to respect human rights. #OFI

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.

According to the document review, public consultation and field visit, there was no new planting nor old plantation area expansion.

According to the result of interview with the surrounding communities and the company management, PT ANJA SIAIS did not have smallholder scheme. The partnership scheme owned by the company is the land conflict resolution with Villagers under cooperative unit forum.

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.

There is a Soil Survey Report for PT. Ondop Perkasa Makmur (name of company before it is changed into PT. Austindo Nusantara Jaya Agri Siais). It was composed by the Faculty of Agriculture of North Sumatera Province on 2007. The result concludes that:

a. Climate Condition

The data of annual precipitation is 4,000 mm with the monthly precipitation average is 425 mm and average raining day is 14.5 days of rain per month. The average of air temperature is 25°C with the height of area is 40-45 m above the sea surface. This condition is suitable for palm oil plantation.

b. Topography

In general, the company is located on the valley with slope between 0 – 3% and it is surrounded by hills and cliff. Hence, good drainage is needed to decrease the overflow water during the rain season.

c. Swamp/Wetland

The trench to maintain soil fertility. Good maintenance for soil fertility shall preserve the soil fertility for long term. The water level must be maintained between 0.7 – 1 m.

d. Soil Fertility

The company must improve the soil pH condition from acidity, for example by adding fertilizer of Ca, Mg and K. The limit factor for the mineral soil are the acidity, C-organik, Nitrogen and Fospor.

e. Soil Type

| Land Unit | Classification | Soil Fertility Status | Boundary Factor | Hectarage (Ha) |
|-----------|-----------------------|-----------------------|----------------------------------|----------------|
| 1 | Typic haplofibrist | Moderate | pH, saturation level | 2,276 |
| 2 | Aquic dystrodepts | Low | pH, C, N, P | 1,070 |
| 3 | Fluventic dystrodepts | Low | P and saturation level | 309.1 |
| 4 | Terric haplosaprist | Very Low | P and saturation level | 250.5 |
| 5 | Typic dystrodepts | Very Low | pH, C, N, P and saturation level | 448.9 |

f. Overall Production Potential

With a good maintenance and the use of high quality seed, the production potential could reach 25.6 ton/Ha/year.

According to the document of soil survey, the company has mapped the marginal soil and adjusted it with the field condition. There are several supporting maps such as topography map, water management map, waterway map and river map.

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.

Total hectar of the HCV area is $\pm 7,781.10$ Ha or about 80.72% of the company area which is $\pm 9,639.06$ Ha (**Indicator. 5.2.1**). PT ANJA Siais was not able to show evidence that the area planted post 2005 was not HCV potential area. If the planted area is considered as HCV area, it should be expelled from the certification program until the HCV compensation process approved by RSPO.

PT ANJA Siais was not able to show evidence that the planted area post 2005 was not the HCV potential area. If the planted area is considered as HCV area, it should not be expelled from the certification program until the HCV compensation process approved by RSPO shown to CB. **See NCR No. 2015.7 (Major 7.3.1)**

Verification on August 25th 2015

The company has shown the evidence of corrective action in form of the document of landsat image map on 2005, 2006, 2007, 2008 and 2009. It informed the condition of the land layer of PT ANJA Siais pre land clearing program on 2005 and the LUC analysis document as well. The company also has shown the evidence of reporting to RSPO via email as well as the response on August 24th 2015. RSPO did receive the report. However, the report was not yet verified. Hence, the **NC is closed with observation**.

The comprehensive HCV assessment by involving consultation with the stakeholders was conducted post the conversion and replanting program. According to the document review, the company was able to show the HCV assessment which cover land use change to determine the changes over the vegetation since 2005.

The planted peatland is managed by setting the water management. The company constructed waterway and watergate to maintain the water level. Furthermore, the water level and soil subsidence monitoring are also conducted by the company.

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| Major 7.3.1 | Status: Comply |
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7.4

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

PT ANJA SIAIS has made marginal soil map in form of the slope class more than 40% and the peatland in scale of 1:65,000 with distribution as follows;

- a. Distribution of land slope of PT ANJA SIAIS

| Kelas Kelerengan | Luas (Ha) | % |
|------------------|-----------------|-------------|
| 0 - 8% | 7.824,19 | 81,17% |
| 8 - 15% | 40,33 | 0,42% |
| 25 - 40% | 220,30 | 2,29% |
| > 40% | 1.554,18 | 16,12% |
| Total | 9.639,00 | 100% |

The hectareage of peatland of PT ANJA SIAIS is 5,665.22 Ha. Meanwhile, the rest is mineral land 3,973.78 Ha.

The company has had procedure in term of marginal land management as written on SOP of marginal land management No. SOP – OPR-006 rev.00 dated June 1st 2009. It describes the type of marginal soil (lateritic soil, acid sulfat soil, sandy soil, saline soil and peatland). There are several management strategies of marginal land type. For example: planting and maintaining LCC plants, distribution of frond from pruning activity on the soil surface and EFB application, washing the acidity by open the water gate during raining, the use of ash, etc.

PT ANJA SIAIS has a strategy to manage marginal soil, for example:

- The land with slope more than 40% is determined as conservation area.
- Regarding the management area with steep slope but under 40%, the company has SOP of soil and water conservation in 1st revision dated August 1st 2013 (SOP – Agr – 05). The SOP described the soil classification and its management strategy. The management strategy is as follow:
 - Individual terrace for land with slope of more than 15%
 - Continuous terrace on the steep and very steep area.
 - Trench digging on the lowland.
 - Planting of Vetiver grass and Guatemala grass. According to the field visit, the company has planted Vetiver

grass and Guatemala grass at the edge of main road and main trench.

- c. The management in peatland in efforts of: construction of main trench, supporting trench, stop bound, installment of tools to measure the water level, installation of soil subsidence rate's measurer device and regular maintenance of drainage system. The water level is maintained between 50 Cm – 70 Cm. According to the interview with the operational staff and the document review of water level monitoring on May 2015 shows that the water level monitoring is conducted regularly once a week.

The company has managed peatland area by conducted peatland management using water management along with the map. According to the verification in block 46 L, 35 I, 39 I, 45 L, the company has an effort to implement its water management by the construction of main trench, supporting trench, stop bound, installment of tools to measure the water level, installation of soil subsidence rate's measurer device and regular maintenance of drainage system. The water level is maintained between 50 Cm – 70 Cm.

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.

There was no changes over the ST-2 assessment result.

The company has had document of Sosial Impact Assessment. It was identified by SONOKELING Akreditas Nusantara. The identification was conducted participatively. For example, interview with the Head (Mr. Himsar Siregar) of Janji Matogu Environment, community figure (Mr. Syafri Gunawan Daulay) of Paropan Napa Hamlet, the Head (Alamsyah) Binasari Smallholder Cooperative Unit, Formet Chief (Sakti Nasution) of Padomuan Village, Head (Salohot Dalimunthe) of Anja Siais Hamlet.

Positive Impacts:

- The village infrastructures construction and maintenance (bridge, sewer and road maintenance) at Sedikit Village, Simaronop Village, Lalang Village.
- Scholarship for students of Janji Matogu Elementary School and Fathan Mubina Foundation.
- Improvement and working priority for the local people.
- Improvement of economy activity such as the new emerging economic center (pekan)
- Optimization of land use from the neglected area or other commodity plantation into the palm oil commodity. The forest encroachment method shall be left.

Negative Impacts:

- Land Conflict (such as cultivation on the conservation area)
- Social jealousy (people felt that they were ignored by the company due to the bad distribution of smallholder scheme)

Based on the document verification of the land compensation, the land compensation involved other party as the representatives of the previous land owners and the mediator. The cadastral measurement for the compensated land is along with the compensation process and was written on the official record of cadastral measurement. Meanwhile, the value of land compensation was written on the official record of land compensation payment.

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.

According to the result of interview during the public consultation with the locals, there was no customary nor traditional land as well as the land dispute on the company operational area.

The benefit of the estate establishment was confirmed by the local people in form of the job opportunity for the local people and cooperation with the local contractor/supplier.

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.

The company did not burning for land clearing. According to the result of interview with the representatives of management, the company cleared the land mechanically. The company was able to show the evidence of the mechanic land clearing in form of the documented land clearing activity photographs. According to the field observation, there was no indication of land burning. Based on interview with the local people surrounding the company known that PT ANJA SiaS does not do burning for land clearing.

Status: Comply

7.8

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

According to the result of document review, public consultation and field visit, there was no new operation nor expansion of existing plantation.

Based on the document review, the company has calculated/monitored GHG using Palm ISPO GHG Calculator Tool V.2 year 2014. However, the company was not able to show the evidence of reporting the GHG monitoring to RSPO. **NCR No. 2015.08**

Minor 7.8.2 &
minor 5.6.3

Status: NCR No 2015.08

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.

The company committed to continue sustainable corrective actions since ST-2. For example:

- Managing and monitoring peatland area with subsidence pole.
- Giving the locals contract to provide product and service to improve the local economy welfare.
- Water sources management by conservation along the riparian area for spraying and manuring program to be stopped there and managing the endanger flora and fauna.
- Reducing the use of chemicals (paraquat) to spray pest like planting *beneficial plant* such as *Tunera subulata* and *antigonon leptopus* (nest of predator for bagworm)

According to the verification of the compliance over **NCR 2014.04 with Major category** in form of the use of hazardous waste as the cork of aerator pump on the WWTP. There is an Internal Memo No. 29/GMO/SiaS/IM/V/2014 in term of the hazardous waste processing stage. PT Anja SiaS shows the evidence of documentation in form of the photographs of the pesticide ex-containers used as the cork being located into hazardous waste storage on June 23rd 2014 that is recorded in the official record on June 17th 2014. However, according to the field visit, the company was still use the pesticide ex-containers as a cork in WWTP. **NCR No. 2015.9**

Verification on August 6th 2015

The company has shown the evidence of corrective action in form of official record of chemicals containers function change at the WWTP on July 1st 2015. It was signed by the storage clerk, EHS Officer, Lab Assistant and Sr Mill Manager. The company then conducted briefing and awareness over the hazardous waste and its usage on the WWTP ponds to the effluent operator on July 6th 2015. The hazardous waste containers on the WWTP ponds have been withdrawn and stored at the storage. The company showed the monitoring of hazardous waste dispatch to CWT on July 1st 2015. There were 10 pieces of containers received by the Head of storage and was recognized by the Mill Manager and Lab Assistant. The company has replaced chemicals drum with 200 liter of plastic chemicals drum. The company showed the evidence of goods request for 15 pieces of drums in No. 217/BPB/MILL/ANJAGRI/VII-2015 dated July 4th

2015.

Hence, the NC is closed and it shall be observed on the next assessment.

| | | |
|------------------------|--|--|
| Major 8.1.1 | Status: Closed with observation | |
|------------------------|--|--|

3.2. Summary of Assessment Report of Supply Chain Requirement

| Clause | (Module E) CPO Mills - Mass Balance Requirements |
|--------|---|
| E.1 | Definition |
| E.1.1 | <p>Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p> <p>According to the field observation, document review and interview with the representatives of management, security officer and weighbridge operator, the company is now receiving the FFB from the nucleus estate (certified) and from the community plantation /outgrower (non-certified). Therefore, the company will be assessed based on supply chain requirement for module E (Mass Balance) .</p> <p>The company was able to show the documents of supply chain requirements implementation. For example, SOP of document No. SOP-SDD-06 in 1st edition of 2nd revision dated October 21st 2014.</p> |
| | Status: |
| E.2 | Explanation |
| E.2.1 | <p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced should then be recorded in each subsequent annual surveillance report.</p> <p>ANJA Sia's POM has determined the estimation of the CPO and PK product generated by mill. For period of 2014/2015, the estimation of FFB product is 170,731.10 ton, CPO is 37,560.84 ton, PK is 7,682.90. During the ASA-1 assessment, the auditor has verified the actual product of CPO, FFB and PK for period certificate of 2014/2015 does not over the estimated certified product that has been determined by the company..</p> <p>ANJA Sia's POM was able to show the estimation of the generated certified product for period of 2015/2016. For example, the FFB estimation is 195,462 ton; CPO is 43,002 ton and PK is 7,818 ton.</p> |
| | Status: Comply |
| E.2.2 | <p>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 or book and claim).</p> <p>ANJA Sia's Mill has complied the requirements for reporting the supply chain managing RSPO Supply Chain (E-Trace) in ID Member RSPO_PO 1000001992 as Oil Mill category registered as PT Austindo Nusantara Jaya Agri Sia's and has been approved by E-Trace on November 12th 2014.</p> |
| | Status: Comply |
| E.3 | Documented procedures |
| E.3.1 | <p>The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <ol style="list-style-type: none"> Complete and up to date procedures covering the implementation of all the elements in these requirements; The name 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 procedures for the implementation of this standard. |

ANJA Siais Mill has the procedure which covers all elements of MB requirements, such as:

- SOP of Mass Balance (Austindo Nusantara Jaya Agri Group) in document No. SOP-SDD-06 in 1st edition of 2nd revision dated October 21st 2014. It was prepared by the Sustainability Manager and was approved by the Head of Sustainability. It describes the objective, responsibility of in charge personel, determination of supply chain format compilation, procedure to deal with overproduction.

According to the SOP, the PIC are:

- Laboratory Assistant who responsible to maintain the balance of CPO and to dispatch it.
- Mill Manager who responsible to maintain the stock balance and the well running CPO dispatch.

Point 6 of the SOP explains that when there is an over production compared to the last year projection, it will be informed to the concerned CB. The PIC for this situation is the sustainability officer and known by manager of sustainability.

Furthermore, there are SOP that have to do with MB implementation. For example:

- SOP of product traceability in document No. SOP-SDD-05 dated November 1st 2013. It describes the process of FFB overproduction and its reporting.
- SOP of Certified Sustainable Palm Oil/Palm Kernel sales system in No. ANJA-F&A-SOP 29. It describes the procedure of the certified-products sales and the exist sales procedure.

Status: Comply

E.3.2

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

ANJA Siais Mill has the procedure which cover all elements of MB requirements. For example:

SOP of Mass Balance (Austindo Nusantara Jaya Agri Group) in document No. SOP-SDD-06 in 1st edition of 2nd revision dated October 21st 2014. It was prepared by the Sustainability Manager and was approved by the Head of Sustainability. It describes the objective, responsibility of personel, supply chain format compilation, procedure to deal with overproduction.

Status: Comply

E.4

Purchasing and goods in

E.4.1

The site shall verify and document the volumes of certified and non-certified FFBs received.

The supply of FFB for the POM processing stage of Siais POM are sent from the nucleus estate (certified) and from the smallholder/outgrower (non-certified). The company showed the document of FFB receipt whether from nucleus estate or from outgrower/smallholder. For example:

- Nucleus Estate FFB (certified) :
 - Local FFB covering letter which informs the No. of covering letter, estate/division, vehicle police number, distance to POM, date of harvest, year of planting, block, quantity of FFB, quantity of loosen fruit. For example, covering letter dated June 30th 2015 from division 2, BK9947CG, quantity of FFB was 384, quantity of loosen fruit was 350 and year of planting was 2006.
 - The weightbridge ticket has been stamped as RSPO certified. For example, the weightbridge ticket dated June 30th 2015. It informed the covering letter No. 014138, vehicle police No. BK9947CG, hour of incoming and hour of outgoing, loosen fruit quantity: 350 kg and nett: 6600 kg.
- Outgrower FFB (Noncertified):
 - Outgrower FFB covering letter. For example, FFB covering letter dated June 30th 2015. It informed covering letter No. C0006481, truck police number: BA8114ZU, FFB origin.
 - Weighbridge ticket. For example, the ticket dated June 30th 2015. It informed the vehicle police number: BA8114ZU, name of supplier: UD Boru Namora, No. of covering letter: 0006481, hour of incoming and hour of

outgoing, nett: 7110 kg.

Furthermore, the company could also show the data of FFB receipt on the report of daily production. It informed the date, the received FFB (certified and non certified) and total of FFB. For example, the report of FFB receipt on June 29th 2015 for the certified FFB for 931,670 ton and the non certified for 163,695 ton, total of the received FFB for 1,095,365 ton, total of the processed FFB for 862,992 ton.

Status: Comply

E.4.2

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

According to the SOP of MB (Austindo Nusantara Jaya Agri Group) in document No. SOP-SDD-06 specifically on clause 6 (point 3), the management unit must inform the overproduction from the projected one to the CB.

Since PT ANJA Siais has been certified on September 25, 2014 until the surveillance 1 (June 30, 2015) known that the mill has been registered (based on Green Palm website) and conduct selling through Gree Palm in form of product of:

- 1) **The registered CSPO for 37,562 ton (on 2014 for 10,085 ton and on 2015 for 27,477 ton) and it was sold for 29,252 ton.**
- 2) **The registered CSPK for 3,384 ton (on 2014 for 855 ton and on 2015 for 2,529 ton) and it was sold for 2,029 Ton.**

CSPO:

- October 2014 for 1,775 Ton.
- March 2015 for 24,571 Ton.
- April 2015 for 2,906 Ton.

CSPK:

- October 2014 for 800 Ton
- February 2015 for 85 Ton
- April 2015 for 1,144 Ton

The sales was no exceeding the quota during period of September 25th 2014 to September 24th 2015 for **37,560.84 ton of CSPO** and **7,682.90 ton of CSPK**.

Status: Comply

E.5

Record keeping

E.5.1

- a. **The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.**
- b. **All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.**
- c. **The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short.(ie product can be sold before it is in stock.)**

ANJA Siais POM has recorded and balanced all FFB receipt as well as the certified CPO and PK dispatch in monthly-based, quarter-based and annual-based.

POM was able to show the report of FFB receipt and CPO and PK production on the document of CPO MB on 2015. The document described the FFB receipt and production during period of September 25th to May 31st 2015.

According to the quarter-based during period of October 2014 to November 2014, the certified FFB receipt was 33,747.85 ton, CPO production was 7320.102 and PK production was 383.63 ton.

The mill conducted registration (based on Green Palm website) and conduct sales via Green Palm in form of:

- 1) Total of FFB receipt was **111,661.9 ton**
- 2) **The registered CSPO for 37,562 ton (on 2014 for 10,085 ton and on 2015 for 27,477 ton) and it was sold for 29,252 ton.**
- 3) **The registered CSPK for 3,384 ton (on 2014 for 855 ton and on 2015 for 2,529 ton) and it was sold for 2,029 Ton.**

Status: Comply

E.5.2

In cases where a mill outsources activities to an independent (not owned by the same organization) palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement.

ANJA Siais Mill does not process kernel. They only sell it.

Status: Comply

3.3. Conformity Checklist of Certificate and Logo Use *(Only apply for Surveillance Assessment Report)*

| | | |
|-------|---|-------|
| 1. | Evidence of permission or approval certificate and logo from Certification Body which submitted by Client | X or√ |
| ASA-1 | The management unit does not use RSPO logo. | √ |
| | Status: Comply | |
| 2. | Implementation of certificate and logo used by Client comply with size and type (shape) against Guideline of Logo Use | X or√ |
| ASA-1 | The management unit does not use RSPO logo. | √ |
| | Status: Comply | |
| 3. | Implementation of Certificate and Logo is not used on product | X or√ |
| ASA-1 | The management unit does not use RSPO logo. | √ |
| | Status: Comply | |
| 4. | Controlling of Certificate and Logo, including withdrawing inappropriate logo. | X or√ |
| ASA-1 | The management unit does not use RSPO logo. | √ |
| | Status: Comply | |

3.4. Summary of RSPO Partial Certification.

| | | |
|---|---|---------------|
| Management unit(s) observed: 1. <i>PT. Kayung Agung Lestari: New Planting Procedure conducted on 2014</i> 2. <i>PT. Galempa Sejahtera Bersama: New Planting Procedure conducted on 2014</i> 3. <i>PT. Putera manunggal Perkasa: New Planting Procedure conducted on 2014</i> 4. <i>PT. Permata Putera Mandir: New Planting Procedure conducted on 2014</i> | | |
| 2.1 | There is compliance with all applicable local, national and ratified international laws and regulations. | X or √ |
| | All the units under PT Austindo Nusantara Jaya Agri subsidiaries are accordance to the Time Bound Plan | √ |
| | Status: Full compliance | |
| 2.2 | The right to use the land can be demonstrated, and is not legitimately contested by local communities with demonstrable rights. | X or √ |
| | All the units under PT Austindo Nusantara Jaya Agri subsidiaries are accordance to the Time Bound Plan | √ |
| | Status: Full compliance | |
| 6.3 | There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all parties. | X or √ |
| | All the units under PT Austindo Nusantara Jaya Agri subsidiaries are accordance to the Time Bound Plan | √ |
| | Status: Full compliance | |
| 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. | X or √ |
| | All the units under PT Austindo Nusantara Jaya Agri subsidiaries are accordance to the Time Bound Plan | √ |
| | Status: Full compliance | |
| 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. | X or √ |
| | All the units under PT Austindo Nusantara Jaya Agri subsidiaries are accordance to the Time Bound Plan | √ |
| | Status: Full compliance | |
| 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. | X or √ |
| | All the units under PT Austindo Nusantara Jaya Agri subsidiaries are accordance to the Time Bound Plan | √ |
| | Status: Full compliance | |
| 7.6 | Local people are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements. | X or √ |
| | All the units under PT Austindo Nusantara Jaya Agri subsidiaries are accordance to the Time Bound Plan | √ |
| | Status: Full compliance | |

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 ST-2 Assessment

| CAR No | Ref Std | Finding | Area | Grade | Time Limits | Corrective Action | Observation | Status | Closing Date |
|---------|-------------|--|----------------|-------|---------------------|--|--|-------------------------|--------------|
| 2014.01 | Major 2.1.1 | <p>Holders of Plantation Business Permit/Plantation Business Permit for Cultivation/ Plantation Business Permit for Processing are Obligated to Report the Change of Management Boards.</p> <p>Based on document observation, there is not sufficient evidence that company has reported the change of management boards to permit holders in accordance with Regulation of Agriculture Ministry No. 98 year 2013 article 41.</p> | PT. ANJA Siais | Major | Before final report | ANJA Siais should be able to provide evidence that the company has reported the change of management boards of the holders of Plantation Business Permit/Plantation Business Permit for Cultivation/Plantation Business Permit for Processing. | <p>Observation on 28 May 2014.</p> <p>Root cause: PT. ANJ Agri Siais has not reported the change of management boards regarding the Plantation Business Permit/Plantation Business Permit for Cultivation/Plantation Business Permit for Processing.</p> <p>Corrective action: PT. ANJ Agri Siais has reported the change of the management of Plantation Business Permit/Plantation Business Permit for Cultivation/Plantation Business Permit for Processing to:</p> <ul style="list-style-type: none"> Plantation and Livestock Service of Tapanuli Selatan District on 26 May 2014. Secretary of Tapanuli Selatan District on 26 May 2014. <p>Preventive Action: ANJ will ensure every change of management is to be reported to relevant agencies by Legal Department of PT ANJ</p> | Closed with observation | 28 May 2014 |

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|---------|-------------|---|-----------------|-------|-----|---|---|--------|--------------|
| | | | | | | | <p>Agri Siais.</p> <p>Auditor's Conclusion: Company has been able to show evidence of the notification receipt to local government (Plantation Service and Secretary of Tapanuli Selatan District) on 26 May 2014. Company should be able to show responses from local government regarding the notification letter (Observation).</p> | | |
| 2014.02 | Minor 2.1.1 | <p>Evaluation of Regulatory Compliance. Company has conducted Evaluation of regulatory compliance by a period of 1 year but not including Regulation of Agriculture Ministry No. 14 year 2009 on Guidelines for the Use of Peat land for Oil Palm Cultivation.</p> | Estate and Mill | Minor | S-1 | <p>ANJA Siais should conduct Evaluation of regulatory compliance including Regulation of Agriculture Ministry No. 14 year 2009 on Guidelines for the Use of Peat land for Oil Palm Cultivation.</p> | <p>Root cause: <i>ANJA Siais has not included Regulation of Agriculture Ministry No. 14 year 2009 in the Evaluation of Legal and Regulatory Compliance of PT ANJ Agri Siais.</i></p> <p>Corrective action: <i>The inclusion of the Regulation of Agriculture Ministry No. 14 year 2009 in the Evaluation of Legal and Regulatory Compliance of PT ANJ Agri Siais.</i></p> <p>Preventive Action: <i>For further updates, the Regulation of Agriculture Ministry No. 14 year 2009 needs to always be included in the Evaluation of Legal and Regulatory Compliance of PT ANJ Agri Siais along with the implementation.</i></p> | Closed | 26 June 2014 |

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|---------|-------------|---|------|-------|-----|---|---|--------|-------------|
| | | | | | | | <p>On 26 June 2013.</p> <p>ANJA Siais showed that the company already has had Evaluation procedure of Regulatory Compliance (SOP-Leg-1) on 1 June 2014 describing additional identification of the rules and regulatory compliance.</p> <p>Auditor's Conclusion:</p> <p>ANJA Siais has been able to show updated mechanism ensuring that the evaluation of legal and regulatory compliance is available.</p> | | |
| 2014.03 | Minor 4.4.2 | <p>Measurement of Effluent Quality.</p> <p>Based on document observation, the measurement of effluent quality has not been consistently carried out in accordance with its period.</p> | Mill | Minor | S-1 | <p>ANJA Siais must consistently measure the effluent quality in accordance with applicable regulations.</p> | <p>26 May 2014.</p> <p>Root cause:</p> <p><i>It takes a long time to receive the results of the samples sent to the testing laboratory.</i></p> <p>Corrective action:</p> <p><i>Communicating with the testing laboratory party concerning cooperative effluent analysis so that the results can be quickly completed. The result of testing/effluent analysis for the period of April-May 2014 available showing that the measurement result of waste quality is still within the threshold of quality standard. Evidence attached.</i></p> | Closed | 26 May 2014 |

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|---------|-------------|---|--------|-------|---------------------|--|--|--------|--------------|
| | | | | | | | <p>Preventive Action: Delivery of samples is conducted earlier before the 10th of the month in accordance with internal memo No. 12/Mgr/PKS/ANJ-Agri/V/2014 and is monitored and included in Sustainable work programs.</p> <p>Auditor's Conclusion: ANJA Siais has shown evidence of effluent periodic testing/analysis every month with the samples of testing are: inlet pond, outlet pond, upstream and downstream of the river, for the period of March-May 2014. The testing result showed that the result of the testing is still within the threshold of quality standard. All evidence of testing is available and well-stored.</p> | | |
| 2014.04 | Major 4.6.4 | <p>SOP of pesticide waste handling is available. Procedure of pesticide waste handling owned by the company has not been fully referred to Government Regulation No 18 year 1999. For example, hazardous waste can be utilized by the company.</p> | Estate | Major | Before final report | ANJA Siais must prove that procedure of the management has been in accordance with applicable rules and regulations. | <p>Observation on 26 May 2014. Root cause: Used pesticide packaging found as a float in effluent pond is not in accordance with the SOP owned.</p> <p>Corrective action: An internal memo No. 29/GMO/SiaiSIM/V/2014 on Hazardous Waste Management has been made. On 23 June 2014, ANJA Siais showed evidence of the photo of used pesticide packaging that was used as a float</p> | Closed | 23 June 2014 |

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|---------|-------------|---|------------|-------|--------|--|--|--------|-------------|
| | | | | | | <p>transferred to Hazardous Waste Temporary Warehouse of Siais mill as well as Minutes of the event on 17 June 2014.</p> <p>Preventive Action: Monitoring and supervising management and the use of used pesticide packaging in accordance with SOP and Government Regulation No. 18 Year 1990 in the program of EHS.</p> <p>Auditor's Conclusion: ANJA Siais has shown evidence of improvement with Minutes/documentation photographs of the transfer of mentioned hazardous waste from WWTP to Temporary Warehouse witnessed by unit leader.</p> | | | |
| 2014.05 | Minor 4.7.1 | <p>Occupational Accident Insurance. Company already has a policy of labour social assurance as occupational accident insurance, yet there is not sufficient evidence that 98 casual workers also received the insurance.</p> | ANJA SIAIS | Minor | Surv-1 | <p>ANJA Siais should be able to ensure to provide occupational accident insurance for all workers in accordance with applicable regulations.</p> | <p>Observation on 26 May 2014.</p> <p>Root cause:</p> <ol style="list-style-type: none">1. The Labour Social Assurance has not understood the whether the categorization of the premium of casual workers is constructional service or regular package (non-constructional).2. The complete file (identity) of the casual workers is hard to be submitted.3. High turnover of the casual workers. <p>Corrective action:</p> | Closed | 26 May 2014 |

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|---------|-------------|---|--------|-------|--------|---|--|--------|-------------|
| | | | | | | | <div>1. Labour Social Assurance categorized the premium into non-constructional package.</div> <div>2. ANJA Siais has registered the insurance program to 83 casual workers with the evidence of payment amounting IDR 1,249,460.</div> <div>3. Monitoring the turn-over of the casual workers.</div> <div>Preventive Action: Enrolling all employees to the Labour Social Assurance program, making the recruitment tighter according to the needs, and monitoring the implementation on a monthly basis in the work program of HRO.</div> <div>Auditor's Conclusion: ANJA Siais has demonstrated evidence of the registration of all casual workers to Labour Social Assurance on 16 May 2014. The evidence of registration and payment slip through Bank Mandiri are available and stored properly.</div> | | |
| 2014.06 | Minor 4.7.2 | Periodic Examination. Company has already conducted periodic examination to spray workers and mill operators, yet there is not sufficient evidence that the company has already conducted periodic examination to harvest workers and manuring workers. | Estate | Minor | Surv-1 | ANJA Siais must ensure to have periodic examination to all workers. | Observation on 26 May 2014. Root cause: Periodic medical examination has not been implemented to harvest workers and manuring workers, but company has | Closed | 26 May 2014 |

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|---------|-------------|---|-----------------|-------|---------------------|---|---|--------|--------------|
| | | | | | | | <p>conducted medical examination at the early stage due to the medical complaints.</p> <p>Corrective action: Physical examination for all manuring and harvest workers was conducted on 6 to 9 May 2014.</p> <p>Preventive Action: Monitoring the health of the workers according to the occupational risk they have, and conducting periodic medical examination on an annual basis in accordance with the work program of polyclinic.</p> <p>Auditor's Conclusion: ANJA Siais has provided evidence of medical examination for all workers (harvest workers and maintenance workers) conducted on 6 to 9 May 2014. All documents of medical examination available.</p> | | |
| 2014.07 | Major 5.1.2 | <p>Types of Impacts and Parameters of the Environmental Management and Monitoring.</p> <p>The implementation Environmental Management and Monitoring Plan reported to relevant agencies has not been sufficient evidence in outlining the environmental management and</p> | Estate and Mill | Major | Before Final Report | ANJA Siais must ensure all types of impacts and environmental parameters reported in the Report of Environmental Management and Monitoring Plan is in accordance with the | <p>Observation on 26 May 2014.</p> <p>Root cause: Document of EIA as a guidelines of Environmental Management and Monitoring Efforts is not available in ANJA Siais unit (only available in Medan Head office).</p> | Closed | 26 June 2014 |

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|---------|--------------|---|--------|-------|--------|--|---|--------|--------------|
| | | monitoring efforts on all types of impact and environmental parameters contained in the document of EIA and document of Environmental Management and Monitoring Efforts owned, such as types of Peat land Fire Impact, Public Unrest Impact, Employment Opportunity, Income Generation and so forth. | | | | Document of EIA and Environmental Management and Monitoring Efforts. | <p>Corrective action: ANJA Siais has made a report in accordance with recommendation of environmental management in Peat land Fire Impact, Public Unrest Impact, Income Generation of EIA and Environmental Management and Monitoring Efforts. There is evidence of Environmental Management and Monitoring Plan report in 2014 (period of January – June) accepted by Environment Bodies of Tapanuli Selatan District on 20 June 2014.</p> <p>Preventive Action: Every making of management and reporting program of the Environmental Management and Monitoring Plan is guided by recommendations contained in the EIA and Environmental Management and Monitoring Efforts.</p> <p>Auditor's Conclusion: ANJA Siais has demonstrated the improvement in reporting Environmental Management and Monitoring Plan in accordance with all types of impacts and environmental parameters.</p> | | |
| 2014.08 | Minor 6.10.2 | Agreed payment is made on time. Result of FFB purchase payment evidence sampling from contractor (UD | Estate | Minor | Surv-1 | ANJA Siais must ensure to make payment to contractors in accordance | <p>Observation on 26 May 2014. Root cause: Evidence of purchase payment evidence</p> | Closed | 23 June 2014 |

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|--|--|--|--|--|--|----------------------------|---|--|--|
| | | Riris) for the period of March 2014 has not fully demonstrated that ANJA Siais has made the payment. | | | | with applicable agreement. | <p>was carried out by Medan Commercial and none left for payment evidence in estate operation unit.</p> <p>Corrective action: ANJA Siais operational unit will collect payment receipt in the estate operation units. On 23 June 2014, ANJA Siais has demonstrated evidence of payment in the form of FFB Purchase Recapitulation of UD Riris for the period of March 2014.</p> <p>Preventive Action: Monitoring by Estate Commercial due to the FFB purchase payment and completing the payment evidence in the operational units.</p> <p>Auditor's Conclusion: ANJA Siais has demonstrated payment evidence to FFB purchase contractor (UD Riris) for the period of March 2014. All documentation of payments are available and stored properly.</p> | | |
|--|--|--|--|--|--|----------------------------|---|--|--|

3.5.2.1 Identification of Findings, Corrective Actions and Observations at ASA-01 Assessment

| No. | Ref Std/ Indikator | Nonconformity | Grade | Area | Deadline | Corrective Action | Observation and Date | Status | Closed Date |
|--------|-----------------------|--|-------|-----------------|------------------|--|--|--------|-----------------|
| 2015.1 | Major 1.1.1 | Information Provision to the Stakeholder. The company was not able to show the evidence of routine reporting to the associated agency. For example: <ul style="list-style-type: none"> - Report of work accident to the Manpower Agency based on the Manpower Ministry Regulation No. 3 Year 98) - Plantation business progress reporting to the Plantation Agency based on the Agriculture Ministry No. 98 Year 2013. | Major | Estate and Mill | August 31st 2015 | The company must be able to show the evidence of the routine reporting to the associated agency. | Root Cause: Work accident was reported writtenly to the labour social assurance but not to the Manpower Agency (orally). Therefore, there was no official record. The plantation business progress reporting to plantation agency was not yet composed for its official record of handover. Corrective Action: Report of plantation business progress and the work accident should be sent writtenly and the official record must be composed as well. Preventive Action: The future work accident reporting should be reported writtenly and the official record must be composed as well. The plantation business progress reporting must be reported writtenly too. Auditor Response: The company has conducted corrective action and has it shown in form of the document of report receipt of plantation business | Closed | August 6th 2015 |

| No. | Ref Std/ Indikator | Nonconformity | Grade | Area | Deadline | Corrective Action | Observation and Date | Status | Closed Date |
|--------|-----------------------|---|-------|-----------------|------------|---|--|--------|-----------------|
| | | | | | | | progress of \PT ANJ Agri Siais in 1 st semester (sent on August 2014) and in 2 nd semester (sent on March 2015) of 2014 in letter No. 002/ANJASiiis-EA/TH.ip/02-15. Hence, the NC is closed. | | |
| 2015.2 | Minor 2.1.3 | Procedure to Ensure the Compliance over the Law The company was able to show the list of the applied law and which was updated for period of 2015. There were several updated laws. However, there were law which were not yet updated on the list. It was not in line with the SOP composed by the company in term of the evaluation of law compliance in document No. SOP-Leg-01. For example : <ul style="list-style-type: none"> - Manpower Ministry Regulation No. 26 Year 2014 in term of the implementation of OHSMS. - Manpower Ministry Regulation No. 27 Year 2014 in term of the changes over Manpower Ministry No. 19 Year 2012 about the requirements for giving several projects to other company (contractor). - Agriculture Ministry Regulation | Minor | Estate and Mill | Pre ASA-02 | The company must be able to show the SOP in term of the evaluation over the law compliance in document No. SOP-Leg-01 has been implemented. | Root Cause: There were several obsolete law. Corrective Action: The company must update the law and regulation for the most recent law and regulation. Preventive Action: The Department of Legal should review the list of regulation based on the SOP annually by referring the most recent regulation issued by the government.. Auditor Response: The company has sent the evidence of corrective action over the list of the updated regulation on 2015 and the report of evaluation of law compliance on 2015. According to the document, all updated law and regulations for the estate and mill operations were | Closed | August 6th 2015 |

| No. | Ref Std/ Indikator | Nonconformity | Grade | Area | Deadline | Corrective Action | Observation and Date | Status | Closed Date |
|--------|-----------------------|---|-------|------|------------------------|--|--|--------|--------------------|
| | | No. 98 Year 2013 in term of plantation business permit. - Agriculture Ministry Regulation No. 11 Year 2015 in term of ISPO. | | | | | described. Hence, NC is closed. | | |
| 2015.3 | Major 4.1.4 | Origin of All FFB from the Third Party The company was not able to show the evidence of the record of FFB from the third party like the name of outgrower, location and document of legality. | Major | Mill | August 31st 2015 | The company must be able to show the evidence of the FFB origin. | <p>Root Cause: There was no identification of the FFB origin from the third party.</p> <p>Corrective Action: Identifying the FFB origin from the third party.</p> <p>Preventive Action: Evaluating the FFB origin from the third party annually.</p> <p>Auditor Response: The company has shown the evidence of corrective action in form of the document of data collecting for the outgrowers who supply the FFB to Siais POM. There are 9 FFB supplier villagers which supply the FFB to Siais POM. The company also showed the evidence of land ownership in form of the abstract of title from the chief of village. For example, the abstract of titel from the chief of Pardomuan and chief of Sikuik-kuik Village on August 4th 2015. It</p> | Closed | August 6th 2015 |

| No. | Ref Std/ Indikator | Nonconformity | Grade | Area | Deadline | Corrective Action | Observation and Date | Status | Closed Date |
|--------|-----------------------|--|-------|------|------------|---|--|-----------------------------------|---------------------|
| | | | | | | | described the 5 villagers who become the FFB supplier to Siais POM and have the land on the Pardomuan and Sikuik-kuik Village. The letter described the name of land owner, address and hectarage of land. Hence, the NC is closed. | | |
| 2015.4 | Minor 4.4.4 | Water Consumption for Mill According to the document review of the water consumption for period of January – May 2015 for the processing stage, the water consumption was 1.33 - 1.46 m ³ /ton of FFB and the consumption of the dirty water for cleaning process was 1.37 – 1.52 m ³ /ton of FFB. However, the company was not able to show the evidence of evaluation and follow up over the inefficiency of water consumption on mill (budget for water consumption was 1.2 m ³ /ton of FFB) | Minor | Mill | Pre ASA-02 | The company must be able to show the evidence of evaluation and follow up over the inefficiency of water consumption. | <p>Root Cause: The over consumption for water was caused by the roof and wall cleaning of mill and plant watering nearby mill as well as floor cleaning.</p> <p>Corrective Action: Composing evaluation over the over consumption of water and compose the budget plan for the future more detail for the non-operational aspect.</p> <p>Preventive Action: Evaluation should be conducted monthly and it should be considered as reference for the program and budget compilation for the next year.</p> <p>Auditor Response: Verification on August 18th 2015. The company has shown the</p> | Closed with observat ion | August 18th 2015 |

| No. | Ref Std/ Indikator | Nonconformity | Grade | Area | Deadline | Corrective Action | Observation and Date | Status | Closed Date |
|--------|-----------------------|---|-------|--------|------------------|---|--|--------|------------------|
| | | | | | | | evidence of water consumption evaluation which exceeded the composed budget and the company has composed plan to repair the waterway and to evaluate the water consumption. Hence, <u>NCR is closed with observation.</u> | | |
| 2015.5 | Major 4.6.6 | Pesticide Containers Management According to the result of field visit during the ASA-1, there was badly-managed pesticide containers: 3. Regent and Amiphosate at the settlement of Division-6 (Next to foreman-1 house) 4. Pesticide container (Gramoxone) used for the reckless purpose in front of the chemicals storage. It was not in line with the SOP of agrochemicals and pesticide waste management in document No. SOP-EHS-011 in 1st edition of 1st revision dated November 30th 2009 and internal memo No. 29/GMO/Siais/IM/V/2014 in term of the hazardous waste management on June 23rd 2014 | Major | Estate | August 31st 2015 | The company must ensure that all pesticide containers are managed based on the SOP and the internal memo as well as its evaluation. | Root Cause: There was a pesticide containers at the employee settlement. Corrective Action: Withdrawal of pesticide containers from the settlement including the hazardous waste management to the hazardous waste storage. Preventive Action: Holding socialization and monitoring weekly in term of the hazardous waste management on the settlement by the EHS/Staff of ANJA Siais. Auditor Response: The company has conducted corrective action and shown the evidence of it in form of the official record of hazardous waste management to the employees on July 11th 2015. It was attended by | Closed | August 20th 2015 |

| No. | Ref Std/ Indikator | Nonconformity | Grade | Area | Deadline | Corrective Action | Observation and Date | Status | Closed Date |
|-----|-----------------------|---------------|-------|------|----------|-------------------|--|--------|----------------|
| | | | | | | | <p>45 participants. The socialization taught the definition of hazardous waste, type of hazardous waste and method to control it. The company showed the declaration letter from the employees of division 8 of LST and supervisor of contractor that they will not use hazardous waste containers too. However, the company was not able to show the evidence that the hazardous waste found on the settlement and storage were managed. Evidence of withdrawal and storing of hazardous waste and the record of hazardous waste balance sheet over the regent, amiphosate dan gramoxone. The official record and photographs are available.</p> <p>Verification on August 20th 2015 The company has shown the evidence of corrective action in form of the official record of hazardous waste handover from civil and LST to the hazardous waste storage and hazardous waste balance sheet. The containers like regent, amiphosate and gramoxone stored at the hazardous waste were described</p> | | |

| No. | Ref Std/ Indikator | Nonconformity | Grade | Area | Deadline | Corrective Action | Observation and Date | Status | Closed Date |
|--------|-----------------------|---|-------|--------|------------------|--|--|--------|-----------------|
| | | | | | | | on the document. Hence, the NC is closed. | | |
| 2015.6 | Major 6.5.2 | Implementation of Law in term of Wage Payment. According to the document review and public consultation, the worker on behalf Arni Basa (LSU of Division 2) was having work accident and was being on the recovery process. However, the company was not paying the compensation based on the applied company regulation for period of 2013-2015. For example: <ol style="list-style-type: none"> 1. The payment for the second 4 months has not yet been paid for 75% of the wage. 2. The payment for the third 4 months has not yet been paid for 50% of wage for 2 months. | Major | Estate | August 31st 2015 | The company must be able to show the evidence that the law in term of wage payment has been implemented. | Root Cause: The wage deduction was conducted without coordination with the company HR. Corrective Action: <i>The deducted amount of wage should be paid to Arni Basa.</i> Preventive Action: Socialization in term of the law of wage to the administrator and the wage deduction must be known by the company HR. Auditor Response: The company has conducted corrective action and has sent the evidence of calculation letter and employee wage payment from HRO of PT ANJA to the Head of Administration of LSU in No. 15/HRO/ANJA-Siais/VII/2015 dated July 1st 2015. It described the process of the employees who experience work accident and on the recovery process based on the company policy. The payment system is as follows: <ul style="list-style-type: none"> - First 4 months for 100% of the | Closed | August 6th 2015 |

| No. | Ref Std/ Indikator | Nonconformity | Grade | Area | Deadline | Corrective Action | Observation and Date | Status | Closed Date |
|--------|-----------------------|--|-------|----------------------|------------------------|--|--|--------|---------------------|
| | | | | | | | <p>wage</p> <ul style="list-style-type: none"> - Second 4 months for 75% of the wage - Third 4 months for 50% of the wage and the payment for the following months is 25% of the wage untill the contract termination. <p>The company has paid the wage based on the terms on July 9th 2015. The company showed the document of cashflow No. B0000838 as the evidence and it has been signed by the mentioned employee. Hence, NC is closed.</p> | | |
| 2015.7 | Major 7.3.1 | <p>Evidence that there was no longer planting program on the HCV area post November 2005</p> <p>PT ANJA Siais was not able to show that the planted area post 2005 was not HCV area.</p> <p>If the planted are was the HCV area, it should be kicked out from the certification program untill the company compensate it and RSPO approve it.</p> | Major | PT ANJ Agri Siais | August 31st 2015 | The company must be able to show that the area planted post 2005 was not HCV area. | <p>Root Cause:</p> <p>The company was not able to show the evidence that the planted area post 2005 was not HCV area.</p> <p>Corrective Action:</p> <p>The company proposed the report as the evidence that the area planted post 2005 was not HCV area.</p> <p>Preventive Action:</p> <p>The company reported the evidence that the planted area post 2005 was not the HCV area.</p> <p>Auditor Response:</p> | Closed | August 25th 2015 |

| No. | Ref Std/ Indikator | Nonconformity | Grade | Area | Deadline | Corrective Action | Observation and Date | Status | Closed Date |
|--------|------------------------------------|---|-------|----------------------|----------------|---|--|--------|----------------|
| | | | | | | | <p>The company showed the evidence of corrective action in form of the report of land identification survey which was conducted by the Agriculture Research and Development Agency in letter No. 1008/LB.010/I.8/6/2014 dated June 2nd 2015.</p> <p>Verification on August 25th 2015 The company has shown the evidence of corrective action in form of the document of landsat image map on 2005, 2006, 2007, 2008 and 2009. It informed the condition of the land layer of PT ANJA Siais pre land clearing program on 2005 and the LUC analysis document as well. The company also has shown the evidence of reporting to RSPO via email as well as the response on August 24th 2015. RSPO did receive the report. However, the report was not yet verified. Hence, the NC is closed with observation.</p> | | |
| 2015.8 | Minor 7.8.1 & Minor 5.6.3 | Reporting of GHG Monitoring According to the document review, the company has monitored GHG by using Palm ISPO GHG Calculator | Minor | PT ANJ Agri Siais | Pre ASA- 02 | The company must be able to show the evidence that they have reported it to RSPO. | <p>Root Cause: The company was not reporting the GHG to RSPO.</p> | OPEN | |

| No. | Ref Std/ Indikator | Nonconformity | Grade | Area | Deadline | Corrective Action | Observation and Date | Status | Closed Date |
|--------|-----------------------|--|-------|------------------|------------------------|---|---|--------|--------------------|
| | | Tool V.2 on 2014. However, there was no evidence that the company has it reported to RSPO. | | | | | <p>Corrective Action: The company reported it to RSPO.</p> <p>Preventive Action: The company should monitor and report it to the RSPO annually and incorporate it on the sustainable program.</p> <p>Auditor Response: According to the document review, the company has calculated and monitored GHG by using Palm ISPO GHG Calculator Tool V.2 on 2014. However, the company was not able to show the evidence of report of GHG monitoring to RSPO. See NCR no. 2015.8.</p> | | |
| 2015.9 | Major 8.1.1 | <p>Sustainable Corrective Action</p> <p>According to the verification of the compliance over NCR 2014.04 in Major in form of the use of hazardous waste as the cork of aerator pump on the WWTP. There was Internal Memo No. 29/GMO/SiaiS/IM/V/2014 in term of the hazardous waste processing stage. PT Anja Siais showed the evidence of documentation in form of the photographs of the pesticide containers used as the cork from the hazardous waste storage on June</p> | Major | PT ANJA Siais | August 31st 2015 | The company must be able to show adequate evidence on the estate and mill operational has been conducted. | <p>Root Cause: It was caused by the urgent need to use pesticide containers as buoy.</p> <p>Corrective Action: The pesticide containers have been evacuated to the hazardous waste storage and the buoy was exchanged with the purposed material.</p> <p>Preventive Action: The socialization should be held</p> | Closed | August 6th 2015 |

| No. | Ref Std/ Indikator | Nonconformity | Grade | Area | Deadline | Corrective Action | Observation and Date | Status | Closed Date |
|-----|-----------------------|--|-------|------|----------|-------------------|--|--------|----------------|
| | | 23rd 2014 on the official record on June 17th 2014. However, according to the field visit, the company was still conduct those things. | | | | | <p>for the mill employees and the collective commitment which was signed by the WWTP pond Officer and recognized by the Manager in term of the prohibition for not using pesticide containers. EHS should compose the program to monitor the pesticide containers on the hazardous waste area in weekly-based and so on and composing the official record for each inspection.</p> <p>Auditor Response: The company has shown the evidence of corrective action in form of official record of chemicals containers function change at the WWTP on July 1st 2015. It was signed by the storage clerk, EHS Officer, Lab Assistant and Sr Mill Manager. The company then conducted briefing and awareness over the hazardous waste and its usage on the WWTP ponds to the effluent operator on July 6th 2015. The hazardous waste containers on the WWTP ponds have been withdrawn and stored at the storage. The company showed the monitoring of hazardous waste dispatch to CWT on July 1st 2015.</p> | | |

| No. | Ref Std/ Indikator | Nonconformity | Grade | Area | Deadline | Corrective Action | Observation and Date | Status | Closed Date |
|-----|-----------------------|---------------|-------|------|----------|-------------------|---|--------|----------------|
| | | | | | | | <p>There were 10 pieces of containers received by the Head of storage and was recognized by the Mill Manager and Lab Assistant. The company has replaced chemicals drum with 200 liter of plastic chemicals drum. The company showed the evidence of goods request for 15 pieces of drums in No. 217/BPB/MILL/ANJAGRI/VII-2015 dated July 4th 2015.</p> <p>Hence, the NC is closed and it shall be observed on the next assessment.</p> | | |

3.5.2.2 Opportunity for Improvement during Surveillance-01 Assessment

| No | Ref Std | Descriptions |
|----|--------------------------------|--|
| 1 | Major 2.1.1 | The company has opportunity to follow up the response over the report of structural changes based on the Agriculture Ministry Regulation No. 98 year 2013 clause 41 to the regional government (South Tapanuli District Secretariat and Plantation Agency) on May 26th 2014. |
| 2 | Mayor 4.3.4 | The company is able to evaluate the implemented program of water management. |
| 3 | Mayor 4.6.4 | The company has opportunity to evaluate the plan and realization of the use of paraquate based on the internal memo of GM dated May 30th 2013 in term of the paraquat use reduction. |
| 4 | Minor 4.6.5 | The company should evaluate the procedure of sprayer's PPE storing and washing. |
| 5 | Minor 4.7.6 | The company has opportunity to evaluate the implementation of the contract for service between the company and contractor in term of the manpower regulation. |
| 6 | Minor 5.1.2 & 5.1.3 | <ul style="list-style-type: none"> The company should input the record of peatland fire impact monitoring and management as well as the hydrology disturbance (flood) based on the matrix of management and monitoring on the document of environment. The company should consult with the stakeholder (environment agency) in term of the negative impacts reduction program such as composting management. |
| 7 | Minor 5.3.3 | <ul style="list-style-type: none"> The company should attach the hazardous waste balance sheet based on the written format on the report of hazardous waste management to the agency. The company has opportunity to re-evaluate the volume of wall containment compared to the volume of diesel fuel tank at the mill. |
| 8 | Minor 6.13.1 | The company has opportunity to improve the performance by holding socialization to respect the human rights. |

3.5.2.3 Noteworthy Positive Components

| No | Ref Std | Descriptions |
|----|---------|---|
| 1 | | The commitment of the company to implement sustainable estate management principles. |
| 2 | | High quality human resources who have good competence and awareness of sustainability standard. |
| 3 | | The company has implemented OHSMS on 2014. |

3.6 Summary of Arising Issues from Public, Management and Auditor Response

| Issue from Public (Agency / NGO / Community) | Management Response | Auditor Response |
|--|--|--|
| <p>South Tapanuli District Manpower Agency (Pardamean Ritonga – The Head of Division of Industrial Relation and Manpower Monitoring)</p> <p>Positive Issue:</p> <ol style="list-style-type: none"> 1. The company has good relation and very cooperative with the Manpower Agency. 2. The company has implemented OHSMS at mill. The mill sanitation was good so it could improve the comfort and safety of the employees. 3. There was no record of the industrial dispute. 4. The company has had system to support the reporting to Manpower Agency. For example, OHS Guiding Committee Report and Workforce Report Obligation. However, the specific report of work accident was not yet reported to the agency. 5. The company has paid the wage based on the minimum wage standard written on the decree of North Sumatera Governor No. 188.44/67/Kpts/2015 dated January 1st 2015 in term of the estate sector minimum wage standard on 2015 for IDR 1,973,800/month. | <p>The good relation shall be maintained and improved.</p> <p>The implementation of OHSMS was the commitment of the company and the must-implemented and obeyed obligation.</p> <p>It was caused by the good communication with the employees and all the information requests were responded by the company.</p> <p>Based on the OHS Guiding Committee Reporting, the company shall report it based on the applied regulation and the work accident shall be reported to the labour social assurance and to Manpower Agency.</p> <p>The company has commitment to apply the regulation in term of minimum wage standard determined by the government.</p> | <p>The implementation over the OHSMS and manpower aspect have been described on the criteria 4.7; 4.8 and 6.5 of the report.</p> |

| Issue from Public (Agency / NGO / Community) | Management Response | Auditor Response |
|--|---------------------|------------------|
| <p>Negative Issue:</p> <ol style="list-style-type: none"> 1. The agency indicated that there were uncertified boiler operator. 2. The company has registered the daily labour assurance on the Manpower BPJS program. However, the realization of the registered data was not yet reported to the agency. 3. There was a contract for service between the company and CV. Rosdiana for hardenning the road. However, the copy of contract for service paper was not reported to the agency. It was indicated that CV. Rosdiana disobey the obligation over manpower regulation such as registering the workers to the assurance and equipping the workers with PPE. Hence, Manpower Agency expect that the company evaluate the agreement and to report it to the agency. 4. In early 2015, the Manpower Agency receive the report from employee of PT ANJA Siais on behalf of Armi Basa Tampubolon (FFB Loader) who experienced work accident on April 22nd 2014. The worker was not able to work due to the accident impacts. The company was not decide anything to deal with it (whether mutation nor contract termination). 5. There was a circular from the Head of Manpower Agency No. 560/928/2015 dated June 15th 2015 in term of the OHS. The company should not use goods transporter vehicle to | | |

| Issue from Public (Agency / NGO / Community) | Management Response | Auditor Response |
|---|--|--|
| <p>transport the employees and their families. However, the letter was not yet responded.</p> | <p>There are 4 boiler Operators. 4 of them have been certified. For example, Amaludin Hasibuan has participated on the certification training on May 2015. However, the certificate was not yet reported to the Manpower Agency.</p> <p>The company has registered all temporary daily period daily workers. There was no longer temporary period daily workers since January 2015. Hence, it shall be informed writtenly to the Manpower Agency.</p> <p>The company shall evaluate the contract for service agreement with the contractor and shall have it reported to the Manpower Agency.</p> <p>The employees shall be temporarily disbanded from the unit in order to get the employee recovery faster based on the medical division recommendation. The worker was not employed on the light job.</p> <p>The circular was not yet received by the company. Hence, the company shall confirm it to the Manpower Agency and the response letter shall be sent to the Manpower Agency.</p> | |
| <p>South Tapanuli District Plantation and Husbandry Agency.</p> <ul style="list-style-type: none"> • A. Sofyan Lubis (Head of Agrobusiness Division) • Ardiansyah (Plantation Business Assessor) | | <p>The information response over the agency is described on the criteria 1.1</p> |



| Issue from Public (Agency / NGO / Community) | Management Response | Auditor Response |
|--|--|--|
| <p>Positive Issue:</p> <ol style="list-style-type: none"> 1. Good relation between the company and the agency. 2. According to the result of plantation business assessment on 2014, the estate got class (???) 3. Chanes of the company's plantation business permit has been reported to the agency. 4. The company has had CSR program for the nearby community. The CSR programs have been deeply recognized by the locals. For example, road maintenance, village development donations and community business fund assistance. 5. The company has vast and well managed HCV area. 6. The company has the scheme smallholders are derived from Land Use Title (HGU). <p>Negative Issue:</p> <ol style="list-style-type: none"> 1. The company policy to report the plantation business progress was not yet complied. According to the record of the Officer, the plantation business progress for period of 2014 (2nd semester) and period of 2015 (1st semester) were not yet reported to the Plantation Agency. | <p>The company shall maintain good relation with the Stakeholder.</p> <p>The company emphasized the legal aspect, management, estate, social, economy, environment, reporting, etc consistently from conducting the business. Hence, the company got the class I estate from the South Tapanuli Regent.</p> <p>The company implemented regulation and law as it applied.</p> <p>The CSR programs are the part of company's commitment as written on the vision and value of the company.</p> <p>The management of conservation shall be improved and preserved by the company.</p> <p>It becomes the part of company's commitment to improve the welfare of the locals.</p> <p>The report of plantation business progress in 2nd semester of 2014 has been reported to the Plantation Agency. However, based on move of Plantation Agency Office to Sipirok, Sipirok, maka dokumen tersebut tidak dapat ditemukan. Perusahaan akan menyampaikan kembali LPUP</p> | <p>The compliance over the law and statute is described on the criteria 2.1</p> <p>The origin of FFB is described on the criteria 4.6.</p> |

| Issue from Public (Agency / NGO / Community) | Management Response | Auditor Response |
|--|---|---|
| <p>2. The Plantation Agency recorded that there are 1,639.06 Ha are which have been measured (cadastral measurement). However, there was no any report from the company in term of the progress of the business untill the public consultation.</p> <p>3. PT. ANJA Siais (ANJA Siais Mill) was the only company which receive the FFB from the third party within South Angkola Sub-District. It was indicated that the FFB was from the forest area. Hence, the company was expected to evaluate the FFB supplier by emphasizing the FFB legal aspect and origin from the third party</p> | <p>2nd semester to the Plantation Agency and shall ask for the receipt paper.</p> <p>The process of Land Use Title (HGU) acquisition for 1,639.06 Ha was keep going. According to the latest update, the company has informed the letter No. 017/LP/Siais/EM/IV/2015 dated June 22nd 2015 in term of the delivery of file and the proposal of the Land Use Title (HGU) process follow up on behalf of PT Ondop Perkasa Makmur to the Head of North Sumatera Province National Land Agency.</p> <p>The company shall evaluate the supplier which supply the FFB to mill and concern the legal aspect. It shall be informed to the FFB covering letter holder (supplier).</p> | |
| <p>South Tapanuli District Environment Agency</p> <ul style="list-style-type: none"> Azhari Sitompul (Head of Environment Monitoring Division) Dakkal Harahap (Staff of Environment Monitoring Division) <p>Positive Issue:</p> <p>1. The good relation with the South Tapanuli District Environment Agency.</p> <p>2. The company has had routine reporting system. For example, report of environmental management and monitoring plan/effort.</p> | <p>The communication and good relation with the environment agency shall be improved.</p> <p>The reporting of environmental management and monitoring plan has been conducted based on the applied terms.</p> | <p>The implementation of the environment aspect has been described on the criteria 5.3.</p> |

| Issue from Public (Agency / NGO / Community) | Management Response | Auditor Response |
|---|--|------------------|
| <p>3. The company has reported the environmental management and monitoring plan/effort based on the EIA guideline matrix. For example, the impact of peatland fire, impact of social restlessness, job opportunity, increase of income, etc. Furthermore, the report of hazardous waste is attached on the report as well.</p> <p>4. The company has had permit to dispose effluent to the waterway based on the decree of South Tapanuli Regent No. 596/KPTS/2014 in term of the effluent disposal permit for PT. ANJA Siais dated November 4th 2014 for 3 years.</p> <p>5. The company has had contract for service agreement with the hazardous waste collector and transporter.</p> <p>6. There was no report from the locals in term of the environment contamination issue caused by the company's operationals.</p> <p>Negative Issue:</p> <p>1. There was no process of EIA document changes on behalf of PT. Ondop Perkasa Makmur to PT. ANJ Agri Siais.</p> | <p>The reporting has been conducted based on the recommendation of assessment finding in which the matrix of environmental management and monitoring plan and its regulation as the guideline.</p> <p>The company shall comply the terms of statute in term of the effluent disposal based on the applied terms.</p> <p>The company cooperated with hazardous waste transporter (CV. Amindy Barokah).</p> <p>The waste management of PT. ANJ Agri Siais was based on the applied terms and they have maintained good relation with the stakeholders.</p> <p>The change in environmental impact problem analysis document/environment permit must be done by the company in term of any change occur as determined in article 50 of Government Regulation on Environment Permit No. 70 year 2012.</p> <p>In that category, the change of company's name is not a category that conditions the change in environmental impact problem analysis document/environment permit</p> | |

| Issue from Public (Agency / NGO / Community) | Management Response | Auditor Response |
|---|---|---|
| <p>2. The company was not reporting the hazardous waste balance sheet to the environment agency consistently on the environmental management and monitoring plan/effort.</p> | <p>The company has got the official and law-based approval based on the applied statutes. For example:</p> <ul style="list-style-type: none"> a. Official Paper No. 4 dated March 2nd 2010 which was made by Mala Mukti, S.H., LL.M (Notary) in term of the change of name from PT Ondop Perkasa Makmur to PT Austindo Nusantara Jaya Agri Siais; b. Decree of Human Right and Law Ministry No. AHU- 15127.AH.01.02 year 2010 dated March 24th 2010 in term of the approval of Official Paper No. . 4 dated March 2nd 2010; c. Approval Paper of Investment Agency No. 832/A-8/2010 dated July 16th 2010 in term of the change of company's name. <p>The company shall attach the hazardous waste balance sheet on the report of environmental management and monitoring plan.</p> | |
| <p>South Tapanuli District National Land Agency</p> <p>There was no personel that was able to be interviewed on the public consultation despite the letter for public consultation has been sent before the assessment program (public consultation letter receipt).</p> | <p>The letter for public consultation has been informed to the South Tapanuli District National Land Agency.</p> | |
| <p>Board of Cooperative Unit</p> <p>The company was actively socializing the CSR program to the locals.</p> | <p>The company guided the cooperative unit to improve the welfare of its member.</p> | <p>The management of partnership has been described on the criteria 6.10.</p> |

| Issue from Public (Agency / NGO / Community) | Management Response | Auditor Response |
|---|--|---|
| <p>The FFB price determined by the company was lower than the price determined by the collector. The cooperative unit determined the FFB price for IDR 1,240/Kg and the collector determined the FFB price for IDR 1,270/Kg.</p> | <p>The FFB price of Siais POM was not different with the FFB price of cooperative unit and the collector.</p> | |
| <p>Janji Matogu Village The CSR program of company was not significantly impact the community off Janji Matogu Village.</p> <p>The community is looking for the solution from the company related to the worker recruitment for local people with less education since many local people do not graduate from elementary school.</p> | <p>The CSR programs were given in general and not in personal based on the need of each village. There were many assistances given Janji Matogu Village like the construction of elementary school, baby and maternal clinic, bridge construction, mass circumcision, road maintenance, etc.</p> <p>The company improved the education on Janji Matogu Village and hired the employees based on the skill and competences.</p> | <p>The management of partnership and CSR have been described on criteria 6.10 and 6.11.</p> |
| <p>Pardomuan Village The company encouraged the community to establish scheme smallholder. However, it hit the wall of legal aspect. The locals asked the company to assist them on the legality process.</p> | <p>The company shall comply the terms based on the statute.</p> | |

| | |
|-----|--|
| 4.0 | CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY |
| 4.1 | Formal Sign-off of Assessment Findings |
| | <p>Hereunder sign by management representative from inspected company and audit team to acknowledge a field assessment and agree for all content explained in this assessment report, included of nonconformities issues.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end; margin-top: 100px;"> <div style="text-align: center;"> <p>Company Name Management Representative (Position)</p>  <p><u>Mulkan Nasution</u> August 25th,2015</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Sandra Purba</u> August 25th,2015</p> </div> </div> |

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

| No | Institution/NGO/Community | Address | Phone/Email | Form of Communication | Date of Contact | Response | |
|----|---|---------------------------|-------------|-------------------------|-----------------|----------|----|
| | | | | | | Yes | No |
| 1 | Social, Labour and Transmigration Agency of South Tapanuli District | Padang Sidempuan | | Visit for interview | 30 June 2015 | √ | |
| 2 | Plantation Agency of South Tapanuli District | Padang Sidempuan | | Visit for interview | 30 June 2015 | √ | |
| 3 | Environmental Agency of South Tapanuli District | Padang Sidempuan | | Visit for interview | 30 June 2015 | √ | |
| 4 | National Land Agency of South Tapanuli District | Padang Sidempuan | | Visit for interview | 30 June 2015 | √ | |
| 5 | Sawit Watch | Jakarta | | Correspondence by email | | | √ |
| 6 | Walhi | Jakarta | | Correspondence by email | | | √ |
| 7 | WWF | Jakarta | | Correspondence by email | | | √ |
| 8 | Worker Cooperative unit | Angkola Sub-district | | FGD | 30 June 2015 | √ | |
| 9 | Janji Matogu Village | Tapanuli Selatan District | | FGD | 30 June 2015 | √ | |
| 10 | Pardomuan Village | Angkola Sub-district | | FGD | 30 June 2015 | √ | |
| 11 | Komite Gender | Angkola Sub-district | | Interview | 1 July 2015 | √ | |
| 12 | contractor | Angkola Sub-district | | Interview | 1 July 2015 | √ | |
| 13 | Bipartite Organization | Angkola Sub-district | | Interview | 1 July 2015 | √ | |

| Appendix 2. Assessment Program | | |
|--|---|--|
| DATE / TANGGAL | 29 Juni – 3 Juli 2015 | |
| ACTUAL DURATION DURASI AKTUAL | PROCESSES / CLAUSES TO BE AUDITED PROSES / HAL YANG DIAUDIT | AUDITOR |
| Monday/Senin, 29 Juni 2015 | | |
| 06.00 – 08.30 | JAKARTA → MEDAN | • ON / SP / AP / FL / WS |
| 10.00 – 18.00 | MEDAN → SIBOLGA → PT.ANJA SIAIS | • ON / SP / AP / FL / WS |
| Tuesday/Selasa, 30 Juni 2015 | | |
| 07.30 – 08.00 | Opening Meeting | • ON / SP / AP / FL / WS |
| 08.00 – 12.00 | Stakeholders consultation to Related Government Institution to Tapanuli Selatan District Government (Padang Sidempuan) and local NGO. | • AP |
| 08.00 – 12.00 | Stakeholders consultation to Company surrounded village and community leader (confirmation for meeting venue) | • WS / FL |
| 08.00 – 12.00 | <ul style="list-style-type: none"> Field Observation on process activity, SCCS implementation, effluent management and hazardous waste management at mill Verification of stage-2 field Visit Non-conformance | • SP / ON |
| 12.00 – 14.00 | BREAK | |
| 14.00 – 17.00 | <ul style="list-style-type: none"> RSPO Document Review and Review of Previous Visit Non-conformance (Stage-2) Clarification of Public Consultation | • ON / SP / AP / FL / WS • ON / SP / AP / FL / WS |
| Wednesday/Rabu, 1 Juli 2015 | | |
| 08.00 – 12.00 | Field Observation to Lembah Subur Selatan Estate <ul style="list-style-type: none"> Manuring, Spraying, Harvesting, best agricultural practices Worker Welfare (payments, complaint mechanism) Verification of stage-2 field Visit Non-conformance Legal operational and Conservation Area Verification of Previous Visit Non-conformance (Stage-2) Worker facilities (housing, health clinic, clean water, etc) and Land Fire facilities, Storage, ect.. Hazardous Waste Material (B3) management Verification of stage-2 field Visit Non-conformance | • AP • SP / ON • FL / WS |
| 12.00 – 14.00 | BREAK | |
| 14.00 – 16.00 | <ul style="list-style-type: none"> Continue Field Observation to Lembah Subur Selatan Estate and field observation clarification | • ON / SP / AP / FL / WS |
| 16.00 – 17.00 | <ul style="list-style-type: none"> RSPO Document Review and Review of Previous Visit Non-conformance (Stage-2) | • ON / SP / AP / FL / WS |
| Thursday/Kamis, 2 Juli 2015 | | |
| 08.00 – 12.00 | Field Observation to Lembah Subur Tengah Estate <ul style="list-style-type: none"> Manuring, Spraying, Harvesting, best agricultural practices Worker Welfare (payments, complaint mechanism) Verification of stage-2 field Visit Non-conformance | • AP |

| | | |
|----------------------------------|--|--|
| | <ul style="list-style-type: none"> Legal operational and Conservation Area Verification of stage-2 field Visit Non-conformance Worker facilities (housing, health clinic, clean water, etc) and Interview with contractor, labour union, gender committee, CPO and FFB transporter Land Fire facilities, Storage, ect.. Hazardous Waste Material (B3) management Verification of stage-2 field Visit Non-conformance | <ul style="list-style-type: none"> SP / ON FL WS |
| 12.00 – 14.00 | BREAK | |
| 14.00 – 16.00 | <ul style="list-style-type: none"> Continue Field Observation to Lembah Subur Tengah Estate and field observation clarification RSPO Document Review and Review of Previous Visit Non-conformance (Stage-2) Audit finding preparation and discuss | <ul style="list-style-type: none"> ON / SP / AP / FL / WS ON / SP / AP / FL / WS |
| 16.00 – 18.00 | Closing Meeting | <ul style="list-style-type: none"> ON / SP / AP / FL / WS |
| Friday/Jumat, 3 Juli 2015 | | |
| 05.00 – 09.00 | PT.ANJA SIAIS → SIBOLGA | <ul style="list-style-type: none"> ON / SP / AP / FL / WS |
| 11.00 – 13.00 | SIBOLGA → MEDAN | |
| 16.00 – | MEDAN → JAKARTA | |