

***Roundtable on Sustainable Palm Oil Certification
R S P O***

[✓] Surveillance-1.1

Name of Management Organisation : ANJA Siais Palm Oil Mill – PT Austindo Nusantara Jaya Agri Siais Subsidiary of PT Austindo Nusantara Jaya Agri

Plantation Name : PT Austindo Nusantara Jaya Agri Siais: Lembah Subur Utara Estate and Lembah Subur Selatan Estate

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

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

Date of Initial Registration : 25 September 2014

Date of Certificate Issue : 25 September 2019 Date of License Issue : 25 November 2020

Date of Certificate Expiry : 24 September 2024 Date of License Expiry : 24 September 2021

Assessment	Assessment Date	PT Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.1	28 September - 02 October 2020	Hasiholan Sihombing (Lead Auditor Witnessed), Leonada (Lead Auditor Witnessing), Yudhi Yuniarto Tallutondok, Rindu Galih Rezza Rachmansyah, Erika Lucitawati	Trismadi Nurbayuto	Ardiansyah

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.1	18 Nov 2020

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

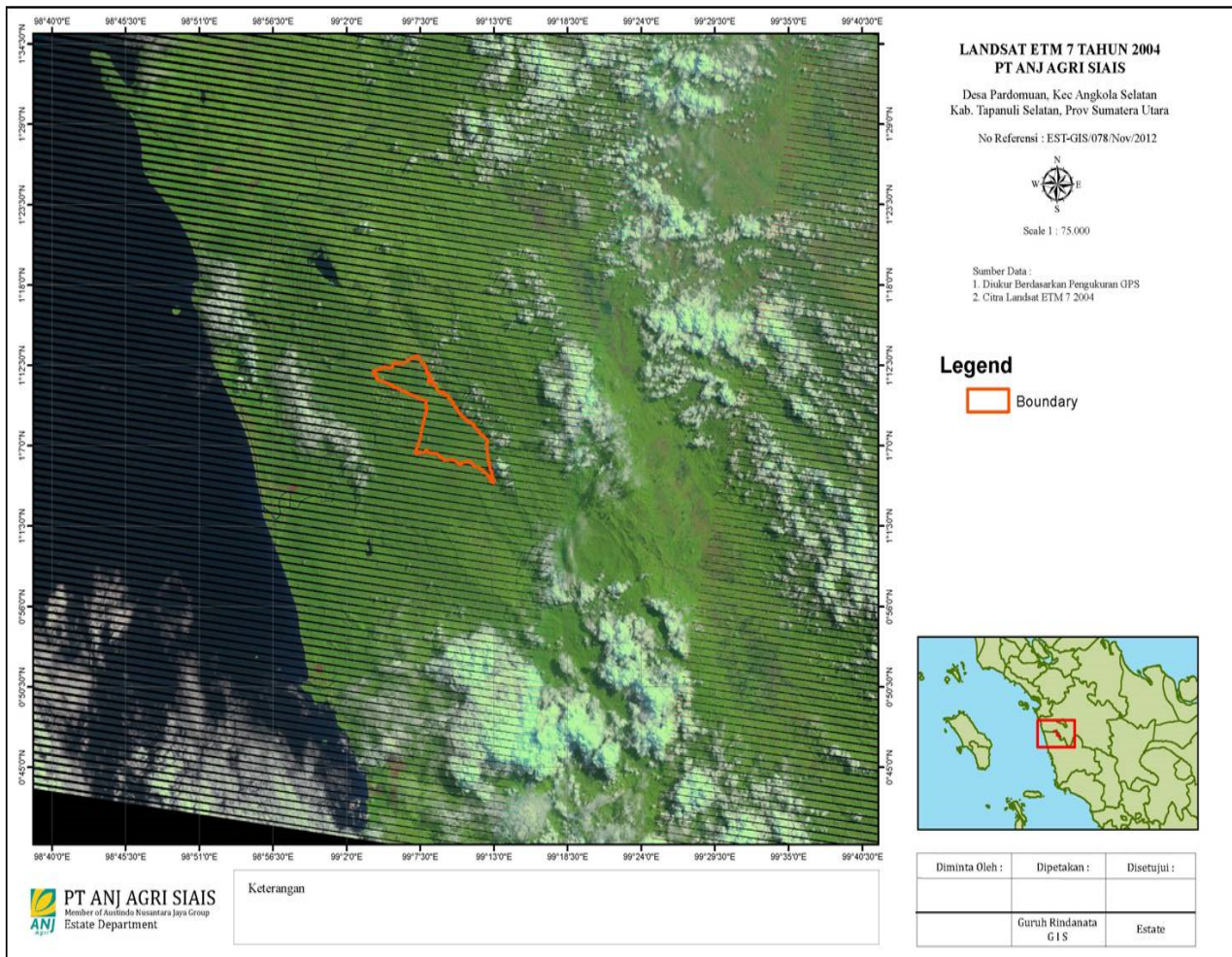
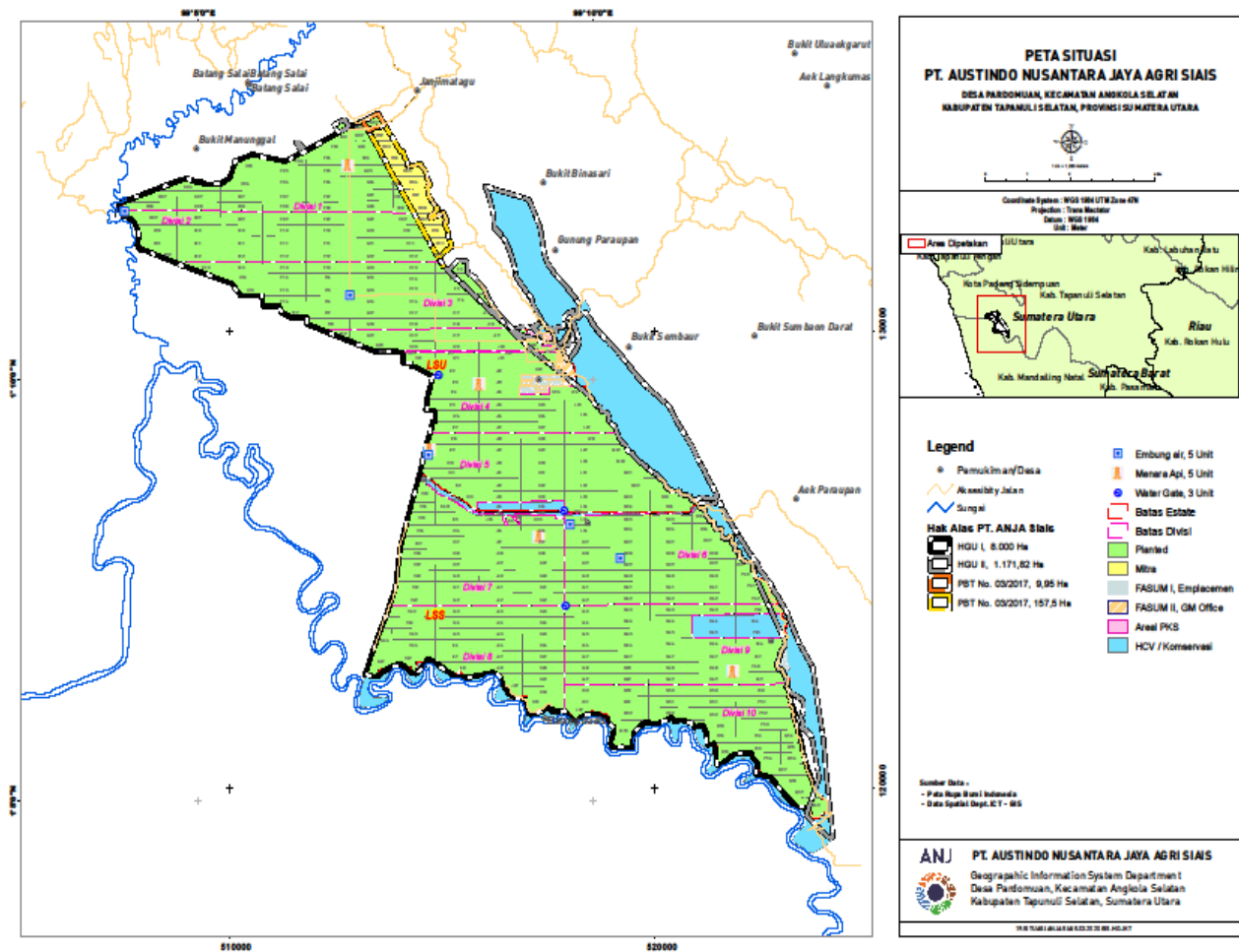


Figure 2. Operational Map of PT Austindo Nusantara Jaya Agri SiaIs



Abbreviations Used

ANDAL	:	Environmental Impact Assessment
ANJA	:	Austindo Nusantara Jaya Agri
ASA	:	Annual Surveillance Assessment
BOD	:	Biological Oxygen Demand
BNN	:	<i>Badan Narkotika Nasional</i> (National Narcotics Board)
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> / Social Security Administrator
BPJN	:	<i>Badan Pertanahan Nasional</i> (National Land Agency)
CB	:	Certification Body
CD	:	Corporate Development
CH	:	Certificate Holder
COVID-19	:	Coronavirus Disease 2019
CPT	:	<i>Circle, path dan TPHI</i> Circle, path and FFB collecting place
CSR	:	Corporate Social Responsibility
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CPO	:	Crude Palm Oil
DPRD	:	<i>Dewan Perwakilan Rakyat Daerah</i> (Regional House of Representatives)
EFB	:	Empty Fruit Bunch
EHS	:	Environmental Health and Safety
EIA	:	Environment Impact Assessment
FFB	:	Fresh Fruit Bunches
FPIC	:	Free, Prior, Informed, Consent
GHG	:	Green House Gases
GM	:	General Manager
GMO	:	General Manager Office
GPS	:	Global Positioning System
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha (Land Use Permit)</i>
HIRA	:	Hazard Identification Risk Assessment
HIRAC	:	Hazard Identification Risk Assessment Control
HIRADC	:	Hazard Identification Risk Assessment Determining Control
HRO	:	Human Resources Officer
IPAL	:	<i>Instalasi Pengelolaan Air Limbah</i> (Effluent Plant)
IPM	:	Integrated Pest Management
IUCN	:	International Union for Conservation of Nature
KER	:	Kernel Extraction Rate
KTPA	:	<i>Kelompok Tani Peduli Api</i> (Community Fire Care)
LSS	:	Lembah Subur Selatan Estate
LSU	:	Lembah Subur Utara Estate
LUCA	:	Land Use Change Analysis
MB	:	Mass Balance
MCU	:	Medical Check Up
MDA	:	<i>Madrasah Diniyah Awaliah</i> (Islamic Elementary School)
MSDS	:	Material Safety Data Sheets
NGO	:	Non-Government Organizations
OER	:	Oil Extraction Rate
OHS	:	Occupational Health and Safety
OSS	:	Online Single Submission

P&C	:	Principles and Criteria
PIC	:	Person In Charge
PK	:	Palm Kernel
POM	:	Palm Oil Mill
POLRI	:	<i>Polisi Republik Indonesia</i> (Indonesian Police)
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
PPLH	:	<i>Pusat Penelitian Lingkungan Hidup</i> (Environmental Research Center)
PT ANJA SiaIs	:	PT Austindo Nusantara Jaya Agri SiaIs
RaCP	:	Remediation and Compensation Plan
RKL	:	<i>Rencana kelola lingkungan</i> (Environment Management Plan)
RPL	:	<i>Rencana pemantauan lingkungan</i> (Environment Monitoring Plan)
RSPO	:	Roundtable on Sustainable Palm Oil
RTE	:	Rare, Threatened and Endangered
SEIA	:	Social and Environmental Impact Assessment
SERBUNDO	:	<i>Serikat Buruh Perkebunan Indonesia</i>
SIA	:	Social Impact Assessment
SCCS	:	Supply Chain Certification System
SOP	:	Standard Operating Procedure
TNI	:	<i>Tentara Republik Indonesia</i> (Indonesian Army)
TPA	:	<i>Tempat Pembuangan Akhir</i> (Landfill)
TPS 3R	:	<i>Tempat Pembuangan Sampah dengan Reduce, Reuse, Recycle</i> (Waste Disposal Place by Reduce, Reuse, Recycle Method)
TPST	:	<i>Tempat Pembuangan Sampah Terpadu</i> (Integrated landfill)
UKL-UPL	:	<i>Upaya Pengelolaan Lingkungan dan Upaya Pemantauan Lingkungan</i> (Environment management and Monitoring Plan)
WI	:	Work Instruction
WTP	:	Water Treatment Plant
WWTP	:	Wastewater Treatment Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT								
1.1	Assessment Standard Used	<ul style="list-style-type: none"> <i>Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020.</i> <i>RSPO Certification System for Principles and Criteria, 14 June 2017</i> 							
1.2	Organisation Information								
1.2.1	Organisation name listed in the certificate	PT Austindo Nusantara Jaya Agri							
1.2.2	Contact person	Antoperis Tarigan							
1.2.3	Organisation address and site address	<p>RSPO registered company: Sinar Mas Land Plaza 7th Floor. Jl. Pangeran Diponegoro, No. 18. Medan, Sumatera Utara, Indonesia, 20152</p> <p>Liaison Office: Menara BTPN Lantai 40 Jalan Dr. Ide Anak Agung Gde Agung Kav 5.5 – 5.6 Kawasan Mega Kuningan, Jakarta 12950</p>							
1.2.4	Telephone	(62 61) 453 7480							
1.2.5	Fax	(62 61) 453 8366							
1.2.6	E-mail	antoperis.tarigan@anj-group.com							
1.2.7	Web page address	www.anj-group.com							
1.2.8	Management Representative who completed the application for certification	Taupan Sibarani (General Manager)							
1.2.9	Registered as RSPO member	1-0032-07-000-00 on 27 February 2007							
1.3	Type of Assessment								
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base: ANJA Siais POM, Lembah Subur Utara Estate and Lembah Subur Selatan Estate. There is a reduction of scope from previous assessment for an area of 240.60 Ha.							
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"</td> <td>E 99° 09' 23"</td> </tr> </tbody> </table>	Coordinate		Latitude	Longitude	N 01° 10' 29"	E 99° 09' 23"
Coordinate									
Latitude	Longitude								
N 01° 10' 29"	E 99° 09' 23"								
	ANJA Siais POM	Village of Pardomuan, Sub District of Angkola Selatan, District of Tapanuli Selatan, Province of Sumatera Utara, Indonesia							
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' 45"</td> <td>E 99° 06' 52"</td> </tr> </tbody> </table>	Coordinate		Latitude	Longitude	N 01° 11' 45"	E 99° 06' 52"
Coordinate									
Latitude	Longitude								
N 01° 11' 45"	E 99° 06' 52"								
	Lembah Subur Utara Estate	Village of Pardomuan, Sub District of Angkola Selatan, District of Tapanuli							

		Selatan, Province of Sumatera Utara, Indonesia					
	Lembah Subur Selatan Estate	Village of Pardomuan, Sub District of Angkola Selatan, District of Tapanuli Selatan, Province of Sumatera Utara, Indonesia	N 01° 07' 22"	E 99° 06' 41"			
1.5	Description of Area Statement						
1.5.1	Tenure						
	• State		9,171.82 Ha				
	• Community		- Ha				
1.5.2	Area Statement						
	• Total area		9,171.82 Ha				
	• Mature area		7751.68 Ha				
	• Emplacement, Oil Mill , etc		69.89 Ha				
	• HCV		1348.18 Ha				
	• HCV Reserve Area		2.07 Ha				
	Source: Area statement PT ANJA Sia's period September 2020						
1.6	Planting Year and Cycles						
1.6.1	Age profile of planting year						
	Planting Year	Hectarage (Ha)					
		Lembah Subur Utara Estate	Lembah Subur Selatan Estate	Total			
	2005	525.16	-	525.16			
	2006	3,132.90	-	3,132.90			
	2007	290.42	1,074.54	1,364.96			
	2008	-	1,574.83	1,574.83			
	2009	-	1,153.83	1,153.83			
	TOTAL	3,948.48	3,803.20	7,751.68			
	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		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	ANJA Sia's	60	279,581.01	58,542.33	20.95	12,122.39	4.34
	*Source Production Data on 12 months before assessment (September 2019 – August 2020).						

1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ ha/year)	Supplied to Mill	
						FFB (tonnes/year)	%
	Lembah Subur Utara	4,816.73	3,948.48	95,653.53	24.23	95,653.53	100
	Lembah Subur Selatan	4,355.09	3,803.20	93,589.68	24.61	93,589.68	100
	TOTAL	9,171.82	7,751.68	189,243.21	24.41	189,243.21	100
	*Source Production Data on 12 months before assessment (September 2019 – August 2020).						
1.7.3	FFB description from other source						
	Name of sources/Organisation	Type of Organisation	number of smallholders	Production Area (Ha)	Supplied to Mill		
					FFB (tonnes/year)		
	Koperasi Petani Binasari (Plasma) – Non Certified	Smallholder scheme	81	157.50	4,227.97		
	Kelompok Tani Janji Matogu (Non Certified)	Independent smallholders	-	-	45,275.76		
	Kelompok Tani Binasari (Non Certified)	Independent smallholders	-	-	316.56		
	UD RIRI (Non Certified)	Independent smallholders	-	-	2,997.65		
	UD Boru Namora (Non Certified)	Independent smallholders	-	-	37,519.86		
	TOTAL					90,337.80	
	*Source Production Data on 12 months before assessment (September 2019 – August 2020).						
1.7.4	Product categories		FFB, CPO, PK				
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product		Last Year Projected Certified Volume (25 November 2019 to 24 November 2020) (MT)		Last Year Actual Certified Volume (September 2019 to August 2020) (MT)		
	FFB Processed		194,500		189,243.21		
	CPO Production		40845		39,799.98		
	Palm Kernel (PK) Production		9725		8,229.30		
1.8.2	Product selling						
	Type of selling product		Actual selling product for last year (September 2019 to August 2020) (MT)				
	CSPO sold as RSPO certified product		4,305.16				
	CSPK sold as RSPO certified product		5,649.40				
	CSPO sold under other scheme		-				
	CSPK sold under other scheme		-				
	CSPO sold as conventional		25,709.31				
	CSPK sold as conventional		1,288.11				

1.8.3	Estimate of Certified FFB Claim							
	Name of Estates		Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)		
	Lembah Subur Utara		4,816.73	3,948.48	105,000	25.59		
	Lembah Subur Selatan		4,355.09	3,803.20	95,500	25.11		
	TOTAL		9,171.82	7,751.68	200,500	25.86		
	*Projected FFB production for 12 months of certificate (25 September 2020 – 24 September 2021).							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		Supply Chain Module
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	
	ANJA Siais	60	200,500	43,000	21.44	9,500	4.73	MB
	*Projected CSPO and CSPK production for 12 months of certificate (25 September 2020 – 24 September 2021).							
1.9	Other Certifications							
	ISO 9001:2008			-				
	ISO 14001: 2015			12 November 2017 to 11 November 2020 (No. 08 04 K 14070)				
	OHSAS 18001:2007			11 November 2017 to 10 November 2020 (No. 05 01 K 17056)				
	ISCC			-				
	ISPO			4 September 2020 to 4 September 2025 (MUTU-ISPO/037)				
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 Siais (PT ANJA Siais)	2014	Lembah Subur Utara	2014	Tapanuli Selatan District, Sumatera Utara Province, Indonesia	Certified		
			Lembah Subur Tengah	2014				
			Lembah Subur Selatan	2014				
			Binasari Cooperative	2020				
	Jangkang (PT Sahabat Mewah Makmur)	2009	Jangkang	2009	Belitung Timur District, Bangka Belitung Province, Indonesia	Certified		
			Balok	2009				
			Ladang Jaya	2009				
			Sari Bunga	2009				
			Air Ruak	2009		Certified		
			Mitra Lestari Cooperative	2019				
			Mitra Anugerah Cooperative	2019		Certified		
			Sambar Jaya Makmur Cooperative	2019		Certified		
	Lindong Raya Cooperative	2020	ST-2 Audit (October 2020)					

		Berhimpun Sejahtera Cooperative	2020		ST-2 Audit (October 2020)
		Tiong Sejahtera Cooperative	2021		-
		Gunung Nyerudong Cooperative	2021		-
		Bumdes Tebing Tinggi Cooperative	2021		-
Binanga (PT ANJ Agri)	2012	Estate Wilayah Timur	2012	Padang Lawas Utara District, Sumatera Utara Province, Indonesia	Certified
		Estate Wilayah Tengah	2012		
		Estate Wilayah Barat	2012		
KAL POM (PT.Kayung Agro Lestari)	2019	Sungai Gemilang Teduh 1 (SGT-1)	2019	Ketapang District, Kalimantan Barat Province, Indonesia	Certified
		Sungai Gemilang Teduh 2 (SGT-2)	2019		
		Gunung Sejahtera Tumbuh 2 (GST-2)	2019		
		Gunung Sejahtera Tumbuh 1 (GST-1)	2019		
		PT Galempa Sejahtera Bersama	2022	Empat Lawang Distict, Sumatera Selatan Province, Indonesia	NPP
PMP POM (PT PPM)	2020	PT Putera Manunggal Perkasa	2020	Sorong Selatan District, Papua Barat Province, Indonesia	NPP
		PT.Permata Putera Mandiri	2020		NPP
		PT. Austindo Nusantara Jaya Tbk (Ex. PT PAM)	2024		-
<p>TBP is updated 30 April 2020 signed by Chief Executive Officer</p> <p>Document of revision of certification time-bound statement of PT ANJA and its subsidiaries on April 2020, with justification i.e:</p> <ul style="list-style-type: none"> - RSPO certification of PT GSB, which was originally targeted to be obtained in 2018, has been changed to 2022 (previously 2020) because the land compensation process has not been completed so planting and factory construction were also delayed. PT GSB's palm oil mill is planned to be built in mid-2020 (previously 2018) and is expected to start operating in by 2022. RSPO certification will take place after the mill is operational. - PT Permata Putera Mandiri (PMM) and PT Putera Manunggal Perkasa (PMP), the land compensation process due to conflicts between clans has not been completed and is still ongoing so that the construction of plantations and mill is postpone. - PT ANJT is ex PT Pusaka Agro Makmur, on 2017 not registered as ANJA subsidiary has been reported on ACOP to be certified on 2024, PT PAM legally become PT ANJT on 2015, for further activities will be use entity as PT ANJT. 					
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard				
	<p>There is an area of 240.60 Ha which is a plasma area (currently managed by the company but belongs to the Binasari Farmers Cooperative). In detail, 157.5 hectares were planted and the remaining 83.1 hectares were used as conservation areas. This area was excluded from the scope of certification at the time of ASA-1.1 because HGU issuance process is hampered due to the problem of missing documents at BPN so that they have to re-submit from the beginning related to the documents for HGU issuance and the company cannot ensure that the process can run positively (company estimates will take sufficient time long in the process).</p>				

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1.1	<p>1. Hasiholan Sihombing (Lead Auditor Witnessed). Indonesian citizen. Bachelor of Agriculture Majoring in Agronomy, Agriculture Faculty. He has working experienced for 7 (seven) years since 2009 as an Operational Staff in an Oil Palm Plantation Company in Indonesia. The training he has followed namely: Lead Auditor ISPO, RSPO P&C Lead Auditor Course, RSPO Supply Chain Certification Lead Auditor Course, SA 8000 Awareness, Quality Management Systems (ISO 9001:2015), Environmental Management Systems (ISO 14001:2015), OHS General Expert, OHSAS 18001:2007, ISO 19011:2018, ISO 17021:2011 and ISO 17065:2012. During this audit, he assigned to verify transparency, legal aspect, land dispute, environmental/conservation and SCCS.</p> <p>2. Leonada (Lead Auditor Witnessing). Bachelor of agriculture for plant breeding and seed technology programme study, department of agronomy, faculty of agriculture in Bogor Agricultural University. Having experience of more than five years working as a plantation operations staff and sustainability in private company of Indonesian oil palm plantations and is currently working on independent certification bodies as auditor. Training have been followed are: training of Indonesian sustainable palm oil (ISPO) lead auditor, training of RSPO lead auditor, RSPO SCCS training, SA 8000, ISO 17021: 2011, ISO 17065: 2012, ISO 19011: 2011, lead auditor ISO 9001: 2008, ISO 14001: 2005, training of management development program agronomy, training of analysis base solution for operation, training of integrated pest management (IPM), use of limited pesticides training, training management of waste pesticides and fertilizers, training mediation and conflict resolution, RSPO social and worker welfare training, general safety specialist training, health and safety management system (SMK3) auditor. During this audit he witnessing the competency of lead auditor.</p> <p>3. Yudhi Yuniarto Tallutondok (Auditor). Indonesian citizen, Bachelor of Fisheries, Padjadjaran University. Have experience of working over three years since 2013 as plantation operations staff in private palm oil plantation companies in Indonesia. Training have been followed including Auditor of Indonesian Sustainable Palm Oil (ISPO), Lead Auditor of Roundtable on Sustainable Palm Oil (RSPO) P&C, Lead Auditor of ISO 9001:2015, ISO 14001:2015, ISO 22000:2009, ISO 19011:2011, Social Accountability 8000, Basic Management Development Program Agronomy, Fire Anticipation on Land and Forest, Potential Mapping and Conflict Resolution in Production Forests, Awareness ISO 17021 and ISO 17065. Has participated in audit activities for the ISPO and RSPO scheme since 2017 for agronomy, OHS, labor, social and legality aspects. During this audit, he assigned to verify the aspects of OHS and worker welfare.</p> <p>4. Rindu Galih Rezza Rachmansyah (Auditor). Indonesian citizen, Bachelor of Agriculture with major in Plant Pest and Disease. Has one year experience as Field Expert in Pesticide Company and 3 years' experience in Industrial Forest Management, Forest Rehabilitation and Reclamation on Indonesia Stated Owned Company as Assistant. Training which had attended including Lead Auditor ISO 9001, ISO 14001, ISO 17021, ISO 19011, SA 8000, ISPO, RSPO, RaCP and NPP Awareness and OHSAS 18001:2007. Has involved in several audit activities related to sustainable palm oil since 2017 on BMP, OHS, and worker welfare aspect. During this assessment has verified best management practices and long term management plan.</p> <p>5. Erika Lucitawati (Auditor Trainee). Indonesian citizen. Bachelor of Engineering with major in Environmental Engineering. The trainings that have been attended include In House Training of ISO 19011: 2018, ISO 17021: 2015, ISO 17065: 2012, ISO 9001: 2015, ISO 14001: 2015, ISO 45001: 2018, and The Supervision of Occupational Health and Safety Training. At this time the audit carried out verification on environmental/conservation and GHG aspects supervised by Lead Auditor.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-1.1	<p>Number of auditors: 3 auditor and 1 auditor trainee</p> <p>Number of days for ASA-1.1 at site: 5 days</p> <p>Number of working days for ASA-1.1 at site: 15 Working days</p>
2.2.2	Assessment Process
ASA-	The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT

1.1	<p>ANJA Siais to the requirements of Principles and Criteria for the Production of Sustainable Palm Oil 2018, endorsed by the RSPO Board of Governors and adopted at the 15th Annual General Assembly by RSPO Member on 15 November 2018 and RSPO Certification System for Principles and Criteria, 14 June 2017.</p> <p>Auditor team traveled on Monday, 28 September 2020 using direct flight from Jakarta to Sibolga and picked up by management in Sibolga Ferdinand Lumbantobing Airport. It took time approximately 4 hours from Sibolga to site of PT ANJA Siais. Opening meeting had been held on the same day in meeting room of General Manager Office PT ANJA Siais. It attended by auditor team and management representatives. Document verification conducted in the same place. The company was cooperative in supporting the audit activities starting from the presentation of documents, facilitation of field observations and stakeholder interviews, and there was no any tendency of pressing and intervening the auditors. Closing meeting held on Friday, 2 October 2020.</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) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p> <p>Some opportunities for improvement of the results ASA-1.1 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase ASA-1.2. Improvement of findings from Recertification findings were observed by auditors at this ASA-1.1 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-1.1.</p> <p>The assessment program please find Appendix 2.</p>
2.2.3	Locations of Assessment
ASA-1.1	<p>The sampling location consider the issue arise from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:</p> <p>ANJA Siais POM</p> <ul style="list-style-type: none"> • Weighbridge (1 Worker). Observations and interviews related to workers welfare, training, FFB traceability and supply chain system. • Security Post. Observation and interview with 3 security officer regarding of receive and dispatch procedure, labour issue etc. • Grading Station. Observation and interview with 4 personel on their understanding towards technical, OHS, License, Labor and environment aspects, as well as facilities provided by the company. • Loading Ramp Station. Observation and interview with 1 Operators on their understanding towards technical, OHS, License, Labor and environment aspects, as well as facilities provided by the company. • Sterilizer Station. Observation and interview with 1 Operators on their understanding towards technical, OHS, License, Labor and environment aspects, as well as facilities provided by the company. • Thresher Station. Observation towards technical, OHS, License, and environment aspects. • Press Station. Observation and interview with 1 Operators on their understanding towards technical, OHS, License, Labor and environment aspects, as well as facilities provided by the company. • Clarification Station. Observation and interview with 1 Operators on their understanding towards technical, OHS, License, Labor and environment aspects, as well as facilities provided by the company. • Kernel Station. Observation and interview with 1 Operators on their understanding towards technical, OHS, License, Labor and environment aspects, as well as facilities provided by the company. • Boiler Station. Observation and interview with 2 Operators on their understanding towards technical, OHS, License, Labor and environment aspects, as well as facilities provided by the company. • Engine Room. Observation and interview with 1 Operators on their understanding towards technical, OHS, License, Labor and environment aspects, as well as facilities provided by the company. • Water Treatment Plant. Observation for water usage monitoring • Chemical Store. Observation for OHS and material handling

- **Workshop Mill.** Observation for OHS and worker welfare
- **Hazardous Waste Storage.** Observation for hazardous waste management
- **Effluent Plant (IPAL).** Observation for waste management
- **Hydrant No. 2 & No. 6.** Observation related to simulation of emergency procedure.

Lembah Subur Utara Estate (LSU)

- **Harvesting at Block I24 Division 4.** Observation to harvesting activities and interview with Foreman and 2 Harvesters, on their understanding towards technical, premium calculation, daily work base, OHS, Labor, environment and conservation aspects, as well as facilities provided by the company.
- **Manual Weeding at Block G16 Division 3.** Observation to manual weeding activities and interview with 2 Foreman and 4 workers (4 females and 2 males) which also Spraying and Manuring Applicators, on their understanding towards technical, premium calculation, daily work base, OHS, Labor, environment and conservation aspects, as well as facilities provided by the company.
- **Road Maintenance at Block N33 Division 5.** Observation to road and bridge maintenance manual by 2 workers.
- **Barn Owl Box at Block L34 Division 5.** Observation to Barn Owl Nest (Gupon)
- **Watergate at Block L34 Division 5.** Observation to Water Gate which used for water management in Division 5, 6 and 7. The Water Gate was connected to Sibara-bara River.
- **Subsidence Pole at Block K31 Division 5.** Observation to Subsidence Pole which installed since 2013.
- **Piezometer at Block L31 Division 5.** Observation to Piezometer which installed on shallow peat area.
- **FFB Loading at Block L31 Division 5.** Observation and interview with 3 personel on their understanding towards technical, OHS, License, Labor and environment asects, as well as facilities provided by the company.
- **Block G01/F01: HGU Pole No. ANJ155.** Observation the conditions and position of legal boundary.
- **Block G01: HGU Pole No. ANJ154.** Observation the conditions and position of legal boundary.
- **Block G02: HGU Pole No. ANJ153.** Observation the conditions and position of legal boundary.
- **Block G03: HGU Pole No. ANJ152.** Observation the conditions and position of legal boundary.
- **HCV Area Block K33/34.** Observation of HCV management.

Lembah Subuh Selatan Estate (LSS)

- **Harvesting at Block L51 Division 10.** Observation to harvesting activities and interview with Foreman and 2 Harvesters, on their understanding towards technical, premium calculation, daily work base, OHS, Labor, environment and conservation aspects, as well as facilities provided by the company.
- **Subsidence Pole at Block P52 Division 10.** Observation to Subsidence Pole which installed since 2015.
- **Piezometer at Block P52 Division 10.** Observation to Piezometer which installed on shallow peat area.
- **Division 9 Housing Complex.** Observation related to employee facilities, management of domestic waste, emergency response facilities, provision of clean water and electricity.
- **Composting Application at Block L36/37 Division 6.** Observation related to composting activity.
- **Watergate at Block L43 Division 9.** Observation to Water Gate which used for water management in Division 5, 6 and 7. The Water Gate was connected to Batang Gadis River.
- **Manual Weeding at Block K48 Division 8.** Observation to manual weeding activities and interview with 2 Foreman and 4 workers (4 females and 2 males) which also Manuring Applicators, on their understanding towards technical, premium calculation, daily work base, OHS, Labor, environment and conservation aspects, as well as facilities provided by the company.
- **Pest Census at Block H42 Division 7.** Observation related to IPM and census activity.
- **Road Maintenance at Block H42 Division 7.** Observation to road and bridge maintenance manual by 1 workers.
- **Chemical Warehouse.** Observation and Interview with workers related to personnel understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- **Fertilizer Warehouse.** Observation and Interview with workers related to personnel understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- **Fire Fighting Warehouse.** Observation and Interview with workers related to personnel understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- **Central/General Warehouse.** Observation related to emergency procedure and material handling.

	<ul style="list-style-type: none"> • Fire Fighting Simulation. Observation related to simulation of emergency procedure. • Clinic. Observation and Interview with workers related to employee facility, implementation of OHS, training from company and worker welfare. • Central Housing Complex. Observation related to employee facilities, management of domestic waste, emergency response facilities, provision of clean water and electricity. • Landfill in Block L 25/26. Observation related to domestic waste management. • Block G47: HGU Pole No. ANJ061. Observation the conditions and position of legal boundary. • Block G46: HGU Pole No. ANJ060. Observation the conditions and position of legal boundary. • Block H37: HGU Pole No. ANJ057. Observation the conditions and position of legal boundary. • HCV Area Division IX. Observation of HCV management. <p>Transit tank: Observation traceability product</p> <p>Public Consultation with Stakeholders:</p> <p>External Stakeholders</p> <ul style="list-style-type: none"> • National Land Agency of Tapanuli Selatan District • Labor Agency of Tapanuli Selatan District • Agriculture and Plantation Agency of Tapanuli Selatan District • Environment Agency of Tapanuli Selatan District • Local Contractor – PT Alam Lestari Angkola Selatan • Local Contractor – PT Nusantara Jaya Winatama • Local Contractor – Nawakara • Village representatives of Pardomuan (from sub-village of Paraupan, Binasari, Labalasiak and Janji Matogu including previous land owner) <p>Internal Stakeholders</p> <ul style="list-style-type: none"> • Worker Cooperative ANJA Lestari • Gender Committee – Women & Child Protection Organization • Labor Union – SERBUNDO (Serikat Buruh Perkebunan Indonesia) of PT ANJA SIAIS
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-1.1	<p>Consultation of stakeholders for PT ANJ Agri Siais was held by:</p> <ul style="list-style-type: none"> • Public Notification on website Mutu International (https://mutucertification.com/notification-of-rspo-surveillance-1-1-for-anja-siais-pom-pt-austindo-nusantara-jaya-agri-siais-subsidiary-of-anja/) on 14 September 2020. • Conduct interviews via telephone with external stakeholders (National Land Agency; Labor Agency; Agriculture Agency; and Environmental Agency of Tapanuli Selatan District, Sumatera Utara Province) on 29 September 2020. • Conduct consultations via email questionnaire to NGOs (World Wide Fund, Wahana Lingkungan Hidup Indonesia, Sawit Watch and Aliansi Masyarakat Adat Nusantara) on 21 September 2020. • Conduct visit and direct interview with village representatives from Pardomuan Village and previous land owner on 29 September 2020. • Conduct visit and direct interview with internal stakeholders (Worker Cooperative, Local Contractor, Gender Committee and Labor Union) on 29 September 2020.
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
	The next visit (ASA-1.2) will be conducted eight (8) month to twelve (12) month after 24 September 2020.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of ANJA Sia's POM – PT Austindo Nusantara Jaya Agri operation consisting of one (1) mill and two (2) oil palm estates.

During the assessment, there were one (1) nonconformity were assigned against Critical Compliance Indicators; one (1) nonconformity were assigned against Non-critical Compliance Indicators; and two (2) 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 evidences e.g. (document record/photographic).

MUTUAGUNG LESTARI found that ANJA Sia's POM – PT Austindo Nusantara Jaya Agri complied with the requirements of **Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification System for Principles and Criteria, 14 June 2017.**

Therefore, MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is **continued**.

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY		
1.1	The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
1.1.1 and 1.1.2	<p>List of publicly accessible document describes in SOP of request of information and response (SOP-Leg-02 Rev. 04) issued on 01 September 2015, consist of documents which has been covering the documents listed in indicator 1.2's requirement. SOPs and accessible list of documents are informed through notice boards in the mill and estates office.</p> <p>All such documents and information are available in the respective offices of each unit, however the environmental documents and permit documents are kept in the Mill office.</p> <p>Based on interviews with local communities, local contractors and internal stakeholder, known that the company has carried out socialization related procedures for requesting information and has determined the person responsible for responding to information requests. Each party also knows the types of general information that can be accessed. Further explained that public documents that can be accessed are specific documents from each operational unit.</p>	
1.1.3.	<p>The CH has procedures for communication and information delivery to stakeholders are presented in document No. SOP-Leg-02 (Rev. 04) dated 01 September 2015. Information can be accessed through verbal (by phone), direct visit and writing (email and letter). Adm Head in the respective unit is responsible to verify the request and forward to the intended person. The requests of information that requiring head of department approval will be responded to a maximum of 1 month, otherwise approval will be required for a maximum of 1 week.</p>	
	The entire request of information (verbal and written) is recorded and kept in the logbook which is available in all units	

both of estates and mill, there was no request for information, but recorded several incoming letters which were entirely the proposals of aid that has been responded by the certification unit.

1.1.4.

The Certification unit has communication procedure number SOP-Leg-02 (Rev. 04), dated 1 September 2015. It's includes all internal & external communication activities related EHS & RSPO. Manager was responsible for gathering information, receiving and inviting invitations and communication, holding meetings and communication with outside agencies. This procedure has socialized to the workers and contractors dated 30 July 2019. Based on interview with surrounding villages sighted that the certification unit has socialized thus procedure.

1.1.5

Based on document verification sighted that the certification unit has stakeholders list from the village level, district level, regency level, province level and national level. Each of stakeholders were completed with contact number information.

Status: Comply

1.2

The unit of certification commits to ethical conduct in all business operations and transactions.

1.2.1.

Code of conduct written in Bahasa, including integrity code and ethical code in all operations and transactions including business ethics, work ethics and firm commitment in particular matters (conflict of interests, political activities, gifts / souvenirs, commissions and bribery prohibitions. These commitment has been listed in the contract letter of supplier/contractor and has been informed to workers during morning roll-call. The certification unit has socialized it on 30 July 2019. Based on interviews with local contractors told that the job offer was fair and there was no indication of bribery and other conflicting practices

1.2.2.

The Certification unit has a system to monitor compliance and implementing a code of conduct policy by regularly outreach on the morning call. In addition that the company also has internal audit team to monitor this system is running. Based on interview with several estates worker sighted that the certification unit has conduct that.

Status: Comply

PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS
2.1

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

2.1.1

The company has list of regulations of 2020 that includes local regulations and national regulation updated annually. List of laws/regulations listed has covers several aspects such as land permit and legality, manpower, occupational health and safety, best management practices and environment. Some examples of regulations compliance that have been done such as:

Legality Aspect

- Plantation permit for agronomies activity (IUP-B) based on Decree of Tapanuli Selatan Head District No: 525.26/1527/K/2003 dated 8 September 2003. According to the permit, hectare coverage is 8,000 Ha.
 - Plantation permit for processing activity (IUP-P) based on permit from Head of Tapanuli Selatan District No: 14/IZIN/2010 dated 22 July 2010. According to the permit, capacity that allowed is \pm 60 tonnes FFB/hour.
 - Plantation permit for agronomies activity (IUP-B) based on permit from Head of Tapanuli Selatan District No: 15.A/IZIN/2010 dated 28 July 2010. According to the permit, hectare coverage is 1,639.06 Ha.
- Total of plantation permit: 9,639.06 plantation area and mill capacity \pm 60 tonnes FFB/hour.

OHS and Employment Aspect

Decree of the Governor of North Sumatra number 188.44/19/KPTS/2020 concerning the Sectoral Minimum Wage of South Tapanuli Regency in 2020, which is IDR 3,030,061.74 or IDR 121,202.46/day. The decree was issued on January 13, 2020.

Environment Aspect

- Decree No. 660.1 / 1670 / K / 2003 concerning the Environmental Feasibility of PT Ondop Perkasa Makmur on October 14, 2003. These documents are environmental documents for the HGU area of 8,000 hectares and a PKS development plan with a capacity of 45 - 60 tons of FFB / hour.
- Recommendation No. 660 // 432 / KPDL-TS / 2009 concerning Environmental Management Efforts (UKL) and Environmental Monitoring Efforts (UPL) plantation activities and conservation of the PT Ondop Perkasa Makmur area on August 7, 2009.
- Permit for hazardous waste storage issued by OSS Management and Organization Institution No. 60.1/09/DPHPTSP/2020 in 25 August 2020 and will be expired in 5 years.
- Decree of the South Tapanuli District Head No. 503/870/DPMPPTSP/2017 about permit for liquid waste disposal into water bodies by PT Austindo Nusantara Jaya Agri Siais South Tapanuli Regency dated 29 December 2017 which is valid for 3 years.

Best Management Practice Aspect

In terms of best management practices, it is known that plantation and mill management has implemented several compliances with Indonesian laws and regulations, for example not using the burning method in the land clearing process, trees planted are from seed producers (DxP) which are recognized by the Indonesian government. Each unit of the Unit of Certification has implemented integrated pest management, biological control and only uses pesticides that are listed on the pesticide government website.

The other compliances of regulations regarding to environment aspects are EIA management and monitoring in routinely, hazardous waste storage license approved by local government. Compliances of workers and OHS regulations are provided the minimum wage, company safety & occupational health, transporting and forklift operator, etc. Based on interview with stakeholders such as government agencies it is known that the company has comply the related regulations for example: has plantation business permit, land use right, no workers under age of 18, hazardous waste storage permit, etc.

2.1.2

Based on the Regulatory Compliance Evaluation Procedure (No. Doc: SOP Leg-01, Edition 01, Rev. 03) effective March 30, 2015, it is known that the person responsible for examining and evaluating regulatory compliance is the External Relations Officer in each unit conducted every one year.

The company maintains a list of regulations for compliance with laws in each plantation and mill unit consisting of regulations on a regional, national and international scale where in the list of regulations there are aspects related to company operations such as:

- Aspects of Occupational Safety and Health (OHS)
- Aspects of Plantation (Related to Plantation Business)
- Manpower Aspects
- Environmental Aspects
- Etc.

The company carries out routine RSPO internal audits every year, at which time the audit activities are carried out in conjunction with examinations related to compliance with relevant regulations, for example the last one was held on 10-14 February 2020.

2.1.3

There is already available procedure for maintenance of HGU boundaries (IK-SOP Leg 001 – 001) PT ANJA Siais. The scope of this procedure is related to the maintenance of HGU boundaries only in the boundary areas of PT ANJA Siais. The purpose is to preserve the HGU boundary according to the coordinate points set by National Land Agency and the HGU boundary conditions are always in a clean and visible condition. Monitoring the boundaries of the HGU is done every 6 months.

Field observations to several HGU boundary markers in Lembah Subur Utara Estate (No. 155 block G01, No. 154 block G01, No. 153 block G02 and No. 152 block G03) and Lembah Subur Selatan Estate (No. 061 block G47, No. 060 block G46 and No. 057 block H37) show that the poles sampled during the audit were available in the field and in well-maintained conditions. Land boundaries with outsiders are clear, such as a large boundary road and trench that borders the HGU area. There is no indication of land use outside the HGU.

Status: Comply

2.2

All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.

2.2.1 and 2.2.2

The CH already has a Contractor Control/Outsourcing mechanism which has included the clauses requested in the RSPO Certification System (approved by the RSPO Executive Board 26 June 2017). The CH shows the proof of contractor employee insurance payment as follows:

- Proof of payment of CV Abadi Jaya health insurance for the period of July 2020 with a value of IDR 6,096,384 on July 14, 2020.
- Proof of payment of CV Abadi Jaya health insurance for the period of August 2020 with a value of IDR 7,125,793 on August 5, 2020.

Based on the above it is known that the CH has owned and implemented a good mechanism to ensure that all contractor workers have been protected by work accident insurance.

In addition, all contractors also sign an Associate Statement which states that the contractor complies with all legal provisions, statutes, regulations and books with anti-bribery and corruption issues.

The auditor conducts consultations with contractor workers, it is known that contractor workers have been given OHS training by the company, monitoring OHS implementation by the company and earning more than the district minimum wage.

2.2.3

The CH has imposed provisions that must be applied by contractors which has been socialized, these provisions include:

- The cooperation is bound by a work agreement
- PT ANJA Siais must ensure that socialization was carried out related regulatory requirements such as labor, OHS, Environment, Legal, including field inspections and audits related to the implementation of RSPO prerequisites can be carried out.

In addition, in agreements with contractors, as in Work Order No 0206/EST/ANJAS/2020 in articles 8 and 9 it is explained that the contractor must meet the applicable regulations in Indonesia but not limited to labor regulations and environmental aspects.

Status: Comply

2.3

All FFB supplies from outside the unit of certification are from legal sources.

2.3.1, 2.3.2

The Mill received FFB through indirectly source i.e third party FFB suppliers (agency) which are UD Boru Namora, Koptansari, Koperasi Tani Janji Matogu, and UD Riri. At this moment, there is identification consists of smallholders ID, name, age, telephone number, smallholders address and geolocation, hectare area, etc.

Status: Comply

PRINCIPLE #3 OPTIMISE PRODUCTIVITY, EFFICIENCY, POSITIVE IMPACTS AND RESILIENCE

3.1

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

3.1.1

The certification unit have a long term management plan period 2019 to 2022 which already evaluated and presented in document of "Financial Projection 2020-2025 and Statement of Operation Projection", this document has been issued by Director and Head of Accounting on 05 March 2020. The document has covers planting program, hectare statement, FFB production, extraction rates, oil and kernel production, sales, inventory, income, expense, costs, operating profit, profit after tax, cash flow operations, cash available for debt service, shareholder and cash ending balance.

Based on the description above, the projection of yield, total FFB processed, total CPO production, total Kernel production, CPO price and kernel price for period 2023 are 26,01 ton/ha/year; 300,000 ton; 69,000 ton; 14.400 ton; USD 600/ton; and USD 390/ton, respectively. Management stated that longterm management plan are subjected to be changed and reviewed every month by the respective management through monthly management report meeting, which considering actual trends and dynamic situation which predicted could be changed in the future. Record on last meeting from January to September 2020 in both estates and mill were available.

The longterm management plan was extracted more details in annual budget plan which prepared by the Estate Manager. Regarding peat management, the current water management has considered satisfactory. Furthermore, company management also informed that there is no plan of land expansion for production area and increment of mill processing capacity in the near future. There is smallholder's scheme in PT ANJA Sia's operational areas. This scheme has starts since 2005 for area covers 157.5 ha. However, there is no plan for further expansion of smallholder areas.

3.1.2

According to year of planting data and Operational Projection period of 2020-2025 from estate management, it was known that palms in PT ANJA Sia's were still on the first cycle that planted during 2005 to 2009. Hence based on one cycle of cultivation only, replanting is expected to be carried out as earliest on 2030. Thus, replanting will not be planned and conducted in the near future and not included on the current longterm management plan.

3.1.3

The certification unit has a procedure for management review that ensuring the consistency of procedures implementation, the companies routinely conduct internal audit activities both agronomic and processing. The records of internal audit on first semester of 2020 has been documented. Noncompliance records of internal audit has been corrected and verified by management. For examples that certification unit has been implemented management review is:

- Management reviews related to sustainability on 20 August 2020 by PT ANJA Sia's (GM, Manager and Staff) related with the implementation of management systems applied in the previous month. The review conducted such as the result of the Internal Audit, performance & product suitability, prevention and sustainable activities to be better in the plantation and mill activities. The meeting was attended by 20 participants.
- Management review related to Monthly Report Mill on 04 September 2020 attended by PT ANJA Sia's (Manager and Staff) management is related to the implementation of management enforcement applicable in the previous month's procedures such as the processing activity, CPO quality report, PK, Losses, Delivery, Work contract with suppliers and others. The meeting was attended by 9 participants.
- RSPO Internal Audit conducted on 10-14 February 2020 using P&C INANI Year 2018, the result is there are 27 non-conformity findings (13 findings for critical indicators and 14 non-critical) and have been complied since 31 May 2020. This is done by 3 people's internal RSPO auditor.

Each unit has documented the operations of the estate and mill production such as daily reports, supervisor workbooks, etc. The field visit at the mill shows that the unit has been documenting the daily activities in a daily production report that documented by using computerized systems.

Status: Comply

3.2

The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.

3.2.1

The certification unit has monitored and evaluated the economic, social and environmental performance as planned in the RSPO internal audit. For example, RSPO Internal audit of ANJA was conducted by Internal Auditors, presented in

document Internal Audit RSPO dated 10 – 16 February 2020. The audit in ANJA has resulting 13 non conformity findings of critical category and 13 non conformity findings of noncritical category. The results of the RSPO internal audit non-conformity are related to the issue of monitoring policy implementation, compliance with regulations, ethical behavior, management plans, SOP, SEIA, OHS, training, complaints, discrimination policies, employment, reproductive rights, PPE, emergency response, integrated pest management, waste management, water management, fire control and supply chain. Follow up of finding, as well as correction evidence of specific findings were available.

3.2.2

Is not relevant, until further decisions by RSPO.

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

Estate and mill management informed that there were no additional and revision of the existing technical procedure and work instruction. Estate management shows list of procedure (SOP) which presented in document No. SOP-AGR-01 to No. SOP-AGR-28 which issued by the Chief Executive Officer (CEO) through letter No. 07/AGR/IM/IA/08/13 dated 01 August 2013. Up to re-certification audit, latest revision (4th revision) has carried out in 01 April 2016. Furthermore, there is several Work Instruction (WI) which describes the SOP more detail. For example, WI No. IK-SOP OPR 004–001 dated 01 June 2013 has describes water level monitoring and measurement on peat area, as well as peat subsidence. Moreover, mill management shows 24 related SOP's of oil palm processing which presented in document No. ST.0/Eng-STR to ST.24/Eng-LAB. All SOP and WI above were available in Bahasa. Master list of procedure for estate and mill were keeps by Head of Research and Development and Head of Engineering, respectively. Document control of SOP was conducted by General Manager of Administration and SOP Management Compliance. Based on SOP document review, it could be concluded that all SOP's and WI's were still relevant with current situation and covers all aspect of best management practices in the estates and mill.

Procedure of safe working practices towards pesticide application is presented in the following documents:

- Manual of OHS No. MAN-EHS-001 issued by EHS Manager on 10 August 2015.
- SOP No. FRM-SOP-SDV 01.001 dated 10 August 2015 about environment health and safety, which consist of 31 sub procedures, presented in document No. SOP-EHS-001 to No. SOP-EHS-031.
- Material safety data sheet (MSDS) of agrochemicals.
- Hazard identification risk assessment control (HIRAC).

Interviews were conducted to harvesters, pesticides applicators, and manuring workers in estate (LSU & LSS) and also operators in ANJA Siais Mill. Based on the results of interviews can be concluded that the workers understand the duties and responsibilities of their work in accordance with the applicable SOP. The entire procedure both of plantation and mill has been included of safe working instruction, other than those described in the HIRAC document.

3.3.2 & 3.3.3

The certification unit has a procedure for management review that ensuring the consistency of procedures implementation, the companies routinely conduct internal audit activities both agronomic and processing. The records of internal audit on first semester of 2020 has been documented. Noncompliance records of internal audit has been corrected and verified by management. For examples that certification unit has been implemented management review is:

- Management reviews related to sustainability on 20 August 2020 by PT ANJA Siais (GM, Manager and Staff) related with the implementation of management systems applied in the previous month. The review conducted such as the result of the Internal Audit, performance & product suitability, prevention and sustainable activities to be better in the plantation and mill activities. The meeting was attended by 20 participants.
- Management review related to Monthly Report Mill on 04 September 2020 attended by PT ANJA Siais (Manager and Staff) management is related to the implementation of management enforcement applicable in the previous month's procedures such as the processing activity, CPO quality report, PK, Losses, Delivery, Work contract with suppliers and others. The meeting was attended by 9 participants.
- RSPO Internal Audit conducted on 10-14 February 2020 using P&C INANI Year 2018, the result is there are 27 non-

conformity findings (13 findings for critical indicators and 14 non-critical) and have been complied since 31 May 2020. This is done by 3 people's internal RSPO auditor.

- The certification unit has monitored contractor compliance in 2020 related to the provisions contained in the RSPO P&C in accordance with Procedure No. MAN-SCM-001. The result is that overall contractors working with the certification unit have met the minimum standards of compliance according to the RSPO P&C, but there are still some records related to worker registration in the "BPJS Ketenagakerjaan" program. This record is still being made progress every year by contractors and closely supervised by the unit of certification.

Each unit has documented the operations of the estate and mill production such as daily reports, supervisor workbooks, etc. The field visit at the mill shows that the unit has been documenting the daily activities in a daily production report that documented by using computerized systems.

Status: Comply

3.4

A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.

3.4.1

Based on documents verification, field observation and interview with stakeholders known that since re-certification, PT ANJ Agri Siais did not expand or conduct any new planting or new development. Certificate Holder possess two Environmental Impact Assessment (EIA) document covering different area consist of AMDAL on 2003 (covered 8000 ha estate areas and 45-60 mt FFB per hour mill capacity) and UKL-UPL (covered 1,639.05 Ha areas) on 2009. Both the EIA documents explained all activities for preconstruction, construction, operation, and post operation covered the palm oil mill, Lembah Subur Utara Estate, and Lembah Subur Selatan Estate. Document review shown last progress for this new EIA development are still on technical meeting stage (on July 2020). Regarding this team auditors enhance company to monitored progress of this new EIA document development.

PT ANJ Agri Siais already has environmental management plan that outlined on RKL/RPL document. Based on document review found that implementation for environment management were done based on current management plan for examples regarding surface water quality, ambient air, biogas plant activities and etc. In 2015, company has developed a new composting plant, regarding to this PT ANJ Agri Siais possess another EIA (UKL-UPL for composting plant in 2015). Last update on 2018 found that company has develop new EIA document (regarding organization name changes and biogas plant).

There is no changes for SIA since last assessment. PT ANJ Agri Siais has established Social Impact Assessment on 2013 by involving the participation of local communities and stakeholders. Records of meetings in the preparation of SIA documents are well documented. SIA has covered all the potential social impacts caused by company operations. Aspects of study in the document include infrastructure, social economy, social culture, local wisdom, workers facilities, and environmental society health and company operations. In SIA assessment, also has covered scheme smallholder's activities (majority of Binasari community). Evidence for local community participation on social impact assessment were available i.e focus group discussion on 16 December 2012 for local community of Paraupan napa, binasari, Janji Matogu, Pardomuan, and etc. Based on on consultation with Pardomuan Village community, it is found that company is involving local community when SIA was conducted and also all impacts has been identified and managed by company.

3.4.2 & 3.4.3

Company have plan which includes monitoring protocol outlined in the RKL-RPL document and implemented to monitor the effectiveness of the management activities to mitigate negative impacts and enhance positive impacts. Review of this plans has been developed on August 2020. Results of monitoring are listed on regular environmental monitoring and management report, and monitoring results for examples first semester of 2020 report shown environmental management related to waste water, surface water quality, land fires, peat subsidence still comply with regulation and monitoring plan. The company has held public discussions with internal and external parties from the company which are published in Internal and External Corporate Social Impact Review Public Discussion 2019 document. In this event, the company held a focus group discussion related to the SIA Review conducted with internal and external parties of the company at the GMO Meeting Room of

PT. ANJ Siais on 6 – 8 February 2019. The public discussion discussed many aspects such as infrastructure, human resource training and education, community environmental health, social assistance, religious activities, land issues, community institutions, job opportunities, business opportunities, and increased income, OHS system, industrial relations, career paths, salaries and welfare benefits, etc.

Status: Comply

3.5

A system for managing human resources is in place.

3.5.1 and 3.5.2

The CH has a Company Regulation for the 2018-2020 Period, which has been approved by the Indonesian Ministry of Manpower. The Company Regulation document describes work relations, social security, leave, permits, Occupational Health and Safety, environment, order, to family planning and cooperative.

Company Regulation has ended on February 28, 2020. In this regard, the company shows its Internal Memo number; 075 / GMO / Siais / EM / III / 2020 on January 11, 2020 from the General Manager regarding the enactment of Company Regulation 2018 - 2020. In the memo it is explained that the Company Regulation 2018-2020 is still in effect for a maximum period of one year until the Company exists. Regulations between companies and labor unions that are legalized by the Manpower Office. Matters related to the extension of the validity period of the Company Regulation will be implemented in accordance with applicable Manpower regulations.

The CH has a human resource system that has been implemented in operational activities including recruitment procedures and career path procedures. In addition, the CH also has a pension and termination mechanism listed in company regulations. Based on interviews with estate and mill workers show that the CH routinely and gradually has carried out socialization related to labor procedures including termination, retirement and promotion so that the average worker understands the employment procedures that the CH has.

Based on interviews with estate and mill workers revealed that the CH did not act discriminatively during the selection, recruitment and promotion processes. All employment processes are carried out according to company-owned procedures.

Based on interviews with estate and mill employees revealed that the CH never made distinctions regarding the rights of each worker. all workers rights are granted in accordance with applicable regulations.

There are jobs that are contracted by companies with third parties, namely manual maintenance work and loose quotes. Related to this, the company can show the work agreement with the contractor (PT Alam Lestari Angkola Selatan), for example:

1. Work Agreement number 010 / SPK-LSS / 01/2020 dated January 2, 2020 for manual weeding activities.
2. Work Agreement number 003 / SPK-LSS / 01/2020 dated 02 January 2020 for loose fruit picker activities.

The entire work agreement describes: the object and scope of the agreement, the value, volume and price of the work unit, payment procedures, the term of the agreement, the rights and obligations of the parties, taxes, work accident insurance, OHS, PPE, implementation and prohibition of job transfer. , fulfillment of licensing and safety provisions and termination of agreements, statements and guarantees, practical integrity and Force majeure.

Based on interviews with estate and mill workers revealed that employees already knew and understood labour mechanism related because the CH has been socializing to employees regularly. Further explained that so far the CH has always been consistent in the application of labour mechanisms.

Status: Comply

3.6

An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.

3.6.1

The certification unit has had a policy of occupational safety and health were written in Bahasa. The policy has been legalized. This policy is designed to control hazards in every activity that is in the working environment to prevent accidents.

and occupational diseases. Management have work program of occupational health safety every year. Realization of the program of work will be monitored through regular meetings Guiding Committee of Occupational Safety & Health (P2K3) every month. This work program applies generally to all workers in the workplace. If the plans have been made yet on target then will be evaluated in the regular meetings to assess effectiveness. Meeting management towards covid-19 situation againsts operational activities on the estate and mill is presented in safety identification review minutes of meeting dated 21 August 2020.

Certification unit have document of hazard identification, risk assessment and risk control (HIRAC) which issued on 15 April 2020. It will be reviewed if any occupational accident happen. The document describes the description/activity, potential hazards, risk assessment and risk control. Based on interview with Harvesters and Agrochemicals Applicators in LSU & LSS, as well as with operators in ANJA Siais Mill, it was known that all employees were able to explain and demonstrate safe working practices in accordance with HIRAC and applicable technical procedure, such as type of PPE and safety equipment, PPE placement and management, special health monitoring, training, etc.

3.6.2

Realization of the program will be monitored through regular meetings Guiding Committee of Occupational Safety & Health (P2K3) every month. This work program applies generally to all workers in the workplace. If the plans have been made yet on target then will be evaluated in the regular meetings to assess effectiveness. The following are examples of the realization by the certification unit in 2019, including:

- OHS inspection of PPE compliance of workers and other equipment on September 2020 conducted inspection in work locations found that there were all workers whose has been using an appropriate PPE.
- Socialization about COVID-19 to all workers, resident and local community every month.
- Identification of areas with potential emergency hazards such as areas prone to fire, explosion, land / water pollution, and workplace accidents and the results of monitoring conducted every months. The last examination was in September 2020.
- Inspection of the availability and condition of first aid boxes in for the in 2020 conducted in January to September 2020 by each field foreman, first aid kit in the office and in the warehousing area are still in good condition and available in 21 types of items in accordance with applicable laws and regulations. If there is item that had not available, the first aid officer will immediately added new item.
- P2K3 Meeting in 21 August 2020 on which discussed the evaluation of the implementation of OHS in July 2020, the annual evaluation of OHS implementation, COVID-19, and others attended by P2K3 officers.

Based on interview & Observed with pesticide applicator in Estate and process operators at Mill, certification unit has been provide adequate and appropriate protective equipment available to all workers at the place of work to cover all potentially hazardous operations. For example, Boilers Operators that has been provide PPE such as safety shoes, helmet, ear plug, & gloves. Aside from that safety induction for all auditors when audit in every unit (estate and mill).

Status: Comply

3.7

All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.

3.7.1 and 3.7.2

In order to retain and improve workers' skills and knowledge, the CH has developed a 2020 training program which is presented in the Training and Socialization Program document. According to the program, the CH has training activities, which are divided into five parts, for example related to the process (technical), labor, health and safety, environment and general socialization.

The CH shows the employee training realization documents for 2019-2020 as follows:

- Job Desk Consolidation Training on January 13, 2020 which was attended by 3 participants
- Training on measuring the distribution of lightning and grounding on January 18, 2020 which was attended by 3 participants
- Maintenance prevention training on September 21, 2019 which was attended by 12 participants
- Bearing maintenance prevention training and introduction to bearing types on July 23, 2019 which was attended by 17 participants

- Sterilizer operational training and how to safely operate the sterilizer on May 13, 2019, attended by 4 participants
- Fertilization training on May 14, 2019 which was attended by 9 participants
- Harvest training on 29 June 2019 which was attended by 72 participants,

The CH has compiled training programs for contractor employees in the 2020 period as follows:

- Dissemination of OHS policies and procedures.
- Socializing the use of PPE and the risks of not using PPE.
- HIRAC socialization.

Based on interviews with company workers and contractor workers show that the CH always provides training to all workers to maintain and improve worker competence at work in order to get good results.

3.7.3

The CH showed socialization of the supply chain on June 12, 2020 to expedition employees, mill clerk, laboratorium clerk, security guards, weighbridge clerk, division assistants, assistants and others (18 employees).

Based on interviews with security employees, weighbridge clerk and expedition clerk show that they have understood fruit traceability (Supply Chain), have understood that ANJA Sia's POM, apart from receiving RSPO certified FFB, also receives FFB from outside parties who are not yet RSPO certified.

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1 and 3.8.2

ANJA Sia's POM proceed their own certified FFB (Lembah Subur Selatan Estate and Lembah Subur Utara Estate) and uncertified FFB from independent out grower (Koperasi Petani Binasari, Kelompok Tani Janji Matogu, UD Boru Namora dan UD Riri). Based on that, ANJA Sia's Mill implementing Module Mass Balance.

3.8.3

Estimate product certified CPO and PK for period 25 September 2020 – 24 September 2021 describe at ASA-1.1 report (basic info 1.8.3). Actual tonnage product certified for last year:

Products	Estimate (MT)	*Actual (MT)
FFB Certified	200,500	189,243.21
CSPO	43,000	39,799.98
CSPK	9,500	8,229.30

**actual production 12 months before audit (September 2019 – August 2020)*

3.8.4

ANJA Sia's POM - PT Austindo Nusantara Jaya Agri Sia's, subsidiary of Austindo Nusantara Jaya has registered in RSPO membership 1-0032-07-000-00 (registered since 27 February 2007).

ANJA Sia's POM has been registered in IT platform palm trace RSPO <https://palmtrace.rspo.org/web/rspo/member-directory> which information as follows:

- Member Name: ANJA Sia's POM - PT Austindo Nusantara Jaya Agri Sia's
- Account UID: RSPO_AC1000002011
- Core Product: Palm Oil
- Member ID: RSPO_PO1000001992
- Type of Business: Oil Mill

3.8.5

The company has traceability procedure in document Standard Operational Procedure of Product Traceability (FRM-SOP SCD 01-04) that approved by top management since 1 July 2020. Those document has covering the implementation of

supply chain model (Module E – Mass Balance) including record keeping of all incoming product, daily report of processing and dispatch and mass balance record.

This procedure also described the personnel in charge of traceability procedure as follows:

- Harvesting clerk responsibility is to calculate, record and create FFB delivery note to mill.
- Weighbridge clerk responsibility is to weighing all FFB transport and record in SAP.
- Mill clerk responsibility is to manage all FFB received and dispatch data. He/she also responsible to input mass balance data in coordination with mill laboratory staff.
- Mill manager responsibility is to monitoring dispatch product according to the delivery order note. He also managed certified product selling not over the allowed quota. If mill wants to sell over the quota, mill manager shall coordinated with compliance department.

During the audit, auditor has interviewed security officer who received incoming FFB at the first and weighbridge operator. Based on interview session known that they can described the separation of certified or non-certified product and mass balance record.

Based on interviews in ANJA Siais POM note that the weighbridge operators understands the supply chain management system. It also known that training and refreshment (awareness) of supply chain management system were carried out annually.

3.8.6

The company has procedure for Internal Audit System Management (No: SOP-SCD-03 Rev 03 dated 27 November 2017). Internal audit will be conducted every year before external audit visit. The latest internal audit RSPO (including supply chain aspect) has been conducted dated 10 – 14 February 2020. There is 26 findings (14 Critical and 12 Minor) during the audit.

3.8.7

ANJA Siais POM conduct verification and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. Certified and non-certified FFB received period of 12 months before audit which is September 2019 – August 2020:

Month	FFB (MT)		Total
	Certified	Non Certified	
September 2019	13,823.18	5,978.23	19,801.41
October 2019	17,324.16	7,016.95	24,341.11
November 2019	13,966.48	5,932.99	19,899.47
December 2019	15,103.08	5,313.65	20,416.73
January 2020	12,975.00	5,640.11	18,615.11
February 2020	14,429.05	7,287.28	21,716.33
March 2020	14,515.28	7,841.59	22,356.87
April 2020	15,531.98	8,425.03	23,957.01
May 2020	14,840.95	9,095.75	23,936.70
June 2020	19,904.41	10,464.30	30,368.71
July 2020	18,479.53	9,336.88	27,816.41
August 2020	18,350.11	8,005.05	26,355.16
Total	189,243.21	90,337.80	279,581.01

Estimate product certified CPO and PK for period 25 November 2019 – 24 November 2020 describe at RC report. Actual tonnage product certified for last year:

Products	Estimate	Actual
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	(ton)	(*September 2019 – August 2020)
FFB Certified	194,500	189,243.21
CSPO	40,845	39,799.98
CSPK	9,725	8,229.30

According to the data during the certification period (25 November 2019 – 24 November 2020), there still not any overproduction yet.

3.8.8

The site has product information provided in such as document of weighbridge ticket, delivery order and other invoices as example at invoices of CSPK certified delivery on 21 September 2020 for 31.13 ton. The information provided on invoices are:

- The name and address of the buyer (PT Ivo Mas Tunggal in Sinarmas Land Plaza Menara 2 LT 30);
- The name and address of the seller (PT ANJ Agri Siais in District Angkola Timur, Tapanuli Selatan)
- The loading or shipment / delivery date (21 September 2020);
- A description of the product RSPO certified Mass Balance model (Mass Balance)
- The date on which the documents were issued (21 September 2020);
- The quantity of the products delivered (31.13 ton);
- Any related transport documentation (transport by Usaha Bersama);
- A unique identification number (1232000161);
- RSPO certificate number (Mutu-RSPO/046);
- etc.

3.8.9

The certificate holder has the agreements with a third parties in terms of transporting CPO & PK that ensure the compliance of RSPO SCCS and the certification bodies have access to the outsourcing contractor or operation if an audit is deemed necessary. Examples of these contracts are as follows:

1. CV Maju Bersama (PK transporter), agreement No. 007/ANJAS/COM/PK-CKG/I/2020 dated 2 January 2020.
2. CV Usaha Bersama (PK transporter), agreement No. 012/ANJAS/COM/PK/I/2020 dated 2 January 2020.
3. CV Mujur Trans (CPO transporter), agreement No. 005/ANJAS/COM/CPO/I/2020 dated 2 January 2020.
4. CV Maju Bersama (CPO transporter), agreement No. 006/ANJAS/COM/CPO/I/2020 dated 2 January 2020.

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

3.8.10

Transportation of CPO and PK has been carried out by third parties and the company has contact detailed records of the contractors used, as follows:

- CV Maju Bersama (CPO and PK transporter), address in street of Jenderal Sudirman No. 7, District of Padang Sidempuan
- CV Usaha Bersama (PK transporter), address in Sutomo Ujung No. 45-A/289 Durian, Sub District of Medan Timur, Medan City
- CV Mujur Trans (CPO transporter), address in street of Jalan Selam-I No. 70-P, Sub District of Tegal Sari, Medan City

3.8.11

Any new contractor used (names and contact details) has been informed to the CB, which are:

- CV Maju Bersama (CPO and PK transporter)
- CV Usaha Bersama (PK transporter)
- CV Mujur Trans (CPO transporter)

3.8.12

The company has had the up-to-date record and report that are kept in mill office, complete, accurate and up-to-date. All

the record can be accessed by the auditor, such as record of certified product shipping, sales contract, delivery order/invoice, production report and product sales.

According to the procedure of system documentation (SOP-SCD-01) that approved by head of sustainability since 10 November 2014, known that retention time for all document related to certification is 5 year. Based on document review known that the mill still kept the document according to the procedure.

Record of all certified palm oil/palm kernel oil volumes purchased (input) and claimed (output) for period of 12 months before audit (September 2019 – August 2020):

Month	CPO (ton)		Total
	Certified	Non Certified	
Total	39,799.98	18,742.70	58,542.68

Month	CSPO Despatch (ton)			Total
	RSPO	Other Scheme	Non Certified	
Total	4,305.16	-	25,709.21	30,014.47

Month	PK (ton)		Total
	Certified	Non Certified	
Total	8,229.30	3,893.08	12,122.39

Month	CSPK Despatch (ton)			Total
	RSPO	Other Scheme	Non Certified	
Total	5,649.40	-	1,288.11	6,937.51

3.8.13 and 3.8.14

The conversion rate of production of CPO (OER) and PK (KER) were based on actual daily, monthly and yearly production. The extraction rate follows the actual data for a 12-month period for September 2019 until August 2020 i.e OER 20.95% and KER 4.34%.

3.8.15

ANJA Sia's POM proceed their own **certified FFB** (Lembah Subur Selatan Estate and Lembah Subur Utara Estate) and **uncertified FFB** from independent out grower (Koperasi Petani Binasari, Kelompok Tani Janji Matogu, UD Boru Namora dan UD Riri). Based on that, ANJA Sia's Mill implementing Module **Mass Balance**.

ANJA Sia's POM conduct verification and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. Certified and non-certified FFB received period of 12 months before audit which is September 2019 – August 2020:

Month	FFB (MT)		Total
	Certified	Non Certified	
Total	189,243.21	90,337.80	279,581.01

3.8.16 and 3.8.17

ANJA Sia's POM has registered all transactions in RSPO IT platform. Transactions are registered in RSPO IT platform as for periods Period of 25 November 2019 – 24 November 2020.

RSPO IT Platform member registration number for ANJA Sia's POM is RSPO_PO1000001992. All transactions have been registered in RSPO IT platform for periods Period of 12 months including a removing stock of certified product sold as conventional, volume sold as credits and there are no case of underproduction, loss or damage, as example:

- Certified CPO sold to PT Synergy Oil Nusantara dated 24 June 2020 for 3,100 ton and transaction creates in IT Palm Trace dated 30 June 2020.
- Certified Palm Kernel sold to PT Ivo Mas Tunggal – Lubuk Gaung dated 17 June 2020 for 499.45 ton and transaction creates in IT Palm Trace dated 30 June 2020.

Removing Stock

The company has also removing and credit allocated (Book and claim) the stock of CSPO and CSPK from the palm trace

for the CSPO and CSPK that sold as conventional, as example:

- Removing stock of CSPO dated 29 September 2020 for 150 ton
- Removing stock of CSPK dated 29 September 2020 for 1,288 ton
- Credit allocation of CSPO dated 17 December 2019 for 10,000 ton
- Credit allocation of CSPO dated 16 January 2020 for 10,000 ton
- Credit allocation of CSPO dated 11 August 2020 for 10,000 ton

Based on announcement and transaction report documents review, it concluded that all RSPO certified products submitted are in compliance with the RSPO Rules on Market Communications and Claims.

Status: Comply

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

4.1

The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.

4.1.1.

A human rights policy document that defines basic human rights, including reproductive rights, privacy rights, women's rights and children's rights. Issued on 1 January 2014. The policy describes respecting human rights and respecting race, nation, culture, religion and without forced labor, ensuring that all employees receive fair remuneration, fair management and opportunities to develop careers. The company has socializing this policy to all workers and contractor on each unit.

Based on an interview with local contractors, worker unions, employee and committee gender, it is known that they already understand the policy. Interview with a worker in estate and mill informed that there is no complaint related to violation of human rights.

4.1.2

The CH uses third party security services by showing the Security and Security Service Agreement number 0911/SCM/ANJAS/2019 between PT ANJ Agri Siais and PT Nawakara Perkasa Nusantara.

Based on interviews with labor unions and gender committees show that so far there have never been cases of human rights violations committed by the company. This is also the same as the results of interviews with the surrounding village community, namely that there has never been a case of human rights violations committed by the company against the surrounding community.

Status: Comply

4.2

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

4.2.1; 4.2.2 and 4.2.4

There is no changes related documented system for dealing with complaints and grievance. Company have Procedure for conflicts, complaints, grievance has been maintained and contained in documents as follows:

- Internal memo 77/GM/RS/10-2012 about procedure and monitoring for workers grievance
- SOP-LEG-02 about communications and information
- Company policy 022/HR&GA/CP/06-09 2009 for land conflicts solving mechanism

In addition, the CH has also regulated the secrecy of the information / whistle blower. The company guarantees in full, the confidentiality of the identity of the information / whistle blower communicating confidential communications to the company whether it is confidential / non-confidential.

The system enable resolution of disputes in an effective and appropriate manner by way of classifying complaints into internal and external, appointed the person who responsible for handling complaints, including level of officials who make decisions for complaint resolution.

Where a resolution is not found mutually by means of deliberations between two parties, the problem can be resolved

through third-party mediation / authorities, be resolved through the applicable law or brought the RSPO Complaints System.

The CH demonstrates Communication Procedures. The officer who is responsible for receiving complaints or complaints has been assigned to each unit. It is further explained in the procedure that the company also facilitates the delivery of information to affected parties including those who cannot read / write by submitting it through pictures, videos and posters.

Based on interview with village representatives known the company provides an access to all of their stakeholder to submit their complaint related to the company's operational activity. All complaint will be responded timely.

Based on field observation and interview with several workers and worker union board sighted that there are no complaint from workers to the CH. All workers also has understood about this mechanism. To ensure that the procedures can be understood by employees who can't reading and writing by regularly socialization on the morning briefing.

4.2.3

The CH already has officers who are responsible for handling complaints so that they continue to get further information related to the progress of complaint resolution, in this case the Assistant Public Relations/CSR. The procedure also explained that the response time related to complaints was 30 days after the complaint was submitted.

Based on interviews with employees and stakeholders, it is known that they have understood the person responsible and the grievance mechanism in which the complainant's identity is protected.

Status: Comply

4.3

The unit of certification contributes to local sustainable development as agreed by local communities.

4.3.1

The company has carried out the identification of local development needs and priorities for the affected communities around the company through the Stakeholder Meeting. The 2019 stakeholder meeting was held on July 30, 2019 which aims to find out stakeholder aspirations, determine the CD / CSR program, and others. Stakeholders who attended this meeting included the surrounding community, village heads, community leaders, cooperation, farmer groups, suppliers, contractors, educational institutions, academics, press, mass organization, NGO, labor organization, TNI, Polri, BNN, DPRD Tapanuli Selatan, and other parties. government of South Angkola District and South Tapanuli Regency.

The company has a local development program contained in PT ANJA SIAIS Community Involvement Development activities report. The document contains the CSR activity program and is also attached to the realization of the program as well as the Report of the CSR team's visit to the surrounding villages completed with photos of the implementation. In general the Community Involvement Development program for the 2020 period includes:

- **Health Sector Programs:** Promotion of PHBS and Support Activities, Assistance for medical treatment for the poor, Construction of Clean Water Facilities for Lasiak Profits, Cadre Training and Home Visit Assistance, Mass Circumcision
- **Education Sector Program:** Physical development Binasari elementary school, high school physical Garonggang Development, Contribution school facilities and infrastructure around the garden, Contributions Operations MDA Al-Ikhlas, outstanding students Choice
- **Economic Sector Program :** Independent Smallholders Program, Empowerment Program of the Paraupan KTPA, Assisted Cooperative Capacity Building Program
- **Socio-Cultural and Religious Programs:** Social, Cultural and Sports Events; Religious Contribution, Ramadan Safari and donations for orphans, Sacrificial Animals, Christmas
- **Infrastructure Sector Program:** Maintenance of public facilities and infrastructure (company initiative), Maintenance and repair of the Assisted Village roads
- **Stakeholders and Media:** Informal meetings with the community

The company can show the realization of the 2019 CSR program in the 2019 Community Involvement and Development Report which has been compiled and intended for the surrounding village community (photos and proof of handover are

attached to the realization) including health, education, economy, social, culture, religious, and infrastructure sectors. Herewith the programmes which have been implemented by the company.

- Free medical assistance to the ANJ clinic for Labalasiak and Janji environmental communities Matogu since January 2019
- Public consultation towards RSPO Audit in July 2019
- Socialization to Labalasiak community and measuring composition of Paraupan river, Aek Lobu river, and Sibara-bara river in March 2019.
- Program of Independent Oil Palm Farmers (PPSM) in January – Desember 2019
- Fostering the Binasari Tani Cooperative since May 2019
- Dalkarhutla socialization to communities in the Janjimatogu, Paraupan, Binasari, and Labalasiak neighborhoods in September 2019
- Socialization of natural river washing to the Janjimatogu community in June 2019
- Maintenance of general facilities and infrastructure of company's first ring in September 2019.
- Repair of community access bridges in May 2019

Status: Comply

4.4

Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their FPIC.

4.4.1

Land Title

The company has had land title as follows:

- Land title (HGU) certificate No. 1 year 2004 for area 8,000 Ha located in Pardomuan Village on behalf PT Ondop Perkasa Makmur. Valid until 27 October 2039.
- Land title (HGU) certificate No. 223 year 2016 for area 1.83 Ha located in Pardomuan Village on behalf PT Austindo Nusantara Jaya Agri Siais. Valid until 2 September 2051.
- Land title (HGU) certificate No. 224 year 2016 for area 5.42 Ha located in Pardomuan Village on behalf PT Austindo Nusantara Jaya Agri Siais. Valid until 2 September 2051.
- Land title (HGU) certificate No. 225 year 2016 for area 11.30 Ha located in Pardomuan Village on behalf PT Austindo Nusantara Jaya Agri Siais. Valid until 2 September 2051.
- Land title (HGU) certificate No. 226 year 2016 for area 13.19 Ha located in Pardomuan Village on behalf PT Austindo Nusantara Jaya Agri Siais. Valid until 2 September 2051.
- Land title (HGU) certificate No. 227 year 2016 for area 11.69 Ha located in Pardomuan Village on behalf PT Austindo Nusantara Jaya Agri Siais. Valid until 2 September 2051.
- Land title (HGU) certificate No. 228 year 2016 for area 4.02 Ha located in Pardomuan Village on behalf PT Austindo Nusantara Jaya Agri Siais. Valid until 2 September 2051.
- Land title (HGU) certificate No. 229 year 2016 for area 267.38 Ha located in Pardomuan Village on behalf PT Austindo Nusantara Jaya Agri Siais. Valid until 2 September 2051.
- Land title (HGU) certificate No. 230 year 2016 for area 583.92 Ha located in Pardomuan Village on behalf PT Austindo Nusantara Jaya Agri Siais. Valid until 2 September 2051.
- Land title (HGU) certificate No. 231 year 2016 for area 273.07 Ha located in Pardomuan Village on behalf PT Austindo Nusantara Jaya Agri Siais. Valid until 2 September 2051.

Total of land titled area: 9,171.82 Ha

Notes on Plasma Binasari Area (± 240.60 Ha) - Plasma Manage PT ANJA Siais

There is an area of 240.60 Ha which is a plasma area (currently managed by the company but belongs to the Binasari Farmers Cooperative). In detail, 157.5 hectares were planted and the remaining 83.1 hectares were used as conservation areas. This area was excluded from the scope of certification at the time of ASA-1.1 for several reasons:

- Do not have land legality where the HGU issuance process is hampered due to the problem of missing documents at BPN so that they have to re-submit from the beginning related to the documents for HGU issuance and the company cannot ensure that the process can run positively (company estimates will take sufficient time long in the process).

- This area was excluded from the scope of certification because it could not ensure that the land legality issue was resolved.
- The company has included this area in the timebound plan for 2020.

Plantation Business Permit

PT ANJA Sia's has plantation permit as follows:

- Plantation permit for agronomies activity (IUP-B) based on Decree of Tapanuli Selatan Head District No: 525.26/1527/K/2003 dated 8 September 2003. According to the permit, hectare coverage is 8,000 Ha.
- Plantation permit for processing activity (IUP-P) based on permit from Head of Tapanuli Selatan District No: 14/IZIN/2010 dated 22 July 2010. According to the permit, capacity that allowed is ± 60 tonnes FFB/hour.
- Plantation permit for agronomies activity (IUP-B) based on permit from Head of Tapanuli Selatan District No: 15.A/IZIN/2010 dated 28 July 2010. According to the permit, hectare coverage is 1,639.06 Ha.

Total of plantation permit: 9,639.06 plantation area and mill capacity ± 60 tonnes FFB/hour.

Based on that fact concluded that all operational area has been covered by plantation permit.

4.4.2; 4.4.3; 4.4.4; 4.4.5 and 4.4.6

According to land historical record, known that concession area of PT ANJA Sia's was owned by PT Ondop Perkasa Makmur and that area took over by PT ANJA Sia's. After this process, there was no record of expansion by PT ANJA Sia's.

Based on document Identification of HCV and stakeholder consultation, there was not found customary/indigenous rights in operational area. There was the records of the process of collecting information on the preparation of the High Conservation Values Identification Report and the Social Impact Assessment Report. The recording evidence comprising of participants list and photographs.

Based on public consultation with village representatives from sub-village of Paraupan, Binasari, Labalasiak and Janji Matogu known that there was no customary right in or near the concession area of PT ANJA Sia's. All land acquisition between local people and company representatives conducted as mutual agreement and with Bahasa that understood by all parties involved.

Status: Comply

4.5

No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.

4.5.1; 4.5.2; 4.5.3; 4.5.4; 4.5.5; 4.5.6; 4.5.7 and 4.5.8

There is no land expansion activity during this audit.

Based on document Identification of HCV and stakeholder consultation, there was not found customary/indigenous rights in operational area. There was the records of the process of collecting information on the preparation of the High Conservation Values Identification Report and the Social Impact Assessment Report. The recording evidence comprising of participants' list and photographs.

Status: Comply

4.6

Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.

4.6.1; 4.6.2; 4.6.3 and 4.6.4

The company has had land acquisition procedure that approved by top management of Austindo Nusantara Jaya Agri Group since 1 June 2009. This procedure explained that the process of land identification is involved the community and the village government. Since the previous recertification (RC), known that the company did not have any land acquisition/land expansion. The results of public consultations with the surrounding communities Pardomuan Village especially from sub-village of Paraupan, Binasari, Labalasiak and Janji Matogu are known that there is no communal or

customary land in the operational area of PT ANJ Agri Siais. All concession area originates from state land that compensated from local communities based on mutual agreement.

Based on the results of interviews with representatives from the sub-village of Paraupan, Binasari, Labalasiak and Janji Matogu, they did not take into account gender differences in the opportunity to have land rights.

Status: Comply

4.7

Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.

4.7.1; 4.7.3 and 4.7.3

The procedure for calculating and distributing fair compensation is described in the Procedure for land acquisition and planting (021/HR&GA/CP/Land Acquisition/06-09) dated 1 June 2009 passed by the President Director and the Director of Corporate Services.

The company has had land acquisition procedure that approved by top management of Austindo Nusantara Jaya Agri Group since 1 June 2009. This procedure explained that the process of land identification is involved the community and the village government. Since the previous recertification (RC), known that the company did not have any land acquisition / land expansion. The results of public consultations with the surrounding communities Pardomuan Village especially from sub-village of Paraupan, Binasari, Labalasiak and Janji Matogu are known that there is no communal or customary land in the operational area of PT ANJ Agri Siais. All concession area originates from state land that compensated from local communities based on mutual agreement.

Based on public consultation with village representatives from sub-village of Paraupan, Binasari, Labalasiak and Janji Matogu known that there was no customary right in or near the concession area of PT ANJA Siais. All land acquisition between local people and company representatives conducted as mutual agreement and with Bahasa that understood by all parties involved. The communities that have lost access and rights to land also provided opportunities to benefit from plantation development such as CSR program.

Status: Comply

4.8

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.

4.8.1; 4.8.2; 4.8.3 and 4.8.4

Based on public consultation with related government agencies of Tapanuli Selatan District and village representatives (sub-village of Paraupan, Binasari, Labalasiak and Janji Matogu) known that there is no land dispute case for the last 5 years.

During field visit, auditor observe random area and not sighted land dispute area. Based on that fact, auditor concluded that there is no land dispute case in PT Austindo Nusantara Jaya Agri Siais.

Status: Comply

PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION

5.1

The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.

5.1.1 , 5.1.2, 5.1.3, 5.1.4, 5.1.5, 5.1.6, 5.1.8

PT. ANJA Siais had an agreement with scheme smallholder named *Koperasi Petani Binasari*. Pricing mechanism of plasma's FFB paid using national regulation when the price is align with local government price on FFB (i.e plantation agency).

ANJA Siais Mill also received FFB from local farmer/trader. Agreement of FFB procurement shows through Work Agreement FFB Suppliers with the validity of the contract for 2 years since the agreement was made, for example as follows:

- Agreement No. 0204/COM/ANJAS/2020 dated 5 Februari 2020 with UD RIRI.
- Agreement No. 0203/COM/ANJAS/2018 dated 5 Februari 2020 with UD Boru Namora.
- Agreement No. 0202/COM/ANJAS/2020 dated 5 Februari 2020 with KT Janji Matogu.
- Agreement No. 0102/COM/ANJAS/2020 dated 20 Januari 2020 with KT Binasari.

Prices were determined considering the market price and the estimated costs. Prices set is included empty bunch so no refund or compensation given to empty fruit bunches. Auditor has verify the record of FFB payment. For example, payslip for period on 28 September 2020.

5.1.7

The company has calibrated the weighing equipment by an independent third party as evidenced by the Test Result Certificate No. 510.3/94-TU/TJE/MET-TS/2019 concerning Verification of Electronic Bridges with a Capacity of 50 Tons on 20 December 2019 by the Regional Trade and Cooperative Agency for SMEs of South Tapanuli Regency. Calibration will be carried out again on 18 December 2020. Weighing equipment calibration at the company is carried out annually.

5.1.9

The company has a complaint handling mechanism contained in the document:

1. Internal memo No. 77 / GM / rs / 10-2012 dated 11 October 2012 concerning Procedures and Monitoring of Employee Complaints Handling.
2. Communication and Information SOP No. SOP-Leg-02 rev 01 dated 1 September 2015 regarding the mechanism for providing company information to stakeholders is described in
3. Company Policy on Procedures for Handling Public Opinions No. 022 / HR & GA / CP / Difference of Opinion / 06-09 dated 01 June 2009 regarding conflict resolution mechanisms (land disputes) described in which prioritizes deliberation to reach consensus, renegotiation and the final option using legal channels (court).

In addition, the company fully guarantees the confidentiality of the information provider / whistle blower who conveys confidential communications to the company, whether confidential / non-confidential, carried out in accordance with the method of communication and provision of information.

Status: Comply

5.2

The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.

5.2.1, 5.2.2, 5.2.3 & 5.2.5

The company has held the 2019 Stakeholder Meeting on July 30, 2019 at the Club House Meeting Building which was attended by Farmer Groups, Suppliers, Contractors, Heads of the Environment, the surrounding community, and members of regional government. At the event, socialization was carried out related to the company's vision and mission, good management practices for oil palm, improvisation of agronomic practices, the company's commitment to gender equality, community empowerment and engagement programs (Community Involvement and Development) and conservation programs.

Besides, company has identified the needs for young mothers coordinated by the gender committee through a questionnaire as an interview media to make it easier to dig up information. The company conducted interviews with 4 mothers with the following results:

- Provision of breastfeeding corners in every afdeling.
- Provision of TPA as a means of child care.
- Arrangement of work rack for "young mothers" is prioritized around day care.
- Increased understanding of young mothers regarding: child health, family health, breastfeeding and child care patterns.
- Support posyandu activities in the form of supplementary feeding for babies and pregnant women
- *Early Childhood Education Programs (PAUD)* facilities for employees' children.

The company can show the realization of the 2019 CSR program in the 2019 Community Involvement and Development

Report which has been compiled and intended for the surrounding village community (photos and proof of handover are attached to the realization) including health, education, economy, social, culture, religious, and infrastructure sectors. Herewith the programmes which have been implemented by the company.

- Free medical assistance to the ANJ clinic for Labalasiak and Janji environmental communities Matogu since January 2019
- Public consultation towards RSPO Audit in July 2019
- Socialization to Labalasiak community and measuring composition of Paraupan river, Aek Lobu river, and Sibara-bara river in March 2019.
- Program of Independent Oil Palm Farmers (PPSM) in January – Desember 2019
- Fostering the Binasari Tani Cooperative since May 2019
- Dalkarhutla socialization to communities in the Janjimatogu, Paraupan, Binasari, and Labalasiak neighborhoods in September 2019
- Socialization of natural river washing to the Janjimatogu community in June 2019
- Maintenance of general facilities and infrastructure of company's first ring in September 2019.
- Repair of community access bridges in May 2019

5.2.4

The certification unit has a full-run managed for scheme smallholders from operational activities to harvesting, so that the provision of pesticide handling are not done. The scheme smallholders only get the result of the production of FFB from the plantation. Pesticide handling activities include applications are conducted by certification unit workers who have regarded pesticide training on a regular basis.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1

Any form of discrimination is prohibited.

6.1.1 and 6.1.2

The CH has a policy on non-discrimination and job opportunities that is listed in the General Manager Internal Memo No. 36 / GMO / SiaS / IM / V / 2013 dated 14 May 2013 concerning Gender Equality and Anti-Discrimination in Employee Admission. The memo explained that the company prohibits acts of discrimination in the CH environment and always provides equal opportunities to work for all company employees. In particular, this policy aims not to discriminate against sex, race or ethnicity, disability, sexual orientation, age or belief; but to develop a capable global workforce based on objective assessments

Based on document verification of the PT ANJA SiaS employee registration documents for the August 2020 period reveal that the composition of workers varies in terms of sex, religion, educational background and ethnicity. Although dominated by local residents, every employee has the same opportunity to work with the CH as long as it meets the specified requirements.

Based on interviews with estate and mill employees, local village representatives, known that information about recruitment is transparent to the village community and delivered through the Village Head. There have never been any problems or conflicts related to discrimination and the diversity parameters of these employees. Local Work Promotion Letter available.

6.1.3.

The CH provides evidence that employee promotions are based on performance appraisals. Based on document verification show that during the January - March 2020 period, 19 new harvesters were recruited. All new workers have been on probation for 3 months and have been declared qualified and have been appointed as permanent workers through an appointment letter.

Based on interviews with estate and mill workers, representatives from surrounding villages, and representatives from the

Manpower Office, known that all workers have the same career opportunities, as long as they meet CH requirements. Furthermore, workers are dominated by local residents. In addition, in 2019/2020 estate management began a promotion program from temporary workers to permanent workers.

6.1.4

Based on interview with women workers in estate and mill as well as gender committees revealed that pregnancy tests were only conducted for pesticide applicators to avoid the employees being exposed to pesticides. Further explained that so far there had never been a pregnancy test which was a discriminatory measure.

6.1.5

The CH has formed a Gender Committee in management unit. Based on interviews with the Gender Committee and female workers known that breastfeeding workers are not permitted to work using chemicals. Workers who are breastfeeding are also given the opportunity to breastfeed their children.

6.1.6

The CH does not discriminate against workers' rights, it is shown by paying equal employee wages and the same scope of work. The results of verification of the February 2020 salary slip document for the LSS 6th Division harvest employees and the January 2020 salary slip for the Polyclinic employees, it is known that the wages paid have referred to the Decree of the Governor of North Sumatra No. 188.44/19/KPTS/2020 with the smallest base salary of IDR 3,030,062. The document describes: employee code, name of worker, department, total working days, basic salary, work benefits.

Status: Comply

6.2

Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).

6.2.1 and 6.2.3

The CH has a Company Regulation in 2018-2020 between the CH and the employees. The Company Regulation has been approved by the Indonesian Ministry of Manpower with document number 245-6/DTK/2018 dated January 31, 2018. The company regulation has explained the acknowledgment of the parties, acceptance of work, work assessment, appointment of employees, placement of employees, placement and the transfer of employees, working hours, work systems, overtime work, leave, permits, wages and assistance; official travel and mandah; amenities; work equipment; annual income allowances and bonuses; social security, discipline and violations, termination of employment, complaints, transition and the validity period of Company Regulations.

PT Alam Lestari Angkola Selatan (ALAS) shows a list of employee wage payments for the August 2020 period for 34 employees. For example, an employee with the initials BSM receives a wage of IDR 3,030,062 (IDR 121,203/day) for 25 working days. From this it is known that PT ALAS has paid employee wages in accordance with the Decree of the Governor of North Sumatra number 188.44/19/KPTS/2020, which is IDR 3,030,061.74 or IDR 121,202.46/day. Based on interviews with estate and mill worker found that the CH had paid wages in accordance with applicable regulations. Based on interviews with contractor workers revealed that workers were paid based on working days in accordance with applicable government regulations. Further explained that until now there has been no case in payment of contractor employee wages.

The CH shows a work agreement number 0206/EST/ANJAS/2020 between PT ANJA Siais and PT Alam Lestari Angkola Selatan. Article 7 paragraph 2 explains that the CH ensures that the actions of the contractor are in accordance with labor, OHS, environmental and other legal requirements as well as standard RSPO requirements including minimum wage payment requirements, prohibition on child labor, prohibition of forced labor, protection of health insurance and work accidents, protection reproductive rights of women workers and the right to access evaluations.

6.2.2

Based on document verification sighted that the certification unit only employ permanent workers. All rights of permanent workers has been covered on the Company Regulation. There is sample of work agreement which explain related to the

validity period of the work agreement, Company Regulations, working hours, wages, work targets and dispute resolution (if any). The work agreement has been agreed by both parties and signed together.

In company regulations in article 33 it is explained related to prohibitions for employees and in article 34 it is explained related to disciplinary actions and procedures for issuing warning letters.

Employee pay slips inform the wages paid if they exceed work hours, exceed work targets and work on holidays.

In the Company Regulations in Chapter 4 regarding Attendance and Absenteeism at Work, it has been explained that workers will not get wages if they are absent on work days. Based on interviews with estate and mill workers showed that each worker understood the consequences of being absent while working.

6.2.6

The CH has carried out prevailing wage calculations by including several components including: reference family size, full time equivalent per family, calorie fulfillment needs, housing cost, non food non housing, net living wage, total mandatory deduction, and gross living wage. The calculation results for estate area show that the lowest wage with a value of IDR 4,114,817 and the highest is IDR 4,877,653 while for factory areas the lowest wage is IDR 4,125,423 while the highest wage is IDR 4,888,258

6.2.7

Based on the document verification of the employee list document show that PT ANJA Siais only employs permanent employees for the main types of work, namely harvesting FFB and processing FFB. In addition, the company also uses labor service providers for supporting work. During the audit activity, the company can show documents on the cooperation agreement with the labor service provider

6.2.4

The CH has provided facilities and infrastructure to support the worker welfare in each management unit, such as permanent housing, electricity sources through generator sets available in each housing, clean water through the provision of bore wells and the provision of clean water tanks in each unit, clinics available in each unit, there is a place for kindergarten and elementary school.

Based on field observations in Division 9 Housing showed that the bathroom was in a damaged condition. The CH has provided publicly used replacement bathrooms for employees whose bathrooms are damaged while waiting for repairs to be carried out. The CH ensures the progress of improving employee housing facilities. **(OFI)**

6.2.5

The CH has made it easier for workers and their families to get a source of food by providing an employee cooperative that sells workers' daily needs and providing vegetable traders with access to selling in the workers housing area. In addition, there are also workers who open small shops to sell daily needs in each housing.

Based on interviews with workers, labor unions and gender committees revealed that workers had no difficulty in obtaining food sources because the company had provided a cooperative that sold groceries and provided a vegetable seller who was given access to sell at home. In addition, workers can also buy these needs from markets located around the company area with easy access.

6.2.4	Status: OFI
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6.3

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

6.3.1

The CH has Internal Memo No. 72/GM/srs/09-2012 dated 24 September 2012 from the General Manager who stated that the company gave the freedom to form labor unions. In addition, the memo has been socialized to workers through trade unions that are active in the company every year. The last socialization was held on January 31, 2019 which was attended

by 44 participants.

Based on interviews with SERBUNDO management show that the CH strongly supports the formation of a workers union in the CH and that every worker is given the freedom to join in it. In the formation and activities of trade unions, so far there has been no intervention from the company, this is because all activities and the formation of labor unions are carried out independently of the workers without any interference from the CH.

Based on field observations and interviews with estate and mill worker revealed that the CH routinely socializes related freedom of association and the delivery of employee complaints.

6.3.2

According to the complaint log book known that there is no complaint submitted since the previous audit. However, through the interview with local stakeholder known that village representatives usually submitted their request or proposal (not complaint) directly to the public affair staff which will be responded quickly.

6.3.3

Based on interview with worker union board sighted that management didn't intervention in the formation of worker union. In addition, the CH also has facilitate the worker unions If the union board is needed to attend the meeting on the other place.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1

The CH has a General Manager Internal Memo No 18/GMO/Siais/IM/III/2013, dated 4 March 2013 concerning the Prohibition of Employing Children Under the Age of 18 and a Sustainability Policy dated 28 November 2016 which explains the commitment to human rights with norms. for no violence, harassment and sexual exploitation

The results of verification of the worker list documents and field observations found no workers who were less than 18 years old at the time of hiring. This is also reinforced by the results of interviews with trade unions and gender committees which state that within the company scope there are no workers under 18 years of age.

6.4.2 and 6.4.3

Based on field observation at LSS and LSU; it's known that there are no employees working under the age of 18 years old. Therefore based on list of employees document sighted that there are no employees which joint with the company under the age of 18 years old.

6.4.4

Based on interview with contractor sighted that for the 2020 contract, there are ban on child workers. The certification unit also has socialized the policy about ban on child workers in LSU and LSS dated 1 December 2019 and 11 February 2020 respectively.

Status: Comply

6.5

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

6.5.1 and 6.5.2

The CH has a policy to prevent all forms of sexual harassment and violence as stated in the Internal Memorandum of General Manager No. 003/GMO/Siais/IM/I/2018 dated January 9, 2018 to all employees of PT. ANJA Siais regarding the Committee for the Protection of Women and Children to revise the name of the committee as well as the organizational structure of the committee for the Management of Sexual Harassment Problems in Internal Memorandum No. 15/GMO/SIAIS/IM/III/2017 dated March 20, 2017. The revised results have been submitted through Internal Memorandum from General Manager No. Ref. 61/GMO/Siais/IM/II/2019 dated 26 February 2019 to all employees of PT. ANJ Agri Siais regarding the Committee for the Protection of Women and Children to revise the management structure of the Committee

for the Protection of Women and Children. The organizational structure is made by the head of the field, recognized by the Committee Chair, and approved by the General Manager. The socialization of the policy was carried out on January 31, 2019, which was attended by 44 participants.

Based on document verification and interviews with estate and mill employees revealed that CH had socialized the prohibition of sexual harassment against women; and protection of reproduction rights on January 10, 2020 to employees, while information dissemination to contractors and employees was carried out on February 11, 2020.

6.5.3

The CH shows the monitoring data document for breastfeeding mothers for 2020. Based on these documents, it is known that there are 202 mothers who are breastfeeding and 4 people with the category of new mothers (mothers who just gave birth to their first child).

The CH has identified the needs for young mothers coordinated by the gender committee. Interview media using a questionnaire to make it easier to dig up information. The company conducted interviews with 4 mothers with the following results:

- Provision of breastfeeding corners in every afdeling.
- Provision of TPA as a means of child care.
- Arrangement of work rack for "young mothers" is prioritized around day care.
- Increased understanding of young mothers regarding: child health, family health, breastfeeding and child care patterns.
- Support posyandu activities in the form of supplementary feeding for babies and pregnant women
- *Early Childhood Education Programs (PAUD)* facilities for employees' children.

6.5.4

Until this audit known that there is no changes related documented system for dealing with complaints and grievance. Company have Procedure for conflicts, complaints, grievance has been maintained and contained in documents as follows:

- Internal memo 77/GM/RS/10-2012 about procedure and monitoring for workers grievance
- SOP-LEG-02 about communications and information
- Company policy 022/HR&GA/CP/06-09 2009 for land conflicts solving mechanism

In addition, the company has also regulated the secrecy of the information / whistle blower. The company guarantees in full, the confidentiality of the identity of the information / whistle blower communicating confidential communications to the company whether it is confidential / non-confidential. Interview with HCV officer for examples shown that company are ensuring anonymity of whistleblower and workers complaints mechanism are implemented well.

Based on interview with village representatives from Pardomuan Village especially from sub-village of Paraupan, Binasari and Janji Matogu known the company provides an access to all of their stakeholder to submit their complaint related to the company's operational activity. All complaint will be responded timely.

Based on field observations and interviews with female worker and gender committees revealed that up to now there have never been cases of sexual harassment or violations of reproductive rights.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1 and 6.6.2

Based on document verification sighted that there are no migrant workers on this certification unit, there are only permanent workers. In addition, based on interview with worker union board sighted that so far, there has never been a penalty for termination of employment, bonded labor practices, withholding wages, and forced overtime.

Status: Comply

6.7

The unit of certification ensures that the working environment under its control is safe and without undue risk to health.

6.7.1

The certification unit have persons that responsible for the OHS program within the organizational structure of Committee of Occupational Health and Safety (*P2K3*) established. The *P2K3* team has received approval from the Head of Manpower Agency of the Province of Sumatera Utara (Decree No. 63-1/DTK-SU/2019 on 08 July 2018) and the *P2K3* secretary is a certified occupational health and safety expert.

OHS committee routinely conducts monthly meetings on OHS issues in the workplace. The documentation of the meeting was recorded and stored well. Based on interviews to workers who are members of the *P2K3* organization it is known that monthly meetings are always routinely conducted to discuss about OHS such as consistency of PPE usage, work accident analysis, report, firefighting simulation, checking of emergency response equipment, OHS sign board, safety patrol, etc. The last meeting has been held in 21 August 2020.

6.7.2

Emergency Preparedness and Response Procedures (FRM-SOP-SDV 01.001), Management of Accidents and Occupational Diseases Procedure (FRM-SOP-SDV 01.001) has been ratified by certification unit. In that procedure has explained the handling of accidents from reporting to coordination. Simulation was performed regularly to ensure the preparedness of emergency response equipment in the certification unit. The simulation was performed on hydrants located in the mill and water pump in ANJA Siais Mill, the result of the simulation was concluded that the emergency tool that certification unit have is ready for use. Based on observation in office, mill and housing complex, certification unit has evacuation route and gathering point that has been marked with arrow sign inside and outside the location.

The last first aid training has been conducted in 12 July 2020 and certification unit has licensed first aid officers. Certification unit also has a first aid box in each unit and based on observations, it's concluded that the contents in the first aid box are sufficient (21 items). There is also a checklist of observations of the contents of first aid boxes routinely performed every month by first aid officers.

There were fifteen (15) work accidents total in certification unit without lost time accident and there is zero accidents for major, minor or fatality incident. All work accidents have been reported to Manpower Agency in form of *P2K3* Quarter Report.

6.7.3

Based on documents verification and interviews, it is known that all operators at LSU, LSS and ANJA Siais Mill already have license/certificate for boiler operators, lift carrier operators, welders and electrical technician. The management unit has had the training plan for every worker that has been exposed high danger level work such as all mill process operators.

Based on observation and interviews with workers in estate/mill, the certification unit has provided PPE to every worker. PPE for type of glove, ear plug, ear muff, helmet, apron, googles and safety shoes can be replaced immediately if damaged. This is evidenced by shown the recording of PPE distribution documents to the workers and the workers recognition from interviews also confirmed it. All broken and/or improper PPE is able to be replaced by showing the used PPE as evidence. Specifically, for agrochemicals applicators, PPE were placed on Special Store and rinsed up on the isolated place as well. PPE Store located on employees housing complex area, with limited access.

6.7.4

Certification unit has registered all workers in the "*BPJS Kesehatan dan Ketenagakerjaan*" program in accordance with government regulations in force in Indonesia. The management unit show proof of payment of BPJS. Payments are made every month by percentage according to the regulation. The last payment that has been paid by certification unit is on 29 September 2020 for "*BPJS Ketenagakerjaan*" period of September 2020 and on 09 September 2020 for "*BPJS Kesehatan*" period of September 2020. In the past year, there have never been any accidents at work that cause accident claims, because accidents that occur do not result in loss of workdays and can still be handled by first aid.

Based on the interview with LSS, LSU and ANJA Siais Mill workers, concluded that all employees were aware of the medical service procedures in the event of an accident or illness. All employees interviewed also claimed to have a health BPJS card, if they went to a company clinic there was no fee at all. Based on interview with contractor representative, it is known that the accident insurance for contractor's workers is covered by the head of contractor itself.

6.7.5

The certification unit has a record of work accidents using the Lost Time Accident (LTA) matrix as a reference to determine and calculate the total workday loss, severity rate and frequency rate of all accidents that occur in the company. The following is a recording of work accidents that occurred using LTA matrices, it is known that during the period January - September 2020 there were 15 accidents that occurred with a total zero loss of working days for all units.

Status: Comply

PRINCIPLE #7 PROTECT, CONSERVE AND ENHANCE ECOSYSTEMS AND THE ENVIRONMENT

7.1

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

7.1.1

The unit of certification has committed to implement integrated pest management (IPM) which presented in several document for example Document No. SOP-AGR-20 dated 01 April 2016, No. SOP-AGR-21 dated 01 August 2013 about rat control by barn owl; No. SOP-AGR-24 dated 01 August 2013 about rat control through chemical baiting; No. SOP-AGR-27 dated 01 August 2013 about termites control; work instruction No. IK-SOP AGR-02 dated 01 September 2015 about Oryctes control, etc. The estate management has a program of integrated pest management and its realization which presented in monthly report, for example as follows:

Early Warning System (EWS) and Census Analysis

Record of census is presented in document No. FRM-EST-024 and/or FRM-EST-020 which signed by Field Assistant, Supervisor and Estate Manager. Estates management were able to shows census records for several pest such as Termite, Rat, Oryctes, Leave Eating Caterpillars, as well as its recommendation, for example as follows:

- Based on census of termite in period of January – August 2020, it was known that incidence was 0.26 %. Termites population control by fipronil were taken to overcome this situation. However, there is no threshold limit for termites attack.
- Based on census of rats in period of January – August 2020, it was known that rats attack more than threshold limit (>5 %). Thus, rat bait is recommended on those particular areas and record of rodenticide that has been used is 1,932,2 Kg.

Biological Method for Pest Population Control

- Estate management has conducting beneficial plants (*Turnera subulata*, *Antigonon sp.*, etc) for leaf eating caterpillar and bagworm population control. This in confirmed during field observation along the edge of main road and collection road.
- Estate management has adopting Barn Owl (*Tyto alba*) for rat population control which projected to covers area for about 30-50 ha. This is confirmed during observation to Division 5 Block L34 LSU. Up to August 2020, average occupation level of Barn Owl Nest (*Gupon*) was 6.35 %.

In order to avoid pest and disease (include weeds) resistance and prophylactic uses of pesticide, estate management had substitute and/or rotate the use of pesticides for the same target, for example, in term of broad leaf control such as *Ageratum conyzoides*, *Boreiva alata* and *Mikania micrantha*, the use of Amiphosate 480 SL (Isoprophyl Amine Glyphosate) could be substitute and/or mixed with Trendy 20 WG (Methyl Messulfuron).

7.1.2

Unit of certification has identified type of invasive species that appears in estate operational areas, as refers to Minister of Forestry and Environment Regulation No. 94 in 2016. Analysis results shows that invasive species used was *Turnera*

subulata and *Antigonon sp* which used for leaf eating caterpillar population control. There is other 42 species that has been identified.

7.1.3

There is no use of fire for pest management purposes. Estate management prefer to control pest population by biological method instead of chemicals. This matter verified through field observation which shows that there were no indication of fire activities in estate operational areas.

Status: Comply

7.2

Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.

7.2.1

There is no revision about the procedure since last audit, procedure No. SOP-AGR-20 dated 01 April 2016 has mentioned that the use of agrochemical should be based on census analysis evaluation when the level of incidence is more than economic threshold. Furthermore, procedure of agrochemical uses and safety is presented in document No. SOP-AGR-19 dated 01 August 2013. In order to avoid P&D (include weeds) resistance and prophylactic uses of pesticide, estate management had substitute and/or rotate the use of pesticides for the same target, for example, in term of broad leaf control such as *Ageratum conyzoides*, *Boreiva alata* and *Mikania micranta*, the use of Amiphosate 480 SL (Isoprophyl Amine Glyphosate) could be substitute and/or mixed with Trendy 20 WG (Methyl Messulfuron).

According to record of pesticide usage for period /2019, as well as observation to Pesticide Store, it was known that there were eight brands of herbicide, three brands of insecticide and one rodenticide. Those pesticides mentioned above were listed in Pesticide and Fertilizer Directorate through http://pestisida.id/simpes_app/rekap_formula_nama.php. For biological control purposes, estate management has conducting planting of beneficial plants (*Turnera subulata*, *Antigonon leptopus* and *Cassia cobanensis*) for leaf eating caterpillar and bagworm population control. This is confirmed during field observation along the edge of main road and collection road.

Pests and diseases management control has mentioned that the use of pesticide should be based on census analysis evaluation when the level of incidence is more than threshold limits. Estates management were able to show census records for several pest such as Termite, Rat, Oryctes, Leaf Eating Caterpillars, as well as its recommendation, for example as follows:

- Based on census of termite in period of January – August 2020, it was known that incidence was 0.26 %. Termites population control by fipronil were taken to overcome this situation. However, there is no threshold limit for termites attack.
- Based on census of rats in period of January – August 2020, it was known that rats attack more than threshold limit (>5 %). Thus, rat bait is recommended on those particular areas and record of rodenticide that has been used is 1,932,2 Kg.

7.2.2

Record of pesticide applied is presented in document of "Agrochemicals Report" and "Agrochemicals Toxicity Report". For example, recapitulation for period January to August 2020 is presented in the following Table:

Pesticide (active substance)	LD-50** (mg/kg)	Toxicity	
		(l or kg)	(as/ha)*
Penta Up (Isoprophyl Amine Glyphosate)	>5,000	564,41	160,23
Trendy 20 WG (Methyl Metsulfuron)	>2,000	33.218	19,65
Lindomin 865 SL (2, 4-D Dimethyl Amine)	>700	32,10	16,28
Herling 150 SL (Ammonium Glufosinat)	>2,000		
Agent 50 SC (Fipronil)	2,863-2,995	968,15	0,31

(Note: *as = active substance; LD-50** = acute oral)

The company has satisfactory records and monitor the used of pesticides.

7.2.3

Program and realization of pest management was presented in monthly report which describes EWS and census analysis,

biological control and pesticide application, for example as follows:

Early Warning System (EWS) and Census Analysis

Record of census is presented in document No. FRM-EST-024 and/or FRM-EST-020 which signed by Field Assistant, Supervisor and Estate Manager. Estates management were able to shows census records for several pest such as Termite, Rat, Oryctes, Leave Eating Caterpillars, as well as its recommendation, for example as follows:

- Based on census of termite in period of January – August 2020, it was known that incidence was 0.26 %. Termites population control by fipronil were taken to overcome this situation. However, there is no threshold limit for termites attack.
- Based on census of rats in period of January – August 2020, it was known that rats attack more than threshold limit (>5 %). Thus, rat bait is recommended on those particular areas and record of rodenticide that has been used is 1,932,2 Kg.

Biological Method for Pest Population Control

- Estate management has conducting beneficial plants (*Turnera subulata*, *Antigonon sp.*, etc) for leaf eating caterpillar and bagworm population control. This in confirmed during field observation along the edge of main road and collection road.
- Estate management has adopting Barn Owl (*Tyto alba*) for rat population control which projected to covers area for about 30-50 ha. This is confirmed during observation to Division 5 Block L34 LSU. Up to August 2020, average occupation level of Barn Owl Nest (*Gupori*) was 6.35 %.

7.2.4

Since 2019 period, estate management has no more to use Paraquat Dichloride for field upkeep (weeding). This is confirmed during field observation Pesticide Store, record of pesticide application and information from pesticide applicators. However, there is still usage of rodenticide which listed on WHO Appendix 1B with active substance Coumatetralyl. In order to minimize the usage this pesticide, since February 2018 estate management has develop barn owl sanctuary in PPLH where located at Division 5 Block M30 LSU.

7.2.5

ANJ Group has a commitment on reduction of World Health Organization (WHO) Pesticides category Class 1A and 1B. For that commitment, certification unit use of pesticides categorized by WHO Class 1A or 1B, or as set forth in the Stockholm or Rotterdam conventions shall not be used unless under certain circumstances or emergency conditions. Furthermore, Parakuat is prohibited to be used. Based on pesticide used records in 2019/2020 in all estates, it could be concluded that there are no pesticides listed in WHO Appendix 1A and/or listed in Stockholm or Rotterdam Convention as well as paraquat. The estate has use rodenticides since 2019 until now for rat control because rats attack has been more than threshold limit (>5 %). In order to minimize the usage this pesticide, since February 2018 estate management has developed barn owl sanctuary in PPLH where located at Division 5 Block M30 LSU.

7.2.6

Estate management has conducting regular training on pesticide application, for exaple as follows:

- Training of IPM and spraying in LSS has conducted on 19 July 2020 that has been attended by 8 participant.
- Training of IPM and spraying in LSU has conducted on 03 February 2020 that has been attended by 12 participant.

Based on interview with Pesticide Applicators in LSU Estate, it was known that workers were able to explain and demonstrate its job in accordance with the procedure, such as justification of pesticide usage, considering wind flows during spraying, pesticide mixing, pesticides and its target, prohibited areas to be sprayed (for example HCV area), as well as PPE's to be used and its management (placement). Furthermore, pesticide applicators also explained that breastfeeding and pregnant women were strictly prohibited to works related with agrochemicals. Applicators has equipped with face shield helmet, respirator mask, apron, boots and gloves.

7.2.7

Procedure of pesticide handling is presented in document No. SOP-AGR-18 dated August 2013 about pesticide used

handling and its management. The procedure has covers guideline of storage and handling of pesticides, handling of accident and first aid, risk identification, pesticides spills and leaks handling, PPE, physical and chemical properties, reactivity and material stability, toxicology and ecology information, pesticide wastes handling and transportation.

Based on observation to Pesticide Store in Central Warehouse, it was known that all pesticide was placed properly on special place with limited access. Several equipment available are shower, eye wash, first aid kit, MSDS, sufficient hazardous symbols, second containment, balance record, fire extinguisher and other emergency equipment.

7.2.8

The company has managed pesticide containers which refer to the SOP for Pesticide Waste Management and Management No. SOP-AGR-18 which took effect on August 1, 2013 and was approved by the Estate Director. The SOP describes the classification of pesticides, the correct use of pesticides, storage of pesticides, pesticide poisoning and its symptoms, and first aid for pesticide poisoning. In addition, in the B3 Waste Management SOP No. SOP-EHS-009 Edition 02 Revision 01 which takes effect on August 10, 2016 and is approved by the Estate Director, pesticide used packaging cannot be used for water containers, trash cans, and flower pots. Based on the results of field observations to the Employee Housing Estate in the North Subur Estate and the South Subur Estate, it was not found that any used pesticide containers were used as trash bins, clean water reservoirs, and flower pots. In addition, the used pesticide packaging has been stored at the hazardous waste storage that has a permit and then sent to a third party.

7.2.9

Based on information from estate unit management, surrounding communities and Government Institutions of Tapanuli Selatan Regency, it was known that there is no aerial pesticide application in certification unit. All pesticides were applied conventionally.

7.2.10

The certification unit has implemented a MCU annually for pesticide operators and other high-risk workers (Fertilizer, operating processes and other) in 2019, but in 2020 is not yet done. This is because of the COVID-19 which resulted in delay of health checks in 2020. The certification unit has provided information for MCU delays to the "UPT Pengawas Ketenagakerjaan Dinas Tenaga Kerja Provinsi Sumatera Utara" on 26 August 2020 with the letter No. 201/GMO/SAIS/EM/VI/2020. The letter was accepted by the agency on 28 August 2020. The basis of consideration of the Certification Unit conveyed the letter to the relevant agencies is as follows:

- Circular Letter of the Minister of Manpower No. M/3/HK.04/III/2020 on the Workers Processing and Business Sustainability in order to prevent and reservation COVID-19.
- Decree of the Honorary General of Ethics Medicine No. 016 / PB / K.MKKE / 04/2020 About Revised Doctor Fatwa Ethics
- Circular Letter Chairman of Association of Issuing Special Occupational No. 0322 / SE / PERINKIVII / 2020 on the recommendation of MCU workers in the COVID-19 pandemic.

Study Class of Covid-19 PT ANJA Siais that has considered that the MCU and periodic activities conducted every year must be delayed due to incurred the risk of COVID-19 transmission at the time of the workers gathered in the time of examination. Based on the above. The certification unit concluded and decided that the MCU periodic and specialized activity was postponed until the pandemic ending or the southern tapanuli district entered the COVID-19 green zone.

7.2.11

During the audit, the pesticide application conducted in LSU and LSS to control weeds in the circle and path. However, the auditor also interviewed the pesticide operator in LSU that transferred to manual upkeep activities. Based on field observation and interview, known that there was no worker age under 18 years old that worked in chemical activity. The pregnant and breastfeeding women prohibited to work in chemical. The monitoring conducted through monthly pregnancy test. If founded expectant mother, she will be transferred to light non chemical activity.

Status: Comply

7.3

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

7.3.1

There is no waste management plan changes since last audits. All waste has identified and managed in accordance with management plan. Result of field visit to ANJ Siais Mill, it is known that mill effluent were processed on effluent pond until it comply with standard before being discharge to water bodies; empty fruit bunch are collected in the empty bunch areas and then reused again as nutrient cycle on composting plan, shell and fiber are utilized as a renewable fuel for boiler, chemical containers including pesticide containers have been stored at licensed scheduled waste storage. Meanwhile, field visit on workers housing on LSU found that domestic waste (organic / inorganic) are transported to TPS 3R (temporary dump site) then disposed by zero burning method to domestic landfill area.

7.3.2

Document review shown that company has sent all hazardous waste to PT Amindy Barokah (licensed collector by decree of national environmental minister) on. Observation during audits at temporary hazardous waste storage shown that all of hazardous waste are compliant with the periods in permit.

Inventory for all chemicals usage and it containers are available on chemicals store / temporary hazardous storage. All ex chemicals containers were kept on temporary hazardous storage at CWT (Central Workshop Technic) and the company has a permit for hazardous waste storage issued by OSS Management and Organization Institution No. 60.1/09/DPHPTSP/2020 in 25 August 2020 and will be expired in 5 years. Based on document review and interview with management representative, shown all ex pesticide containers on estates are managed by washing them, and regularly submitted to licensed transporter.

All settlements waste are not disposed using open fire, certificate holder are provides landfill for domestic waste management. Field observation on LSU workers housing for example, found that companies managed settlements/housing domestic waste by carrying domestic waste to TPS 3R (temporary dump site) then disposed by zero burning method to domestic landfill area.

Company already has mechanism related to hazardous waste management, listed on procedures SOP-EHS-009 on 2015 and waste management plan procedures SOP-EHS-008 on 2018. All of this procedures stated that all of hazardous waste produced by company must be kept on hazardous waste store and delivered / disposed to other third parties. Besides, non hazardous waste management mechanism listed on procedures SOP-EHS-039 on 2019 and stated that domestic waste (organic / inorganic) is transported to TPS 3R (temporary dump site) then disposed by to domestic landfill area. Based on field observation and interview in semi-permanent housing in Lembah Subur Selatan Estate, it was found that all domestic waste is not transported to TPS 3R and there is an empty house that is used as a domestic waste dump. Therefore this become **NC 2020.01 as Non-critical Category**

7.3.3

The company already has a Nonhazardous Waste Management listed in SOP No. SOP-EHS-039 on 2019. This procedure contains the management of nonhazardous waste including the provision of waste management facilities and infrastructure, waste sorting, collection of waste at the temporary 3R collection point (TPS 3R), recording of waste, transporting waste from TPS 3R to TPST / TPA, waste treatment, waste reduction, and final waste processing. Based on the results of interviews with TPS 3R officers, the waste in the company will be sorted into plastic waste and compostable waste. Based on the results of field visits, there is no indication that the company disposed of waste by burning it in open land.

7.3.2	Status: NC 2020.01 as Non-critical Category
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7.4

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

7.4.1

Procedure related to soil fertility management is presented in several procedure, such as:

- No. SOP-AGR-08 about planting of cover crop (legumes);
- No. SOP-AGR-11 about fertilizer and manuring;
- No. SOP-AGR-12 about manuring in immature area and cover crop;

- No. SOP-AGR-23 about leaf sampling unit; No. SOP-AGR-26 about soil analysis;
- No. IK-SOP-AGR-011-01 about compost fertilizer;
- No. IK-SOP-AGR-011-007 about compost application.

Based on interview with Fertilizer Applicators in LSU estate, it was known that the applicators were able to explained and demonstrate several technical implementation such as time of application, macro and micro nutrient fertilizer placement, prohibited areas to be applied with fertilizer (i.e. conservation and riparian areas) and PPE used. Furthermore, based on field observation, it was found several strategy had implemented which aims to enhance soil fertility, i.e.: fertilizer application as recommended by Agronomist; EFB-compost mulching as seen in Division 6 Block L36/L37; as well as selective weeding which aims for water and soil conservation.

7.4.2

Procedure of Leaf and Soil sampling for manuring recommendation are presented in document No. SOP-AGR-23 and No. SOP-AGR-26. The procedure mentioned that leaf and soil analysis shall be conducted annually and every five years, respectively. Procedure of leaf and soil sampling is presented has been implemented.

Results of leaf and soil sampling was used as reference for annual manuring recommendation. Leaf and soil laboratory testing works is conducted by *Centre De Cooperation Internationale En Recherche Agronomique Pour Le Developpement* (CIRAD) in France, while soil analysis was conducted by PT Nusa Pusaka Kencana Analytical and QC Laboratory (Asian Agri Group). Analysis of leaf and soil sampling results for annual manuring recommendation is conducted by Agronomist team from Research and Development Department. For example, latest leaf and soil analysis was presented in document No. CIRAD-PERSYST/UPR 34 dated March 2019 and document Ref. No. 046/RD-EXT/S/JUN/19 dated 03 June 2019, respectively. Parameters measured on leaf sampling analysis are dry matters content of macro (N, P, K, Mg, Ca) and micro (B, Cu, Zn) nutrients. Meanwhile parameters measured in soil sampling analysis are texture, density, pH, permeability class, pH, C-Organic, N-Total, C/N Ratio, Total and Available P, Cation Exchange Capacity (CEC) and nutrient content (Ca, Mg, K, Na, P, K, Fe, Cu, Zn and Mn).

7.4.3

Estate management did not implementing by-products application such as EFB composting and POME as part of nutrient cycling strategy, due to the presence of peat area in both LSU and LSS. However, nutrient strategy which actually implemented on the field as are observed were came from pruned fronds during harvesting and pruning, as well as trunk chipping during replanting or removing unproductive palms.

7.4.4

According to fertilizer monitoring program 2020 which informed type of fertilizers, dosage, volume and hectares of application, time of application. According to estate review, it was known that manuring program for period 2020 had been completed for mature area. Among fertilizer recommended are Urea, MOP, RP and EFB composting. Estate management has monitored the used of fertilizers and satisfactory documented. Monitoring of fertilizer application is reviewed every month that presented in document of "monthly report". For example, review on September 2020 is summarized as follows:

- Urea application has fully completed in total of 197,053 Kg in LSS and 309,303 in LSU.
- MOP application has fully completed in total of 304,765 Kg in LSS and 222,199 in LSU.
- RP application has fully completed in total of 396,138 Kg in LSS and 344,535 in LSU.
- EFB Composting application has filly completed in total of 10.355 Kg in LSS and 13,521 in LSU.

Status: Comply

7.5

Practices minimise and control erosion and degradation of soils.

7.5.1

The company has soil map with scale varies from 1:23,984 to 1:75,000 which derived from semi detail soil survey report conducted by CIRAD dated 01 January 2015. Distribution of soil type is presented in the following Table:

Soil Type	Area (ha)	%
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Red Yellow Podzolic	248.53	3.14
Peat – saprist	1,587.74	20.07
Muck (peat to mineral transition)	2,039.66	25.78
Alluvial Clay	4,035.69	51.01
Total	7,911.62	100.00

(Note: HCV area for about 1,171.82 ha is not included on soil type analysis).

According to the table above, it could be concluded that alluvial clay soils has dominated estate operational areas which cover about 51.01 %, followed by peat and organic soils (muck) which covers about 45.85 %. There is small portion of red yellow podzolic for about 3.14 %. All peat soils were shallows with depth less than 3.00 m. There is no fragile soils but there is marginal which mostly due to the presence of muck and shallow peat which covers about 45.85 % or 3,627.40 ha. The particular area has also prone to flooded and has a poor drainability soil property. Based on explanation above, it could be concluded that estate management has a proper soil map which informed the presence of marginal area.

7.5.2

Based on Slope Map analysis, slope distribution in PT ANJA Sia's is presented in the following Table:

Slope (%)	Classification	Hectarage (ha)	Coverage (%)
0 – 8	Flat to undulating	7,824.19	81.17
8 – 25	Undulating to rolling	40.33	0.42
25 – 40	Rolling to hilly	220.30	2.29
>40	Hilly to steep and very steep	1,554.18	16.12
Total		9,639.00	100.00

Estate management has procedure No. SOP-AGR-09.01 (Rev.04) dated April 1st 2016 about oil palm planting which mentioned that area classified as rolling to hilly (slope 25-40 %) shall adopting terraces planting pattern while area with slope more than 40 % or hilly to steep slope condition, shall be left for planting. This has been conducted by estate management for soil and water conservation purposes, as also mentioned in procedure No. SOP-AGR-05 (Rev. 3) dated April 1st 2016. Based on field observation to LSU and LSS estate, it could be concluded that all palms were planted on flat to undulating areas. There were no planting on hilly to steep areas, hence terraces planting pattern has does not exist. However, flat area in PT ANJA Sia's were prone to flood. Hence, field drain with pattern 1:2 to 1:4 were installed to overcome this situation.

7.5.3

Based on review towards long-term management plan and hectare statement 2020, as well as information from estate management, it was known that there are no new planting in certification unit operational areas. This indicator is not applicable.

Status: Comply

7.6

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

7.6.1

The company has soil map with scale varies from 1:23,984 to 1:75,000 which derived from semi detail soil survey report conducted by CIRAD dated 01 January 2015. Distribution of soil type is presented in the following Table:

Soil Type	Area (ha)	%
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7.6.2

Based on soil survey analysis, it was known that all soils in certification unit was peat with various depth. There is no fragile soils but there is marginal which mostly due to the presence of muck and shallow peat which covers about 45.85 % or 3,627.40 ha. The particular area has also prone to flooded and has a poor drainability soil property. To overcome this situation, several strategies that already implemented by estate management was adoption a proper peat management as follows:

- Water managemet through maintaining water level at 60-80 cm and monitoring of peat subsidency rate as indicator of water management quality.
- Maintaining land cover crop which aims to retain soil moisture on the field.
- Fertilizer applicaiton as in accordance with Agronomist recommendation.

7.6.3

Based on semi detail soil survey analysis, it was known that slope condition in certification unit are dominantly flat to undulating, ranged between 0° to 8°. Thus, soil management limitation was mostly due to prone to flooded and has a poor drainability soil property. To overcome this matters estate management has conducting field drains system. Based on field observation, it was known that field drain pattern was 1:4 and 1:2. The latter was introduced on prone flooded areas, for example as sighted to Block L43 Division 9 LSS.

Status: Comply

7.7

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

7.7.1

Based on estate management information as well as review towards hectare statements from the previous audit, it was known that there are no additional new planting or expansion on estate operational areas after 15 November 2018. Thus, this indicator is not applicable.

7.7.2

Peat Area Distribution

The company has soil map with scale varies from 1:23,984 to 1:75,000 which derived from semi detail soil survey report conducted by CIRAD dated 01 January 2015. Distribution of soil type is presented in the following Table:

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(Note: HCV area for about 1,171.82 ha is not included on soil type analysis).

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it could be concluded that estate management has a proper soil map which informed the presence of marginal area.

Peat Inventory Report

Process of peat inventory report of ANJ Group has started submitted by Personal Assistant & Secretary Coordinator of PT ANJ Tbk. to GHG Unit of RSPO (ghg@rspo.org) as RSPO Secretariat representative on 15 November 2019 as verified through email record. The response from RSPO GHG Unit was delivered on 27 November 2019 which informed that RSPO is acknowledge the submission and noted that ANJ Group will update us should there be more accurate data available as well as the submission for uncertified area can be anticipated by 31st March 2020.

7.7.3

Estate management has conducting peat subsidence monitoring which could be important parameter for effectiveness of water management evaluation. For example, explanation of subsidence rate in both estate is presented as follows:

- During 2020, subsidence rate on 9 monitoring point in LSU were ranged between 1.05-1.55 cm/year. This figure was better compare to the last year which about 1.05-1.60 cm/year. As observed to Subsidence Pole in Division 5 Block K31 LSU which installed since 2013, it was known that according to field measurement, subsidence rate on these particular Block was about 2,92 cm/year.
- During 2020, subsidence rate on 6 monitoring point in LSS were ranged between 1.13-1.35 cm/year. This figure was better compare to the last year which about 1.20-2.05 cm/year. As observed to Subsidence Pole in Division 10 Block P52 LSS which installed since 2015, it was known that according to field measurement, subsidence rate on these particular Block was about 1.92 cm/year.

According to above explanation, it could be concluded that in general, average of subsidence rates in both estates were still bellow limits as required by Regulation of Minister of Environment No. 7 in 2006 (35 cm per 5 year or about 7 cm/year). This figure indicates that water management has satisfactory implemented in estates operational areas.

7.7.4

All procedure requires that water level shall be maintain between 60-80 cm. Both LSU and LSS has monitor water level and water table of the field which the record had reported every month. Water level in both estate were controlled through watergate and stopbund. Estate management explained that there were 3 units of watergate and 520 units of stopbund in LSU and 2 units of Watergate and 116 stopbunds in LSS. This in confirmed through observation to Water Gate in Division 5 Block L34 LSU and Divison 9 Block L42.43. Both Water Gate were connected to Sibara-bara River. According to estate monitoring record, it was known that water level managed in between 60 to 80 cm, which aims to minimizing peat subsidence rates. In order to monitor water table inside the field, estate management has installing Piezometer, as observed to Division 5 Block L31 LSU and Division 10 Block P52 LSS. LSU and LSS has 96 and 141 pcs of piezometer, respectively. Record of monitoring were available on-site, as managed as in accordance with procedure.

7.7.5

According to hectare statement, it was known that palms in PT ANJA SiaIs were planted between 2005 to 2009. Hence based on one cycle of cultivation, replanting is expected to be carried out as earliest on 2030. Thus, replanting will not be planned and conducted in the near future. In general, average subsidence rates in PT ANJA SiaIs were ranged between 1.05 to 2.05 cm/year, which indicate that both estate management has satisfactory implementing water management on peat areas. Study on peat area including drainability assessment has conducted by Consultant from Wetland International on 25 -27 June 2015, with recommendation as follows:

- To update peat area distribution, revitalization of drainage system and measurement of carbon stock.
- To anticipate el-nino phenomenon through block watergate which aims to preserve more water on the field.
- To keep monitoing on water level, water table, subsidence rate and GHG emission.

7.7.6

Based on soil survey analysis, it was known that all soils in certification unit was peat with various depth. There is no fragile soils but there is marginal which mostly due to the presence of muck and shallow peat which covers about 45.85 %

or 3,627.40 ha. The particular area has also prone to flooded and has a poor drainability soil property. To overcome this situation, several strategies that already implemented by estate management was adoption a proper peat management as follows:

- Water managemet through maintaining water level at 60-80 cm and monitoring of peat subsidency rate as indicator of water management quality.
- Maintaining land cover crop which aims to retain soil moisture on the field.
- Fertilizer applicaiton as in accordance with Agronomist recommendation.

7.7.7

Based on hectare statement review, it was known that there is no presence of peatland conservation areas. All areas were used for oil palm plantation activities. Furthermore, there is no land clearance for non-corporate purposes areas in PT ANJA SiaIs.

	Status: Comply	
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7.8

Practices maintain the quality and availability of surface and groundwater

7.8.1 & 7.8.2

The company has a routine water management plan which is included in the 2020 water management document. The results of the identification of water sources / flows by the company are contained in the Conservation Area Identification Document and state that the plantation business area is included in the Batang Gadis watershed. Other rivers that flow within the plantation area include the Sungau Sibara-bara, the Paraupan River and the Aek Lobu River.

The company already has SOP for Soil and Water Conservation No. SOP-AGR-05 Edition 01 which took effect from August 1, 2013 and was approved by the Estate Director. This procedure describes water management through efforts to construct a main trench, branch trench, stop bund, install a device to measure the water level, install a subsidence rate measurement device, carry out regular trench washing, and maintain a water level between 60-80 cm.

The company has conducted surface water quality testing for Semester 1 of 2020 which was carried out by the Sucofindo Medan Testing Laboratory (LP-416-IDN). The results of testing the quality of water downstream of the river show that the value in each parameter is still below the quality standard used, namely PP. 82 of 2001.

7.8.3

The company shows the permit for wastewater disposal to water stream in accordance with the Decree of the Regent No. 503/870/DPMPTSP/2017, which is valid for 3 years. Mill effluent produced by ANJ Agri SiaIs mill processed at effluent and based on procedure SOP-EHS-008, until it complying to standards before it distributed into water stream.

Mill effluent has been monitored every months and monitoring period January – August 2020 shows that all of outlet palm oil mill effluent testing parameters are compliant to the standards quality, for example BOD on January 2020 were 99,6 mg/l (< 100 mg/l). Mill Effluent management also was reported and submitted quarterly to environmental agency of Tapanuli Selatan District.

7.8.4

Standards of water usage for FFB process recorded on year 2020 budget projected 2.121 m³/mt FFB process. Water usage monitoring was done periodically and recorded, for example on July 2020 FFB processed was 29,834 mt, process water usage 41,870 m³, and water usage efficiency was 1,403m³/mt FFB process. Field visit on ANJ Agri SiaIs POM also found records for water usage are done based on flowmeter reading by WTP officer on daily basis.

	Status: Comply	
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7.9

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

7.9.1

Certificate Holder had planned and implemented the use of fiber and shell for fossil fuels substitution. Realization of

renewable energy have been monitored every day and documented on monthly report for fiber and shell usage. On January-June 2020 periods, the usage of fiber and shell for boiler resulted average energy efficiency for electricity about 128.62 kWh/MT CPO meanwhile fossil fuel usage energy efficiency were 0.64 litre/mt CPO.

Status: Comply

7.10

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

7.10.1, 7.10.2 & 7.10.3

To reduce pollution and emissions, the company has identified the source of pollution and greenhouse gases and measurement to manage them. The efforts made by the management unit to reduce the pollution and GHG emissions through the activities including engine maintenance, effluent management and waste utilization, conduct fertilization according to the doses, conduct pesticide application according to the procedure, etc. Waste water has been monitored every months and monitoring period Jan-April 2020 shown that all of waste water testing parameters is compliant to the standards quality (see indicator 7.3.2). Meanwhile company also conduct regular emission testing for semester basis, first semester 2020 testing results indicates boiler emission for examples opacity has been met with standard quality. ANJ Agri Siais POM conduct GHG calculation and its monitoring using RSPO palm GHG calculator V4.0 for its supply base. Summary of GHG emission for ANJ Agri Siais POM for Jan to Dec 2019 periods are listed as follows :

Summary Emission

Product	tCO ₂ e/tProduct
CPO	5.69
PK	5.69

Description	Unit	Value
Oil palm planted on mineral soil	Ha	4109.42
Oil palm planted area on peat	Ha	3642.26
Total oil palm planted area	Ha	7751.68
Conservation area (Forested)	Ha	1350.25
Conservation area (Non-Forested)	Ha	0.00
FFB Production per hectare	t/ha	34.15
OER	%	21.37
KER	%	4.44

Mill Emissions and Credits

Remarks	tCO ₂ e	tCO ₂ e/t FFB
Emissions sources		
POME	45121.83	0.17
Fuel consumption	651.13	0.00
Grid electricity	0.00	0.00
Credits		
Export of grid electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	45772.96	0.17

Estate/ Plantation Field Emissions Sinks

Description	Own crop		
	tCO ₂ e	tCO ₂ e/ ha	tCO ₂ e/tFFB
Land conversion	68484.66	8.83	0.38
CO ₂ emissions from fertilizer	4607.00	0.59	0.03
NO ₂ emissions from Peat	27264.93	3.52	0.15
NO ₂ emissions from Fertiliser	4053.42	0.52	0.02
Fuel consumption	711.53	0.09	0.00
Peat oxidation	198866.31	25.65	1.11
Crop sequestration	-72569.15	-9.36	-0.41
Sequestration in Conservation area	0.00	0.00	0.00
Total	231418.70	29.85	1.29
Status: Comply			
7.11			
Fire is not used for preparing land and is prevented in the managed area.			
7.11.1 and 7.11.2			
<p>The company already has SOPs related to fire prevention and control, such as:</p> <ul style="list-style-type: none"> SOP for land fire control no. SOP-EHS-005 effective 10 August 2015 made by the EHS Officer and approved by the EHS Manager Dept. The SOP describes the implementation of fire control and prevention. Prevention is carried out by mapping vulnerable areas, monitoring fire towers, maintaining firebreaks, making signs and providing fire education. Emergency Response Team SOP with no. SOP-EHS-026 effective April 29, 2017. <p>Based on a field visit to the hydrant at the factory (Hydrant no. 4) and fire infrastructure for the plantation area, the company already has adequate emergency response equipment and is ready to use. In addition, emergency response personnel understand their respective functions and responsibilities. The company has made reports related to land fires at PT. ANJ Agri Siais which is included in the Fire Monitoring and Guidance Report for the January - June 2020 Period and has been submitted to the Regional Government of South Tapanuli Regency with evidence of Letter No. 01 / EHS / UE-1/03/2020 dated 3 August 2020. In the report, there is a list of fire prevention facilities and infrastructure owned by the company.</p>			
7.11.3			
<p>The company has formed an Emergency Response Team for the Land, Plantation, Forest & Housing Fire Hazard Control Brigade consisting of a core team and a support team with a total membership of 99 people. In addition, the company has collaborated with the Binasari Paraupan environmental fire farmer group (KTPA) which consists of 40 community members and has been approved by the South Tapanuli Regency Plantation Office.</p>			
Status: Comply			
7.12			
Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1			
<p>Company has conducted Disclosure of Liability for ANJ Agri, that has been submitted to the RSPO on 16th July 2014, while LUCA has been submitted to RSPO on 24th August 2015.</p> <p>PT ANJ Agri Siais has conducted disclosure of liability and LUC analysis in accordance with RSPO template on 2015. During 2016-2019, company shown intense communications with RSPO compensation panel related LUCA progress for PT ANJ Agri Siais. As confirmed by RSPO email on 21 October 2020, LUCA of PT. ANJ Agri Siais has been approved.</p>			
7.12.2, 7.12.4, 7.12.5, 7.12.6, 7.12.7			

The Company does not undertake new land clearing is done after November 15, 2018, so that the existing HCV assessment remains valid.

All HCV and the RTE species were identified by the RSPO approved assessor. RTE species that were identified based on regular monitoring and referred to IUCN Redlist are: EN: *Tapir (Tapirus indicus)* White-winged Duck, White-winged Wood Duck (*Cairina scutulata*); Sambar Deer (*Cervus unicolor*); Hairy-nosed Otter (*Lutra sumatrana*); Southern Pig-tailed Macaque (*Macaca nemestrina*) status Vulnerable, Siamang (*Symphalangus syndactylus*); Owa (*Hylobates sp.*); False Gharial/Buaya senyulong (*Tomistoma schlegelii*). HCV identifying process conducted by using HCV identification guides in Indonesia on June 2008 and involved affected parties by public consultation with related affected parties for examples Paraupan, Binasari, lorong ANJ Siais, Labalasiak and Janji Matogu community on 21 December 2012. The company has conducted an Internal Review of the HCV area and experienced an increase from the previous 1230.17 Ha (2018) to 1348.18 Ha (2020) due to the difference in area in re-measurement. There is no change for the overall HCV function (HCV 1.1; 1.2; 1.3; 1.4; 2.3; 4.1; 4.3). These results were delivered at the Stakeholder Meeting on 30 July 2019 and an update was made for the HCV Management Plan 2020.

Company has established HCV management plan to maintain the HCV areas in operation area of PT ANJA Siais, listed on Management plan HCV 2020 documents. HCV management activities that taken by the management unit are maintain HCV attributes (HCV boundary, sign board), HCV socialization (community and worker), maintain HCV area, patrolling around HCV area, monitoring of flora and fauna, enrichment in riparian. Company has done HCV area monitoring which is done every month and documented on HCV Monitoring Report January to August 2020 that contain the activity to manage HCV area including HCV area patrol, enrichment in riparian, and monitoring of flora and fauna. There is also evaluation for every monitoring which had been done in every month. For example, based on HCV Monitoring report on May 2019, company has done patrolling to Batang Gadis riparian, repairing jungle track, and maintaining legume around HCV area such as HCV nearby mill, HCV Paraupan riparian, and Sibara-bara riparian. Besides, based on the evaluation of HCV Monitoring Report on August 2020, there is no HCV area damaged when HCV monitoring conducted. Based on interview with sprayer and maintenance worker in Lembah Subur Utara Estate and Lembah Subur Selatan Estate, They already know that there are HCV areas where protected animals are found and they are not allowed to hunt for these animals. Apart from that, they have also known the protected animals through warnings installed in several HCV areas.

7.12.3

Is not relevant, until further decisions by RSPO.

7.12.8

In the ASA-1.1 assessment, the company demonstrated the results of communication with RSPO Secretariat via email on September 25, 2020 stating that "In view of the current COVID 19 pandemic in Indonesia that is in travel restriction, we agreed to allow the NC to be opened until the next Surveillance. I hope your company will continuously work towards closing the issue to ensure that the certification can be maintained." Based on the email, the RaCP status of PT ANJA Siais has not received approval from the RSPO Secretariat but has received approval to continue the surveillance assessment so that this indicator becomes NC Critical with a deadline improvement up to the next surveillance. Therefore, this is **NC 2020.02 as Critical Category**.

7.12.8

Status: NC 2020.03 as Critical Category

3.2 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or√
ASA-1.1	ANJA Siais POM and its supply bases did not use trademark in the product or any of its activity	✓
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use	X or√
ASA-1.1	ANJA Siais POM and its supply bases did not use trademark in the product or any of its activity	✓
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or√
ASA-1.1	ANJA Siais POM and its supply bases did not use trademark in the product or any of its activity	✓
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or√
ASA-1.1	ANJA Siais POM and its supply bases did not use trademark in the product or any of its activity	✓
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of ANJA against the rules for partial certification was determined through Self-Assessment in accordance with RSPO Certification System clause 4.5.4. A summary of findings is as stated below.

ANJA Time Bound Plan (TBP) is explaining in table section 1.10.1 ANJA has run five (5) mills and eight (8) management unit/company in Indonesia. All mills and estates are operated in Indonesia. ANJA has informed the TBP progress through head office in Indonesia.

MUTU has verified partial certification for un-certified unit's subsidiary of ANJA based on their Time Bound Plan. There are four (4) uncertified management unit of ANJA. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

- There is no significant land conflicts which have not been declared above
- The company has follow RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There is no labour disputes that are not being resolved through an agreed process
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Company statement : The company are already doing internal audits.</p> <p>Auditor verification: Internal Audit for uncertified management unit</p> <ul style="list-style-type: none"> • PT Galempa Sejahtera Bersama has been conducted Internal Audit on 23 - 27 September 2019. • PT Putera Manunggal Perkasa has been conducted Internal Audit on 6 – 20 July 2020. • PT Permata Putera Mandiri has been conducted Internal Audit on 6 – 20 July 2020. • PT Austindo Nusantara Jaya Tbk has been conducted on 29 June to 10 July 2019.
2.1.2	No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance with RSPO criterion 7.3 (it has changed be Criterion 7.12 in P&C 2018)	<p>Company statement: The company has been reporting disclosure and zero liability to RSPO. Progress result of review LUCA at follow up by email to RSPO.</p> <p>Auditor Verification : ANJA and its subsidiaries have been reporting disclosure and zero liability to RSPO by email dated August 24, 2015. The validation progress of Remediation and Compensation Plan (RaCP) for the area opened since November 1, 2005 without preceded by the identification of HCV in accordance</p>

		with RaCP Procedure will be observed again on the next visit audit.
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>company statement: NPP has been applied</p> <p>Auditor Verification :</p> <ul style="list-style-type: none"> • PT Galempa Sejahtera Bersama, NPP date of notification on May 2, 2014 • PT Putra Manunggal Perkasa, NPP date of notification on 24 July 2014 • PT Permata Putra Mandiri, NPP date of notification on September 29, 2014 • PT Austindo Nusantara Jaya Tbk, NPP preparation on process – HCV Assessment review by HCV RN
2.1.4	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO criteria 2.2, 6.4, 7.5 and 7.6 (it has changed be Criterion 4.8, 4.7 and 4.5 in P&C 2018).	<p>Company statement: There is land conflict, but there is documented evidence that land conflict has been process for resolution.</p> <p>Auditor verification : The company has had a mechanism for addressing land conflicts, described in the SOP of Handling Differences Opinion with the Community and Dispute Tenure (SOP-Leg-03, Issue 01, dated 1 September 2015).</p>
2.1.5	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3 (it has changed be Criterion 4.2 in P&C 2018).	<p>Company statement: There is no labour disputes</p> <p>Auditor verification : The company has a mechanism for grievance described in SOP Handling of Differences of Opinion with Public and Land Dispute (Document No. SOP-EAD-01; Issue 01/00) dated August 1, 2013.</p> <p>A policy related to confidentiality of informant (whistle-blower) regulated in the SOP of Communication and Provision Information (Document No. SOP-Leg-02, Issue 01/04, dated 1 September 2015), it's mentioned in the section 6 of tis SOP.</p> <p>There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p>
2.1.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Company statement: All legal requirement for palm oil plantation has been comply</p> <p>Auditor verification : PT Galempa Sejahtera Bersama</p>

	<ul style="list-style-type: none"> • Status of PT GSB based on Forest Area Indicated (TGHK) is Non Forest Designated Area (Area Penggunaan Lain) • Location Permit No. 525/535/KEP/HUTBUNTAMBEN/2012, 20 April 2012 • Plantation Permit No. 525/423/KEP/HUTBUNTAMBEN/2013, 08 May 2013 • HGU on process • Environment Permit No. 211, 2013, dated 06 May 2013 • SEIA No. 210, 2013, dated 1 May 2013 <p>PT Putera Manunggal Perkasa</p> <ul style="list-style-type: none"> • Location Permit No. 522/30/II/2011, dated 09 February 2011. Total area ± 22,195.28 Ha • Change Location Permit No. No. 522.2-6/206/10/2012, dated 12 October 2012. Total area ± 22,195.28 Ha • Converted forest area release by the Republic Indonesia Ministry of Forestry Number SK.606/MENHUT-II/2012, dated 31 October 2012 • Environment Permit No. 660.1/58/II/2012 TAHUN 2012, dated 16 Feb 2012, for 22.195 Ha, Mill Capacity 60 TPH • Plantation Business Permit, According to West Papua Governor Decree No. 525/90/V/2011, dated 10 May 2011 for 25,159 Ha and 60 Ton FFB/Hours plant. • Adjustment of plantation area According to West Papua Governor Decree No. 525/584/GPB/2013, dated 30 April 2013 for 23,424.38 Ha and 60 Ton FFB/Hours plant <p>PT Putra Permata Mandiri</p> <ul style="list-style-type: none"> • Location Permit No. 83/2010, dated 30 April 2010. Total area ± 40,000 Ha • Change Location Permit No. 522.2/118/BSS/August Tahun 2010, dated 11 August 2010. Total area ± 40,000 Ha • Converted forest area release by the Republic Indonesia Ministry of Forestry Number SK.731/MENHUT-II/2011, dated 21 December 2011 • Environment permit No. 525/76/BSS/IV/2011, dated 25 April 2011. • Plantation Business Permit, According to West Papua Governor Decree No. 95 tahun 2010, dated 28 June 2010 for 40,000 Ha and 3 x 60 Ton FFB/Hours plant. • Cadastral map from National Land Body of Republic Indonesia No. 021-33.05-2014, dated 26 March 2014 for 32,025.14 Ha <p>PT Austindo Nusantara Jaya Tbk</p>
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		<ul style="list-style-type: none"> • Location Permit No. 12/2011, dated 6 oct 2012. Total area ± 40,000 Ha • Extension of Location Permit No. 74 Tahun 2014, dated 2 sept 2014. Total area ± 40,000 Ha • Converted forest area release by the Republic Indonesia Ministry of Forestry Number No. 131.09/118/B.MBT/2011, Tgl. 12 Oktober 2011 • Plantation Business Permit, According to West Papua Governor Decree No. 525/101/5/2013 Tahun 2013 for 40,000 Ha and 2 x 60 Ton FFB/Hours plant. • Environment Permit PKS 60 X 2 TPH, No. 660/147/7/2013 TAHUN 2013, dated 18 Juli 2013 • SK HGU (Inti), Number. 03/HGU/KEM-ATR/BPN/2015 dated 02 April 2015, 30.515,75 Ha
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3.4 Identification of Findings, Corrective Action, Observations, Opportunity for Improvement and Noteworthy Positive Components.

3.4.1. Identification of Findings, Corrective Actions and Observations at Re-Certification Assessment

NCR No.	:	2019.10	Issued by	:	Steve Mualim
Date Issued	:	18 July 2019	Time Limit	:	Next Surveillance
NC Grade	:	Major	Date of Closing	:	
Standard Ref. & Requirement	:	7.3.1 There shall be evidence that no new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since November 2005. New plantings shall be planned and managed to best ensure the HCVs identified are maintained and/or enhanced (see Criterion 5.2).			
Evidence observed (filled by auditor): PT. ANJ Agri Sia's has conducted disclosure of liability and LUC analysis in accordance with RSPO template on 2015. During 2016-2019, company shown intense communications with RSPO compensation panel related LUCA progress for PT ANJ Agri Sia's. Until Re-cert based on company communication with RSPO shown that LUC analysis for are still on review process.					
Non-Conformance Description (filled by auditor): Company are not able to shown evidence that RaCP for PT ANJ Agri Sia's has been approved by RSPO.					
Root Cause Analysis (filled by organization audited): The company has had intensive communication regarding to LUCA process with RSPO certificate. However, according to the information it still on review process.					
Correction (filled by organization audited): Conducting intensive communication with RSPO secretariat.					
Corrective Action (filled by organization audited): Not opening new land before identifying HCV area.					
Assessor Evaluation and Conclusion (filled by auditor): Verification 21 October 2019 Austindo Nusantara Jaya Group and Mutuagung Lestari has asked the status of LUCA process of ANJA Sia's after the audit. According to the email on 21 October 2019, Biodiversity Manager stated that <i>"The Secretariat agrees to allow the extension for 12 months to close the NC. This means that the compensation plan should be approved by the next surveillance audit"</i> .					
Auditor Conclusion on 21 October 2019 Based on that information, this Non Conformity No. 2019.10 is open until next surveillance audit .					
Auditor Verification (1 Oktober 2020) In the ASA-1.1 assessment, the company demonstrated the results of communication with RSPO via email on September 25, 2020 stating that <i>"In view of the current COVID 19 pandemic in Indonesia that is in travel restriction, we agreed to <u>allow the NC to be opened until the next Surveillance</u>. I hope your company will continuously work towards closing the issue to ensure that the certification can be maintained."</i>					
Based on this, PT ANJA Sia's' RaCP status has not yet received approval from the RSPO but has received approval to continue the surveillance assessment so that this indicator becomes NC Critical with a time limit for improvement until the next surveillance.					
Auditor Verification (6 November 2020) The company has described root cause analysis and corrective action. However, PT ANJA Sia's RaCP status has not yet received					

approval from the RSPO. Therefore, this NC become NC No. 2020.02 (indicator 7.8.12) because there is a change in standards and the non-conformity on this indicator remains OPEN until the next surveillance audit.

Verified by	:	Hasiholan Sihombing/Erika Lucitawati
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3.4.2. Identification of Findings, Corrective Actions and Observations at ASA-1.1

NCR No.	: 2020.01	Issued by	: Hasiholan Sihombing/Erika Lucitawati
Date Issued	: 1 October 2020	Time Limit	: ASA-1.2
NC Grade	: Non Critical	Date of Closing	: 6 November 2020
Standard Ref. & Requirement	: 7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Evidence observed (filled by auditor): Based on the results of document review and field observations, the following evidences are known: <ul style="list-style-type: none">The company has a Non-B3 Waste Management SOP (SOP-EHS-039 dated 1 August 2019) which explains that non-production waste will be collected at the 3R temporary shelter (TPS 3R) or TPS.The results of interviews with 2 residents of the semi-permanent housing G6 Division 9 Lembah Subur Selatan Estate informed that domestic waste was not transported thoroughly.From the results of the auditor's observations in the semi-permanent housing of G6 Division 9 Lembah Subur Selatan Estate, domestic waste is still not managed properly and there are empty houses that are used as garbage storage areas.With regard to waste management, there has been a discrepancy in the previous assessment.			
Non-Conformance Description (filled by auditor): The company has not fully managed domestic waste according to its procedures.			
Root Cause Analysis (filled by organization audited): Lack of employee awareness of the cleanliness of the company's housing environment, the company has provided a trash can in front of each house and the company has accommodated the transportation of non-production waste to TPS 3R or TPS.			
Correction (filled by organization audited): <ol style="list-style-type: none">Cleaning up rubbish in the residential area.Refresh Socialization of housing domestic waste management to employees.Refresh Understanding It is the responsibility of employees to keep their housing environment clean and to reactivate Clean Friday activities.Give direct warning to employees during Apple morning for employees who throw garbage inappropriately. Handover of Housing Facilities to employees (Point 6: Residents have the responsibility to maintain and keep the house intact).			
Corrective Action (filled by organization audited): <ol style="list-style-type: none">Providing understanding to employees to be able to dispose of trash in the trash bin that has been provided by the company which will be transported by the contractor to be sent to TPS 3R or Garbage TPA that has been provided.Conducting Gotong Royong activities on Friday after work (Clean Friday).Provide staff / field officers who are tasked with cleaning and maintaining housing in general as well as monitoring, monitoring and reporting houses that are disorderly in maintaining and maintaining the cleanliness of their houses to the Assistant Division 9.			
Assessor Evaluation and Conclusion (filled by auditor): Auditor Verification (26 Oktober 2020) The company has explained root cause analysis, corrective action and corrective action (prevention), but there are still some questions from the auditors regarding this matter. The company also has not submitted any evidence regarding the corrective action described above. Therefore, the discrepancies in this indicator cannot be declared fulfilled.			
Auditor Conclusion (6 November 2020) The company has determined the root of the problem, corrective and corrective actions to correct the discrepancy, in addition the			

company also shows evidence of corrections and corrective actions in the form of:

- Documentation of cleaning up rubbish and unloading empty houses that are used as garbage storage.
- Training Report related to non hazardous and hazardous waste management for employees on 30 October 2020.
- Report of Contractor Performance for domestic waste transport in Lembah Subur Selatan Estate on September 2020.
- Agreement of House Placement for employee in Lembah Subur Utara Estate and code of conduct for employee in estate housing that states to maintain the hygiene and wholeness of estate housing.
- House handover along with house placement rules and a house placement agreement letter, one of which is that employees are required to keep the house and yard clean as well as gutters / ditches.

Based on the explanation of the root cause analysis, preventive / corrective actions and the evidence that has been shown, it can be concluded that the discrepancies in this indicator can be declared **Fulfilled** and will be re-observed in the next audit.

Verified by : Erika Lucitawati/Hasiholan Sihombing

NCR No.	: 2020.02	Issued by	: Hasiholan Sihombing/Erika Lucitawati
Date Issued	: 1 October 2020	Time Limit	: ASA-1.2
NC Grade	: Critical	Date of Closing	:
Standard Ref. & Requirement	7.12.8 Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCVHCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.		
Evidence observed (filled by auditor): In the ASA-1.1 assessment, the company demonstrated the results of communication with RSPO via email on September 25, 2020 stating that <i>"In view of the current COVID 19 pandemic in Indonesia that is in travel restriction, we agreed to <u>allow the NC to be opened until the next Surveillance</u>. I hope your company will continuously work towards closing the issue to ensure that the certification can be maintained "</i>			
Non-Conformance Description (filled by auditor): Based on this, PT ANJA Sia's RaCP status has not yet received approval from the RSPO but has received approval to continue the surveillance assessment so that this indicator becomes NC Critical with a time limit for improvement until the next surveillance.			
Root Cause Analysis (filled by organization audited) The company has communicated regarding LUCA's progress with RSPO, but it is still not approved by RSPO and is still in the review stage.			
Correction (filled by organization audited): Communicating intensively with RSPO regarding LUCA PT. ANJ Agri Sia's.			
Corrective Action (filled by organization audited): Do not conduct new land clearing prior to identification of HCV areas			
Assessor Evaluation and Conclusion (filled by auditor): Auditor Verification (6 November 2020) The company has described root cause analysis and corrective action. However, PT ANJA Sia's RaCP status has not yet received approval from the RSPO. Therefore, the non-conformity on this indicator remains OPEN until the next surveillance audit.			
Verified by	: Hasiholan Sihombing		

3.4.3. Opportunity for Improvement

No	Ref. Std.	Description
1	2.2.2	Contractor workers are currently being monitored by the company regarding work accident insurance services and compliance with other labor regulations. This is an opportunity for improvement for the company to continue to make progress in ensuring that these contractor workers can comply with the prevailing labor regulations.
2	6.2.4	Ensuring the progress of improving employee housing facilities

3.4.4. Noteworthy Positive Components

No	Description
1	Management commitment to applying the principles of sustainable palm oil management.
2	The company has personal competences related to meeting the sustainable palm oil certification standards.
3	The company has obtained the ISPO certificate.
4	The company no longer uses pesticides with the active ingredient paraquat


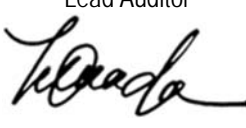
3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
National Land Agency of Tapanuli Selatan District. <ul style="list-style-type: none"> The company has a Plantation Business Permit (IUP) for the Oil Palm Plantation Activity covering an area of 8,000 Ha, which was approved by the Regent of Tapanuli Selatan in 2003. Mandatory reports to agencies have been routinely reported by companies including the Plantation Business Development Report and Firefighting Management Report. In the last one period there were no reports related to disputes and land claims received by the agency. All operational areas of the company already have Land Permit (HGU) and there are no operational areas within the forest area. Communication relations between agencies and companies are fairly well established. 	<p>The company already has a Plantation Business Permit (IUP) for oil palm plantation and processing activities in accordance with applicable laws and regulations.</p> <p>Submission of information on a regular basis to the relevant agencies in the form of mandatory reports has been carried out by the company in accordance with their respective time periods.</p> <p>During the past year there were no information or issues related to land claims / conflicts made by the community to the company.</p>
Labor Agency of Tapanuli Selatan District. <ul style="list-style-type: none"> The company have Company Regulation that has been verified by the agencies. The company has routinely reported mandatory reports to the agency manually in the form of the 2019 Compulsory Labor Report. The minimum wage applied today is the District Minimum Sectoral Wage for Plantations in 2020. The last Labor development carried out by the agency to the company was in 2019 with discussions related to the "BPJS" Program. The company has labor unions which have been registered by the Labor Agency The company has included workers in the "BPJS Kesehatan dan Ketenagakerjaan" program Over the past year there have been no issues related to child labor, discrimination and human rights violations in the company operational area. Communication relations between agencies and companies are fairly well established. 	<p>There is no negative issue related to labor. The management unit has comply with RSPO standard.</p>
Plantation Agency of Tapanuli Selatan District. <ul style="list-style-type: none"> The company has a Plantation Business Permit (IUP) for the Oil Palm Plantation Activity covering an area of 8,000 Ha, which was approved by the Regent of Tapanuli Selatan in 2003. The company has a Plantation Business Permit (IUP) for Palm Oil Mill Processing Activities with a capacity of 60 	<p>The company has implemented minimum wages and other labor regulations in accordance with applicable regulations.</p> <p>Mandatory reports to relevant agencies in accordance with their respective time periods.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Tons of FFB / Hour which was approved by the Regent of Tapanuli Selatan in 2010.</p> <ul style="list-style-type: none"> • Mandatory reports to agencies have been routinely reported by companies including the Plantation Business Development Report, CSR Realization Report, and Firefighting Management Report. • In the last one period there were no reports related to disputes and land claims received by the agency. • The company already has facility and infrastructure for fire fighting. • In the past year, there has never been any information or fire incidents in the company's operational areas. • Communication relations between agencies and companies are fairly well established. 	<p>The entire labour union has been registered in the agencies.</p> <p>Based on the results of interviews and document studies, it is known that to date there have never been violations of human rights, child labor and discrimination in the company operational area.</p>
<p>Environment Agency of Tapanuli Selatan District</p> <ul style="list-style-type: none"> • The company has environmental permit documents such as EIA and Environmental Management/Monitoring Plan. • The company has Waste Water Disposal Permit and will be expired in 2020. • Hazardous Waste Temporary Warehouse Permit is already expired on 2020. • The company has routinely reported mandatory reports in accordance with their respective periods such as the Environmental Management/Monitoring Plan Report, Hazardous Waste Management Report, and Waste Water Management Report. • During the past year there have been no reports or issues related to environmental pollution caused by plantation operations and factories. • Environmental control has been carried out by the agency in September 2019 and for 2020 has not been carried out. • Communication relations between agencies and companies are fairly well established. 	<p>Based on the results of the Law Enforcement Ministry of Environment & Forestry, it was found that the company was not proven to clear new land in the forest area and the allegations related to it had been well clarified by the ministry.</p> <p>The company has documents related to environmental permits required by the government.</p> <p>Reports must be reported regularly by the company to the relevant agencies in accordance with applicable regulations.</p> <p>There were no issues or events related to environmental pollution that occurred in the company's area.</p>
<p>Village representatives of Pardomuan (from sub-village of Paraupan, Binasari, Labalasiak and Janji Matogu including previous land owner)</p> <ul style="list-style-type: none"> - The company absorbs workers from the village. - There is no problems and land tenure conflicts between the company and the surrounding community. - The company has socialized about protected animals and posted a prohibition sign around the plantation area. - Socialization of the prohibition on burning for land clearing has been conducted. - There is no environmental pollution issues from the company to the village area. - Companies routinely provide assistance to villages in the 	<p>In general, there is no negative issues from sub-village of Paraupan, Binasari, Labalasiak and Janji Matogu including previous land owner.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>form of CSR and direct assistance such as repairing village roads and social assistance during the Covid-19 pandemic.</p> <ul style="list-style-type: none"> - There is no problem with the communication between the village and the company and the company always responds to requests from the village. 	
<p>Worker Cooperative ANJA Lestari</p> <ul style="list-style-type: none"> • The company has a policy to support the formation of worker cooperatives to help the welfare of its employees. • The support of the company to the cooperative is to provide venture capital assistance in the beginning of the formation and provision of buildings as cooperative business land. • The ANJA Lestari Worker Cooperative was formed in 2010 and currently there have been three changes in management. At present the number of cooperative members registered is \pm 1,191 workers. • The cooperative operates in the business of Convenience Stores and lending money to its members. • The Annual Member Meeting for the 2019 fiscal year was held in June 2020 which discussed the replacement of one of the management (vice chairman), the financial statements of the past year and the distribution of the Remaining Operations of the Cooperative in 2019. 	<p>The company morally and materially has supported it well to form worker cooperatives. In addition to forming support, the company also always provides support in every cooperative operational activity.</p>
<p>Labor Union (SERBUNDO) of PT ANJA SIAIS</p> <p>Labour Unions have been registered at the Tapanuli Selatan District Labor Agency as a labor union at PT ANJA SIAIS since 2016. The union has been quite active in organizing in the company and up to September 2020 there were 647 workers. At present the basic employment system used by companies is the Company Regulations.</p> <p>Notes:</p> <ul style="list-style-type: none"> • There are work termination that has been going in estate because the absence in working time and the workers cannot accepted that. It's has been dispute between worker and certification unit. • There are one mechanic in mill that has been moving from previous job in oral coomand from management and until now the decree has not showing to workers. • Not all workers has been registered in BPJS Ketenagakerjaan. 	<p>In general, manpower regulation has satisfactory implemented by the unit of certification (wage, overtime, insurance, safety, worker welfare, etc.).</p> <p>For the notes, that has been verified by auditors and can be seen in related indicators above.</p>
<p>CV Winanta CV. Alam Lestari Angkola Selatan</p> <ul style="list-style-type: none"> • The contractor has a copy of the agreement with the company 	

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> • Payments to contractors accordance with the agreement. • Contractor workers have been provided with PPE and already have <i>BPJS</i> • The company has provided socialization regarding the code of ethics and human rights. 	<p>Based on document verification, show that the rights and obligation of each party has been set in the contract.</p>
<p>Gender Committee</p> <ul style="list-style-type: none"> • There is no issue related to sexual harassment, reproductive rights, and discrimination. • Routine activities <i>posyandu</i>, socialization of committee gender. • Women worker give menstruation leave by recommendation paramedic for maximum 2 days. Women workers also has rights of maternity leave for 45 day before and 45 days after. 	<p>There is no negative issue related to women workers. The management unit has comply with RSPO standard.</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 to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Austindo Nusantara Jaya Agri Sia's General Manager</p>  <p>Taupan S. Sibarani Friday, 06 November 2020</p> </div> <div style="text-align: center;"> <p>PT Mutuagung Lestari Lead Auditor</p>  <p>Leonada Friday, 6 November 2020</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	National Land Agency	Tapanuli Selatan Districts	-	Via telephone	29 September 2020	✓	
2	Labor, Transmigration and Social Agency	Tapanuli Selatan Districts	-	Via telephone	29 September 2020	✓	
3	Environmental Agency	Tapanuli Selatan Districts	-	Via telephone	29 September 2020	✓	
4	National Land Agency	Tapanuli Selatan Districts	-	Via telephone	29 September 2020	✓	
5	Village representatives of Pardomuan (from sub-village of Paraupan, Binasari, Labalasiak and Janji Matogu including previous land owner)	Pardomuan Village	-	Interview	29 September 2020	✓	
6	Local Contractors <ul style="list-style-type: none"> PT. Alam Lestari Angkola Selatan PT. Nusantara Jaya Winatama Nawakara 	Pardomuan Village	-	Interview	29 September 2020	✓	
7	Gender Committee	Pardomuan Village	-	Interview	29 September 2020	✓	
8	Labor Union "SERBUNDO"	Pardomuan Village	-	Interview	29 September 2020	✓	
9	1 Weighbridge operator, 1 WTP Officer, 1 Chemical Storage Officer, 1 Maintenance Officer, 1 Hazardous Waste Storage Officer, 1 WWTP Officer, 3 security, 4 sortation workers, 1 sterilizer operator, 1 press operator, 1 kernel operator, 1 engine room operator and 2 boiler operators	ANJA Siais Mill, PT ANJA Siais	-	Interview	29 September 2020	✓	
10	5 TPS 3R Officer, 1 cooperative worker Officer, 1 Logistic Officer, 1 harvester supervisor, 3 harvesters, 3 loose fruit pickers, 1 spraying supervisor, 3 sprayers, 1 manuring supervisor, 3 manurers, 2 road maintenance workers, and 3 contractors workers at composting area.	Lembah Subur Utara Estate, PT ANJA Siais	-	Interview	29 September 2020	✓	
11	1 harvester supervisor, 3 harvesters, 2 residences at housing complex Division 9, 1 manuring supervisor, 2 manurers, 2 census workers.	Lembah Subur Selatan Estate, PT ANJA Siais	-	Interview	30 September 2020	✓	
12	World Wide Fund	-	wwf-indonesia@wwf.or.id	Via email	21 September 2020		✓
13	Wahana Lingkungan Hidup Indonesia	-	informasi@walhi.or.id	Via email	21 September 2020		✓
14	Sawit Watch	-	info@sawitwatch.or.id	Via email	21 September 2020		✓
15	Aliansi Masyarakat Adat Nusantara	-	rumahaman@cbn.net.id	Via email	21 September 2020		✓

Appendix 2. Assessment Program

DATE	28 September – 02 October 2020	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 28 September 2020		
06.20 – 08.30	Jakarta → Sibolga (GA 262)	All Auditor
09.00 - 15.00	Sibolga → Site	All Auditor
15.00 – 16.00	Opening Meeting <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Determine of Field Visit, Transparency and Confidentiality Clarification) 	Management of PT. ANJ Siais All Auditor
16.00 – 17.00	Documents Review <ul style="list-style-type: none"> Review of previous (Initial assessment) findings Verification of Basic Information Mill and Estate Confirmation of Time Bound Plan Review of Partial Certification 	All Auditor
Tuesday, 29 September 2020		
08.00 – 09.00	<ul style="list-style-type: none"> Stakeholder consultation to affected communities surrounding the plantations, indigenous peoples, local communities, smallholders and previous land owners. Public Consultation of Government Agency of Tapanuli Selatan Interview with Gender Committee, Worker's Union, Worker's Cooperative, Local Contractor (for Mill and Estate), and Third Party Supplier 	HHS ELW/LEO YYT/RGR
	Field Observation Lembah Subur Utara Estate <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect 	HHS RGR
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	Field Observation to ANJA Siais POM <ul style="list-style-type: none"> Supply Chain verification (FFB Receiving, Weighbridge) Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect, security post, FFB Sorting, Processing Activity, Despatch CPO) Implementation of Environmental aspect, Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond & land application 	HHS RGR YYT/ELW

Wednesday, 30 September 2020		
08.00 – 12.00	Field Observation Lembah Subur Selatan Estate <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). 	HHS RGR ELW/LEO
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	<ul style="list-style-type: none"> Continue Field Observation and field observation clarification Verification of documents and completing checklist 	All Auditor
Thursday, 01 October 2020		
08.0 – 12.00	Verification of documents and completing checklist	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 16.00	Interim Meeting (closing meeting preparation)	All Auditor
Friday, 02 October 2020		
07.30 – 08.30	Closing Meeting	All Auditor
09.10 – 11.15	Sibolga → Jakarta (GA 263)	All Auditor