

*Roundtable on Sustainable Palm Oil Certification
RSPO*

[✓] Surveillance

Name of Management Organisation : **Berangir Palm Oil Mill – PT PERKEBUNAN NUSANTARA IV**

Plantation Name : Berangir Estate

Location : Village of Perkebunan Berangir, Sub District of NA IX-X, District of Labuhanbatu Utara, Province of Sumatera Utara, Indonesia

Certificate Code : **MUTU-RSPO/118**

Date of Certificate Issue : 20 July 2018

Date of License Issue : 20 February 2021

Date of Certificate Expiry : 19 July 2023

Date of License Expiry : 19 July 2021

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
Remote Audit ASA-2	28 to 29 July 2020	Arif Faisal Simatupang (Lead Auditor), Mohamad Amarullah, Bayu Yogatama, Nurdin Chaeriana (Auditor Trainee)	Muhammad Rinaldi	Ardiansyah
ASA-2	20 to 22 October 2020	Trismadi Nurbayuto (Lead Auditor), Asystasya Aishah Silalahi, Yudhi Yuniarto Tallutondok, Rahmat Abdiansyah (Auditor Trainee)		

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-2	3 February 2021

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Figure 1. Location Map of PT Perkebunan Nusantara IV-Berangir Estate

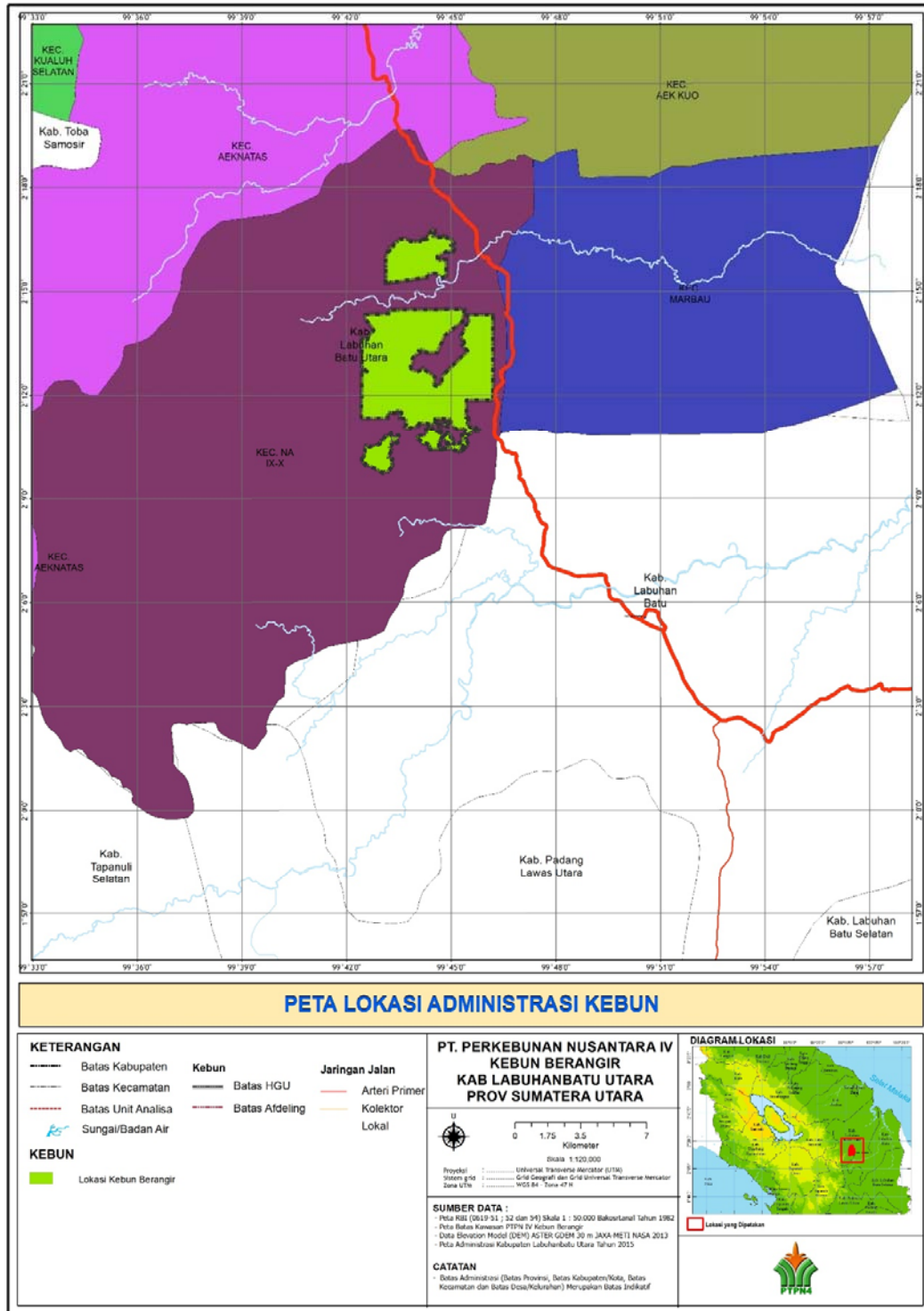
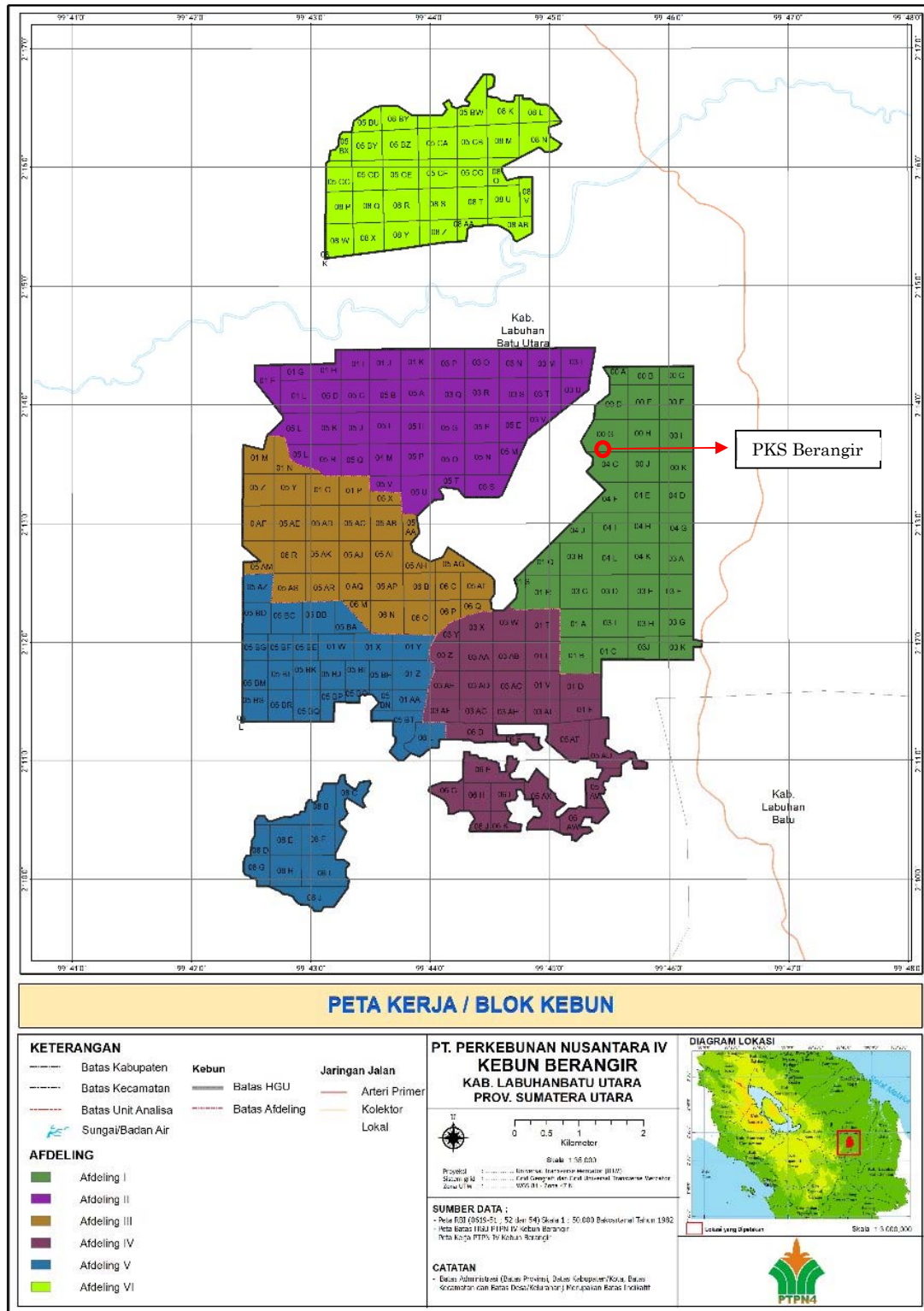


Figure 2. Operational Map of PT Perkebunan Nusantara IV-Berangir Estate



Abbreviations Used

ACOP	:	The Annual Communication of Progress
ASA	:	Annual Surveillance Assessment
BOD	:	Biological Oxygen Demand
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> / Social Security Agency
CB	:	Certification Body
CH	:	Certification Holder
CPO	:	Crude Palm Oil
CLA	:	Collective Labor Agreement
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate Social Responsibility
EFB	:	Empty Fruit Bunch
EIA	:	Environment Impact Assessment
FFB	:	Fresh Fruit Bunch
GHG	:	Greenhouse Gas
HCV	:	High Conservation value
HGU	:	<i>Hak Guna Usaha</i> (Land Use Permit)
IPM	:	Integrated Pest Management
ISPO	:	Indonesian Sustainable Palm Oil
KER	:	Kernel Extraction Rate
LA	:	Land Application
LSU	:	Leaf Sampling Unit
MSDS	:	Material Safety Data Sheet
OER	:	Oil Extraction Rate
OHS	:	Occupational, Health, and Safety
P2K3	:	<i>Panitia Pembina Kesehatan dan Keselamatan Kerja</i> OHS Committee
P & C	:	Principle and Criteria
PDIK	:	<i>Pedoman dasar & instruksi kerja</i> (Guidelines and work instruction)
PK	:	Palm Kernel
PKS	:	<i>Pabrik Kelapa Sawit</i>
PLN	:	<i>Perusahaan Listrik Negara</i>
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPD	:	<i>Petugas Pengendali Dokumen</i> Document control officer
PPE	:	Personal Protective Equipment
PPh	:	<i>Pajak Penghasilan</i> Income Tax
PPN	:	<i>Pajak Pertambahan Nilai</i> / Value-Added Tax
PPKS	:	<i>Pusat Penelitian Kelapa Sawit</i> / Indonesian Oil Palm Research Institute
PTPN	:	<i>Perusahaan Terbatas Perkebunan Nusantara</i>
RKL/RPL	:	<i>Rencana Pengelolaan Lingkungan / Rencana Pemantauan Lingkungan</i>
RSPO	:	Roundtable Sustainable Palm Oil
SCCS	:	Supply Chain Certification Standard
SIA	:	Social Impact Assessment
SIUP	:	<i>Surat Izin Usaha Perdagangan</i> (Business License)
SOP	:	Standard Operational Procedures
SSU	:	Soil Sampling Unit
WTP	:	Water Treatment Plant
WWTP	:	Waste Water 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 Perkebunan Nusantara IV	
1.2.2	Contact person	Dison Girsang	
1.2.3	Organisation address and site address	Head Office registered in RSPO: Jalan Suprpto No. 2 Medan, Sumatera Utara, Indonesia	
1.2.4	Telephone	(62-61) 415 4666	
1.2.5	Fax	(62-61) 457 3117	
1.2.6	E-mail	ptpnusantara4@ptpn4.co.id	
1.2.7	Web page address	www.ptpn4.co.id	
1.2.8	Management Representative who completed the application for certification	Dison Girsang	
1.2.9	Registered as RSPO member	1-0082-09-000-00 29 June 2009	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Berangir Palm Oil Mill and Berangir Estate	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude Longitude
	Berangir	Village of Perkebunan Berangir, Sub District NA IX – X, District Labuhanbatu Utara Province Sumatera Utara	N 02° 13' 29" E 99° 45' 37"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude Longitude
	Berangir Estate	Village of Perkebunan Berangir, Sub District NA IX – X, District Labuhanbatu Utara Province Sumatera Utara	N 02° 13' 20" E 99° 46' 35"
1.5	Description of Area Statement		
1.5.1	Tenure		
	• State	4,583.67 Ha	
	• Community	- Ha	
1.5.2	Area Statement		

	• Total area		4,583.67	Ha			
	• Mature area		4,015.26	Ha			
	• Mill		7.79	Ha			
	• Workshop		0.52	Ha			
	• Storage		2.40	Ha			
	• Housing		69.75	Ha			
	• Effluent pond		7.00	Ha			
	• HCV		208.64	Ha			
	• Mosque and Church		2.25	Ha			
	• Drain and road		267.56	Ha			
	• School building		2.50	Ha			
1.6	Planting Year and Cycles						
1.6.1	Age profile of planting year						
	Planting Year	Hectarage (Ha)					
		Berangir Estate	Total				
	2000	175.71	175.71				
	2001	512.41	512.41				
	2003	732.00	732.00				
	2004	263.50	263.50				
	2005	1,617.35	1,617.35				
	2006	226.57	226.57				
	2008	487.72	487.72				
	TOTAL	4,015.26	4,015.26				
1.6.2	New Planting area after January 2010		-	Ha			
1.6.3	Planting Cycle		2 nd 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 (%)
	Berangir	30	118,171.67	27,095.63	22.93	5,419.81	4.58
	<i>*Production data source from 12 months before assessment (Oct 2019 – Sep 2020)</i>						
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)	%
	Berangir	4,583.67	4,015.26	98,875.14	24.62	98,875.14	100
	TOTAL	4,583.67	4,015.26	98,875.14	24.62	98,875.14	100
	<i>*Production data source from 12 months before assessment (Oct 2019 – Sep 2020)</i>						
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)			
	Ajamu Estate (RSPO Certified)	PTPN IV	-	3,920.00	784.37			
	Meranti Paham Estate (RSPO Certified)		-	4,651.00	14,013.36			
	Air Batu Estate (RSPO Certified)		-	7,418.83	102.43			
	CV Perkasa Aidil Zulkiansyah	Independent supplier	-	-	3,281.67			
	CV Deggan Agrojaya Labuan		-	-	1,304.67			
	TOTAL				19,486.50			
<i>*Source Production Data on 12 months before assessment (Oct 2019 – Sep 2020)</i>								
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 (MT)		Last Year Actual Certified Volume (Oct 2019 – Sep 2020) (MT)			
	FFB Processed		144,110		113,775.30			
	CPO Production		34,285		26,238.99			
	Palm Kernel (PK) Production		6,735		5,211.85			
1.8.2	Product selling							
	Type of selling product		Actual selling product for last year (Oct 2019 – Sep 2020) (MT)					
	CSPO sold as RSPO certified product		4,868.88					
	CSPK sold as RSPO certified product		4,933.00					
	CSPO sold under other scheme		-					
	CSPK sold under other scheme		-					
	CSPO sold as conventional		16,038.03					
	CSPK sold as conventional		-					
1.8.3	Estimate of Certified FFB Claim							
	Name of Estate	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)			
	Berangir	4,583.67	4,015.26	103,800	25.85			
	TOTAL	4,583.67	4,015.26	103,800	25.85			
<i>*Projected FFB production for 12 months of certificate</i>								
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 (%)	
	Berangir	30	103,800	24,900	24	5,200	5	MB
<i>*Projected CSPO and CSPK production for 12 months of certificate</i>								
1.9	Other Certifications							
	Others							

1.10	Time Bound Plan				
1.10.1	Time Bound Plan for Other Management Units				
Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status
MILL	Time Bound Plan				
Pabatu	2015	Pabatu	2015	Serdang Bedagai, Sumatera Utara	Certified
Dolok Ilir	2015	Dolok Ilir	2015	Simalungun, Sumatera Utara	Certified
		Laras	2018	Simalungun, Sumatera Utara	Certified
Pulu Raja	2015	Pulu Raja	2015	Asahan, Sumatera Utara	Certified
Adolina	2018	Adolina	2018	Serdang Bedagai dan Deli Serdang, Sumatera Utara	Certified
Bah Jambi	2018	Bah Jambi	2018	Simalungun, Sumatera Utara	Certified
		Marihat	2018	Simalungun, Sumatera Utara	Certified
		Bah Birung Ulu	2021	Simalungun, Sumatera Utara	Stage-1 Audit
		Marjandi	2019	Simalungun, Sumatera Utara	Certified
		Marjandi HGU on process (30 Ha)	2021	Simalungun, Sumatera Utara	-
Dolok Sinumbah	2018	Dolok Sinumbah	2018	Simalungun, Sumatera Utara	Certified
		Dolok Sinumbah HGU on progress (35.94 Ha)	2021	Simalungun, Sumatera Utara	-
		Balimbangan	2018	Simalungun, Sumatera Utara	Certified
Mayang	2021	Mayang	2019	Simalungun, Sumatera Utara	Certified
		Bukit Lima	2021	Simalungun, Sumatera Utara	-
Gunung Bayu	2019	Gunung Bayu	2019	Simalungun, Sumatera Utara	Certified
		Tanah Itam Ulu	2019	Simalungun, Sumatera Utara	Certified
Tinjowan	2019	Tinjowan	2019	Simalungun, Sumatera Utara	Certified
		Aek Nauli	2019	Simalungun, Sumatera Utara	Certified
		Padang Matinggi	2019	Simalungun, Sumatera Utara	Certified
Air Batu	2018	Air Batu	2019	Asahan, Sumatera Utara	Certified
		Air Batu HGU on progress (459.02 Ha)	2021	Asahan, Sumatera Utara	-
Berangir	2018	Berangir	2018	Labuhanbatu Utara, Sumatera Utara	Certified
		Berangir HGU on progress (10 Ha)	2021	Labuhanbatu Utara, Sumatera Utara	-
Sawit Langkat	2018	Sawit Langkat	2018	Langkat, Sumatera Utara	Certified
		Sawit Langkat HGU on progress (301.50 Ha)	2021	Langkat, Sumatera Utara	-
Pasir Mandoge	2020	Pasir Mandoge	2020	Asahan, Sumatera Utara	Certified
		Sei Kopas	2020	Asahan, Sumatera Utara	Certified
		Tonduhan	2020	Simalungun, Sumatera Utara	Certified
		Sei Kopas HGU on progress (763 Ha)	2021	Asahan, Sumatera Utara	-
Timur	2021	Timur	2021	Mandailing Natal, Sumatera	-

				Utara	
		Balap	2021	Mandailing Natal, Sumatera Utara	-
Ajamu	2021	Ajamu	2019	Labuhanbatu Utara, Sumatera Utara	Certified
		Meranti Paham	2019	Labuhanbatu Utara, Sumatera Utara	Certified
		Panai Jaya	2021	Labuhanbatu Utara, Sumatera Utara	-
Sosa	2021	Sosa	2021	Padang Lawas, Sumatera Utara	-
PT Agro Sinergi Nusantara		PT Agro Sinergi Nusantara	2021	Aceh Barat, Aceh	-
PT Sinergi Perkebunan Nusantara		PT Sinergi Perkebunan Nusantara	2021	Morowali Utara, Sulawesi	-
<i>Last update on June 2020</i>					
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard				
	The company has no agreement with any associated smallholders and associated out-growers.				

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
Remote Audit ASA-2	<ol style="list-style-type: none"> 1. Arif Faisal Simatupang (Lead Auditor) Bachelor of Agriculture, from Department of Agriculture Agronomy, Faculty of Agriculture, University of Gadjah Mada. He has successfully completed an RSPO endorsed P&C Lead Auditor Training, RSPO SCCS endorsed Lead Auditor Training, Indonesian Sustainable Palm Oil (ISPO) Lead Auditor Training, Management System Certification ISO 9001-2008 Lead Auditor Training, Environmental Management System ISO 14001 Lead Auditor Training, ISO 17021 and ISO 17065 Awareness Training, Management of High Conservation Value (HCV) Training, Social Accountability SA 8000 Training. He has four years of working experience as a Field Assistant on oil palm plantation company in Indonesia. Since 2014, he works as an auditor of RSPO and ISPO in the aspects of legal, social, best management practices of mill and estate, OHS, employment, and environmental. In this audit, he was assessing the aspects of best management practices of agronomy and processing. During this assessment he verified environment, conservation and GHG aspect and supply chain aspect. 2. Mohamad Amarullah (Auditor). Indonesian Citizen. Master of Wood Science and Technology from Universiti Putra Malaysia and Bachelor of Forestry with major in Forest Product Technology from IPB University. Has experiences as Agronomist and Research Assistant in Indonesia and Malaysia from 2008 to 2014. Has attended several trainings such as Lead Auditor of ISPO, RSPO, RSPO Supply Chain, ISO 17021, ISO 17065, ISO 9001, ISO 19001, ISO 14001, SA 8000, HCV, etc. Has conducting RSPO, MSPO and ISPO audit scheme since 2014 on any aspect, as auditor or lead auditor. Fluent in Malay and English. During this audit has verify safety and manpower aspect. 3. Bayu Yogatama (Auditor) Bachelor of Forestry, Department of Forest Resources Conservation and Ecotourism, Bogor Agricultural University. Has attended the ISO 9001: 2015 Quality Auditor / Lead Auditor Course Quality Management System (QMS) course and ISO 19011: 2011 Guidelines for Auditing Management System, ISPO Lead Training, SA 8000, RSPO Lead Training, IHT RSPO NPP, IHT RSPO RaCP, IHT ISO 17021, and IHT ISO 17065. Having experience working in plywood field as Inspector in foreign private company. Currently working for an independent certification body. During this assessment has verified environment, conservation and GHG aspect. During this assessment has verified BMP, long term management plan and transparency aspect. 4. Nurdin Chaeriana (Auditor Trainee). Associate Expert in Forest Management, Faculty of Forestry, has 5 years working experience in Industrial Plantation Forest Companies as Environment, Health and Safety Staff and worked for 5 years in plantations as Assistant Manager of Sustainability. Training attended was ISPO Lead Auditor, General OHS Expert, Hazardous and Toxic Waste Material Management Technical Guidance, Fundamentals of Forest and Land Fire Control, Training of Trainer Fire Fighting Course, Basic Fire Fighting Course, Fire Management, Fire Fighting Technique Prevention & Control, ISO 14001:2004 Internal Auditor, awareness of the RSPO Certification System and the RSPO P&C.
ASA-2	<ol style="list-style-type: none"> 1. Trismadi Nurbayuto (Lead Auditor). Indonesian Citizen. Diploma of Forest Management, Forestry Faculty; and Bachelor of Economy, Major of Agribusiness, Faculty of Economic and Management. He has experienced as field assistant on oil palm plantation year of 2008. Therefore, he has experienced as HCV and SEIA Assessor on 2010-2013. He has been followed HCV identification and management training; ISO training (9001;14001; 22000); ISPO Lead Auditor's training; Safety Expert; RSPO Lead Auditor's; OHS Auditors by Government Regulation No 50 year of 2012; RSPO Next, and SA 8000. He has been conducted audit on ISPO and RSPO scheme since year of 2013 as an Auditor on several aspect as environment, OHS, Legality, Best Management Practices, Social, Worker Welfare, Conflict Resolutions, Long term Business Plan and Supply Chain on Palm Oil Mill. In this audit activity performs the assessment of the social, transparency, best management practice, long-term business plan, 2. Asystasya Aishah Silalahi (Auditor). Indonesia Citizen, Bachelor of Economy, Major of Agribusiness, Faculty of Economic and Management. She has one year experience in consultancy. She has followed training such as ISPO Auditor Training, Lead Auditor ISO 9001:2015, OHS General Expert, RSPO lead auditor training course, SCCS, and several in house training related to environmental, BMP, SA 8000, etc. Has been involved in several audit activities since 2016 related to sustainable palm oil certification covering waste management aspect, Social Aspect, Health and Safety Aspect, and Worker Welfare. During this audit, she verify Legality aspects and SCCS. 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),

	<p>Lead Auditor of Roundtable on Sustainable Palm Oil (RSPO) P&C, Lead Auditor of ISO 9001:2015, Lead Auditor of 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. In this audit activity performs worker welfare environmental and OHS.</p> <p>4. Rahmat Abdiansyah (Trainee). Indonesian citizen, Bachelor of Forestry from the Department of Forest Resources Conservation and Ecotourism, Bogor Agricultural University. Has experience working in the Indonesian Palm Oil Farmers Organization and Indonesian private oil palm plantation companies. Participate in ISPO and RSPO Internal Auditor training in 2018, ISPO and P&C Certification Systems IHT in 2019, IHT ISO 19011, ISPO Auditor Training in 2020, ISO 14001 and ISO 9001 Lead Auditor Training in 2020, and Lead Auditor of Roundtable on Sustainable Palm Oil (RSPO) P&C. During this audit it was conducted as a Trainee under supervised by Lead Auditor to verify environmental, conservation, GHG, waste management and.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
Remote Audit ASA-2	<p>Number of auditors: 3 auditors & 1 auditor trainee Number of days for Remote ASA 2 at site: 2 days Number of working days for Remote ASA 2 at site: 6 Working days.</p>
ASA-2	<p>Number of auditors : 3 auditors & 1 auditor trainee Number of days for ASA-2 at site : 3 days Number of working days for ASA-2 at site : 9 Working days</p>
2.2.2	Assessment Process
Remote Audit ASA-2	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT PN IV Berangir POM to 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.</p> <p>For this section (Remote Audit ASA-2) The assessment was conducted in One method: document review, aiming to observe the sufficiency of types or substances from required documents. Some opportunities for improvement of the results ASA-1 Remote Audit by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase ASA-2 Onsite Audit. Improvement of findings from resertification findings were observed by auditors at this Recertification assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of Recertification.</p> <p>The opening meeting was held on Tuesday 28 July 2020 at 08 am through a teleconference (zoom meeting). As for the participants who attended the opening meeting included the Berangir POM Manager, Berangir Estate Manager, Supported Team from Medan Office and other staff at PTPN IV Unit Berangir. While the closing meeting will take place on Thursday 29 July 2020 at 16 pm. attended by the same participants as the opening meeting.</p> <p>The assessment program please find Appendix 2</p>
ASA-2	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Perkebunan Nusantara IV to 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.</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) <i>interview</i>, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p> <p>Public Stakeholder Notification was made on Mutu International Website. There is no written negative feedback receive.</p>

	<p>Stakeholder consultation involved internal and external stakeholders. Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings. The comments made by external stakeholders were also taken into account in the assessment</p> <p>Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal meetings at their housing. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix 1.</p> <p>During the COVID-19 pandemic, there were several modifications to the audit due to health protocols. There are several activities that are not possible to do face to face, such as public consultations with government agencies, communities or previous land owners so that these activities are carried out by telephone.</p> <p>Commonly, the audit activities went smoothly with good support from the unit management. The presentation of documents is presented quite well by involving related personnel.</p> <p>Some opportunities for improvement of the results ASA-2 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (ASA-3).</p> <p>Improvement of findings from ASA 1 and remote audit ASA-2 findings were observed by auditors at this ASA-2 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-2.</p> <p>The assessment program please find Appendix 2</p>
<p>2.2.3</p>	<p>Locations of Assessment</p>
<p>ASA-2</p>	<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>Berangir POM</p> <ol style="list-style-type: none"> 1. Chemical Warehouse. Observation of chemical warehouse facilities and OHS facilities 2. Workshop. Observation and interviews of officers related to OHS and procedure 3. Water Treatment Plan. Observation of water management in Mill both for processing and domestic activities 4. Mill Drainage. Observations mill effluent lines, sanitation mill and flow of leaching mill 5. Diesel Tank. Observation and interviews of officers related to OHS and procedures 6. Empty Bunch Press Station. observation and interviews of officers related to OHS and procedures 7. Hazardous & Toxic Waste Warehouse. Observation and interviews of officers related to OHS and procedures 8. WWTP. Observation and Interview operator related WWTP ponds and flowmeter condition. 9. Land Application Block 04D and 04E Observation and Interview related POME Management, PPE and working hours 10. Pump Room. Observation and Interview related water use and flowmeter condition. 11. Housing Complex. Observation about house condition and interview with residents about other facilities for worker, domestic waste management. 12. Grading Station. Observation and interview with 4 personel on their understanding towards technical, OHS, License, Labor and environment asects, as well as facilities provided by the company. 13. 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. 14. 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. 15. 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.
16. **Empty Bunch Station.** Observation and interview with 1 Operators on their understanding towards technical, OHS, Labor and environment aspects, as well as facilities provided by the company.
 17. **Hydrant.** Observation related to simulation of emergency procedure.
 18. **Kernel station.** Observation and interview with 1 Operators on their understanding towards technical, OHS, Labor and environment aspects, as well as facilities provided by the company.
 19. **Security post (2 securities).** Interview with security about worker welfare, OHS implementation, emergency situation, worker training, FFB supplier, and complaint mechanism.
 20. **Weigh bridge (1 worker).** Interview with worker about worker welfare, OHS implementation, emergency situation, worker training, SSCS aspect, and complaint mechanism.
 21. **Dispatch station (1 worker).** Interview with worker about worker welfare, OHS implementation, emergency situation, worker training, SSCS aspect, and complaint mechanism

Berangir Estate

1. **Global Telling. Block 042, Division I.** Observation and interviews of officers related to OHS and procedures.
2. **EFB application. Block 03H, Division I.** Observation and interviews of officers related to OHS and procedures.
3. **Chemical Application. Block 03S, Division II.** Observation and interviews of officers related to OHS and procedures
4. **Ganoderma Census.** Block 05B, Division II. Observation and interviews of officers related to OHS and procedures.
5. **Land Fill. Block 05P, Division II and Block 05 X.** Observation regarding management of domestic waste
6. **Rinse House.** Observations regarding sanitary facilities for pesticide applicators
7. **HGU stakes No. 6, 100 and 131 block 05 AG and 05 AM.** Observation on boundaries poles, coordinates, maintenance, and demarcation.
8. **HCV Area of Bukit Jagat Block 05 AF.** Observation of HCV management.
9. **HCV of Aek Pandan River Block 05 AH.** Observation of HCV management
10. **HCV of Batu Mamak River Block 05 CG.** Observation of HCV management
11. **Harvesting at Block 08AB Division 6.** 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.
12. **Manual Weeding at Block 08C Division 5.** 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.
13. **Central Housing Complex.** Observation related to employee facilities, management of domestic waste, emergency response facilities, provision of clean water and electricity.
14. **Housing complex of Afdeling IV.** Observation and interview workers facility, employment and domestic waste management.
15. **Clinic.** Interview with paramedic about infectious waste management, clinic service, frequently work accident, worker welfare.
16. **Rinse house.** Observation about rinse house condition, PPE of spraying worker storage, and waste management.
17. **Premix area.** Observation about the location of premix area, trap condition, and waste management.

Stakeholder consultation with relevant agencies

- Environmental Agency of Labuhanbatu Utara Regency
- Local contractor of FFB Transporting.
- Plantation Agency of Labuhanbatu Utara Regency
- Land National Agency of Labuhanbatu Regency

Surrounding Villages

- **Pasang Lela Village.** Interview land issues, environment, social etc.
- **Perkebunan Berangir Village.** Interview land issues, environment, social etc.

	<ul style="list-style-type: none"> • Simpang Merbau Village. Interview land issues, environment, social etc.
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-2	<p>Summary of stakeholder consultation process Consultation of stakeholders for PTPN IV-Berangir POM was held by:</p> <ul style="list-style-type: none"> • Public Notification on Mutuagung website on 5 October 2020 • Public consultation meeting with government institution (Manpower Agency, Environment Agency, Plantation Agency in Labuhanbatu Utara on 20 October 2020) • Public consultation meeting with communities on 20 October 2020 • Public consultation meeting with internal stakeholders (worker union and gender committee) and contractor on 20 October 2020 • Public consultation by email with NGO (AMAN, Sawit Watch, and Walhi) on 14 October 2020 <p>Numbers of input from stakeholders were clarified by PTPN IV-Berangir POM</p>
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
	The next visit (ASA-3) will be conducted eight (8) month to twelve (12) month after date of annual license.

3.0 ASSESSMENT FINDINGS
3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Berangir POM – PT Perkebunan Nusantara IV. Operation consisting of one (1) mill and one (1) oil palm estates.

During the assessment, there were nine (9) Nonconformities were assigned against Major Compliance Indicators and six (6) Nonconformities against minor compliance indicators and seven (7) opportunities for improvement were identified.

Further explanation of the non-conformity raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective action that had been reviewed and accepted by Auditors in form of documentation evidence) e.g. (*document record/photographic/etc.*). Those corrective actions taken that consist of nine (9) Major non-conformities and four (4) minor non-conformities had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that Berangir POM – PTPN IV 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 During onsite audit activity sighted that the unit of certification is able to shows several public-available documents as follows: <ul style="list-style-type: none"> - Report on Management of Hazardous and Toxic Material Waste, Solid Waste and Liquid Waste of Quarter III of 2019 to the Labuhanbatu Utara Regency Environmental Service dated December 10, 2019 (number: BER / X / SPS / XII / 2019) - Report on Management of Hazardous and Toxic Material Waste, Solid Waste and Liquid Waste of Quarter IV of 2019 to the Labuhanbatu Utara Regency Environmental Service dated February 24, 2020 (number: BER / X / SPS 02 / XII / 2019). - Report on Management of Hazardous and Toxic Waste, Solid Waste and Liquid Waste of the First Quarter of 2020 to the Labuhanbatu Utara Regency Environmental Office on June 11, 2020 (number: BER / X / SPS / VI / 2019) - Report on Management of Hazardous and Toxic Material, Solid Waste and Liquid Waste of the Second Quarter of 2020 to the Labuhanbatu Utara Regency Environmental Agency on July 8, 2020 (number: BER / X / SPS / VII / 2019) - Report on Environmental Management and Monitoring Plan (RKL-RPL) for Semester II 2019 to the Environmental Agency of LabuhanBatu Utara Regency on April 5, 2020 (Number: BER / X / SPS03 / IV / 2020 - Report on Environmental Management and Monitoring Plan (RKL-RPL) for Semester 1 2020 to the Environmental Agency of LabuhanBatu Utara Regency on September 9, 2020. - Flora Fauna Monitoring Report semester I 2020 to the North Sumatra Province Natural Resources Conservation Center on July 9, 2020 (number: BER / X / VII / 2020) - Fire fighting preparedness report for Semester I 2020 to the Agriculture Agency of Labuhanbatu Utara Regency dated 22 June 2020 (Number: BER/VI/SPS/68/VI/2020). - Annual Compulsory Manpower Report (or WLKP) for period 2020 had delivered online as shows through document of 	

Delivery Report Number 21454.20200811.0001 dated 11 August 2020.

- OHS report of third quarter of 2020 to the Manpower Agency of Labuhanbatu Utara dated 22 October 2020 (number: BER/X/SPS.196/X/2020).

There are correction evidences for remote audit nonconformity with number 2020.01, such as:

- Estate Manager letter number BER/MP/Kpts/02/IX?2020 dated 23 September 2020 about: PIC to monitor the compulsory report to the four workers.
- List of compulsory report dated 25 September 2020, there are 13 routinely reports.

However, during the onsite audit there are several compulsory reports that had not been submitted, such as:

- Report on Management of Hazardous and Toxic Material Waste, Solid Waste and Liquid Waste of of third quarterly 2020.
- Temporary workers report to the Manpower Agency.

The unit of certification has no been able to show evidence that all reports are publicly available. **It was raised as nonconformance number 2020.01 with Major category.**

1.1.2 & 1.1.3

The unit of certification has a SOP for the period of time of information request and response with number SPO 06, revision on 1 August 2017. The procedure describes the mechanism for responding to request for information from stakeholders. The maximum period of time for responding information request is 30 working days. The PIC of communication and consultation with the community is Human Resources and General Assistant as stated in the SOP communication and consultation number SPO 03 dated January 2, 2017. Based on document verification sighted that there were no request information from stakeholders during last year. Therefore based on interview with the surrounding village and relevant agencies sighted that there are knowing about information request procedure.

The company shows a list of internal and external communication recapitulation of PTPN IV- Unit Berangir which explains the date of receipt of the letter, the applicant / sender, the communication media, the subject / problem, the follow-up, and the status. As for an example of a request for information from stakeholders, namely a letter from the Regent of Labuhanbatu Utara on February 24, 2020 No 4154/509 / Pembangunan / 2020 received by the management unit on March 12, 2020 regarding the company's CSR realization data request. The management unit has responded to requests for information by sending data on CSR realization in the form of a 2019 PTPN IV Unit Berangir CSR implementation report on March 18, 2020, addressed to the Regent's office with No: Ber / X / SPS-49 / III / 2020.

1.1.4

The unit of certification has SPO communication and consultation with the community No. SPO 03 No. Revision 03 Effective date January 2, 2017. The SOP describes the communication mechanism with the community which is carried out in the plantation unit, district and head office. The SOP also appointed HR and General assistants to be in charge of communication and consultation with the community.

The unit of certification shows documentation / socialization minutes related to the Communication and Consultation mechanism in PTPN Unit Berangir. Some of the activities that have been carried out include:

- Outreach to members of the Labuhanbatu Utara Regency DPRD, Vendors and SP-Bun on August 5, 2020 attended by 40 participants.
- Outreach to members of village community leaders, journalists and NGOs on 6 August 2020 attended by 16 participants.

1.1.5

The company shows an updated list of company stakeholders on July 1, 2020. The document details the stakeholders who are frequently associated with the company, contact persons, positions, and telephone numbers that can be contacted, consisting of national agencies (4 agencies), provinces (3 agencies), districts. (11 agencies), sub-districts (13 agencies), internal (5 agencies), partners (7 agencies), and journalists, NGOs, OKP (Youth Organization) (5 agencies).

1.1.1.	Status: NCR No 2020.1 with Major/Critical Category	
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1.2

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

1.2.1

The company has a code of conduct that was signed by the Commissioner and the President Director in November 2013. The code of conduct regulates the code of conduct with respect to conflicts of interest, KKN and bribery, political activities, drugs and gambling, business meals, gifts, souvenirs, donations, and despicable acts which are prohibitions for company business actors. Companies can show proof of socialization of the Ethical Behavior Policy (COC) to relevant stakeholders which was carried out on January 25, 2019 which was attended by 18 participants, for 2020 the company has not been able to show the latest documentation. To ensure that every stakeholder currently understands the ethical behavior policy, this will be ensured during the onsite audit activity.

1.2.2

Based on interviews with management, the method used to monitor compliance and the implementation of aesthetic business practice policies was carried out by means of an Internal audit (Internal Audit Unit). The management unit shows the SPI audit documents that were last carried out in September 2019. Some examples of audits conducted on business partners are as follows a warning letter based on the results of an internal audit to CV Gas regarding the transportation of FFB that exceeds the maximum limit and is not equipped with a safety net.

Especially for recruitment agents and labor suppliers, they are not available at PTPN Unit Berangir. Employee recruitment is carried out based on open recruitment without going through distributor services, either for staff or employees. To ensure this, further verification will be carried out in the field.

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 complied with environmental regulations, this has been proven by having permits related to the environment such as:

- The company already has an Environmental Impact Assessment (AMDAL) document.
- The company already has an environmental permit from the One-Stop Integrated Investment and Licensing Service Office, Labuhanbatu Utara Regency with No: 503/05 / DPM-PPTSP / II / 2019 dated February 27, 2019 for plantations and Mill with an area of approximately 4,775 Ha.
- The company has obtained a permit for Temporary Storage of Hazardous and Toxic Waste based on the Decree of the Labuhanbatu Utara Regent number 660 / 227.A / DLH / 2017 dated May 24, 2017 and is valid for 5 years.
- The company already has a Palm Oil Mill Effluent Utilization Permit to Land (Land Application) to PT Perkebunan Nusantara IV Berangir B Unit based on Labuhanbatu Utara District Decree number 660/68 / DLH / 2017 dated 17 February 2017 and is valid for 5 years.

2.1.2

The company has an evaluation to ensure legal compliance in the Compliance Evaluation Report document against Laws, Regulations, and Other Requirements Related to the Implementation of RSPO / ISPO. The evaluation applies to the legal compliance of PTPN IV Berangir. The latest update was on 14 September 2020

The company also shows evaluations for contracted third parties. Matters that become the criteria for the assessment include standard work quality, work completion, and payment to casual workers. However, the company does not yet have a list and proof of legal compliance by the contracted third parties.

Related to this, the company has not been able to demonstrate a system to ensure legal compliance, including by all contracted third parties. This becomes a **nonconformity No. 2020.02 with noncritical category.**

2.1.3

Based on field observation to HGU stakes No. 10, 131, and 6, it is known that HGU stakes are available and well

maintained. The position of HGU stakes also in accordance with HGU stakes map from Land National Agency. It is known that there is no indication of oil palm planting outside the land use rights area.

2.1.2. Status: NCR No 2020.2 with minor/non-critical category

2.2 All contractors providing operational service and supplying labour, and Fresh Fruit Bunch (FFB), comply with relevant legal requirements.

2.2.1.

According to document of contractor data for period 2020, it was informed there were 4 contractors of FFB transportation and 1 goods supplier. List of contractor has informed name of company, address, Director/Owner or contact person and its mobile number and type of activities provided by contractor. Unit of certification informed that FFB supplier were from other unit of PTPN 4, i.e. Meranti Paham Estate, Ajamu Estate and Panai Jaya Estate.

Unit of certification has mechanism of contractor selection that presented in document of "*Dokumen Pengadaan Rencana Kerja Dan Syarat Syarat Klasifikasi Pekerja*". For example, as shows through document No. 04.14/RKS-TAN/1103/XII/2019 dated 05 December 2019 for FFB Transportation Works fin the 1st Quarter 2020, it was mentioned in Point 2.2.3.1 and 2.2.3.2 about tax payment, permit, Manpower Insurance Scheme (*BPJS*), PPE, anti discrimination, child labour and forced labour, etc. those who fulfillthe requirement will be selected as partner and continue with work agreement.

2.2.2

Unit of certification has mechanism of contractor selection that presented in document of "*Dokumen Pengadaan Rencana Kerja Dan Syarat Syarat Klasifikasi Pekerja*". For example, as shows through document No. 04.14/RKS-TAN/1103/XII/2019 dated 05 December 2019 for FFB Transportation Works fin the 1st Quarter 2020, it was mentioned in Point 2.2.3.1 and 2.2.3.2 about tax payment, permit, Manpower Insurance Scheme (*BPJS*), PPE, anti discrimination, child labour and forced labour, etc. Those who fulfill the requirement will be selected as partner and continue with work agreement.

As review of work agreement with contractor, for example through Agreement Letter with contractor of FFB Transporter namely CV GAS No. GMD-IV/BER/Angkut TBS Afd-V/14/XII/201930 dated 30 December 2019, it was known that clause of applicable laws/regulation pursuance is presented in Article 11 Point 3. Furthermore Point 6 has mentioned that the contractor is willing to be audited by the RSPO Certification Body when necessary.

Based on document review of FFB loading worker attendance list of Afdeling I in September 2020 and the recapitulation of premium payment for FFB loading worker it is known that there were 10 FFB loading worker from CV Gas who worked in Afdeling I Berangir. Based on the loader's premium recap in September 2020, it is known that only 4 out of 10 workers have received wages in accordance with the 2020 minimum wage of North Sumatra province.

Based on this explanation, it is known that the contractor has not been able to show evidence that it has fulfilled the relevant legal obligations, for example regarding the fulfilment of wages according to the minimum wage. **This becomes nonconformity No 2020. 3 with noncritical category.**

2.2.3

As mentioned in Indicator 2.2.1 and 2.2.2, it was known that unit of certification has mechanism of contractor selection which includes requirement towards manpower and safety as consideration points. The respective points has also included on company policy No. 03 (Rev. 02) dated 02 January 2015 which had socialized to stakeholders on 22 February 2019.

2.2.2. Status: NCR No 2020.3 with minor/non-critical category

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

2.3.1

The Mill receive FFB directly from other Estate under PTPN IV, that are Ajamu Estate, Meranti Paham Estate, Air Batu Estate, and Panai Jaya Estate. The company has had the detail of address, geo coordinate, land title status and plantation permit status, as well as the unit that already has RSPO certificate and not.

2.3.2

The company received FFB from a third party who is the agent (collection center), namely CV Perkasa Aidil Zulkiansyah and CV Deggan Agrojaya Labuan.

The company shows a valid operating / trading license for PT Deggan Agro Jaya Labuan, among others, as follows.

- Company Registration Certificate issued by the One-Stop Integrated Licensing Agency of the Labuhanbatu Selatan Regency on February 26, 2018 which is valid until February 26, 2023.
- SIUP number 503/0070 / DPMPTSP-LS / SIUP / II / 2018 dated 26 February 2018.

The company also shows a valid operating / trading license for PT Perkasa Aidil Zukiansyah, among others, as follows

- Company Registration Certificate issued by the One-Stop Integrated Licensing Agency of Labuhanbatu Utara Regency dated 11 October 2017 which is valid until 13 October 2022
- SIUP number 503/151 / DPMPTSP-LS / SIUP / 2017 dated 11 October 2017

The company has the opportunity to complete information regarding geolocation and proof of land ownership status by farmers who supply FFB through PT Deggan Agrojaya Labuan and Perkasa Aidil Zukiansyah. (OFI)

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 company has documents on the long-term plan contained in the *Rencana Jangka Panjang* PT Perkebunan Nusantara IV Unit Berangir period 2020 - 2024 that explain about business plan and operational management which includes: area statement, projections for production, CPO, PK, Revenue CPO and PK, cost estates, mill costs, profit and loss, and net profit and loss. Annual planning also evaluated at the end of year and compared with realization. It annual planning can be adjusted based on field condition, financial condition or another reason. Based on information from representative management (estate manager), the long-term plan has been planned well with top management (company directors) and sufficient or feasible as a management plan for achieving the long term economic and financial.

3.1.2

Until now, PT Perkebunan Nusantara IV Berangir Estate does not have a detailed replanting plan because the oldest planting year was in 2000 (19 years old plant). Plans for replanting will be carried out after the age of the plant enters 1 cycle of oil palm plants (the fastest is done in 2025).

3.1.3

The management unit shows several documentation of management review activities contained in several documents such as the SPI (Internal Supervisory Unit) audit and RSPO Internal audit. The last SPI audit activity was carried out in September 2019 while the last RSPO audit activity was carried out in January 2020. From the results of the audit that has been carried out by the management unit, it has conducted periodic reviews, the last periodic review was carried out on March 19, 2020. In addition to internal audits and Operational audits of the management unit carry out additional activities for contractors and suppliers that are included in the 2020 Berangir Unit partner evaluation report. The partner audit activity aims to ensure that every contractor and supplier is willing and implements standards in accordance with the RSPO Principles. The management review of RSPO audit result was carried out on 3 February 2020 including the follow up of internal audit results (preventive actions), there are no feedback from CPO & PK buyers and also there are no changes of management 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.

Unit of certification shows annual management review minutes of meeting dated 17 January 2020 which resulted program of socialization that will be carried out in 2020, subjected to BMP on the estate and mill, OHS implementation, social and

manpower, environment and HCV matters. List of attendance and picture of meeting situation is presented in document Form No FPM-MR-08-01 (Rev. 0). Furthermore, detail of management review towards safety matters is presented document Form of No. FM-4.3.1-01 (Rev. 0) about OHS Minutes of Meeting and Form No. FM-4.3.1-02 (Rev. 0) about attendance evidence. Sighted OHS minutes of meeting and attendance evidence dated 09 March 2020, 06 February 2020 and 08 January 2020. Follow up progress and notes are available and presented in the quarter P2K3 report

3.2.2.

There are ACOP for period of 2019 on behalf PTPN IV can accessed on the RSPO website.

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1. & 3.3.2.

The company has had procedures related to agronomy and processing. The agronomy procedures consist of nursery, land preparation, planting, planting legume cover crop, manual upkeep and chemical upkeep, soil and water conservation, manuring, pest and disease control, harvesting and FFB transportation. Procedures related to processing consist of FFB receiving, processing stations, to dispatch, laboratory and maintenance, as well as waste management. These procedures have been relevant and have covered all the operational aspects of existing plantations and factories. That SOP's is available on audit site (Estate and Mill office) and written in a language that is easily understandable for workers (written in Bahasa). The entire procedure both of plantation and mill has been included of safe working instruction, other than those described in the HIRAC document. The mechanism to check consistency of procedure implementation by annual internal audit and monthly review by Estate & Mill Manager.

3.3.3

The company has conducted annually internal monitoring to ensure implementation of procedures. The monitoring conducted through annually operational internal audit by internal audit department and RSPO internal audit by sustainability department. The records of internal audit on January 2020 has been documented. Noncompliance records of internal audit has been corrected and verified by management. 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 and 3.4.2

Until the ASA 2 assessment was carried out, the company had not carried out any new plantings. PT Perkebunan Nusantara IV Berangir Unit has environmental documents in the form of Environmental Management and Monitoring Plan (RKL-RPL) for PTPN IV Berangir Unit on January 24, 2005 which was approved by the Head of Bapedalda Province of North Sumatra No. SK 137 / BPD.L.SU / BTL / 2005. The company also has an Environmental Permit from the One Stop Investment Service and Licensing Office of North Labuhanbatu Regency with No: 503/05 / DPM-PPTSP / II / 2019 dated 27 February 2019 for plantations. and a factory with an area of approximately 4,775 hectares. The environmental management plan is as follows:

- Decreasing air and dust quality
- Increased noise
- Groundwater
- Liquid waste
- Increasing the regional economy
- Job opportunities
- Business opportunities
- Community income
- Social and social facilities

Meanwhile, the Environmental Monitoring Plan is as follows:

- Air quality: emissions, ambient: once every 6 months
- Noise: Once every 6 months
- Groundwater (monitoring well: LA, control, resident): once every 3 months
- Mill Effluent (inlet and WWTP outlet) once a month
- Regional economy: once a year
- Job opportunities: once a year
- Business opportunities: once a year
- Community income: once a year
- Public and social facilities: once a year
- Security and order: once a year
- Community perception: once a year
- Vector disease: Once a year
- Disease prevalence: once a year

Based on the study of environmental documents owned by the company, it is known that all activities and the company's area have been covered in these environmental documents.

The company has carried out a social impact study which was conducted in July 2011 by a team of consultants PT Surveyor Indonesia. The aspects assessed include socio-economic aspects, social aspects (education, health), socio-cultural aspects, and customs. Data collection in the field was carried out by direct interview method based on questionnaires to respondents which aimed to find out the community's perception of plantation activities and observations made on the patterns of daily life of the communities around the plantation in their interactions with the company. The villages involved in the assessment included Sungai Raja Village, Berangir Plantation, Pasang Lela, and Silumajang. In 2019 the company has compiled a social management and monitoring plan by involving stakeholders such as from the villages of Berangir, Pasang Lela and Sei Raja on May 23, 2019. The social management and monitoring plan includes:

- Public facilities and social facilities.
Improve communication with village stakeholders to discuss participatory village development programs based on priority scales from the perspective of village residents.
- Employment Opportunity
Promote labor recruitment to villages around the estate, equal access for all job applicants and direct contractors to prioritize residents around the estate if they meet the qualifications needed as workers.
- Business opportunity.
Encourage the realization of partnership and community development programs according to village needs.

Based on interviews with Pasang Lela and Berangir Plantation Villages, it is known that the social impacts that occur due to company operations are job opportunities and CSR programs. Based on the study of the social impact document, it has been covered in the company social management and monitoring plan.

3.4.3

The company has implemented the results of the environmental permit listed in the RKL RPL report document for semester 1 of 2020 and has been reported to the local government, this is evidenced by the receipt of the RKL RPL Report for Semester I 2020 to the Environmental Service of North Labuhanbatu Regency on 9 September 2020.

Based on the results of the review of the RKL / RPL implementation documents for semester 1 of 2020, it is known that the company has implemented the RKL / RPL in accordance with the directions from the environmental documents owned by the company. The company has also conducted trend evaluation, critical level evaluation and compliance evaluation. Based on the results of interviews with the Environmental Office of North Labuhanbatu Regency, it is known that the company has routinely reported the implementation report of RKL / RPL every semester.

The company has also implemented the Management Plan and social monitoring plan in 2019-2020 which is implemented participatively, for example:

- Parameters for Public Facilitation and Social Facilities, the company has helped the village of Pasang Lela in repairing road infrastructure.
- Job Opportunity Parameters, the company has appointed 51 employees from around the village in 2019 and 2020.

- Business opportunity parameter. The company has implemented an environmental development program in accordance with the needs of the village.

Based on the results of interviews with Pasang Lela and Berangir Plantation Villages, it was found that the company has also participated in assisting road repairs, recruiting local workers from the village and partnering with local contractors, for example as construction workers for building construction.

Status: Comply

3.5

A system for managing human resources is in place.

3.5.1 and 3.5.2

The CH has a Collective Labor Agreement (CLA) for the 2020-2021 Period, which has been approved by the Indonesian Ministry of Manpower. The CLA document describes work relations, social security, leave, permits, Occupational Health and Safety, environment, order, to family planning and cooperative.

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 CLA.

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 FFB Loading. Related to this, the CH can show the work agreement with the contractor (CV GAS).

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

Evidence observed:

- The CH has compiled a HIRAC Form for division locations which includes FFB harvesting, budding, fertilizing, circle spraying, loading FFB, handling people with symptoms of COVID-19, preventing transmission of COVID-19, harvesting under the electricity grid, cutting through the grid, road maintenance, operating the water pump machine, loading FFB into baskets, shifting the FFB, lowering the FFB, shifting the FFB using baskets.
- Based on field observations and verification of the HIRAC Form documents for division locations show that there are still activities that have not identified the potential hazards and risks but are not limited to activities: tuning under the power grid, global telling under the power grid, activities in rinse houses, storage of work tools in the homes of employees and fuel traders in residential areas.

The CH has not been able to show sufficient evidence that it has carried out the identification of risks and hazards to OHS problems as a whole in the operational area so this is a non conformity. **NCR 2020.04** with Major/Critical category.

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 2020, including:

- OHS committee meeting on 9 June 2020 which was attended by 14 administrators and members. The meeting agenda included a damaged MSDS in the material warehouse. The company can show documentation and meeting minutes.
- OHS committee meeting on 18 July 2020 which was attended by 14 administrators and members. The agenda for the meeting, among others, has not yet made a HIRAC for handling COVID-19. The company can show documentation and meeting minutes.
- OHS committee meeting on 10 August 2020 which was attended by 15 administrators and members. The agenda for the meeting included many damaged OHS signs in the workshop area. The company can show documentation and meeting minutes.

Based on field observation and interview with pesticide applicator in Estate and process operators at Mill, The CH 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).

3.6.1. Status: NCR No 2020.4 with Major/Critical category

3.7

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

3.7.1

Evidence observed:

- The CH has a training program in 2020, for example: plants, administration and general human resources, but there is no operator training program at the Mill.
- Based on field observations show that the CH has:
 1. Generator Set with a capacity of 455 kVA/487.94 HP; turbine engine with a capacity of 910 kVA/975.87 HP and 1000 kVA/1072.38 HP
 2. Sterilizer with a capacity of 23.5 tons/hour (2 units) and 20 tons/hour (1 unit), respectively.
- Results of interviews with
 1. Engine room operators note that the CH has only 1 operator that has license with the initials LJ and registration number 7832/PM/PTP/X/2019 which is valid until 18 October 2024.
 2. It is known that the sterilizer operator does not have a license.
- The CH does not yet have boiler operator 2nd grade, Electric OHS Expert and boiler operators for sterilizer machines.
- *Permenaker* No. 38/2016 Table E states that the initial movers with a capacity of > 214.47 HP must have 1st grade operator and 2nd grade operator.
- *Permenaker* Number 12 Year 2015 Article 7 reads as follows "For companies that have power plants of more than 200 (two hundred) kilo Volt-Ampere are required to have Electric OHS Expert ".
- *Permenaker* No. 1 of 1988 concerning Qualifications and Requirements for Boiler Operators.

The CH has not been able to show sufficient evidence that it has identified the training needs of all employees according to the RSPO principles and criteria so this is a non conformity. **NCR number 2020.05 with Major/Critical category.**

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.

3.7.2

The CH shows the following documents for the realization of employee training in 2020:

- Emergency response simulation which was held on September 3, 2020 and was attended by 25 employees.
- The *Bakortiba* simulation on September 2, 2020 takes place in the yard of the laboratory service office. The simulation was attended by 33 people consisting of Karpim and Karpel. The company can show documentation and attendance list for these activities.
- Emergency Response Simulation on September 3, 2020 at the office yard. The simulation was attended by 24 people consisting of Karpim and Karpel. The company can show documentation and attendance list for these activities.

Based on interviews with CH 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 company has conducted training related to supply chain certification on October 19, 2020 which was attended by shipping officers and weighbridge operator. Based on interviews with weighbridge operator, it is known that worker understood about the separation between FFB certified and noncertified.

3.7.1.	Status: NCR No 2020.5 with Major/Critical category	
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3.8
Supply Chain Requirements for Mills
3.8.1

The Mill did not implement IP Module

3.8.2

Based on document verification, the Mill implements the MB Module, which is received both FFB from certified and uncertified sources. Verification of Mass Balance record, the Mill has been recorded well the separation of FFB and products (CPO and PK) from certified and uncertified sources. The Mill only claims certified products from certified sources.

3.8.3

Estimated certified product recorded in the last Assessment Report and Certificate and has been updated in the RSPO Palm Trace. Actual certified produced has been verified during this assessment, and not exceed the estimate. The estimates of certified production for the next license period also have been set, in reasonable amount considering the last year's production. The data are shown in the following table:

Product	Estimate Production of 12 month (MT)	Actual Production of 12 months previous audit (Oct 19 to Sep 20) (MT)	Estimate Production of next 12 month of license (MT)
FFB	144,110	113,277.29	103,819
CSPO	34,285	26,238.99	24,917
CSPK	6,735	5,211.85	5,191

3.8.4

The Mill has registered as RSPO member under PT Perkebunan Nusantara IV (No. 1-0082-09-000-00), and also registered in RSPO Palm Trace as Berangir POM – PT Perkebunan Nusantara IV with License ID CB90975, and Member ID RSPO_PO1000004134.

The reporting requirements has been conducted by the Mill through RSPO Palm Trace, such as CSPO and CSPK sales announcement and confirmation from the buyer. Other than that, the CSPO sold as non-certified has been allocated to credit.

3.8.5

The Mill has had the SOP of RSPO Supply Chain Model of Mass Balance (No. 04.03/UNIT/SUS/P/001 dated 1 August 2018, revised 2 on 1 March 2020). The procedure has covered all aspects in latest RSPO supply chain standard (P&C 2018), such as the announcement in RSPO Palmtrace not later than 3 months after despatch, receiving and recording that identify the traceability of RSPO certified and uncertified source and products, FFB processing, key persons such as security, weight bridge clerk, dispatch/kernel officer, production clerk, Administration Head, as well as the training. The regular dissemination and training of the procedures has been conducted on 14 April 2020.

3.8.6

The Procedure to conduct supply chain internal audit set in SOP of RSPO Internal Audit (No. 21 dated 2 January 2018). In the SOP mentioned that internal audit will be conducted annually. Internal audit of RSPO supply chain conducted on 11-12 May 2020. All of supply chain standard and rules on market communication and claim has been assessed, and the CARs have been complied.

Management Review of RSPO supply chain implementation conducted annually, latest on 13 May 2020. The management review has covered the discussion CAR of internal audit result, correction and corrective action.

3.8.7

The Mill has maintain the record of goods in such as in FFB Delivery Note and Mass Balance data, that identify amount and sources of FFB certified and uncertified received, as well as the certified products (CSPO and CSPK), shown as follows :

Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
Oct-19	14,908.94	-	14,908.94
Nov-19	10,134.21	-	10,134.21
Dec-19	10,999.72	-	10,999.72
Jan-20	7,245.63	-	7,245.63
Feb-20	8,746.28	-	8,746.28
Mar-20	516.32	-	516.32
Apr-20	4,970.52	-	4,970.52
May-20	8,541.91	-	8,541.91
Jun-20	10,732.08	-	10,732.08
Jul-20	12,964.23	-	12,964.23
Aug-20	12,298.56	2,019.30	14,217.86
Sep-20	11,716.90	2,567.04	14,283.94
Total	113,775.30	4,586.34	118,361.64

Based on palm trace, below is the volume of certified product from **1 October 2019 to 19 January 2021**

Product	Estimate Production of 12 month + extension volume and time (1 Oct 2019 – 19 Jan 2021) (MT)	Actual Production of 12 months previous audit (Oct 19 to Sep 20) (MT)
FFB	144,110	113,775.30
CSPO	34,285	26,238.99
CSPK	6,735	5,211.85

Originally, the estimate of FFB, CSPO, and CSPK is 115,000 tonnes, 26,500 tonnes, and 5,500 tonnes. However, Berangir POM has submit extension volume of FFB, CSPO, and CSPK because of over production. Based on the table above,

know that there is no FFB overproduction of against credit given during one year of license.

3.8.8

The CSPO and CSPK from the Mill were sold has met the requirements of certified product information. Supporting documents shown were contract agreement, delivery order, delivery ticket, report of loading, weighing minutes, weighing card, and delivery note. Those documents cover information of delivery date, description of product and supply chain model, product quantity, identification number, certificate number, sender's name and address of the seller.

3.8.9

The Mill outsources its products transportation to the third parties and have valid contractual agreements. CSPO transportation handled by PT Wahana Adidaya Pertiwi (agreement dated 17 January 2020, valid thru 31 December 2022), while CSPK transportation handled by CV Karya Mandiri (agreement dated 12 January 2020, valid thru 31 December 2020).

To ensure the contractors complies with the RSPO Supply Chain, in the agreement, there were clauses that set obligations of the contractor to comply with the supply chain rules. For instance, the responsibility to ensure the purity of certified product delivered during the distribution, as well as the willingness to be observed by Certification Body to verify the compliance.

3.8.10

The Mill has the records of details of the contractors, covers the contractor's company profile, address, contact person, email and phone number, contract agreement and period, and list of vehicles.

3.8.11

The company has informed the certification body that at ASA 1 the Mill using three contractors, and at this ASA 2 only using two contractors. The Mill has no contractual agreement anymore with CV. Dini Arta Lestari (PK transporter) that has been observed in ASA 1.

3.8.12

The Mill has maintained accurate, complete, and up to date records related RSPO Supply Chain implementation that kept at least 2 years in accordance with Mill's procedure. The records cover FFB received from certified and uncertified sources, production of CPO and PK (certified, noncertified, total), products dispatch (as RSPO certified, sold in another certified scheme, sold as noncertified, total sold), as well as balance/stock of certified products.

The Mill balancing the certified products and dispatch on a monthly basis. The summary of Mass Balance data 12 months previous the audit can be seen on the table below:

Mass Balance record of CPO

Period	All CPO Production (MT)			CSPO Dispatch (MT)		
	CSPO	Non CSPO	Total	RSPO	Non Cert	Total CSPO
Oct-19	3,485.60	-	3,485.60	391.68	727.17	1,118.85
Nov-19	2,443.45	-	2,443.45	196.68	1,788.08	1,984.76
Dec-19	2,562.40	-	2,562.40	726.23	-	726.23
Jan-20	1,650.20	-	1,650.20	296.66	-	296.66
Feb-20	2,016.82	-	2,016.82	215.12	1,651.89	1,867.01
Mar-20	129.22	-	129.22	-	115.24	115.24
Apr-20	1,011.79	-	1,011.79	-	-	-
May-20	1,831.67	-	1,831.67	196.88	1,250.00	1,446.88

Jun-20	2,752.60	-	2,752.60	525.72	473.19	998.91
July-20	2,988.67	-	2,988.67	651.13	1,007.76	1,658.89
August-20	2,694.66	372.47	3,067.13	918.78	968.00	1,886.78
Sept-20	2,671.91	484.16	3,156.07	750.00	2,493.78	3,243.78
Total	26,238.99	856.63	27,905.62	4,868.88	10,475.11	15,343.99

Mass Balance Record of PK

Period	All PK Production (MT)			CSPK Dispatch (MT)		
	CSPK	Non CSPK	Total	RSPO	Non Cert	Total
Oct-19	745.88	-	745.88	692.37	-	692.37
Nov-19	478.61	-	478.61	534.61	-	534.61
Dec-19	503.04	-	503.04	473.89	-	473.89
Jan-20	320.57	-	320.57	355.86	-	355.86
Feb-20	395.32	-	395.32	383.07	-	383.07
Mar-20	25.79	-	25.79	86.02	-	86.02
Apr-20	193.09	-	193.09	173.97	-	173.97
May-20	354.55	-	354.55	201.66	-	201.66
Jun-20	520.51	-	520.51	609.40	-	609.40
July-20	564.13	-	564.13	577.34	-	577.34
August-20	563.40	91.61	655.00	435.45	-	435.45
Sept-20	547.06	116.25	663.31	409.36	-	409.36
Total	5,211.85	207.86	5,419.81	4,933.00	-	4,933.00

Based on palm trace on 19 October 2020, it is know that

Product	License Volume (1 Oct 2019 to 19 Jan 2021) Extension Volume (MT)	Volume Sold as Physical (MT)	Volume sold as credit (MT)	Volume allocated as credit (MT)	Remaining Volume (MT)
CSPK	6,735	6,673.09	0	0	61.91
CSPO	34,285	3,576.37	4,842	1,158	24,708.63
FFB	144,110	0	0	0	144,110

Based on document SCCS Monitoring Berangir 19 July 2019 – October 2020, it is known that

Product	Production		Selling	
	Certified	Noncertified	Certified	Noncertified
PK	5,211.85	207.86	4,933.00	0
CPO	26,238.99	856.63	4,868.88	10,475.11
FFB	113,630.23	5,452.76	0	0

Based on the data above, it can be seen that there is differences between CSPK and CSPO sales from palm trace and monitoring of SCCS Berangir POM. In addition, the sales of CSPK that are registered to the palm trace are bigger than

the actual production of CSPK. (Palm trace sales were 6,673.09 tons, while actual production was CSPK 5,211.85 tons).

Based on interviews with management, it was found that there were sales of CSPK with contracts for old license period, but new sales could be made after a new license (October 2019 - 19 January 2020). Based on CSPK sales recapitulation data, sales for contracts for the old license period amounted to 3,728.56 tons. However, the company has not been able to show the details of sales using the new license quota.

Based on the explanation above, Berangir POM has not shown evidence of having recorded all sales data completely. **This becomes non conformity No. 2020. 06 with critical category.**

3.8.13, 3.8.14

The conversion rate of production of CPO (OER) and PK (KER) were based on actual production. Then the management will monitor if the rate reasonable. Based on production data 12 months previous audit the certified products average OER is 22.93 %, while KER is 4.41 %. The extraction rate will be updated annually based on actual production.

3.8.15

The Mill only applying RSPO Supply Chain Module of Mass Balance.

3.8.16

Based on delivery and transaction document review, it was known that the announcement was carried out regularly. The supply chain PIC already known that for P&C 2018 (included supply chain standard) the announcement should be conducted within three months after the delivery date. For the certified product that sold conventionally still allocated as credits.

Based on palm trace on 19 October 2020, it is know that

Product	License Volume (1 Oct 2019 to 19 Jan 2021) Extension Volume (MT)	Volume Sold as Physical (MT)	Volume sold as credit (MT)	Volume allocated as credit (MT)	Volume removed (MT)	Remaining Volume (MT)
CSPK	6,735	6,673.09	0	0	0	61.91
CSPO	34,285	3,576.37	4,842	1,158	0	24,708.63
FFB	144,110	0	0	0	0	144,110

Based on document SCCS Monitoring Berangir 19 July 2019 – October 2020, it is known that

Product	Production		Selling	
	Certified	Noncertified	Certified	Noncertified
PK	5,211.85	207.86	4,933.00	0
CPO	26,238.99	856.63	4,868.88	10,475.11
FFB	113,630.23	5,452.76	0	0

Company also showed the shipping announcement for CSPO and CSPK sales/shipping with total announced as follows.
 CSPO: 3,576.37 ton
 CSPK: 2,944.53 ton

Based on data above, company could not showed:

- Shipping announcement made in accordance with SCCS monitoring document and palm trace data
- Removal of certified stock for CSPO that sold as noncertified/conventional.

This becomes non conformity No. 2020. 07 with critical category.

3.8.17	
The products are claimed as mass balance and conventional. The Mill does not use RSPO logo on product or off product.	
3.8.12.	Status: NCR No 2020.6 with Major/Critical category
3.8.16.	Status: NCR No 2020.7 with Major/Critical category
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 and 4.1.2	
<p>A human rights policy document that defines basic human rights, including reproductive rights, privacy rights, women's rights and children's rights. Issued on 2 January 2015. 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.</p> <p>The CH has carried out socialization related to respecting human rights on February 18, 2020 which was attended by mill employees, estates and stakeholders. The CH also shows proof of socialization to contractors on March 21, 2020.</p> <p>Based on interview with local contractors, worker unions, employee and committee gender, 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.</p> <p>Based on interviews with labor unions and gender committees known 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.</p>	
	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 and 4.2.2	
<p>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:</p> <ul style="list-style-type: none"> • SOP for Internal Communication and Handling of Employee Complaints (No. 19 Rev. 2, effective from 02 January 2015). The procedure states that employee complaints are submitted verbally and in writing to the Labor Union. Then the Labor Union Management examines the problem being complained of and as far as possible the problem is resolved at the Labor Union level. • SOP for Handling Customer and Environmental Complaints (No. 13 Rev. 01 dated January 2, 2015). Includes complaints from customers and the surrounding environment received by the head office, complaints received by business units, handling of social unrest in the community, securing demonstrations at the head office. A flow chart is available. <p>In addition, the CH has also regulated the secrecy of the information/whistle blower. The CH guarantees in full, the confidentiality of the identity of the information/whistle blower communicating confidential communications to the CH whether it is confidential/non-confidential.</p> <p>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.</p> <p>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.</p> <p>The CH demonstrates Communication Procedures. The officer who is responsible for receiving complaints or complaints</p>	

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

There was a complaint from the public based on information from the media on March 28, 2019 (<https://sentralberita.com/2019/03/dit-Finding-pipa-ters-hidden-ptpn-iv-berangir-buang-limbah-ke-sungai/>) that there were allegations that the company has disposed of liquid waste into a small river that flows into the Merbau river, this is due to the discovery of a pipe on the bank of a small river.

Based on this, at the time of this audit, the Company showed the Minutes of Supervision of Compliance with Laws and Regulations in the Field of Protection and Management of the Environment and Forestry in the context of verification of complaints made on 10 May 2019 by the Directorate General of Law Enforcement of the Environment and Forestry, Security Office. and Forestry and Environmental Law Enforcement in Sumatra Region.

From the results of the examination, it was not proven that there were any violations related to the disposal of waste into the river.

Moreover, based on interview with representative of Simpang Merbau Village, it is known that this problem has been resolved and has been recognized by the Environmental Service of North Labuhanbatu Regency and the Environmental Service of North Sumatra Province. There is no complaint from this village and other village.

4.2.4

The company has an SOP for complaints for external and internal parties (as described in indicator 4.2.2). The company has also resolved complaints from the public based on information from the media on March 28, 2029 (<https://sentralberita.com/2019/03/dit-Finding-pipa-ters-hidden-ptpn-iv-berangir-buang-limbah-ke-river/>) that there is an allegation that the company has disposed of liquid waste into a small river that flows into the Merbau river, this is based on the discovery of a pipe on the bank of a small river.

Moreover, based on interview with representative of Simpang Merbau Village, it is known that this problem has been resolved and has been recognized by the Environmental Service of North Labuhanbatu Regency and the Environmental Service of North Sumatra Province. There is no complaint from this village and other village.

Status: Comply

4.3

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

4.3.1

Based on interview with representatives from Sei Raja Village and Pasang Lela Villages, it is known that the company has contributed to the development of the surrounding community. Every proposal received by the company will be responded by the company and given its assistance. For example, assistance has been provided for the construction of places of worship, road paving, bridge construction, and so on.

The company showed the 2020 CSR program with proposed programs, including Road Paving in Pasang Lela Village, Construction of 4 drilling wells for Villages in NA IX - X and Marbau Sub-District, Road Paving in Sidomulyo Hamlet, and others.

Then the company showed a memo from the PTPN IV Company on April 15, 2020 No 04.01 / BER / M.582 / IV / 2020 which stated that CSR program of PTPN IV would be diverted to tackle the Corona Virus outbreak. However, the company also showed some assistance that had been given to villagers, for example:

<ul style="list-style-type: none"> • Low-cost market program activities in Aek Kota Baru, Pasang Lela, Marbau, and Aek Kota Baru Churches on January 20, 2020 • Assistance to build At Taqwa mosque in Marbau Village on January 21, 2020. • Providing basic food assistance for surrounding communities affected by Covid 19 in villages around the Berangir unit in June 2020.
<p>Status: Comply</p>
<p>4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their Free, Prior and Informed Consent (FPIC).</p>
<p>4.4.1 PTPN IV – Berangir Estate has managed totaling area for about 4,592.79 Ha, which consist of 4,583.67 Ha as scope of certification and 9.12 Ha that out of certification scope and has planned to be certified in 2021 (describe at time bound plan on basic info 1.10.1). Berangir Estate has managed since 1974, which previously was owned by PT Wongso Rubber Coy, a rubber plantation company. The land acquisition processed by previous owner, began with land acquisition from communities area by providing compensation in 1977, continued by Berangir Unit and finished in 2005. The PTPN IV Berangir Estate then get the land use title for 4,583.67 Ha (scope of certification) which are:</p> <ul style="list-style-type: none"> - HGU Certificate No. 48 for areas 3,288.93 ha which valid until 30 December 2034. The certificate HGU issued based on HGU Decree No. 17/HGU/BPN RI/2013 dated 28 February 2013. - HGU Certificate No. 22 for area 1,294.74 ha which valid until 19 September 2043. The certificate HGU issued based on HGU Decree No. 49-HGU-BPN RI-2008 dated 7 August 2008. <p>Berangir Estate has plantation business permit (IUP-B) for based on Decree of Labuhanbatu Utara Regent No. 503/2159/TAPEM/2012 dated 24 October 2012, covering an area of ± 4,648.74 ha. While Berangir Mill has had Plantation Business Permit for Processing (Mill) based on Decree of Capital Investment Agency No. 503/01/DPM-PPTSP/IUP-P/2019 dated 12 August 2019 for Mill capacity of 30 MT of FFB/hour.</p> <p>4.4.2 Berangir Estate has managed since 1974, which previously was owned by PT Wongso Rubber Coy, a rubber plantation company. The land acquisition processed by previous owner, began with land acquisition from communities area by providing compensation in 1977, continued by Berangir Unit and finished in 2005.</p> <p>Based on interview with representative of surrounding village, it is known that there is no land conflict in Berangir Estate or previous land owner or customary rights in surrounding village.</p> <p>4.4.3 Berangir Estate has managed since 1974, which previously was owned by PT Wongso Rubber Coy, a rubber plantation company. The land acquisition processed by previous owner, began with land acquisition from communities area by providing compensation in 1977, continued by Berangir Estate – PTPN IV and finished in 2005. PTPN IV currently has no information of previous land inventory mapping during the initial land acquisition.</p> <p>Based on the interview with management, representative of Pasang Lela, Perkebunan Berangir, and Simpang Merbau Village and also previous audit result, known that there is no indigenous rights or customary rights and there is no issues regarding to FPIC process. The compensation process was done directed to the land-owner and not diminish the legal/customary right, landowners are given the freedom to release their land without coercion.</p> <p>4.4.4, 4.4.5 and 4.4.6 Berangir Estate has managed since 1974, which previously was owned by PT Wongso Rubber Coy, a rubber plantation company. The land acquisition processed by previous owner, began with land acquisition from communities area by providing compensation in 1977, continued by Berangir Unit and finished in 2005.</p> <p>Based on interview with representative of surrounding village, it is known that there is no land conflict in Berangir Estate or previous land owner or customary rights in surrounding village</p>
<p>Status: Comply</p>

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, 4.5.8 There is no new land clearing in PTPN IV Berangir. Berangir Estate has managed since 1974, which previously was owned by PT Wongso Rubber Coy, a rubber plantation company. The land acquisition processed by previous owner, began with land acquisition from communities area by providing compensation in 1977, continued by Berangir Unit and finished in 2005. Based on interview with representative of surrounding village, it is known that there is no previous land owner, customary rights or land conflict in surrounding village.	
4.5.7 Based on document review and interviews with company representatives, it was found that there was no new land development after November 2018 by the company.	
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, 4.6.4 The company has a procedure for identifying legal rights, customary rights, or use rights in the SOP Handling Land Conflicts No. SPO 04 dated January 2, 2017. The procedure also regulates about calculation and land compensation. Based on interview with Plantation Agency of Labuhanbatu Utara Regency and Land National Agency of Labuhanbatu Regency, it is known that that there is no previous land owner, customary rights or land conflict in surrounding village. Berangir Estate has managed since 1974, which previously was owned by PT Wongso Rubber Coy, a rubber plantation company. The land acquisition processed by previous owner, began with land acquisition from communities area by providing compensation in 1977, continued by Berangir Unit and finished in 2005.	
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 The company has a procedure for identifying legal rights, customary rights, or use rights in the SOP Handling Land Conflicts No. SPO 04 dated January 2, 2017. Based on interview with Plantation Agency of Labuhanbatu Utara Regency and Land National Agency of Labuhanbatu Regency, it is known that that there is no previous land owner, customary rights or land conflict in surrounding village. Berangir Estate has managed since 1974, which previously was owned by PT Wongso Rubber Coy, a rubber plantation company. Land acquisition was completed in 1977 which was carried out directly to the owner of the land. The 2005 compensation payment was due to demands from the community who claimed they had not received compensation from PT. Wongso Rubber Coy for their land. PTPN IV - Berangir Business Unit carried out reconciliation and provided compensation to the community which was completed in 2005.	
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 – 4.8.4 Based on interview with representative of surrounding village, it is known that there is no customary rights in PTPN IV Berangir. Also there is no land conflict or land compensation or land occupation in PTPN IV Berangir. Land acquisition was completed in 1977 which was carried out directly to the owner of the land. The 2005 compensation payment was due	

to demands from the community who claimed they had not received compensation from PT. Wongso Rubber Coy for their land. PTPN IV - Berangir Business Unit carried out reconciliation and provided compensation to the community which was completed in 2005.

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

PTPN IV Berangir does not have a smallholder scheme. However, the company also receives FFB from independent supplier. However, based on interview with management, the FFB price is set by the company and also agreed by the supplier. It has been written on the work agreement.

5.1.2 – 5.1.4

PTPN IV Berangir does not have a smallholder scheme. However, the company also receives FFB from independent supplier. Based on interview with management, Berangir POM just received FFB from independent supplier for the last two months, so there is no communication yet with the supplier about RSPO certification. However, the company has the opportunity to establish communication with all farmers (Independent Smallholders and Smallholders) and support farmers to carry out RSPO certification (OFI).

5.1.5

The company has a work agreement with a third party FFB supplier, namely CV. Perkasa Aidil Zukiansyah Pasaribu and PT. Deggan Agrojaya Labuan. Based on the review of the work agreement document, it is known that the Cooperation agreement has been made fairly and has been approved by both parties, according to applicable law, has a period of until 31 December 2020. The agreement also stipulates the purchase price for FFB is set by PT Perkebunan Nusantara IV PKS Berangir unit based on the price of palm oil and palm kernel from the Medan Head Office, and paying attention to the price around the PKS Berangir unit and will be submitted to the second party every day. TBS payment includes 10% PPN and has been deducted by PPh of 0.25% of the price before PPN. Payments are made at the PTPN IV Unit Berangir Office using Mandiri Cash Management through Bank Mandiri.

5.1.6

The company shows proof of payment for the purchase of FFB for the period of 4 September 2020 to CV Perkasa Aidil Zukiansyah Pasaribu. In the proof of payment, it explains the minimum purchase of FFB with the total weight of FFB sold, 10% VAT and 0.25% PPh collection. Based on Auditor verification that payment is in accordance with the work agreement.

5.1.7

The unit of certification has tested the weighing equipment. For certification, it can show the results of testing weighing equipment number 25 / PKTN.4.0 / KHP / 01/2020 from the Directorate General of Consumer Protection and Trade Order, Directorate of Metrology, Regional Legal Metrology Standardization Center I. The weigh bridges that are tested are:
 Brand, Type, No. Series: GSC; GST - 9600; 967350
 Made in: Taiwan
 March 23, 2020
 Result: Ratified under the Law of the Republic of Indonesia Number 2 of 1981 concerning Legal Metrology.

5.1.8

PTPN IV Berangir does not have a smallholder scheme. However, the company also receives FFB from independent supplier. Based on interview with management, Berangir POM just received FFB from independent supplier for the last two months, so there is no communication yet with the supplier about RSPO certification. However, the company has the opportunity to establish communication with all farmers (Independent Smallholders and Smallholders) and support farmers to carry out RSPO certification (OFI)

5.1.9

PTPN IV Berangir does not have a smallholder scheme. However, the company also receives FFB from independent supplier. Based on interview with management, Berangir POM just received FFB from independent supplier for the last two months, so there is no communication yet with the supplier about RSPO certification.

Company has grievance mechanism for external stakeholder, including for smallholder in procedure No. 13 Rev. 01 dated January 2, 2015. However, based on document review of complaint book, there is no complaint from independent supplier.

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 and 5.2.5

Based on interviews with Pasang Lela Village, Berangir Plantation Village and Simpang Merbau Village, it is known that some of the livelihoods of the village community are as oil palm farmers, the company has the opportunity to make improvements in the form of socialization and consultation with oil palm farmers in order to support the participation of oil palm farmers in the value chain sustainable palm oil and report publicly on the progress of farmer support programs regularly. This becomes OFI (OFI number 5).

5.2.3

PTPN IV Berangir does not have a smallholder scheme. The company receives FFB from its own estate and from other PTPN IV estates. Even so, the company has the opportunity to provide support to farmers to fulfill the legality of FFB production (OFI).

5.2.4

PTPN IV Berangir does not have a smallholder scheme. The company has received FFB from 3 suppliers since July 2020. The company has the opportunity to provide training / socialization on the handling of pesticides to the FFB supplier.

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 policy towards non-discrimination and equal opportunity is presented in document of Job Opportunity Policy No. 04 (Rev. 02) dated 02 January 2015 and CLA 2020-2022 Chapter II Article 15 and 16. These policy has been communicated to worker. Implementation on policy has selected in several documents such as employees performance and evaluation, promotion letter and selection of process on job recruitment. However, implementation and worker understanding towards this matters will be verified through interview with representatives from Manpower Agency, Labour Union, Gender Committee, surrounding communities and employees, on the coming field visit assessment.

Based on document verification of employee registration documents for the September 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.

Procedure of recruitment is presented document of CLA 2020-2022 Chapter II Article 11 to 13. Detail of requirement is also presented in the advertisement through Director of Human Resources and General Letter, as sighted to Letter No. 04/11/SE/20/VI/2019 dated 29 May 2019. Recruitment has conducted through fair and transparent process. Job opportunities were communicated and informed to the surrounding villages as priority. In recruitment process, the

company has set the standard of competence that required in the position offers. Selection has include evaluation towards skills, performance and medical test result. Furthermore, promotion is conducted based on work period, annual evaluation result and availability of position. All workers are treated equally in accordance with company regulation including rights of worker as well.

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

Payment of salary has verify to upkeep worker position (level IC) as sample for male with and female worker in Berangir Estate for period May 2020, for example to employee with NIK SAP No. 4016689 and No. 4016704 for female and male worker, respectively. In general, the salary was in accordance with applicable regulation in 2020 (Decree of Sumatera Utara Governor No. 188.44/674/KPTS/2019 dated 01 November 2019), which was about IDR 2,499,423.06/month. Different ammount of salary obtained is only affected by number of attendance, work performance, premium and debt, without taking gender into consideration account.

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

The CH has a CLA in 2020-2021 between the CH and the employees. The CLA has approved by Manpower Agency of Sumatera Utara through Decree No. 560/04-6/DTK/II/2020 dated 13 January 2020 with Registration No. 6/DFT/PKB/6/SU/II/2022 dated 13 January 2020. The CH 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.

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 between PTPN IV and CV GAS. The work agreement 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. CV GAS shows a list of employee wage payments for the September 2020 period. From the document it is known that CV GAS has paid employee wages in accordance with the Decree of the Governor of North

Sumatera.

6.2.2

As verified to contract of employees documents, for example No. BER/04.Dir SDM Umum/5/IV/2020 dated 30 April 2020, Director Decree No. 04/11/Kpts/18/I/2019, HRD Memorandum No. 04.11/KOL/M-3941/I/2019, HRD Letter No. 04.08/SE/32/IV/2020 dated 27 April 2020, it was known that manpower right matters such as as salary as refers to minimum wages regulation, leave, manpower insurance, health insurance, holiday allowance, bonus, premium, overtime calculation etc., has included on the company regulation and policy. Furthermore, these matters has also mentioned on the CLA. Those points mentioned in the Article of work contract has in accordance with manpower regulation in Indonesia. Actual implementation of the above, will be verified through interview with representatives from Labour Union, Gender Committee and several workers.

6.2.3

During the audit activity, several evidences are shown as follows:

- The CH shows the salary slip and attendance documents of water machine operator, engine room operators and boiler operator for the period of August 2020.
- The auditors simulate the calculation of overtime pay based on *Kepmenakertrans* No. 102/2004 with the following results:

Employee Initials	Unit	Overtime Paid	Auditor Simulation Results	Variance
LJ	Engine Room	IDR 3,494,782	IDR 3,506,650	- IDR 11,868
SF	Boiler	IDR 2,749,782	IDR 2,852,001	- IDR 102,219
SD	Water Machine	IDR 731,895	IDR 591,888	IDR 140,007

The CH has not been able to show that the wages for employees who work over working hours are in accordance with applicable regulations so this is a non-conformity **NCR No. 2020.08** with Major/Critical category.

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 employee housing show that the CH has provided adequate welfare facilities for workers such as housing, availability of clean water, availability of electricity (*PLM*), availability of health facilities in the form of clinics managed by doctors and paramedics (nurses and midwives), day care centers, worship facilities for workers. Apart from that, the CH also provides educational facilities in the form of kindergartens and elementary schools located within the company as well as school buses for transportation for the children of workers. All these facilities can be accessed easily by all workers and their families.

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.

6.2.6

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 3,899,100 and the highest is IDR 3,900,054.

Based on verification of the employee list documents for the period of September 2020 show that the company does not employ any employees with piece rate status. There are employees with permanent and contract status

6.2.7

Based on document verification of the employee list document show that the main activities in estate and mill operations are carried out by permanent employees. However, the estate also employs workers with contract status for supporting work, such as office staff, drivers and clerical officers. Based on the explanation above, it is known that the CH has implemented *Permenakertrans* No. 19/2020 and *SK GAPKI* number 002/PPG/II/2013 properly, where there are no main jobs done by temporary workers.

6.2.3.	Status: NCR No 2020.8 with Major/Critical category
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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 policy towards recognising freedom of association right to collective bargaining is presented in document CLA Article 5. Director has recognize Plantation of Labour Union (*SP-BUM*) of PTPN-4 as the existence has in accordance with Law No. 21 in 2000. Approval of *SP-BUN* of Berangir Unit for period 2019-2024 shows through several documents, as follows:

- Registration of Labour Union in Manpower and Transmogrator Agency of Sumatera Utara Province No. 567/50/DSTKM/2001.
- Decree of SP-BUN PTPN 4 No. 14/Kpts/SP.BUN-PTPN-IV/VII/2019 dated 17 July 2019. This document signed by Kabid PPHI Labuhanbatu Utara District.

Based on interviews with Labor Union 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

The CH shows the minutes of the meeting of the *SP-Bun* Berangir Management meeting as follows: the meeting on July 8, 2020 which took place in the meeting room of the central office. The meeting was attended by labor union officials and the Berangir Estate. The topics of discussion at the meeting included: replacement of *mudim* who entered retirement and improving human resources and skills in the field of Islam. The CH can show attendance documents and minutes of the meeting.

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 facilitated the worker unions If the union board is needed to attend the meeting on the other place.

Based on interviews with union worker officials show that for activities including the selection of union worker officers, there has been no interference from the company. Further explained that the CH provides freedom of association to all employees as long as it is in accordance with applicable regulations.

Status: Comply

6.4 Children are not employed or exploited.

6.4.1

The CH has an Internal Memo concerning the Prohibition of Employing Children Under the Age of 18 and a Sustainability Policy 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 estate and mill; 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 at estate and mill 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 policy towards preventing sexual and other form of harassment and violence is presented in document Policy No. 06 dated 02 January 2015, issued by PTPN IV Board of Director. Gender Committee has appointed to involved on this matters. Socialization on this matter has been conducted in 11 November 2019. Implementation towards any case related with sexual and other form of harassment and violence.

Based on interviews with members of the Gender Committee show that policies related to gender and women's rights that have been established by the company become a reference for administrators to carry out activities and socialization to workers. During the past year, there were no incidents or issues related to sexual harassment, domestic violence, child labor or human rights violations.

6.5.3

Based on document verification and field observations show that currently in the CH environment there are no young mothers (mothers who have just given birth to their first child). However, the CH has identified the needs of young mothers by conducting interviews with employees in June 2020 with the following results:

- Providing menstrual leave
- Babysitting facilities
- Integrated Healthcare Center
- Health checks for pregnant women
- Providing time for breastfeeding children
- Special room for breastfeeding
- Counseling for women who have experienced acts of violence.

The CH can show the identification questionnaire to 50 mothers but not the category of young mothers.

6.5.4

Employees who experience or witness sexual harassment in the workplace can report it immediately to the HR and General Director. All allegations of sexual harassment will be immediately investigated. The confidentiality of employees, witnesses and perpetrators will be protected. When the investigation is completed, employees will be notified of the results of the investigation.

Until the audit activity took place, there had never been a report related to sexual harassment and violence against female employees.

Based on interviews with gender committee members stated that socialization had been carried out routinely to employees during informal gathering activities (recitation and gathering), based on interviews with female employees at the mill office and spray activities, it was stated that communication was carried out routinely by the female committee. In this regard, the CH need to improve the system for documenting women's committee activities

Based on interview with village representatives known that the CH 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

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.

Based on interviews with estate and mill employees, it was found that until now there had never been forced labor. overtime work carried out is in accordance with the applicable regulations both in terms of time and wages

6.6.2

Based on the employee list document verification show that the main activities in estate and mill operations are carried out by permanent employees. However, the CH (estate) also employs employees with contract status for supporting work, such as office staff, drivers and clerical officers. Based on the explanation above, it is known that the CH has implemented *Permenakertrans* No. 19/2020 and *SK GAPKI* number 002/PPG/II/2013 properly, where there are no main jobs done by temporary workers.

Unit of certification has mechanism of contractor selection that presented in document of "*Dokumen Pengadaan Rencana Kerja Dan Syarat Syarat Klasifikasi Pekerjaan*". For example, as shows through document No. 04.14/RKS-TAN/1103/XII/2019 dated 05 December 2019 for FFB Transportation Works fin the 1st Quarter 2020.

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 CH has OHS Committee (*P2K3*) which already registered, as shows Decree of Manpower Agency of Sumatera Utara Province No. KEP.120-7/DTK/SU/2018 dated 29 June 2018. The *P2K3* Secretary was a Licensed OHS Expert with Certificate No. KEP.7050/NAKER-BINWASK3/IX/2017 dated 04 September 2020, with Appointment Letter shows through Decree of Manpower Minister No. KEP.7050/NAKER-BONWASK3/IX/2017 dated 04 September 2017. The license valid for three years (or until 03 September 2020). Furthermore, OHS Committee has consistantly conducting monthly OHS meeting that presented in document No. FM-4.3.1-01, while the attendance is presented in document No. FM-4.3.1-02. On the first quarter, the meeting is conducted on 08 January 2020, 06 February and 00 March 2020. The minutes of meeting were compiled on the quarter *P2K3*, as verified through 2nd quarter report of *P2K3* that presented in document No. BER/X/116/VII/2020 dated 09 July 2020.

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.

6.7.2

Evidence observed:

- Based on the verification document of Hydrant Mobile Inspection on September 21, 2020, found that the tool was in good condition (there were no leaks) and ready for use.
- Based of field observations in the fire extinguisher simulation activities using mobile hydrant showed that the equipment was not in optimal condition where there was a leak in the nozzle.
- The CH shows the procedures for handling emergency and post-emergency situations No. 4.3.16. December 14, 2013.

The CH has not been able to show evidence that emergency response procedures have been implemented, including monitoring of emergency response facilities and infrastructure. **NCR 2020.09 with minor/non-critical category.**

6.7.3

Based on field observation result sighted that the certification unit has a proper sanitation facilities for the chemical applicators. Therefore there are several evidences, as below:

Evidence observed:

- Based of field observations and interviews with mill employees (3 people) show that employees use PPE (shoes) that they buy themselves. It was further explained that the last PPE was given by the CH in 2019.
- Based on interviews with management show that the provision of PPE to employees is carried out once in 1 year (last 2019).
- Based on document verification of the 2019 PPE Distribution show that the last PPE was given on December 27, 2019.
- *Permenakertrans* No. 8/2010 Article 2 states that employers are required to provide PPE for workers/laborers in the workplace free of charge.

The CH has not been able to show evidence that it has provided PPE free of charge to all workers in the workplace which includes all operations. **NCR 2020.10 with Major/Critical category.**

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 CH is on 15 September 2020 for "*BPJS Ketenagakerjaan*" period of August 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 Mill and Estate 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

Lost Time Accident (LTA) monitoring and calculation has still consistently conducted by the unit of certification, presented in document "*Rekapitulasi Kejadian Kecelakaan Kerja* (Estate or Mill). As per report dated 30 June 2020, it was informed that there were zero accident between July 2019 to June 2020, on the estate and mill. The report signed by Manager and EHS Officer.

6.7.2.	Status: NCR No 2020.9 with minor/non-critical category	
6.7.3.	Status: NCR No 2020.10 with Major/Critical category	

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 activity budgeted on the program were consist of detection (global telling), census (effective telling) and monitoring of pests and diseases attack, biological control such as planting of beneficial plants. According to IPM activity records for 2019 until June 2020 such as program and realization of rat census, leaf eating caterpillar census, and Ganoderma census, it could be concluded that all the census results were still under its economic threshold. There is no invasive species attack. This may lead to zero use of pesticides for pests and diseases control. It could be concluded that IPM techniques implemented by biological methods is effective to control pests and diseases, and also to minimize the use of chemicals. Furthermore, according to pesticides used record in 2019 until June 2020, agrochemical uses was only implemented for weeds control purposes. Based on field observation to the Berangir Estate sighted that there are global telling activities to identified pest and disease on the oil palm plant.

7.1.2

The company shows the types of flora and fauna in the Manage company area. The list of flora and fauna species in the company does not contain invasive species. As for the plantation management, the types of plants used for beneficial plants are *Turnera* and *Antigonon*. Both types are not included in the invasive type.

7.1.3.

Based on document verification, interview with workers and stakeholders sighted that there is no pest infestation outbreak during last year. Therefore, based on field observation to the Berangir Estate sighted that there are no pest infestation outbreak.

Status: Comply

7.2

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

7.2.1 and 7.2.2.

The company has a Memo from the Plant Division of PTPN IV (No: 04.04 / District-Kebun / M.1238 / XII / 2018, dated 19 December 2018) signed by the Head of the Plant Division of PTPN IV regarding the Use of Chemicals With Active Paraquat Dichloride Materials) which explains that herbicides with active ingredients of paraquat dichloride should not be used except for special conditions (borders), for which the use of these chemicals can be used only for the control of pteridophyta broadleaf weeds (ferns / ferns).

In Procedure No. SPO.05 Part 5.10-12 mentioned that chemical application for pests and diseases population control has only allowed when the level of incidence has passed the threshold limit, as identified through census analysis. The certification unit was able to shows justification of pesticide usage, for example: Fluroksipir 280 g/l: 219.34 kg; Metil metsulfuron: 69.83 Kg; and Glifosat: 2,762.20 Liter until September 2020.

7.2.3.

The certification unit has monitors the effectiveness of biological pest control such as the development of beneficial plants for nettles. There has been no chemical pest control in the last year. Based on data on pesticide use during the last year, it is known that the use of pesticides is only intended for weed control, there is no use of pesticides in pest control.

7.2.4.

Based on the results of the global telling documentation study and field observations to the chemical warehouses, it is known that during the last year there has been no pest control using chemicals. Biological control of nettle by planting the beneficial plants such as *Turnera subulata* and *Antigonon leptosus*.

7.2.5 and 7.2.6.

The certification unit was showing Director Letter number 04.04/SE/18/X/2016 dated 14 October 2016 about: prohibited active pesticide (Category WHO 1A&1B, paraquat). That letter was addressed to the group manager District I-IV) and all managers cc: Director, Internal Superintendent, and Planning Division. Based on field observation to the chemical warehouse and interview with spraying team in Afdeling II, Block 03 S, sighted that there are no using chemical with categories WHO 1A, WHO 1B and Paraquat since 2016. They also can explain about the spraying procedure, the routinely training were conducted every month by assistant.

7.2.7.

There are procedure No 23 dated 2 January 2018 about chemical handling. Based on field observation to the chemical warehouse sighted that there are MSDS for each of chemical with English and *Bahasa* version. However the unit of certification to be consider to providing all MSDS in *Bahasa* versions. (OFI).

7.2.8.

The certification unit has SOP for the Management of hazardous and toxic waste with No. SPO 02 No. Revision 02 dated January 2, 2015. In the SOP it is explained that all hazardous and toxic waste and the former hazardous and toxic waste packaging that is produced cannot be reused for other purposes and must be immediately submitted to a licensed hazardous and toxic Waste temporary storage.

Based on the results of field visits to Landfills Blok 05 AP Afdeling 3 and Berangir Mill employee housing, it was found that there were no former pesticide containers that were discarded at Landfills and there was no reuse of pesticide containers as flowerpots or as water storage. The results of the field visit to the hazardous and toxic waste temporary storage in Berangir Mill revealed that the waste chemical packaging used was stored at the temporary storage and would be handed over to a licensed hazardous and toxic waste collector.

7.2.9.

Based on a review of documents and interviews with surrounding village and workers sighted that the company did not perform the application of pesticides from the air.

7.2.10

The last medical examination carried out for pesticide and chemical handlers was carried out on September 19, 2019 by doctors from PT Prima Medica Nusantara Unit Pabatu Hospital to 43 workers related to chemicals in the Berangir Business Unit (Estate and Mill workers).

From the results of the examination, there is a recommendation to control the CH doctor. In this regard, the auditor can show evidence of follow-up actions on the recommendation of the audit results.

For 2020 employee health checks will only be carried out in November 2020 based on a letter with number BER/0407/60/X/2020 dated 8 October 2020 concerning health checks for handlers of pesticides and toxic chemicals. In the letter, a list of names of employees who will be included in the medical examination is provided.

7.2.11

During the audit, the pesticide application conducted at estate area to control weeds in the circle and path. Based on field observation and interview with pesticides applicator 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 ways that are environmentally and socially responsible manner.

7.3.1 and 7.3.2

The company has a waste management plan consisting of:

- **Solid waste**
Solid waste is reused by the certification unit. The solid waste that is reused is EFB which is reused into the land as fertilizer. Meanwhile, shells and fiber are reused as boiler fuel. The amount of EFB usage for the period January - September 2020 was 15,392.71 tons. As for the use of shells up to August 2020 as much as 4,839.29 tons and fiber as much as 11,382.67 tons.
- **POME**
Mill Effluent management, namely by reusing it with land applications. Before being distributed to the Land Application, first the mill effluent is managed in the WWTP pond. The company already has a Permit to Use Palm Oil Industry Wastewater in Soil from PT Perkebunan Nusantara IV Berangir based on the Decree of the Regent of

North Labuhanbatu number 660/68 / DLH / 2017 dated 17 February 2017 and is valid for 5 years. Companies can show records of utilization of mill effluent, for example in the period of September 2020 as much as 9,750 M³.

- **Hazardous and toxic waste**

The company has a standard operating procedure for hazardous and toxic waste management with No. SPO 02, revision 3, issued on January 2, 2017, which describes the management of hazardous and toxic waste from the time it is produced until it is submitted to the waste carrier. The company also has a permit for the Temporary Storage of Hazardous and Toxic Waste based on the Decree of the Regent of North Labuhanbatu number 660 / 227.A / DLH / 2017 dated 24 May 2017 and is valid for 5 years. The company has also handed over hazardous and toxic waste to the party carrying the waste, namely PT Jagar Prima Nusantara, which was carried out on October 16, 2020. The waste submitted includes used contaminated packaging waste, used filters, electronic waste, and used rags waste. In addition, the company keeps records of hazardous and toxic waste which is stored in temporary storage. The records carried out until the period of October 2020 are as follows:

- Electronic waste: 57 Pcs
- Contaminated packaging waste: 613 Pcs
- Used Filters: 8 Pcs
- Used rags: 31,852 Pcs.

- **Domestic Waste**

The company has SOP for domestic waste management document No.SPO-20 revision 2, effective January 2, 2015, in the procedures described related to waste management from offices and housing, provision of garbage bins (trash cans) in offices and housing, making temporary garbage dumps , manufacture of landfills with a size of 1.5 x 2 x 9 meters with a minimum distance of 1 KM from the housing.

Based on document review, interviews and field visits, the following evidence is obtained:

- SOP for Domestic waste Management with No.SPO 20 No. Revision 02 dated January 2, 2015, which states that each employee collects his / her trash in the trash can provided and cleans the surrounding yard. Waste disposal by sorting organic and inorganic waste.
- The results of interviews with residents of mill employee housing show that domestic waste is collected next to the house by making a hole and then burning it.
- The results of a field visit to mill employees' housing found piles of domestic waste next to the housing estate and there were burn marks.
- The results of a field visit to Afdeling 6 employee housing found piles of domestic waste and burn marks.
- The results of the field visit to Afdeling 4 employee housing found 2 waste burning spots.
- The results of field visits to the area around the clinic were found by employees burning rubbish.

Based on this evidence, the company has not been able to show evidence that the waste disposal is in accordance with procedures that are fully understood by workers. This becomes **NCR 2020.11 indicator 7.3.2 with minor / non critical category.**

7.3.3

Based on the results of field visits and interviews with workers, the following evidence is obtained:

- The results of interviews with residents of PKS employee housing show that domestic waste is collected next to the house by making a hole and then burning it.
- The results of a field visit to mill employees' housing found piles of domestic waste next to the housing estate and there were burn marks.
- The results of a field visit to Afdeling 6 employee housing found piles of domestic waste and burn marks.
- The results of the field visit to Afdeling 4 employee housing found 2 waste burning spots.
- The results of field visits to the area around the clinic were found by employees burning rubbish.

Based on this evidence, the company has not been able to show evidence of not using open burning for all waste disposal. This becomes **NCR 2020.12 indicator 7.3.3 with minor / non critical category.**

7.3.2.	Status: NCR No 2020.11 with minor/non-critical category	
7.3.3.	Status: NCR No 2020.12 with minor/non-critical category	

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 & 7.4.3**

The company has procedure related to maintain soil fertility (No. Unit Usaha A.10 June 2013). The procedure regulates the basic of fertilization, soil and leaf analysis activities, organic and inorganic fertilization, and fertilization management. During the audit, there is no manuring activity related to stock of fertilizer not yet available in the warehouse. However, based on document review, implementation of manuring activity has been well documented in book of manuring program. It shows that the dose, amount, and location has been in accordance with the recommendation.

Some of the implementations that have been carried out by management include:

- Implementation of Soil and Leaf Analysis conducted by PPKS
- The nutrition cycle strategy carried out by the management unit is the application of empty stretches and the application of liquid waste to the land. The company can demonstrate the realization of the application of 26,000 tonnes of EFB in 2019 with details:
 - Div 1: 7042 tonnes
 - Div 2: 7004 tonnes
 - Div 3: 1736 tonnes
 - Div 4: 2344 tonnes
 - Div 5: 2421 tonnes
 - Div 6: 5462 tonnes

The EFB application for the January-September 2020 period is 15,392.71 tonnes.

As for the realization of POME utilization, companies can show the realization of the utilization of pome which is contained in the liquid waste management report for the fourth quarter of 2019 and the first quarter of 2020. The examples of the realization of POME utilization for the last 3 months are as follows:

- January 2020: 7825 M3
- February 2020: 7650 M3
- March 2020: 3475 M3

Fertilization Realization Up to December 2019

- Urea 671 kg
- Za 374 kg
- NPK 12 865,859 kg
- NPK 15 1,891,890 kg
- MOP 147,725 kg
- Dolomite 692,833 kg
- Borax 1,065 kg

Fertilization realization until June 2020

- NPK 12 f 1,383,222 kg
- NPK 14 much as 261 kg
- MOP 212 kg
- Dolomite 692,833 kg

Based on the results of a field visit to the EFB application area in Block 05 X Afdeling 3, it was found that EFB was applied to the soil in inter row with 1 layer. EFB applications are carried out at locations that have low production.

7.4.2.

The company has routinely monitored the changes on the nutrient status based on the regular soil sampling unit (SSU) and leaf sampling unit (LSU) analysis to determine fertilizers recommendation. The sampling spot has been determined in each division and block routinely and it's supported by well-trained census officer in each unit. SSU is conducted every 3-5 year, meanwhile LSU is conducted annually. The latest Soil Sampling Unit was conducted on 28 December 2017. While The last LSU result was issued on 5 August 2019. Visual observations performed every year at the time of leaf

analysis activities. Visual observation is a consideration in determining the fertilizer recommendations, deficiency of nutrients and analyze the potential of disease which is likely to become endemic of a particular disease.

7.4.4.

There are record of fertilizer usage during year of 2020, such as: Dolomite and NPK. The realization of NPK 12, 12, 7 until September 2020 are 1,382,222.75 Kg for example. The average of fertilizer usage per ton of FFB are 2.51 MT.

Status: Comply

7.5
Practices minimise and control erosion and degradation of soils.
7.5.1

The company has Soil Map and Slope Map in the HCV document. Based on the map, soil type in the operational area of Berangir Estate is Inceptisol and Ultisol. The soil fertility of Inceptisol is generally better than Ultisol. However, because the soil has shallow or flooded groundwater levels, this soil is classified as marginal with special treatment to be suitable for oil palm, while Ultisol is still suitable for oil palm. There was no peat soil in the operational area. There were no fragile or problematic soils such as sandy soil or soil with low organic matter content.

7.5.2. and 7.5.3.

Based on document verification sighted that the oldest oil palm planted year is year of 2000. Therefore interview result sighted that the replanting activity will be conducted on 2025.

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; 7.6.2; and 7.6.3.

The company has Soil Map and Slope Map in the HCV document. Based on the map, soil type in the operational area of Berangir Estate is Inceptisol and Ultisol. The soil fertility of Inceptisol is generally better than Ultisol. However, because the soil has shallow or flooded groundwater levels, this soil is classified as marginal with special treatment to be suitable for oil palm, while Ultisol is still suitable for oil palm. There was no peat soil in the operational area. There were no fragile or problematic soils such as sandy soil or soil with low organic matter content.

Based on document verification sighted that the oldest oil palm planted year is year of 2000. Therefore interview result sighted that the replanting activity will be conducted on 2025. Based on field observation and interview with stakeholders sighted that there are no new development during period of 2019/2020.

Status: Comply

7.7
No new planting on peat, regardless of depth after November 15th, 2018 and all peatlands are managed responsibly.
7.7.1 to 7.7.7.

Based on document verification sighted that the oldest oil palm planted year is year of 2000. Therefore, interview result sighted that the replanting activity will be conducted on 2025. Based on field observation and interview with stakeholders sighted that there are no new development during period of 2019/2020.

Status: Comply

7.8
Practices maintain the quality and availability of surface and ground water
7.8.1 & 7.8.2

The company has a water management plan to support continuous utilization of water sources and availability, the plans are as follows:

- To test the quality of river water, spring water and well water, monitor it regularly. The company has carried out water quality tests for the Upstream and Downstream rivers in the *Berangir, Aek Pandan, Batu Mama, Aek Merah* and *Pasang Lelo* rivers. The test results in semester 1 of 2020 are in accordance with the established Quality Standards, namely PP No. 82 of 2001 Class II.

- Making a signboard related to river border protection. Based on field visits to the area of the *Aek Pandan* river border in Block 05 AH and the *Batu Mama* River border Block 05 AP, it was found that there was a signboard for prohibiting poisoning and electrocuting fish, there was a spray limit and a prohibition on damaging plants.
- Conducting socialization to employees and the community. Based on interviews with the people of *Pasang Lelo* Village and Berangir Plantation Village, it was found that the company had carried out socialization of the river border area and the community understood that the company protected the river by prohibiting poisoning fish and polluting the river.

In addition, the company also has a river border management mechanism with document number SPO 05 revision 02 effective January 2, 2015. The procedure describes the designation of riverbanks as protected areas. Based on a field visit to block 05 AH, the *Aek Pandan* riverbank, it was found that the *Aek Pandan* river border was maintained. There are no traces of chemical applications such as fertilizing and spraying pesticides on the area. 5 palms from the riverbank are marked with a red cross as the spray limit.

Based on field visits and interviews with residents of employee housing at Afdeling 4 Employee Housing and PKS, it is known that the company has provided drilled wells for clean water that can be accessed by employees.

7.8.3

The company has carried out periodic monitoring of the quality of liquid waste in accordance with applicable regulations. The results of testing the quality of liquid waste for the period July 2019 - September 2020, where the pH and BOD parameters were still below the quality standard. The company has a permit for utilizing palm oil waste water on land in accordance with the Decree of the Regent of North Labuhanbatu Number: 660/68 / DLH / 2017, valid for five years since it was enacted in 2017.

The auditors verify environmental pollution issues by the company based on online news with the website: <https://sentralberita.com/2019/03/ditemukan-pipa-tersembunyi-ptpn-iv-berangir-buang-limbah-ke-sungai/>.

Based on the results of the auditor's verification as follows:

- Based on an interview with Simpang Merbau Village, it was found out that it was true that there was waste pollution in March 2019 due to an alleged dumping of waste into the Merbau river. However, this issue has been resolved and the company immediately tackles the issue.
- Based on an interview with the Head of the Environmental Agency of North Labuhanbatu Regency, it is known that the environmental service has conducted a direct check in the field to see the condition of the waste pollution issue. Based on the results of the inspection by the Environmental Service, it is suspected that the issue of environmental pollution was carried out by 5 other companies and it is unlikely that PTPN IV Unit Berangir would pollute waste because the location of PTPN IV Unit Berangir is far from the Merbau river. The environmental office has checked the PTPN Unit Berangir WWTP and after checking there is no indication of waste contamination by PTPN Unit Berangir.
- The company shows evidence of the Minutes of Supervision of Compliance with laws and regulations in the field of protection and management of the environment and forestry in the context of verifying complaints made on May 1, 2019 at Berangir Plantation by 4 officers from the security and law enforcement agencies for the environment and forestry in Sumatra and 1 officers from the Environmental Office of North Labuhanbatu Regency. The main point of the complaint is the allegation of environmental pollution by oil palm plantations and mills by PTPN IV Berangir in Sei Raja Village, Na IX-X District based on Online media. From the verification results, it is known that the company has:
 - a. The company has complied with the status of the waste water disposal permit.
 - b. The company has complied with the status of compliance with the coordinate point compliance.
 - c. In April 2019, the company reported the incident of pipe damage to the North Sumatra Regional Police and the follow-up to this report is that the report is in process and witnesses have been examined.
 - d. Currently the company is doing pipe maintenance by replacing several types of pipes and planting pipes.
 - e. It is planned that WWTP and embankment maintenance will be carried out in June under the supervision of the Environmental Service of North Labuhanbatu Regency.
 - f. The implementation and findings of the verification facts of complaints and environmental monitoring are known and approved by PTPN IV Berangir.

Based on this explanation, the Auditor concluded that environmental pollution according to the online media website has

been completed.

Based on field visits, interviews and document reviews, the following evidence was obtained:

- Based on the results of field visits to WWTP and interviews with WWTP officers, it was found that the outlet flow meter was damaged and not installed. So far, the company has performed a manual calibration to determine the amount of mill effluent applied to the Land Application.
- Total POME Utilization for the period of July 2020 was 7,550 M3, August 2020 was 9025 M3, September 2020 was 9750 M3.

Based on this evidence, the company has not been able to show evidence that monitoring the volume of mill effluent applied to the land uses accurate data. This became **NCR No 2020.13 indicator 7.8.3 with minor / non critical category.**

7.8.4

The company already has a surface water use permit, whether for mills, estate or housing, based on the results of a document review, all of its permits have expired on February 28, 2020. The company has shown an application for an extension of the water resources legalization permit to the Integrated Licensing Investment Office of North Sumatra Province on February 13, 2020. At the time of the onsite audit, the process of extending the water resources exploitation permit had not yet been completed. So this becomes OFI (OFI number 7).

The company has recorded the use of water for processing FFB. The company can show records of water use for FFB processing for the period July 2019-September 2020. Based on the document review, it is known that the water use by the company is still below the water use budget set by the company.

Based on the results of field visits and document reviews, the following evidences are obtained:

- Records of water use for FFB processing in the period July 2020 totaling 20,429 M3; August 2020 as many as 23,142 M3 and September 2020 as many as 23,256 M3.
- Based on the results of field visits and interviews with WTP station officers, it was found that the water flow meter to the processing station was damaged and had not functioned for more than 1 year.

Based on this evidence, the company has not been able to show evidence of the amount of calculated water use for processing accurately. This becomes **NCR No 2020.14 indicator 7.8.4 with minor / non critical category.**

7.8.3. Status: NCR No 2020.13 with minor/non-critical category

7.8.4. NCR No 2020.14 with minor/non-critical category

7.9

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

7.9.1

The company improves the efficiency of non-fossil fuels such as shells and fiber as boiler fuel. Companies can show records of the utilization of shells and fiber as boiler fuel for the period July 2019-September 2020. FFB production was 81,304.85 tons with the use of shells as much as 4,839.29 tons and the use of fiber as much as 9,109.73 tons. As for the efficiency of using shells and fiber until September 2020, shells are 0.05 ton / tonFFB and Fiber 0.11 ton / tonFFB.

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

Calculation of GHG and its monitoring has conducted by sustainable department. GHG emission calculated using RSPO palm GHG calculator 4.0 Summary of GHG emission for Berangir POM and its supply base are listed as follows:

Summary Emission

Emmission per product	tCO2e/tProduct
CPO	9.91
PK	9.91

Production	t/yr
FFB processed	98080.00
CPO produced	30276
PK produced	5927

Extraction	%
OER	23.13
KER	4.53

Land use	Ha
Planted area	21952.26
Planted on peat	4787.75
Conservation Area	601.67

Summary of field emission and Sinks

Description	Own crop		
	tCO2e	tCO2e/ha	tCO2e/tFFB
Land conversion	210809.33	9.60	1.61
CO2 emmisions from fertilizer	14428.88	0.66	0.11
N2O emissions from Peat	35839.95	1.63	0.27
N2O emissions from Fertilizer	8366.81	0.38	0.06
Fuel comsumption	1921.64	0.09	0.01
Peat oxidation	261411.14	11.91	2.00
Sinks			
Crop sequestration	-199819.29	-9.10	-1.53
Sequestration in Conservation area	0.00	0.00	0.00
Total	332958.45	15.17	2.54

Summary Oil Mill Emissions and Credits

Remarks	tCO2e	tCO2e/t FFB
Emissions sources		
POME	25655.09	0.20
Fuel consumption	81.12	0.00
Grid electricity	4.28	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	25740.49	0.20

Palm Oil Mill Effluent (POME) Treatment

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

POME Divert to Anaerobic Digestion

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

Divert to methane capture (electricity generation) (%)	0
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The GHG value for the January - December 2019 period has increased when compared to the value in the previous year. This is because in the 2019 Berangir POM has 5 supply bases consisting of Air Batu estate, Ajamu estate, Berangir estate, Meranti Paham estate, and Panai Jaya estate and there are peatlands in Meranti Paham estate, Ajamu estate and Panai Jaya estate covering an area of 4787 hectares.

7.10.2

PTPN IV Berangir Unit did not clear any new land after January 1, 2015. Based on interviews with management and document review, it is known that the operational area of the Berangir business unit has been managed since 1974 and is currently entering its second planting cycle.

7.10.3

List of pollutant identification includes listed in the RKL / RPL and SOP for GHG Mitigation. The emission sources cited include fertilization and spray, use of diesel, transportation, processing of FFB, POME.

To reduce or minimize GHG emissions listed in the GHG Mitigation document, for example the use of fertilizers and agrochemicals in the right dosage, application of empty lengths on the soil, utilization of fiber and shells as boiler fuel, utilization of factory wastewater on the ground and conducting regular emission testing. Based on the results of testing ambient emissions, generator set emissions and boiler emissions for semester 1 of 2020, it is known that the test results are still in accordance with the established quality standards.

Status: Comply

7.11

Fire is not used for preparing land and is prevented in the managed area.

7.11.1.

Based on area statement review, interview with surrounding village and field observation result. It was obtained information that there are no new planting or replanting activity during period of 2019/2020.

7.11.2

Efforts made by the CH to prevent, monitor and control fire incidents include:

- The existence of a land fire control SOP.
- There is a fire fighting team.
- Socialization of land fires to employees.
- Conduct regular monitoring of fire prone areas. This is indicated by the routine monitoring records.
- Conducted a fire fighting team simulation.
- Routinely inspect fire fighting equipment on a monthly basis

The CH routinely reports the results of fire monitoring, for example Land Fire Monitoring Report of PTPN IV Berangir POM to the Labuhanbatu Utara Regency Agriculture Office on 4 July 2020 (proof of receipt from the relevant agencies is available).

The CH can show the monitoring results of the fire prevention and control facilities in the Berangir Estate for the semester I 2020. The monitoring results state that the infrastructure owned is in good condition and can be used if necessary.

Based on the explanation above, it is concluded that the CH has documents on the implementation of fire prevention and control, fire monitoring and maintenance of facilities and infrastructure as well as reporting.

7.11.3

The CH has formed an Emergency Response Team for the Land, Plantation, Forest and Housing Fire Hazard Control Brigade consisting of a core team and a support team with a total membership of 99 people. In addition, the CH has collaborated with the Fire Care Farmers Group which consists of 40 community members and has been endorsed by the

Plantation Office of Labuhanbatu Utara Regency.

The CH shows the Attendance List document for the Fire Fighting Training which was held on August 6, 2020, in that document it is known that the CH also involves the surrounding community in the context of fire prevention and control.

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 and 7.12.8

PTPN IV Berangir did not clear any new land after November 2005. Based on interviews with management and document review it was found that the operational area of the Berangir business unit had been managed since 1974 and is currently entering its second planting cycle. The disclosure was sent to the RSPO on 2 August 2018.

7.12.2

The company did not clear any new land after 15 November 2018 so the HCV assessment carried out in 2011 is still valid. The company already has documents on the results of the identification of high conservation value areas carried out by PT Surveyor Indonesia in 2011. The scope of this is the PTPN IV Berangir plantation with an area of 4,648.7 ha. The total area of HCV Kebun Berangir is 208.64 Ha consisting of HCV1.1, HCV 1.2, HCV 4.1, HCV 4.2, HCV 6. Identification of HCV by involving local communities through public consultations held on 3 September 2011. Based on the study of the HCV identification document, it is known that there are several wild animals, for example:

Aves

- *Burung alap-alap* (*Accipter trivirgatus*)
- *Ruak-ruak* (*Gallicrex sp.*)
- *Burung jalak* (*Sturnus contra*)
- *Burung elang bondol* (*Haliastur indus*)

Mammals

- *Kukang* (*Nycticebus coucang*)
- *Berang-berang* (*Prionailurus bengalensis*)
- *Tupai* (*Tupaia javanica*)
- *Musang* (*Prionodon linsang*)
- *Landak* (*Hystrix brachyurum*)

Reptiles

- *Tokek* (*Gecko gecko*)

7.12.3

Indonesia, especially the part of North Sumatra, is not a High Forest Cover Landscape (HFCL), so this indicator is not applicable.

7.12.4

Based on the results of document studies, interviews and field visits to HCV areas, the following evidence was obtained:

- The company has an HCV management and monitoring plan for the period of Semester 1 of 2020 which includes: Signboard Conditions, Biodiversity of Flora and Fauna, Intensity of disturbance to river boundaries and springs from fire hazards, Changes in river width, and river water quality.
- The company has carried out management and monitoring of HCV such as Monitoring Signboard in July 2020, Monitoring Flora and fauna in July 2020, conducting water quality testing in semester 1 of 2020, Monitoring fire hazard intensity inspection in July 2020, and Monitoring River width monitoring in July 2020.
- Based on the report on the results of HCV identification carried out by PT Surveyor Indonesia in 2011, it is known that there are areas identified as HCV 4.2, namely areas that are important for erosion and sedimentation control, namely *Jagat Hill*, *Soleh Hill*, *Jala Hill*, *Monyet Hill* and *Terjal Hill*.
- Based on the results of a field visit to the *Jagat Hill* HCV area in Block 05 AF Afdeling III, it was found that there were

traces of burning wood in the area.

- Based on interviews with Assistant Afdeling III, it was found that the Jagat Hill HCV area was often used for human activities such as camping.
- Based on interviews with HCV / PPD Officers, it is known that the HCV Semester 1 2020 management and monitoring plan has not been prepared in consultation with stakeholders.

Based on this, the company has not been able to show evidence of:

- Results of a review of the HCV management and monitoring plan (min 5 years)
- Monitoring Program for disturbance of HCV areas 4.2.
- Evidence that an HCV management and monitoring plan has been developed in consultation with stakeholders.

This becomes **NCR No 2020.15 indicator 7.12.4 with Major / Critical Category.**

7.12.5

Based on previous assessments and field visits, it was found that within the company's operational areas there were no HCV areas that conflicted with the rights of local communities.

7.12.6

The company already has SOP for the Protection of Flora and Fauna with Document Number SPO 09 dated January 2, 2015 which explains that the management procedure for the protection of flora and fauna is carried out by disseminating information to employees and the community regarding the prohibition of cutting down trees, capturing, maintaining or killing animals and making signs prohibiting cutting trees, capturing, maintaining and trading animals. In addition, there is a circular number: BER / SE / Intrn / 05 / I / 2018 dated 02 January 2018 from the Energetic Business Unit Manager regarding the Prohibition and Sanctions for Capturing, Harming, Collecting, or Killing Animals which are included in the RTE (Rare Threatened Endangered) category. in Law No. 5 of 1990 article 40 paragraph 2 the sanction referred to is the maximum imprisonment of five years and a maximum fine of Rp 100,000,000.

The company has also identified flora and fauna in semester 1 of 2020 and the results of monitoring have been reported to the North Sumatra Province Natural Resources Conservation Agency (BKSDA) on July 9, 2020. As an effort to protect flora and fauna, the company has also conducted outreach to employees This is evidenced by the Attendance List of HCV Socialization to employees on April 8, 2019 which was attended by 58 employees and on August 20, 2020 to 14 employees.

Based on the results of interviews with Spraying workers in Block 03 S Afdeling III and Harvest Workers in Block 08 AB Afdeling VI, it was found that the workers understood that it was forbidden to catch or hunt animals. The company has carried out socialization about the presence of flora and fauna around the plantation with direct socialization or with signboards for the species of animals around the estate area.

7.12.7

The company has monitored the biodiversity of flora and fauna in the first semester of 2020. Based on the monitoring results of flora and fauna, several types were found, namely:

- 19 Species of birds, such as *Burung Perenjaj* (*Orthotomus atrogularis*), *Burung Terocok* (*Pycnonotus goiavier*), *Burung Raja udang* (*Halcyon cyanoventris*) dan *Burung Jalak* (*Sturnus contra*).
- 6 Types of Mammals such as *Monyet Ekor Panjang* (*Macaca fascicularis*), *Kancil* (*Tragulus javanicus*), *Babi hutan* (*Sus verucossus*), *Tupaia* (*Tupaia javanica*), *Musang* (*Prionodon linsang*) dan *Kalong* (*Pteropus vampires*).
- 5 types of reptiles and amphibians such as: *Tokek* (*Gecko gecko*), *Biawak* (*Varanus salvator*), *Kadal* (*Mabouia multifasciata*), *Katak* (*Bufo sp*), *Bunglon* (*Myrmeleon sp*).

In addition, the company has conducted monitoring of HCV areas. Based on the monitoring of the HCV area for the July 2020 period, it was found that there were no indications of fire, no hunting of animals, and no animal traps. The company has also installed a signboard to prohibit hunting, poison fish, and a ban on destroying HCV areas.

7.12.4.	Status: NCR No 2020.15 with Major/Critical category	
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3.2 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and logo from Certification Body which submitted by Client	X or√
ASA-2	The company has no logo license.	√
	Status: Comply	
2.	Implementation of certificate and logo used by Client comply with size and type (shape) against Guideline of Logo Use	X or√
ASA-2	The company does not use RSPO logo on products.	√
	Status: Comply	
3.	Implementation of Certificate and Logo is not used on product	X or√
ASA-2	The company does not use RSPO logo on products.	√
	Status: Comply	
4.	Controlling of Certificate and Logo, including withdrawing inappropriate logo.	X or√
ASA-2	The company does not use RSPO logo on products.	√
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of PT Perkebunan Nusantara (PTPN) IV against the rules for partial certification was determined through external assessment conducted by RSPO Accredited Certification Body in accordance with RSPO Certification System clause 4.2.4. A summary of findings is as stated below.

PT Perkebunan Nusantara (PTPN) IV Time Bound Plan (TBP) is explained in point 1.10. PT Perkebunan Nusantara (PTPN) IV has informed the TBP progress, MUTU has considered that PTPN IV is complied with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by PTPN IV on June 2020.

MUTU has verified partial certification for un-certified unit's subsidiary of PTPN IV based on their Time Bound Plan. There is three (3) uncertified mills and eleven (11) uncertified estates of PTPN IV, 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:

1. There are no significant land conflicts which have not been declared above.
2. The company has follow RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
3. There is no labour disputes that is not being resolved through an agreed process.
4. 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.

1. Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
1.	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Yes and positive assurance is produced for these units.</p> <p>Auditor verification There are internal audit that has been conducted for management units of Bah Birung Ulu Estate, Bukit Lima Estate, Timur Estate, Balap Estate, Panai Jaya Estate, Sosa Estate, PT Agro Sinergi Nusantara and PT Sinergi Perkebunan Nusantara.</p> <p>Positive assurance is produced for these units.</p>
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>PTPN IV has submitted liability disclosure to RSPO.</p> <p>Based on PTPN IV disclosure of liability there is one (1) estate that has liability which is PT Sinergi Perkebunan Nusantara.</p> <p>PTPN IV has sent their liability disclosure to the RSPO Compensation Panel (rspocompensation@rspo.org in 2016. PTPN IV has been update their liability disclosure and</p>

		<p>also sent LUCA on 2018. There is one (1) unit that has non-compliant land clearance.</p> <p>Auditor verification Auditor has verified the supporting evidence of above the company statement. The above statement in accordance with the supporting evidence provided.</p>
3.	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>There is new planting/ land clearing after 1st January 2010 in subsidiary of PTPN IV (SPN, Timur Estate, ASN, Panai Jaya Estate, Balap Estate, Bah Birung Ulu Estate).</p> <p>Auditor verification PTPN IV has sent their liability disclosure and LUCA to the RSPO Compensation Panel (rspocompensation@rspo.org in 2016. PTPN IV has been update their liability disclosure and also sent LUCA on 2018. There is seven (7) unit that has non-compliant land clearance without NPP and this unit is become object of sanction.</p>
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>There are land conflicts in Bukit Lima Estate, Balap Estate, Sosa Estate and PT SPN. To resolve the land conflict, company use legal manner, mediation with local government or negotiate with complainant.</p> <p>Auditor verification The company has procedure of conflict area management No. 4 (revise 3) January 2, 2017 has explain that problem solving of conflict area is conducted by negotiation which involves leader of dispute area and determine the compensation done by negotiation until they reach agreement.</p> <p>There is evidence of documented land dispute resolution for the uncertified units.</p>
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>There is no labor disputes.</p> <p>Auditor verification There is no information from public source and RSPO website on any labor conflict for uncertified unit of the group subsidiaries.</p> <p>The company has a mechanism for dealing with complaints and dissatisfaction in the SOP of</p>

		<p>Internal Communication and Employee Grievance Handling (internal) (No. 19 Rev 3 on 6 November 2018), SOP Handling Customer Complaints and Environment (external) (No. 13 Rev. 1 on 2 January 2015) and there are SOP of Communication and Public Consultation (No. SPO 03, Rev. 02, on 2 January 2015).</p> <p>The Company has a policy to protect the identity of the Whistle Blowing that stated in the documents of Infringement Complaint Management System (Whistle Blowing System) PT Perkebunan Nusantara IV (Persero) on 2013 in Article 10: Protection for Reporter.</p>
6.	<p>Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1 (it has changed be Criterion 4.2 in P&C 2018).</p>	<p>Yes, there is legal non-compliance is being processed i.e. HGU, consist of:</p> <p>Marjandi Estate: 30 Ha</p> <ol style="list-style-type: none"> 1. Dolok Sinumbah Estate: 35.94 Ha 2. Air Batu Estate: 459.02 Ha 3. Berangir Estate: 10 Ha 4. Sawit Langkat Estate: 301.50 Ha 5. Sei Kopas Estate: 763 Ha 6. Panai Jaya Estate <p>Auditor verification</p> <p>The company has a complete list of regulations in 2020 that includes local regulations, national regulation and international regulation.</p> <p>The procedure explains that the person responsible for the management of legal documents are the Head of General Affairs and Human Resources. The company has kept a list of rules and regulations in 2020 at the Head of General Affairs and Human Resources Department and has distributed to each division office in hardcopy and softcopy. The</p>

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 ASA-1 Assessment

NCR No.	: 2019.01	Issued by	: Hasiholan Sihombing
Date Issued	: 20 June 2019	Time Limit	: 18 September 2019
NC Grade	: MAJOR	Date of Closing	: 22 August 2019
Standard Ref. & Requirement	: 4.7.3 Records of Occupational Health and Safety (OHS) program (see 4.8) and Personal Protective Equipment (PPE) training in accordance with the result of hazard identification and risk analysis shall be available to all workers.		
Evidence observed (filled by auditor): The company has a PPE Replacement Mechanism in the Circular Letter (No: BER/SE/Intern/24/II/2019), which explains when found damaged PPE, the administrative officer made the damage PPE reports and made a report on the request for new PPE replacement. Based on field observations and interviews with workers at the Berangir Mill and Berangir Estate, the facts of the field were found as follows: <ul style="list-style-type: none"> • 1 worker at the kernel station, 1 worker at the engine room station, 1 worker at the chemical warehouse, 1 worker at the temporary storage of hazardous and toxic materials, 1 worker at the water treatment plant, 2 harvesters at the division I, 1 harvester at the division IV, 2 pesticide applicators at the division II and 3 manual weeding workers at the division IV using PPE shoes that do not meet company standards (purchased by the workers themselves because the shoes that provided by the company are damaged before the new replacement period). 			
Non-Conformance Description (filled by auditor): Based on that evidences, the company has not been able to demonstrate the implementation of PPE management according to the procedure owned.			
Root Cause Analysis (filled by organization audited): <ul style="list-style-type: none"> - There is no monitoring on the completeness and condition of PPE used by employees - There is still a lack of employee understanding of PPE replacement mechanisms 			
Correction (filled by organization audited): <ul style="list-style-type: none"> - Make monitoring of the completeness and condition of PPE used by employees every month - Socialize PPE replacement mechanism to all employees who use PPE 			
Corrective Action (filled by organization audited): <ul style="list-style-type: none"> - Evaluating the completeness and condition of PPE - Evaluate the socialization mechanism of PPE replacement a maximum of 1 month after socialization 			
Assessor Evaluation and Conclusion (filled by auditor): Verification July 15, 2019 The company has explained the root cause analysis of the discrepancies that arise as well as corrective actions so that the discrepancies do not arise again in subsequent assessments. However, the company has not yet sent evidence of corrections to the discrepancies that have arisen. This Nonconformity is still not fulfilled. Major Verification August 22, 2019 The company shows evidence of improvements in the form of: <ul style="list-style-type: none"> - Make monitoring of the completeness and condition of PPE used by employees every month (July) 			

- Monitoring data on PPE usage and PPE conditions in July 2019 in Estate and Mill.
- Minutes of the socialization of the PPE usage mechanism that were carried out in all afdeling and factories on July 17, 2019 which were attended by:
 - Afdeling 1: 43 employees
 - Afdeling 2: 51 employees
 - Afdeling 3: 59 employees
 - Afdeling 4: 43 employees
 - Afdeling 5: 60 employees
 - Afdeling 6: 36 employees
- Evaluate the related mechanism for PPE replacement on August 1, 2019 to 263 Afdeling I-VI employees, from the evaluation results it is known that all employees have understood the mechanism related to the replacement of damaged PPE.
- The 2019 PPE procurement documents (boots, safety shoes, helmets, earplugs) are matched with the size and number of the Berangir unit to the planning section on August 14, 2019.
- Example of a request for replacement PPE that has been damaged from Afdeling 1 harvesting employees with no. 04016764 on July 8, 2019.
- Local procurement documents for PPE consisting of 5 safety shoes and 8 boots for employees whose PPE has been damaged.
- Proof of PPE handover from management to employees whose PPE was damaged on July 9, 2019. (Broken shoes handed over to the company)
- Based on the results of field visits and interviews with Mill employees (1 WTP officer, 1 warehouse officer, 1 sorting officer, and 1 sterilizer operator) and 3 Harvest Employees (Afdeling 5) it is known that employees have used the appropriate PPE and can explain the mechanism of PPE change in accordance with the socialization delivered by the management.
- Based on the results of a visit to the Central Warehouse, it is known that PPE besides Shoes, Earplugs and helmets are available at the Central Warehouse.

Based on field verification and evidence presented by management, Nonconformity was stated to be fulfilled

Verified by : **Hasiholan Sihombing & Bayu Yogatama**

NCR No.	: 2019.02	Issued by	: Bayu Yogatama/Nurdin Chaeriana
Date Issued	: 20 Juni 2019	Time Limit	: 18 October 2020
NC Grade	: Minor upgrade to Major/ Critical	Date of Closing	: 26 September 2020
Standard Ref. & Requirement	: 5.2.4 Where a management plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> •The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; •Outcomes of monitoring shall be fed back into the management plan. 		
Evidence observed			
The company has a HCV management and monitoring plan for semester II 2018 and Semester I 2019 with the following details: <ul style="list-style-type: none"> - Diversity of flora and fauna species 			

- Disturbance to river boundaries and springs from fire hazards
- Changes in river width and river water quality
- Sign board condition.
- Landslides and erosion
- Success rate of river riparian rehabilitation program

However, based on the results of the 2018 HCV monitoring document review, the activities that have been carried out are monitoring the condition of the sign board and monitoring woody plants in the river riparian area. As for semester 1 of 2019, the company has not been able to show documents on the realization of HCV monitoring.

Non-Conformance Description

Based on the explanation above, the Company has not been able to show evidence that all HCV monitoring plans have been implemented.

Root Cause Analysis

- There is no PIC who is directly responsible for monitoring HCV.
- Negligence and lack of understanding regarding HCV monitoring. PIC does not yet understand because this year there has not been any socialization (refreshment) for HCV management and monitoring.

Correction

22 June 2019

- Establish a PIC that is directly responsible for conducting HCV monitoring
- The results of HCV management and monitoring are evaluated by the Assistant Plantation Personnel
- Conducting outreach regarding HCV management and monitoring activities

Corrective Action

22 June 2019

Carry out HCV monitoring in accordance with the program or plan
 After the socialization of HCV management and monitoring, an evaluation is carried out a maximum of one month after the socialization. Evaluation is carried out to measure the level of understanding of the socialization participants. Then conducted periodic Refreshment socialization.

Assessor Evaluation and Conclusion

Verification 18 July 2019

Dissemination of high Conservation Values to employees which was held on July 16, 2019 in a estate manager meeting room attended by 18 participants. Attendance list, training materials, and documentation of activities are attached.

The company has analyzed the root cause of the discrepancies that have emerged, made corrections and planned corrective action to avoid the same discrepancies from reappearing in the future, besides that the company has sent proof of corrections for the non-conformities that have emerged. Please answer the auditor's question above and show additional evidence according to the question above, based on this explanation. This discrepancy is still not fulfilled.

Verification 24 July 2019

Decree of the Berangir Business Unit Manager Number: BER / MU / Kpts / 2 / VII / 2019 regarding the Person in Charge and Implementing the Management and Monitoring of HCV in the Berangir Business Unit dated July 1, 2019. In a written decree, the Officer is responsible for managing and HCV Monitoring is Afdeling 1-6 Assistant and Foreman. And one chairman is the Assistant Head of Plants. The job descriptions include:

- Monitoring of HCV areas in the Berangir Business Unit (signboard, Animal / Endangered Plants, Tree Planting, etc.)
- Monitoring HCV every 6 months.
- Doing tree planting
- Propose improvements and further management if there are areas or attributes of damaged HCV management.
- Conducted an inventory of the number of HCV signboard in the Berangir Business Unit.

The company has analyzed the root cause of the discrepancies that have emerged, made corrections and planned corrective action to avoid the same discrepancies from reappearing in the future, besides that the company has sent proof of corrections for the non-conformities that have emerged. Please provide additional evidence regarding the example implementation of HCV monitoring, based on this explanation, this non-conformity **has not been fulfilled**.

29 July 2020

Until the ASA 2 Remote Audit activity, there has not been any improvement related to the non-conformity, this remains a discrepancy in indicator **7.12.4 Critical** to the 2018 Principles and Criteria for Sustainable Palm Oil Production, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on April 20, 2020.

Non-conformities at the time of ASA-2 assessment**Evidence observed**

The company shows the following evidence:

- PT PN IV Berangir did not open any new land after November 2005
- The company has documented the results of the identification of high conservation value areas conducted by PT Surveyor Indonesia in 2011. The scope is the PTPN IV Berangir plantation with an area of 4,648.7 ha. The total area of HCV Kebun Berangir is 208.64 Ha. The HCV report has been reviewed by a registered RSPO HCV Assessor.
- The company conducted a review with the community regarding the HCV management and monitoring plan on 14 May 2020
- The company has a management and monitoring plan for the HVC area for the first semester of 2020 with indicators for the management and monitoring plan as follows:
 - Signboard condition
 - Biodiversity of flora and fauna
 - Intensity of disturbance to the area of river boundaries and springs from fire hazard
 - Change in river width
 - Quality of river water and banners
- The company shows the following HCV monitoring and management activities in semester I 2020:
 - Signboard monitoring results in the first semester of 2019 in the HCV area, for example the condition of the signboard in the Aek Pandan River riparian (Afdeling III) and the springs in Afdeling II with good condition.
 - The company has reported the results of flora and fauna monitoring to the North Sumatra Province Natural Resources Conservation Center on July 9, 2020.
 - The company has tested the quality of river water in the second semester of 2019, and has shown proof of receipt from the river water sample laboratory for testing the quality of river water in semester 1 of 2020.

However, the Company has not been able to present a management and monitoring plan for changes in river width and intensity of disturbance from fire hazard.

Non-Conformance Description

Based on the explanation above, the Company has not been able to show evidence that all HCV monitoring plans have been implemented, such as changes in river width and intensity of disturbances from fire hazards.

Assessor Evaluation and Conclusion**Verification 12 August 2020**

The company has sent proof of repair as follows:

- The company shows the results of monitoring the width of the river for the semester I 2020 which was carried out on August 1, 2020. Monitoring was carried out in the Aek Pandan River riparian, Berangir River riparian, Batu Mama River riparian and Aek Merah River riparian. From the results of monitoring the width of the river water, the company concluded that there was no significant change in the width of the Berangir river when compared to the results in the HCV assessment in 2011 which stated that the width of the river in the Berangir area was around 5-10 meters, whereas based on current monitoring results, the width The rivers passing this range are on the Aek Pandan (Afdeling IV) riverbank with a width of 11.2 meters and the Aek Pandan River (Afdeling III) with a width of 10.9 meters.

- The company also showed the results of fire intensity checks that were carried out on August 31, 2020 at the locations of the Aek Pandan River Border, Berangir River Border, Batu Mama River riparian and Aek Merah River riparian. The results of the examination were that there were no hotspots either on the river or spring borders.
- Memo of Kebun Berangir Manager number: BER / M-173.A / VII / 2020 dated 30 July 2020 which is addressed to the HCV PIC, Assistant Head of Plants and Assistant Plants regarding Supervision of the HCV Management and Monitoring Program. This memo contains statements related to the implementation and monitoring of all HCV management and monitoring programs.

Based on the evidence of repairs sent, the Company has shown evidence of monitoring and management for changes in river width and the intensity of disturbances from fire hazards in the 1st semester of 2020. However, a description of the root cause analysis and corrective actions to prevent the same incident from recurring in the next audit assessment cannot be shown yet. Non-conformance No. 2019.02 has **not been fulfilled**.

Verification 24 September 2020

Based on corrective actions conveyed by the company that as an effort to prevent the same incident from recurring, the Company will conduct an evaluation of the PIC of HCV management and monitoring activities in the Berangir Unit in order to find out the level of understanding of the socialization participants.

However, the socialization and evaluation documentation that has been carried out by the company cannot yet be shown. Based on this, the discrepancies in this indicator **have not been fulfilled**.

Verification 26 September 2020

The company shows additional evidence of the following:

- HCV socialization on August 20, 2020 which was attended by Managers, Assistant Head of Plants, Assistant Human Resources, General and Security, Plant Assistant, Foreman 1 Afdeling, Krani, and employee representatives with a total of 14 participants.
- The results of the evaluation are related to the socialization of HCV management and monitoring that was carried out on August 20, 2020. In accordance with the results of the evaluation that have been shown, all participants have understood the contents of the socialization, namely related to the management and monitoring of HCV areas carried out within the company scope.

Auditor Conclusion

Based on evidence of improvement, root cause analysis and demonstrated corrective action, the discrepancies in this indicator have been **fulfilled**.

Verified by : Bayu Yogatama/Nurdin Chaeriana

<i>NCR No.</i>	: 2019.03	<i>Issued by</i>	: Bayu Yogatama
<i>Date Issued</i>	: 20 June 2019	<i>Time Limit</i>	: 18 September 2019
<i>NC Grade</i>	: MAJOR	<i>Date of Closing</i>	: 22 August 2019
<i>Standard Ref. & Requirement</i>	: 5.3.2 There shall be evidence that all chemicals and their empty containers are disposed of responsibly		
Evidence observed (filled by auditor):			
The company has an SOP related to the management of Hazardous Waste No. SPO 02 dated January 2, 2017 (Revised 03) and Manager Circular related to Hazardous Waste Management on August 14, 2017 which explained that Hazardous Waste must be submitted to Hazardous Waste Warehouse no later than 1 day after use. As for the results of document studies and field observations, the facts are as follows:			
Pesticide Used Packaging			

- The latest shipment of waste to 3rd party licensed by the company on August 28, 2018.
- Documents for the use of Pesticides in 2019 until May, there were known uses of pesticides such as Santafuron as much as 35.88 Kg, Metsulindo as much as 40.02 kg, and Elang (Glyphosate) as many as 2,995.6 ltr.
- However, based on a study of 2019 logbook hazardous waste documents up to June, there was no record of used pesticide packaging that entered the hazardous waste warehouse and based on field observations to the hazardous waste warehouse, Central Pesticide Warehouse and Afdeling Pesticide Warehouse, no pesticide packaging was found.

Medical Waste

- The results of interviews with doctors and paramedics in the clinic are known that until now no records have been made of medical waste produced.
- There is no evidence of handover of medical waste from the clinic to Pabatu Hospital (Medical Waste Destruction)
- Field observation in the clinic area, it is known that the medical waste storage area has not met the minimum storage standard. (placed in an open box).

Based on the explanation above, the Company has not been able to show evidence that all chemical waste and its containers have been disposed of responsibly.

Non-Conformance Description (filled by auditor):

Based on the explanation above, the Company has not been able to show evidence that all chemical waste and its containers have been disposed of responsibly.

Root Cause Analysis (filled by organization audited):

- There is still a lack of employee understanding of hazardous waste management
- There is still a lack of understanding from clinic staff in managing Medical Waste
- Not yet carried out monitoring of the implementation of hazardous Waste and Medical Waste management on a scheduled basis

Correction (filled by organization audited):

- Packaging of used pesticides (Hazardous Waste) is stored in Afdeling because of a lack of understanding of warehouse officials in Afdeling to immediately deliver the used pesticide packaging to the hazardous waste temporary warehouse in accordance with SOP
- CH immediately deliver packaging used pesticides to the hazardous Waste temporary warehouse and conduct a socialization of hazardous waste management to employees on July 16, 2019
- Re-socializing the clinic staff about managing Medical Waste.

Corrective Action (filled by organization audited):

- Conduct an evaluation of the socialization that has been done a maximum of 1 month after the socialization to measure the level of understanding of employees and clinic staff
- Monitor the implementation of hazardous waste and medical waste management routinely and documented.
- Make notes on the entry and exit of Medical Waste in Clinics (Medical Waste Log Book)

Assessor Evaluation and Conclusion (filled by auditor):

Verification July 18, 2019

The company shows evidence of improvements in the form of:

- Minutes of the socialization of Medical Waste management to medical officers conducted on July 3, 2019 at the Berangir Estate Polyclinic attended by 5 attendance clinic officers, outreach materials and documentation of activities attached.

- Minutes of the socialization of Hazardous Waste management to employees conducted on July 16, 2019 in the Meeting Room of the Berangir Estate Central Office Manager, which was attended by 22 employees. Attendance list, socialization material and activity documentation attached.

Verification July 24, 2019

The company shows evidence of improvements in the form of:

Medical Waste Recapitulation Documents stored at the Pabatu Hospital (PT Prima Medica Nusantara) until July 15, 2019.

- Infusion Bottles 6 bottles
- Infusion hose 6 strands
- 30 pcs Syringes
- 30 ampoule medicine bottles
- Used gauze 300 gr
- Plastic and cardboard drug container.

Verification July 30, 2019

The company shows evidence of improvements in the form of:

Goods Issuance Letter No. 033 / JPN-VII / 19 dated July 22, 2019 for PT Jagar Prima Nusantara from the PTPN IV area of the Berangir unit using vehicles with BP number 9149 DU with details:

- Contaminated packaging with manifest no WY 0003230
 - Jerrycan 437.5 kg
 - 270 kg drum
 - Santafuron 7 kg
- Use Rags 6,476.25 kg with manifest no WY 0003229
- 0.9 kg cartridge with manifest no WY 0003232
- 54 kg Used battery with manifest no WY 0003231
- 115 kg Used Oil with manifest no WY 0003233

Major Verification August 22, 2019

The company shows evidence of improvements in the form of:

- Evaluation of the results of the socialization of the management of Medical Waste to 4 Berangir polyclinic officers conducted on 31 July 2019 by the HR Assistant and polyclinic Doctors. From the evaluation results it is known that all four officers have understood the procedures for managing medical waste in polyclinic.
- Evaluation of the results of the socialization of Hazardous Waste management to 263 employees in Afdeling I-VI consisting of harvesting employees, which was carried out on July 31, 2019 by the HR Assistant and the afdeling assistant. From the evaluation results it is known that all four officers have understood the procedures for managing medical waste in polyclinic.
- Letter of Agreement hazardous waste management No: 210 / FB-ABS / SPK-LB3 / IV / 2019 between Berangir polyclinic and PT Amindy Barokah North Sumatra dated April 1, 2019, which is valid for 1 year.
- Hazardous waste logbook to date August 21, 2019, from the results of the study of documents known to August 21, 2019 LB3 has been stored as follows:
 - 21 Jerigen Ex Pesticides
 - 43 bottles of Ex metsulindo
- Data on the use of pesticides from July 22 to August 21, it is known that the use of pesticides is as much as
 - 425 liters of Elang 480 SL (Glyphosate) / 20 liters = 21 jerry cans
 - 10.65 kg Metsulindo / 250 gr = 43 bottle

Based on the results of the field visit to hazardous waste temporary warehouse, it is known that the number of hazardous waste stored is in accordance with what was recorded in the logbook. Based on field verification and evidence presented by management, the Nonconformity was stated to be fulfilled

Verified by : Bayu Yogatama

<i>NCR No.</i>	: 2019.04	<i>Issued by</i>	: Asystasya Aishah Silalahi
<i>Date Issued</i>	: 20 June 2019	<i>Time Limit</i>	: 18 September 2019
<i>NC Grade</i>	: MAJOR	<i>Date of Closing</i>	: 9 September 2019
<i>Standard Ref. & Requirement</i>	: 6.5.1 Wage documentation and work requirements must be available in accordance with applicable labor provisions.		
Evidence observed (filled by auditor): incentives for class IA-IIID employees of business units. The letter explained that the amount of attendance incentive that was given to each employee was in accordance with the average overtime carried out in the months before this letter was issued. Based on the attendance list of water pump operator with employee code 04016577 IB / 13 in May 2019, the operator's actual working hours are 06.00 - 11.00 and 15.00 - 19.00 (9 hours / day). The employee works every day (25 working days + 6 holidays). Worker get attendance incentives as a substitute for overtime in the amount of Rp. 716,263 (considered 1 month overtime for 80 hours) according to the SE owned. However, if calculated by calculating overtime, then the water machine operator who works every day in the example in May 2019 (25 working days + 6 days off) must get overtime pay of Rp 3,471,912, -			
Non-Conformance Description (filled by auditor): Based on the explanation above, it was concluded that the company had not paid wages for overtime in accordance with applicable regulations.			
Root Cause Analysis (filled by organization audited): The lack of understanding of main clerk in Afdeling regarding the procedure for granting attendance / performance incentives			
Correction (filled by organization audited): socialization of procedures for calculating and awarding overtime and Performance / Attendance Incentives to main clerk throughout the Section			
Corrective Action (filled by organization audited): - Conduct an evaluation of the socialization regarding the calculation and procedures for overtime award and Performance / Attendance maximum 1 month after the socialization to measure the understanding of the participants - Monitor the provision of overtime and attendance / performance incentives by HR, General and Security			
Assessor Evaluation and Conclusion (filled by auditor): Verification July 15, 2019 The company has provided root cause analysis, corrective actions, and corrective actions. However, there are still a few points on corrections and corrective actions that still need to be completed by the company. Based on this			

explanation, the non-conformity No 2019. 04 was declared unfulfilled.

Verification July 24, 2019

The company has provided evidence of improvements in the form of minutes of the socialization of calculations and the provision of overtime and performance / attendance incentives. The socialization was carried out on 5, 6, and 15 July 2019 and was attended by 371 workers from Afdeling 1 - VI and Berangir POM.

Major Verification August 22, 2019

The company shows evidence of improvements in the form of:

- Manager's Decree Number: BER / MU / Kpts / 04 / VII / 2019 dated July 1, 2019 which explains; 1) determination of 5 employees responsible for managing Afdeling clean water sources 2-6. 2) Water Operational Hours in Afdeling, namely 06.00 - 13.00 West Indonesia Time, outside of these operational hours must ask permission from the assistant.
- Minutes of the socialization of the understanding of overtime calculations and incentives carried out at Afdeling I-VI on 5-10 July 2019 to all employees.
- Minutes of Evaluation of the understanding of Overtime and Incentive calculations on August 5, 2019, which was attended by 263 employees of the I-VI affair, from the evaluation results it was known that each employee understood how to calculate overtime / incentive pay.
- Based on the results of the field visit and interviews with the afdeling V water pump officer, it is explained that currently the officer concerned starts work at 06.00 and finishes at 12.00 / 13.00 and there is no water ignition in the afternoon, different things were conveyed by 2 afdeling employee wives 5 that the water is still burning 2 times a day. Namely morning and evening.

However, based on the results of a Water Pump Employee wage study with employee number 4016577 in July 2019 it is known that the wages obtained are Rp 2,470,344 which consists of the base wage of Rp 1,843,407, the Special Allowance of Rp 303,937 and the rice allowance of Rp 323,000. As for the employee's attendance list, it is known that the person doing overtime work for 4 days on holidays. From 4 days overtime the employee gets an incentive of Rp 716,263, this is not appropriate if an overtime calculation is made, the employee concerned should get overtime pay of Rp 799,648. Based on the evidence this Non-Conformity declared to be unfulfilled.

Verification 9 September 2019

The company shows improvements in the form of:

- Internal Memo dated August 1, 2019 no: BER / M / 184 / VIII / 2019 concerning the regulation of Water life hours in Afdeling which is a revision of the SK Manager Manager of Berangir Business Unit number: BER / MU / Kpts / 4 / VII / 2019 on July 1, 2019 It was explained in the revised memo that the operational schedule for water livelihoods in employee housing was conducted at 6:00 to 1:00 pm (Monday - Saturday), 7:30 to 12:30 (Sunday).
- Overtime Recap Calculation documents for water operators in afdeling which are compared between overtime formulations with PTPN IV Incentive + Overtime formulations. From the calculation results it is known that the nominal incentive and overtime provided is greater than the calculation of ordinary overtime.
- salary receipt for 5 machine operators in the August 2019 period. From the list of salary receipts, it is known that the calculation and payment of overtime is in accordance with applicable regulations.

Based on the evidence of improvement shown by management, the nonconformity was stated to be fulfilled.

Verified by : **Asystasya Aishah Silalahi & Bayu Yogatama**

NCR No.	: 2019.05	Issued by	: Asystasya Aishah Silalahi
Date Issued	: 20 June 2019	Time Limit	: ASA 2
NC Grade	: Minor	Date of Closing	: 29 July 2020
Standard Ref. & Requirement	6.5.3 Oil palm plantations and mills must provide adequate housing, water supplies, medical needs, education and public facilities that are in accordance with national standards or higher standards, if public facilities are not available or inaccessible		
Evidence observed (filled by auditor): Based on field visits to Afdeling III and V employee housing, it was known that: <ul style="list-style-type: none"> - Bathing Washing and Toilet Facilities (1 of 2 houses visited on Afdeling III) was in unproper conditions as in fact that there is no place for bathing and toilet door is broken. - Employees' toilets (2 of the 3 houses observed on Afdeling V) were built by the employees themselves without any support from estate unit. Door condition has also broken. - Used water from housing drainage was leaked and caused flooded to the road 			
Non-Conformance Description (filled by auditor): Based on explanation above, the company has not been able to provide adequate housing facilities for workers.			
Root Cause Analysis (filled by organization audited): <ul style="list-style-type: none"> • The company has provide housing facilities but lacked in monitoring of facility conditions and its sufficiency (broken or unpropen). • No realization of housing maintenance and reparation in 2019. • Lack of monitoring towards employees' complaint. 			
Correction (filled by organization audited) : <ul style="list-style-type: none"> • Currently the occupant with unproper haousing facility condition will be relocated to the better house as approved by "Asisten Kepala Tanamari" or Plantation Head Assistant. • To conduct monitoring on employees' housing facilities, as well as renovation as budgetted. 			
Corrective Action (filled by organization audited): <ul style="list-style-type: none"> - To conduct monitoring on housing facilities. - Any complaint will be immediatly responded (less than three months), as mentioned in Communication Procedure No. 19 dated 06 November 2018. - Allocating annual housing renovation budget that presented in document of RKAP. Implementation will considering budget allocation. 			
Assessor Evaluation and Conclusion (filled by auditor): <u>Verification 15 July 2019</u> Unit of certification has describe root of cause analysis and corrective action. However evidence of correction is not available. Thus, NCR No. 2019.05 is still remain open . <u>Verification 29 July 2020</u> Unit of certification shows several correction documents, as follows: <ul style="list-style-type: none"> • Letter of Employee House Relocation No. 03/01/IX/2019 dated 04 September 2019 and No. 05/01/VI/2019 dated 04 September 2019. New houses has register code No. 40/003.01/034/1980 and No 40/003.01/068/B1981. New houses occupied on 11 September 2019. • Budget Allocation for Housing Facility Renovation for period 2020 was IDR 58,205,574. Renovation will be started on August 2020 onwards. • Manager Letter No. BER/04.05/07/VI/2020 dated 02 May 2020 about house sufficiency validation data in Berangir Estate. 			
Based on root of cause and corrective action review, as well as correction evidence given, NCR No. 2019.05 is stated			

closed and its continuity progress will be observed on the coming onsite visit.

Verified by : Asystasya Aishah Silalahi and Mohamad Amarullah

NCR No.	: 2019.06	Issued by	: Asystasya Aishah Silalahi
Date Issued	: 20 June 2019	Time Limit	: 18 September 2019
NC Grade	: MAJOR	Date of Closing	: 22 August 2019
Standard Ref. & Requirement	: 6.7.1 Documented evidence must be available regarding the fulfillment of the workers' minimum age requirements		
<p>Evidence observed (filled by auditor): Company policy for not use child labor in Policy of <i>Pekerja Anak</i> (No. 03) on 2 January 2015. Based on the document, states that children under the age of 18 may not work in company. This policy has been socialized on February 22, 2019 which was attended by 19 workers. However, based on field observation to Block 04G Afdeling 1, child worker was found to assist the harvesting work.</p> <p>Non-Conformance Description (filled by auditor): Based on explanation, the company has not been able to demonstrate the implementation of child labor policies effectively.</p> <p>Root Cause Analysis (filled by organization audited): Employees still lack understanding of the Child Labor Policy.</p> <p>Correction (filled by organization audited): Re-socializing the Child Labor Policy to all employees</p> <p>Corrective Action (filled by organization audited):</p> <ul style="list-style-type: none"> - Evaluate the socialization that has been conducted a maximum of 1 month of socialization to measure employee understanding - Monitoring in the field especially harvesting employees every day - Monitoring is carried out by the Afdeling Assistant assisted by the Overseer I of each Afdeling when the harvesting is underway. <p>Assessor Evaluation and Conclusion (filled by auditor):</p> <p>Verification July 15, 2019 The company has provided root cause analysis, corrective actions, and corrective actions. However, there are still questions on corrective action that still needs to be answered by the company. Based on this explanation, the non-conformity No 2019. 04 was declared unfulfilled.</p> <p>Verification July 24, 2019 The company has provided evidence of improvements in the form of:</p> <ul style="list-style-type: none"> - Minutes of the socialization of the prohibition on the use of underage workers on 5, 6 and 10 July 2019 to 312 afdeling workers I - VI Kebun Berangir - SK Manager Manager Berangir Business Unit No: BER / MU / Kpts / 3 / VII / 2019 concerning officers who are responsible for monitoring the prohibition on the use of underage workers of the Berangir Estate unit. Based on 			

the decree, the officer responsible for monitoring the use of underage workers is the assistant and foreman I of each afdeling.

Major Verification August 22, 2019

The company provides evidence of improvements in the form of:

- Warning letter BER / P / 10 / VI / 2019 from Assistant to employees who bring children to work on June 20, 2019
- A statement will not bring the child to work again from the employee with number 407214001 on June 20, 2019.
- The evaluation document on the results of the socialization on the prohibition of using underage workers on August 1, 2019 was carried out in Afdeling I-VI with the Assistant of each afdeling with a total of 263 employees consisting of Overseers, Pemanaen, Election Officers, Brondolan quoting Officers and chemist officers.
- Monitoring document on the use of child labor in the Berangir Estate from Afdeling 1-6 in July 2019. Monitoring is carried out by the foreman 1 every afdeling and is carried out every day, from the monitoring results it is known that during July 209 no use of underage labor was found.
- Based on the results of field visits and interviews with afdeling 5 employee's wives and harvesters in afdeling 5, it is known that the employee's wife and employee already know about the prohibition of carrying children in any work activity.

Based on field verification and evidence presented by management, the Nonconformity was stated to be fulfilled

Verified by : **Asystasya Aishah Silalahi & Bayu Yogatama**

3.4.2. Identification of Findings, Corrective Actions and Observations at ASA-2 Assessment (Remote)

NCR No.	: 2020.01.	Issued by	: Mohamad Amarullah
Date Issued	: 29 July 2020	Time Limit	: 19 October 2020
NC Grade	: Major / Critical	Date of Closing	: 5 October 2020
Standard Ref. & Requirement	1.1.1 Critical Management documents that are specified in the RSPO P&C are made publicly available.		
<p>Evidence observed (filled by auditor): Based on review towards "Wajib Lapo Ketenagakerjaan di Perusahaan (WLKP)" or Manpower Compulsory Report Online for Period 2018 dated 13 June 2019, it was informed that the unit of certification is required to deliver WLKP Period 2019 through online in 13 June 2020. However, WLKP report for period 2019/2020 and its delivery evidence are not available.</p> <p>Non-Conformance Description (filled by auditor): Unit of certification is not able to shows WLKP Report Period 2019/2020, as well as its delivery evidence (online) to the respective Agency.</p> <p>Root Cause Analysis (filled by organization audited): Coordination between Personnel Assistant (<i>Asisten Personalia</i>) who responsible on report delivery monitoring and Department of Human Resources (HR), General and Security (<i>Bagian SDM, Umum dan Keamanan</i>) that responsible for documentation record is not properly conducted. Evidence of report delivery (hardcopy nor softcopy) is not informed to the HR Department.</p> <p>Correction (filled by organization audited):</p> <ul style="list-style-type: none"> To appoint PIC on compulsory report monitoring. To shows evidence on WLKP Period 2019/2020 and its delivery evidence to Auditor. <p>Corrective Action (filled by organization audited):</p> <ul style="list-style-type: none"> Socialization to the PIC of compulsory report monitoring. To make a proper coordination between PIC (Personnel Assistant) and HR Department. To conduct monitoring on compulsory report delivery. <p>Assessor Evaluation and Conclusion (filled by auditor): <u>Verification 12 August 2020</u> Unit of certification shows evidence of WLKP Report delivery that carried out via online with report No. 21454.20200811.0001 dated 11 August 2020. However, description on root cause analysis and corrective action are not available. NCR No.2020.01 has still remain open.</p> <p><u>Verification 05 October 2020</u></p> <ul style="list-style-type: none"> Unit of certification shows Letter Manager of Berangir Decree No. BER/MP/Kpts/02/IX/2020 dated 23 September 2020 about appointment of document controller towards compulsory report. Annex 1 of Letter mentioned there were four (4) Officers appointed to carried out these matters, i.e. Assistant of Administration and Personnel (<i>Asisten tata Usaha dan Personalia</i>), Head of <i>Masinis</i> and two Clerks from HR and General Department. List of compulsory report monitoring check list dated 25 September 2020. There are 13 reports which compulsory to be delivered periodically. <p>Based on description on root cause analysis and corrective action, as well as evidence of correction given, NCR No. 2020.01 is stated closed. Consistency on this matter will be verified during onsite visit.</p>			

Verified by	: Mohamad Amarullah
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NCR No.	: 2020.02.	Issued by	: Bayu Yogatama
Date Issued	: 29 July 2020	Time Limit	: 19 October 2020
NC Grade	: Major / Critical	Date of Closing	: 23 September 2020
Standard Ref. & Requirement	1.1.4 Critical Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.		
Evidence observed (filled by auditor): Based on the results of the document review, it is known that the Company has a communication and consultation SOP with the community which is contained in the SPO 03 Revision 03 dated January 2, 2017. In addition, the company has appointed an officer who is responsible for carrying out communication and consultation with all stakeholders, namely General HR Assistant & Security, assisted by clerk of SDM General & Security which is contained in the Decree of the Berangir Business Unit Manager Number: BER/MU/Kpts/01/III/2020 dated March 1, 2020. However, the company has not been able to show evidence of the procedures it has submitted to all stakeholders.			
Non-Conformance Description (filled by auditor): The company has not been able to show evidence of the socialization of the Communication and Consultation Procedure to all stakeholders.			
Root Cause Analysis (filled by organization audited): The officers' negligence to disseminate all company procedures to the Stakeholders			
Correction (filled by organization audited): Shows the document on the Socialization of Communication and Consultation Procedures to the Stakeholders			
Corrective Action (filled by organization audited): Monitoring the socialization of company procedures every year to stakeholders			
Assessor Evaluation and Conclusion (filled by auditor): Verification 18 August 2020 The company shows documentation / socialization minutes related to the Communication and Consultation mechanism in PTPN Unit Berangir. Some of the activities that have been carried out include: <ul style="list-style-type: none"> • Outreach to members of the Labuhanbatu Utara Regency DPRD, Vendors and SP-Bun on August 5, 2020 attended by 40 participants. • Outreach to members of village community leaders, journalists and NGOs on 6 August 2020 attended by 16 participants. 			
Verification 23 September 2020 The company shows improvements in the form of root cause analysis, and corrective action, based on evidence of improvements that have been shown this non-conformity is declared fulfilled.			
Verified by	: Bayu Yogatama		

NCR No.	: 2020.03.	Issued by	: Mohamad Amarullah
Date Issued	: 29 July 2020	Time Limit	: 19 October 2020
NC Grade	: Major / Critical	Date of Closing	: 5 October 2020
Standard Ref. & Requirement	3.6.1 Critical All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.		
Evidence observed (filled by auditor): Unit Berangir which lastly updated on 26 May 2020 has not identified risk analysis towards Covid-19 pandemic, as well as its mitigation strategy.			
Non-Conformance Description (filled by auditor): Unit of certification is not be able to shows that Covid-19 Pandemic Issues has been taken into account on Hazard Identification, Risk Assessment and Control to all mill and estate operational activities.			
Root Cause Analysis (filled by organization audited): Policy and protocol towards Covid-19 matter for PTPN IV is presented in document No. 04.01/KOL/KOL/P/045, Circular Letter No. 04.07/SE/72/IX/2020 and No. 04.07/SE/73/IX/2020. However, these policies have not immediately adopted into HIRAC by the OHS Secretary and the respective documents are not shown to the Auditor.			
Correction (filled by organization audited): To adopt company policies towards Covid-19 on the HIRAC 2020. And shows socialization of the policies.			
Corrective Action (filled by organization audited): Manager and OHS Committee will immediately make coordination with the Health Agency and other respective institutions on mitigations strategy towards pandemic, in relation with plantation activities.			
Assessor Evaluation and Conclusion (filled by auditor): <u>Verification 12 August 2020</u> Unit of certification shows Form No. FM-4.2.1-01 (Rev. 0) dated 30 July 2020 about Risk Management and HIRAC towards Covid-19. The document approved by Unit Manager, Risk Management Team and Plantation Head. Mitigation strategy has referred to Director Circular Letter No. 04.08/SE/13/III/2020, in accordance with National Covid-19 Protocol. However, description on root cause analysis and corrective action are not available. NCR No.2020.03 has still remain open . <u>Verification 05 October 2020</u> Unit of certification shows several additional correction evidences, as follows: <ul style="list-style-type: none"> • Report No. BER/SE/85/IX/2020 dated 14 September 2020 about report monitoring towards Covid-19 Protocol Implementation. • Minutes of socialization towards Covid-19 matters that conducted on 15 September 2020. • Record of guest monitoring in all unit, signed by Personnel Assistant on 26 September 2020. Based on description on root cause analysis and corrective action, as well as evidence of correction given, NCR No. 2020.03 is stated closed . Consistency on this matter will be verified during onsite visit.			
Verified by	: Mohamad Amarullah		

NCR No.	: 2020.04.	Issued by	: Mohamad Amarullah
Date Issued	: 29 July 2020	Time Limit	: 19 October 2020
NC Grade	: Major / Critical	Date of Closing	: 5 October 2020
Standard Ref. & Requirement	<p>3.7.1 Critical A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and out-growers taking into account gender specific needs, and which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training</p>		
<p>Evidence observed (filled by auditor): -</p>			
<p>Non-Conformance Description (filled by auditor): Unit of certification is not be able to shows training program for Period 2020, as well as its monitoring of realization.</p>			
<p>Root Cause Analysis (filled by organization audited): Lack of coordination between Personnel Assistant as PIC of training program with other respective positions such as Head Assistant of Plantation (<i>Asisten Kelapa Tanaman</i>), Administrative Assistant (<i>Asisten KTU</i>) and Estate Personnel Assistant. Thus, training program for Period 2020 is not shows during the audit.</p>			
<p>Correction (filled by organization audited):</p> <ul style="list-style-type: none"> To make appointment Letter for the PIC who's responsible on training program and monitoring. To deliver training program for period 2020 to team auditor. 			
<p>Corrective Action (filled by organization audited):</p> <ul style="list-style-type: none"> To make a proper coordination between PIC (Personnel Assistant) as mentioned in the root cause analysis. To conduct monitoring on training program realization. 			
<p>Assessor Evaluation and Conclusion (filled by auditor):</p> <p><u>Verification 12 August 2020</u> Unit of certification shows document of Unit Manager Memorandum that appointed to Human Resources and General Assistant No. BER/M-70A/VII/2020 dated 30 July 2020 about Training Program Arrangement and Monitoring. The Memo has attached Training Need Analysis Period 2020 dated 16 July 2020, as well as Training Program and Monitoring dated 16 July 2020. In 2020, training has consisted of 10 programs. Up to July 2020, several training that had conducted are clean harvesting, administrative FI and MM Module, HCM Module and socialization of Collective Work Agreement (PKB). However, description on root cause analysis and corrective action are not available. NCR No.2020.04 has still remain open.</p> <p><u>Verification 05 October 2020</u> Unit of certification shows Letter Manager of Berangir Decree No. BER/MP/Kpts/03/IX/2020 dated 23 September 2020 about appointment of officers who's responsible for training program, monitoring and evaluation. Annex 1 of Letter mentioned there were seven (7) Officers appointed to carried out these matters, i.e. Head of Masinis, Assitant of Admnistration and Personnel, Mill Technical Assistant, Mill Assistant I, Mill Assistant II, Clerk of HR and General and PPD.</p> <p>Based on description on root cause analysis and corrective action, as well as evidence of correction given, NCR No. 2020.04 is stated closed. Consistency on this matter will be verified during onsite visit.</p>			

Verified by	: Mohamad Amarullah
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NCR No.	: 2020.05	Issued by	: Bayu Yogatama
Date Issued	: 29 July 2020	Time Limit	: 19 October 2020
NC Grade	: Major / Critical	Date of Closing	: 23 September 2020
Standard Ref. & Requirement	<p>7.2.6 Critical Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p>		
Evidence observed (filled by auditor): -			
Non-Conformance Description (filled by auditor): The company has not been able to show evidence that the pesticide application activities have been carried out by employees who have been trained and have received regular updates (refreshment) in the application of pesticides.			
Root Cause Analysis (filled by organization audited):			
<ul style="list-style-type: none"> - Training activities have not been well documented so that at the time of the Remote Audit the training activity documents could not be shown. - There is no monitoring of training documents 			
Correction (filled by organization audited): Show documents of pesticide training and evaluation			
Corrective Action (filled by organization audited): Monitor all documents related to the Plantation Management System, especially training			
Assessor Evaluation and Conclusion (filled by auditor):			
Verification 18 August 2020			
The company shows the minutes of the pesticide handling training which was conducted on August 3, 2020, carried out by spray officers from afdeling I - VI and officers of the Pesticide Warehouse with a total of 55 participants.			
Based on the proof of improvement which shows that the non-conformity is declared Not Fulfilled, please do a root cause analysis, fill in corrections and corrective actions.			
Verification 23 September 2020			
The company shows improvements in the form of root cause analysis, and corrective action, based on evidence of improvements that have been shown that this non-conformity is declared fulfilled.			
Verified by	: Bayu Yogatama		

3.4.3. Identification of Findings, Corrective Actions and Observations at ASA-2 Assessment (Onsite)

NCR No.	: 2020.1	Issued by	: Trismadi N
Date Issued	: 22 October 2020	Time Limit	: 21 January 2021
NC Grade	: Major / Critical	Date of Closing	: 4 January 2021
Standard Ref. & Requirement	1.1.1. Management documents that are specified in the RSPO P&C are made publicly available.		
<p>Evidence observed (filled by auditor):</p> <p>During onsite audit activity sighted that the unit of certification is able to shows several public-available documents as follows:</p> <ul style="list-style-type: none"> - Report on Management of Hazardous and Toxic Material Waste, Solid Waste and Liquid Waste of Quarter III of 2019 to the Labuhanbatu Utara Regency Environmental Service dated December 10, 2019 (number: BER / X / SPS / XII / 2019) - Report on Management of Hazardous and Toxic Material Waste, Solid Waste and Liquid Waste of Quarter IV of 2019 to the Labuhanbatu Utara Regency Environmental Service dated February 24, 2020 (number: BER / X / SPS 02 / XII / 2019). - Report on Management of Hazardous and Toxic Waste, Solid Waste and Liquid Waste of the First Quarter of 2020 to the Labuhanbatu Utara Regency Environmental Office on June 11, 2020 (number: BER / X / SPS / VI / 2019) - Report on Management of Hazardous and Toxic Material, Solid Waste and Liquid Waste of the Second Quarter of 2020 to the Labuhanbatu Utara Regency Environmental Agency on July 8, 2020 (number: BER / X / SPS / VII / 2019) - Report on Environmental Management and Monitoring Plan (RKL-RPL) for Semester II 2019 to the Environmental Agency of LabuhanBatu Utara Regency on April 5, 2020 (Number: BER / X / SPS03 / IV / 2020 - Flora Fauna Monitoring Report semester I 2020 to the North Sumatra Province Natural Resources Conservation Center on July 9, 2020 (number: BER / X / VII / 2020) - Fire fighting preparedness report for Semester I 2020 to the Agriculture Agency of Labuhanbatu Utara Regency dated 22 June 2020 (Number: BER/VI/SPS/68/VI/2020). - Annual Compulsory Manpower Report (or WLKP) for period 2020 had delivered online as shows through document of Delivery Report Number 21454.20200811.0001 dated 11 August 2020. - OHS report of third quarter of 2020 to the Manpower Agency of Labuhanbatu Utara dated 22 October 2020 (number: BER/X/SPS.196/X/2020). <p>There are correction evidences for remote audit nonconformity with number 2020.01, such as:</p> <ul style="list-style-type: none"> - Estate Manager letter number BER/MP/Kpts/02/IX?2020 dated 23 September 2020 about: PIC to monitor the compulsory report to the four workers. - List of compulsory report dated 25 September 2020, there are 13 routinely reports. <p>However, during the onsite audit there are several compulsory reports that had not been submitted, such as:</p> <ul style="list-style-type: none"> - Report on Management of Hazardous and Toxic Material Waste, Solid Waste and Liquid Waste of of third quarterly 2020. - Temporary workers report to the Manpower Agency. <p>Non-Conformance Description (filled by auditor):</p> <p>The unit of certification has no been able to show evidence that all reports are publicly available.</p> <p>Root Cause Analysis (filled by organization audited):</p> <p>Lack of understanding of PIC about the mandatory reports including temporary workers report and hazardous waste management report.</p>			

<p>Correction (filled by organization audited): The certification unit have send the quarter III 2020 report to the environment service on November 17, 2020 and the PKWT report to the Manpower office on December 21, 2020.</p>
<p>Corrective Action (filled by organization audited): The certification unit updates the monitoring report document to the relevant agencies on 19 December 2020</p>
<p>Assessor Evaluation and Conclusion (filled by auditor): Verification on 4 January 2021 The certification unit was shown several evidences, as follow: 1. Hazardous waste, solid waste and effluent management period on the third quarter of 2020 to the Environment Agency of Labuhanbatu Utara dated 12 November 2020. 2. PKWT report to the Manpower Agency of Sumatera Utara Province with 28 temporary workers dated 21 December 2020.</p> <p>Auditor conclusion: Based on above explanation this non compliance been fulfilled.</p>
<p>Verified by : Trismadi N</p>

NCR No. :	2020.2	Issued by :	Asystasya Aishah Silalahi
Date Issued :	22 October 2020	Time Limit :	ASA-3
NC Grade :	Minor / Non Critical	Date of Closing :	4 January 2021
Standard Ref. & Requirement :	<p>2.1.2 There is a documented system in place to ensure legal compliance. This system has a means to track changes to applicable regulations, and includes a list and evidence of evaluation of legal compliance by all contracted third parties, including: recruitment agencies, service providers and workers</p>		
<p>Evidence observed (filled by auditor): The company has an evaluation to ensure legal compliance in the Compliance Evaluation Report document against Laws, Regulations, and Other Requirements Related to the Implementation of RSPO / ISPO. The evaluation applies to the legal compliance of PTPN IV Berangir. The latest update was on 14 September 2020 The company also shows evaluations for contracted third parties. Matters that become the criteria for the assessment include standard work quality, work completion, and payment to casual workers. However, the company does not yet have a list and proof of legal compliance by the contracted third parties.</p> <p>Non-Conformance Description (filled by auditor): Related to this, the company has not been able to demonstrate a system to ensure legal compliance, including by all contracted third parties.</p>			
<p>Root Cause Analysis (filled by organization audited): The certification unit has made an evaluation of the contractor's work that assesses legal compliance, but the company has not kept the evaluation document.</p>			
<p>Correction (filled by organization audited):</p> <ul style="list-style-type: none"> The company re-filed documents on compliance with legal aspects for contractor work. Show contractor evaluation documents 			

Corrective Action (filled by organization audited):

The certification unit makes Memo on compliance with legal aspects for all contractors.

Assessor Evaluation and Conclusion (filled by auditor):

There are no improvement documents in accordance with the root cause analysis, corrections and corrective actions.

Verification on January 4, 2021

The company has provided evidence of improvement in the form of:

- Memo from the Berangir Estate Manager dated November 2, 2020 No. BER / M-924 / XI / 2020 regarding the fulfillment of legal compliance aspects for contractor workers. The memo explained that the contractor would be evaluated in relation to laws and regulations every month.
- An example of contractor evaluation in 2020 for CV GAS and PT Bravo Anak Kolong with an evaluation date of 10 November 2020. The things that are evaluated include the quality and performance of contractors, timeliness of work completion, compliance with labor regulations, compliance with OHS implementation, housekeeping, and compliance with environmental regulations.

Based on this explanation, this nonconformity have been fulfilled.

Verified by : **Asystasya Aishah Silalahi**

NCR No.	: 2020.3	Issued by	: Asystasya Aishah Silalahi
Date Issued	: 22 October 2020	Time Limit	: ASA-3
NC Grade	: Minor / Non Critical	Date of Closing	: 7 January 2021
Standard Ref. & Requirement	: 2.2.2 All contracts, including contracts with FFB suppliers, have separate clauses regarding the fulfillment of relevant legal obligations, and can be proven by the third party concerned		
Evidence observed (filled by auditor): Based on document review of FFB loading worker attendance list of Afdeling I in September 2020 and the recapitulation of premium payment for FFB loading worker it is known that there were 10 FFB loading worker from CV Gas who worked in Afdeling I Berangir. Based on the loader's premium recap in September 2020, it is known that only 4 out of 10 workers have received wages in accordance with the 2020 minimum wage of North Sumatra province.			
Non-Conformance Description (filled by auditor): Based on this explanation, it is known that the contractor has not been able to show evidence that it has fulfilled the relevant legal obligations, for example regarding the fulfillment of wages according to the minimum wage.			
Root Cause Analysis (filled by organization audited): The contractor pays wages to employees based on work results (piece rate) and has not yet referred to the minimum wage payment.			
Correction (filled by organization audited): <ul style="list-style-type: none"> • The contractor provides payment of wages to workers in accordance with the applicable minimum wages. • The company makes a memo to the contractor containing compliance with legal regulations. 			
Corrective Action (filled by organization audited): The company prepares a contractor evaluation document that contains compliance with labor regulations, including meeting the minimum wage for contractor workers.			

Assessor Evaluation and Conclusion (filled by auditor):

Verification January 4, 2021

The company shows evidence of improvement in the form of:

- An example of contractor evaluation for CV GAS with an evaluation date of 7 December 2020. Matters being evaluated include contractor quality and performance, timeliness of work completion, compliance with labor regulations, compliance with K3 implementation, housekeeping, and compliance with regulations environment.
- List of wages for CV Gas loader employees for the period 2020. All workers have earned wages above the UMP of North Sumatra in 2020.

However, there are still questions in the root cause analysis column that still need to be answered by the company. In this regard, the nonconformity have not been fulfilled.

Verification January 7, 2021

The company provided additional proof of improvement in the form of a memo from the Berangir Estate Manager No. BER / M-924 / XI / 2020 dated 2 November 2020 regarding Fulfillment of Legal Compliance Aspects for Contractor Workers. The memo informs to ensure legal compliance of contractor workers in accordance with laws and regulations.

The company has also answered questions on root cause analysis, corrections, and corrective action. Based on this explanation, the non-conformities have been closed and will be re-observed in the next assessment.

Verified by : **Asystasya Aishah Silalahi**

NCR No.	: 2020.4	Issued by	: Yudhi Yuniarto Tallutondok
Date Issued	: 22 October 2020	Time Limit	: 21 January 2021
NC Grade	: Major / Critical	Date of Closing	: 7 January 2021
Standard Ref. & Requirement	: 3.6.1 All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.		
<i>Evidence observed (filled by auditor):</i>			
<ul style="list-style-type: none"> • The CH has compiled a HIRAC Form for division locations which includes FFB harvesting, budding, fertilizing, circle spraying, loading FFB, handling people with symptoms of COVID-19, preventing transmission of COVID-19, harvesting under the electricity grid, cutting through the grid, road maintenance, operating the water pump machine, loading FFB into baskets, shifting the FFB, lowering the FFB, shifting the FFB using baskets. • Based on field observations and verification of the HIRAC Form documents for division locations show that there are still activities that have not identified the potential hazards and risks but are not limited to activities: tuning under the power grid, global telling under the power grid, activities in rinse houses, storage of work tools in the homes of employees and fuel traders in residential areas. 			
<i>Non-Conformance Description (filled by auditor):</i>			
The CH has not been able to show sufficient evidence that it has carried out the identification of risks and hazards to OHS problems as a whole in the operational area.			
<i>Root Cause Analysis (filled by organization audited):</i>			
The related officers have not re-evaluated the HIRAC documents so that there are still operational activities in the field where the potential hazards and risks have not been identified.			
<i>Corrective Action (filled by organization audited):</i>			
<ul style="list-style-type: none"> • Memo to the OHS committee to identify risks and hazards of all company operational activities / work in the 			

<p>HIRAC document, not limited to low or rare risks.</p> <ul style="list-style-type: none"> • Memo to all employees regarding the prohibition of storing work tools at home and trading fuel in residential areas. • Reprimand for employees who are still storing work tools at home and trading fuel in residential areas. • Annual evaluation of HIRAC documents to ensure that all operational activities have identified potential hazards and risks.
<p><i>Assessor Evaluation and Conclusion (filled by auditor):</i> Auditor Evaluation January 7, 2021 The company shows evidence of improvement as follows:</p> <ul style="list-style-type: none"> • Memo to the OHS committee to identify risks and hazards of all company operational activities / work in the HIRAC document, not limited to low or rare risks. • Memo to all employees regarding the prohibition of storing work tools at home and trading fuel in residential areas. • Reprimand for employees who are still storing work tools at home and trading fuel in residential areas. • Annual evaluation of HIRAC documents to ensure that all operational activities have identified potential hazards and risks. <p>Based on the foregoing, the non-conformity is declared fulfilled by observation notes in the next assessment.</p>
<p>Verified by : Yudhi Yuniarto Tallutondok</p>

NCR No. :	2020.5	Issued by :	Yudhi Yuniarto Tallutondok
Date Issued :	22 October 2020	Time Limit :	21 January 2021
NC Grade :	Major / Critical	Date of Closing :	18 January 2021
Standard Ref. & Requirement :	<p>3.7.1 A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender-specific needs, and which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training</p>		
<p><i>Evidence observed (filled by auditor):</i></p> <ul style="list-style-type: none"> • The CH has a training program in 2020, for example: plants, administration and general human resources, but there is no operator training program at the Mill. • Based on field observations show that the CH has: <ol style="list-style-type: none"> 1. Generator Set with a capacity of 455 kVA/487.94 HP; turbine engine with a capacity of 910 kVA/975.87 HP and 1000 kVA/1072.38 HP 2. Sterilizer with a capacity of 23.5 tons/hour (2 units) and 20 tons/hour (1 unit), respectively. • Results of interviews with <ol style="list-style-type: none"> 1. Engine room operators note that the CH has only 1 operator that has license with the initials LJ and registration number 7832/PM/PTP/X/2019 which is valid until 18 October 2024. 2. It is known that the sterilizer operator does not have a license. • The CH does not yet have boiler operator 2nd grade, Electric OHS Expert and boiler operators for sterilizer machines. • <i>Permenaker</i> No. 38/2016 Table E states that the initial movers with a capacity of > 214.47 HP must have 1st grade operator and 2nd grade operator. • <i>Permenaker</i> Number 12 Year 2015 Article 7 reads as follows "For companies that have power plants of more than 200 (two hundred) kilo Volt-Ampere are required to have Electric OHS Expert". • <i>Permenaker</i> No. 1 of 1988 concerning Qualifications and Requirements for Boiler Operators. <p><i>Non-Conformance Description (filled by auditor):</i> The CH has not been able to show sufficient evidence that it has identified the training needs of all employees according</p>			

to the RSPO principles and criteria.
Root Cause Analysis (filled by organization audited): Officers do not understand the identification of training needs.
Correction (filled by organization audited): Identification of training needs has been made
Corrective Action (filled by organization audited): Monitor and evaluate employees who have licenses as operators and also employees who have and do not have a license.
Assessor Evaluation and Conclusion (filled by auditor): Auditor Evaluation January 18, 2021 The company shows evidence of improvement, among others: <ol style="list-style-type: none"> 1. Certificate of PT EMCOTAMA with number B.12.1 / EMCOTAMA-SK / I / 2021 dated January 12, 2021 which states that PTPN IV Unit Berangir employees with the initials JP have been registered as participants in Class II sterilizer operator training which will be held on 20-23 January 2021 . 2. Certificate of PT EMCOTAMA with number B.12.2 / EMCOTAMA-SK / I / 2021 dated January 12, 2021 which states that PTPN IV Unit Berangir employees with the initials LJ, SK, PN and AS have been registered as training participants for class II engine room operators diesel which will be implemented on 27-30 January 2021. 3. Certificate of PT EMCOTAMA with number B.12.3 / EMCOTAMA-SK / I / 2021 dated January 12, 2021 which states that PTPN IV Unit Berangir employees with the initials PS, RT, ZS and SH have been registered as participants in class I boiler operator training to be carried out on March 1 - 6, 2021. 4. Certificate of PT EMCOTAMA with number B.12.4 / EMCOTAMA-SK / I / 2021 dated January 12, 2021 which states that PTPN IV Unit Berangir employees with the initials DA have been registered as participants of the OHS Electricity Expert training which will be held on February 8-27 2021. <p>The company has also evaluated and revised its corrective actions so that non-conformities are declared fulfilled by observational notes at the next assessment.</p>
Verified by : Yudhi Yuniarto Tallutondok

NCR No.	: 2020.6	Issued by	: Asystasya Aishah Silalahi
Date Issued	: 22 October 2020	Time Limit	: 21 January 2021
NC Grade	: Major / Critical	Date of Closing	: 5 January 2021
Standard Ref. & Requirement	3.8.12 <u>Record keeping</u> <ol style="list-style-type: none"> i. The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii. Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii. For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv. For Mass Balance Module, the mill: <ol style="list-style-type: none"> a) Shall record and balance all receipts of RSPO certified FFB and 		

deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.

- b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.
- c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.)

Evidence observed (filled by auditor):

Based on palm trace on 19 October 2020, it is know that

Product	License Volume (1 Oct 2019 to 19 Jan 2021) Extension Volume (MT)	Volume Sold as Physical (MT)	Volume sold as credit (MT)	Volume allocated as credit (MT)	Remaining Volume (MT)
CSPK	6,735	6,673.09	0	0	61.91
CSPO	34,285	3,576.37	4,842	1,158	24,708.63
FFB	144,110	0	0	0	144,110

Based on document SCCS Monitoring Berangir 19 July 2019 – October 2020, it is known that

Product	Produksi		Penjualan	
	Certified	Noncertified	Certified	Noncertified
PK	5,211.85	207.86	4,933.00	0
CPO	26,238.99	856.63	4,868.88	10,475.11
FFB	113,630.23	5,452.76	0	0

Based on the data above, it can be seen that there is differences between CSPK and CSPO sales from palm trace and monitoring of SCCS Berangir POM. In addition, the sales of CSPK that are registered to the palm trace are bigger than the actual production of CSPK. (Palm trace sales were 6,673.09 tons, while actual production was CSPK 5,211.85 tons).

Based on interviews with management, it was found that there were sales of CSPK with contracts for old license period, but new sales could be made after a new license (October 2019 - 19 January 2020). Based on CSPK sales recapitulation data, sales for contracts for the old license period amounted to 3,728.56 tons. However, the company has not been able to show the details of sales using the new license quota.

Non-Conformance Description (filled by auditor):

Based on the explanation above, Berangir POM has not shown evidence of having recorded all sales data completely

Root Cause Analysis (filled by organization audited):

Officers do not understand and record all sales data from the marketing department.

Correction (filled by organization audited):

The sales is recorded completely.

Corrective Action (filled by organization audited):

Improve sales records in coordination with the Marketing and Planning Division in head office in accordance with PDIK PTPN IV: Handling of Certified Palm Oil products, with document number 04.03 / UNIT / SUS / P / 001.

Assessor Evaluation and Conclusion (filled by auditor):

Verification 28 December 2020

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

- A recapitulation of PKS Berangir sales as of 16 November 2020 which explains that the sales of CSPO and CSPK for the license period (1 Oct 2019 to 19 Jan 2021) up to 30 September 2020 are as follows.

Product	Production (ton)		Sales (ton)	
	Certified opening stock +	Noncertified	Certified	Noncertified
PK	5,211.85	207.86	2.944.53	0
CPO	26,238.99	856.63	4,076.37	16,038.03
FFB	113,630.23	4,586.34	0	0

- Data on sales transactions of CSPK and CSPO (palmtrace) for certified product licenses (1 Oct 2019 to 19 Jan 2021), which explains that CSPO sales are 4,076.37 tons and CSPK sales **6,673.09** tons. There is a difference between CSPK sales on palmtrace and the company's mass balance data of **3,728.56** tons because the difference sales for contracts before the active license period (1 Oct 2019 to 19 Jan 2021). However, this transaction was only confirmed by RSPO in November 2019 (after the new license period (1 Oct 2019 to 19 Jan 2021) is active) and deduct the stock of CSPK. However, there are still auditors' questions that still need to be answered by the company regarding the evidence of repairs sent.

Based on this explanation, the discrepancy number 2020. 6 has not been fulfilled

Verification January 4, 2021

The auditor has sent the first verification on December 28, 2020 and there are additional questions related to evidence of improvements and corrective actions submitted, but the company has not answered questions that have been highlighted in yellow.

Thus, the non-conformities cannot be fulfilled.

Verification January 5, 2021

The company sends additional correction evidence in the form of:

- Sales recapitulation of PKS Berangir Update which explains that there is an initial stock of CSPK in October 2019 of 1,647 tons. So that, the total of CSPK production for the period October 2019 - September 2020 is 6,858.85 tons, and CSPK sales are 6,673.09 tons. CSPK production is no less than CSPK sales.
- CSPK delivery order for contract No. 0035 / HOLD / PKO-L / N-IV / 2019.

The company has also answered questions in the corrective action column. Based on this explanation, the discrepancy No. 2020. 6 has been fulfilled.

Verified by : **Asystasya Aishah Silalahi**

NCR No.	: 2020.7	Issued by	: Asystasya Aishah Silalahi
Date Issued	: 22 October 2020	Time Limit	: 21 January 2021
NC Grade	: Major / Critical	Date of Closing	: 5 January 2021
Standard Ref. & Requirement	: 3.8.16 <u>Registration of Transactions</u> i. Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries,		

- ii. crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.

Evidence observed (filled by auditor):

Based on palm trace on 19 October 2020, it is know that

Product	License Volume (1 Oct 2019 to 19 Jan 2021) Extension Volume (MT)	Volume Sold as Physical (MT)	Volume sold as credit (MT)	Volume allocated as credit (MT)	Volume removed (MT)	Remaining Volum (MT)
CSPK	6,735	6,673.09	0	0	0	61.91
CSPO	34,285	3,576.37	4,842	1,158	0	24,708.63
FFB	144,110	0	0	0	0	144,110

Based on document SCCS Monitoring Berangir 19 July 2019 – October 2020, it is known that

Product	Production		Sales	
	Certified	Noncertified	Certified	Noncertified
PK	5,211.85	207.86	4,933.00	0
CPO	26,238.99	856.63	4,868.88	10,475.11
FFB	113,630.23	5,452.76	0	0

Company also showed the shipping announcement for CSPO and CSPK sales/shipping with total announced as follows.

CSPO: 3,576.37 ton

CSPK: 2,944.53 ton

Non-Conformance Description (filled by auditor):

Based on data above, company could not showed:

- Shipping announcement made in accordance with SCCS monitoring document and palm trace data
- Removal of certified stock for CSPO that sold as noncertified/conventional

Root Cause Analysis (filled by organization audited):

The officer has yet to receive data on the shipping announcement and the removal of CSPO certified stock sales.

Correction (filled by organization audited):

Show the proof of the shipping announcement and the removal of stock.

Corrective Action (filled by organization audited):

The officer coordinates with the Marketing Division in Head Office to complete the proof of the shipping announcement and stock removal in accordance with PDIK PTPN IV: Handling of Certified Palm Oil products, with document number 04.03 / UNIT / SUS / P / 001.

Assessor Evaluation and Conclusion (filled by auditor):

Verification on 28 December 2020

The company shows evidence of improvement in the form of:

- A recapitulation of PKS Berangir sales as of 16 November 2020 which explains that the sales of CSPO and CSPK for the license period (1 Oct 2019 to 19 Jan 2021) up to 30 September 2020 are as follows.

Product	Production (ton)		Sales (ton)	
	Certified opening stock +	Noncertified	Certified	Noncertified
PK	5,211.85	207.86	2.944.53	0
CPO	26,238.99	856.63	4,076.37	16,038.03
FFB	113,630.23	4,586.34	0	0

- Remove stock data for non-certified sales with the following details.
 - Remove stock of 181.4 MT
 - The volume allocated as credits of 15,000 MT
- Shipping announcement for CSPK. However, the company has yet to show the shipping announcement for the CSPO sale.

In addition, there are also questions on the corrective action table that the company still has to answer.

Based on this explanation, the discrepancy No. 2020.7 has not been fulfilled.

Verification on January 4, 2021

The company has sent the shipping announcement document for the CSPO. However, there are still additional questions related to corrective actions that have not been answered by the company.

Thus, the non-conformities cannot be fulfilled.

Verification on January 5, 2021

The company has answered questions in the corrective action column. Thus, the nonconformity has been fulfilled.

Verified by : **Asystasya Aishah Silalahi**

NCR No.	: 2020.8	Issued by	: Yudhi Yuniarto Tallutondok
Date Issued	: 22 October 2020	Time Limit	: 21 January 2021
NC Grade	: Major / Critical	Date of Closing	: 12 January 2021
Standard Ref. & Requirement	6.2.3 There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.		
<i>Evidence observed (filled by auditor):</i> During the audit activity, several evidences are shown as follows: <ul style="list-style-type: none"> The CH shows the salary slip and attendance documents of water machine operator, engine room operators and boiler operator for the period of August 2020. The auditors simulate the calculation of overtime pay based on <i>Kepmenakertrans</i> No. 102/2004 with the following results: 			
Employee Initials	Unit	Overtime Paid	Auditor Simulation Results
LJ	Engine Room	IDR 3,494,782	IDR 3,506,650
SF	Boiler	IDR 2,749,782	IDR 2,852,001
SD	Water Machine	IDR 731,895	IDR 591,888
			- IDR 11,868
			- IDR 102,219
			IDR 140,007

Non-Conformance Description (filled by auditor): The CH has not been able to show that the wages for employees who work over working hours are in accordance with applicable regulations.	
Root Cause Analysis (filled by organization audited): The unit does not understand the procedures for calculating overtime, premiums and performance incentives.	
Correction (filled by organization audited): Conducting outreach on the procedure for calculating and providing overtime, premiums and performance incentives to the first administration in all divisions	
Corrective Action (filled by organization audited): Monitor the calculation of overtime, premiums and performance incentives by the HR, General and Security Division (the PIC is the Plantation Personnel Assistant and Administrative Assistant).	
Assessor Evaluation and Conclusion (filled by auditor): Auditor Evaluation January 12, 2021 The CH sends proof of repair, including: <ol style="list-style-type: none"> 1. Machine room operator salary slip with the initials LJ and boiler operator with the initials SF for the period November 2020. 2. The results of the calculation of overtime for machine room operators and boiler operators for the period of November 2020. 3. Attendance and working hours of machine room operators and boiler operators for the period of November 2020. <p>Based on the simulation results of employee overtime calculations for the period of November 2020, it is known that the calculation of overtime is in accordance with the applicable regulations so that the discrepancy is declared to have been fulfilled with the observation note in the next assessment.</p>	
Verified by	: Yudhi Yuniarto Tallutondok

NCR No.	: 2020.9	Issued by	: Yudhi Yuniarto Tallutondok
Date Issued	: 22 October 2020	Time Limit	: ASA-3
NC Grade	: Minor/Non Critical	Date of Closing	:
Standard Ref. & Requirement	6.7.2. Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed		
Evidence observed (filled by auditor): <ul style="list-style-type: none"> • Based on the verification document of Hydrant Mobile Inspection on September 21, 2020, found that the tool was in good condition (there were no leaks) and ready for use. • Based of field observations in the fire extinguisher simulation activities using mobile hydrant showed that the equipment was not in optimal condition where there was a leak in the nozzle. • The CH shows the procedures for handling emergency and post-emergency situations No. 4.3.16. December 14, 2013. 			
Non-Conformance Description (filled by auditor): The CH has not been able to show evidence that emergency response procedures have been implemented, including			

monitoring of emergency response facilities and infrastructure.	
<i>Root Cause Analysis (filled by organization audited):</i>	
<i>Correction (filled by organization audited):</i>	
<i>Corrective Action (filled by organization audited):</i>	
<i>Assessor Evaluation and Conclusion (filled by auditor):</i>	
Verified by	:

NCR No.	:	2020.10	Issued by	:	Yudhi Yuniarto Tallutondok
Date Issued	:	22 October 2020	Time Limit	:	21 January 2021
NC Grade	:	Major/Critical	Date of Closing	:	20 January 2021
Standard Ref. & Requirement	:	6.7.3 Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.			
<i>Evidence observed (filled by auditor):</i>					
<ul style="list-style-type: none"> Based of field observations and interviews with mill employees (3 people) show that employees use PPE (shoes) that they buy themselves. It was further explained that the last PPE was given by the CH in 2019. Based on interviews with management show that the provision of PPE to employees is carried out once in 1 year (last 2019). Based on document verification of the 2019 PPE Distribution show that the last PPE was given on December 27, 2019. <i>Permenakertrans</i> No. 8/2010 Article 2 states that employers are required to provide PPE for workers/laborers in the workplace free of charge. 					
<i>Non-Conformance Description (filled by auditor):</i>					
The CH has not been able to show evidence that it has provided PPE free of charge to all workers in the workplace which includes all operations.					
<i>Root Cause Analysis (filled by organization audited):</i>					
The provision of PPE's by the company has not been realized until the end of 2020.					
<i>Correction (filled by organization audited):</i>					
<ul style="list-style-type: none"> The company has distributed replacement PPE to all employees The standard for providing PPE has been stipulated in article 49 and article 50 of the CLA (Collective Labor Agreement) between SP-BUN and PTPN IV Management. The company has prepared a PPE replacement standard in its Circular Number: PKS.BER / SE / Intern / 17 / I / 2021. 					
<i>Corrective Action (filled by organization audited):</i>					
Monitoring the use of PPE, the condition of the PPE and replacing the PPE if it is deemed unsuitable for use.					

Assessor Evaluation and Conclusion (filled by auditor):

Verification on 20 January 2021

The company sent proof of improvement in the form of revisions related to corrective actions, corrective actions and sent several documents, including:

1. Monitoring of employee PPE for the period January 2021
2. The mechanism for giving and changing employee PPE.
3. Documentation of employee PPE replacement distribution.

Based on the foregoing, the discrepancy is declared fulfilled by the observation note in the next assessment.

Verified by : **Yudhi Y Tallutondok**

NCR No.	: 2020.11	Issued by	: Trismadi Nurbayuto
Date Issued	: 22 October 2020	Time Limit	: ASA 3
NC Grade	: Minor/Non Critical	Date of Closing	: 07 January 2021
Standard Ref. & Requirement	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		

Non-Conformance Description & Evidence observed (filled by auditor):

- SOP for Domestic waste Management with No.SPO 20 No. Revision 02 dated January 2, 2015, which states that each employee collects his / her trash in the trash can provided and cleans the surrounding yard. Waste disposal by sorting organic and inorganic waste.
- The results of interviews with residents of PKS employee housing show that domestic waste is collected next to the house by making a hole and then burning it.
- The results of a field visit to PKS employees' housing found piles of domestic waste next to the housing estate and there were burn marks.
- The results of a field visit to Afdeling 6 employee housing found piles of domestic waste and burn marks.
- The results of the field visit to Afdeling 4 employee housing found 2 waste burning spots.
- The results of field visits to the area around the clinic were found by employees burning rubbish.

Non-Conformance Description (filled by auditor):

Based on this evidence, the company has not been able to show evidence that the waste disposal is in accordance with procedures that are fully understood by workers.

Root Cause Analysis (filled by organization audited):

The company has SOP No. 20 regarding the processing of household domestic waste, and some employees still control domestic waste by burning it and collecting the waste by making holes in residential areas. this is due to the absence of confirmation and outreach to employees regarding domestic waste control in accordance with the SOP.

Correction (filled by organization audited):

- The company makes a memo according to the SOP and asks employees to transport piles of domestic waste in each section and emplacement to the landfill that has been provided in each area and emplacement and separates organic and inorganic waste.
- The company made a warning to employees for burning domestic waste.

Corrective Action (filled by organization audited):

- The company conducts outreach to employees not to burn and transport domestic waste to the Landfill that has been provided.

- The company made a memo that prohibits domestic waste control by burning it and transporting domestic waste to the landfill that has been provided.

Assessor Evaluation and Conclusion (filled by auditor):

Auditor Verification dated December 28, 2020:

There are no repair documents in accordance with the root cause column, corrections and corrective actions.

Auditor Verification dated January 04, 2021:

The company has sent evidences of improvement in the form of:

- Root cause analysis, correction, and corrective action.
- Minutes of socialization of SOP for Domestic Waste Management to PKS, Afdeling IV and VI employees on December 17 and 23, 2020.
- Memo for controlling domestic domestic waste with number BER / M-143 / XII / 2020 dated December 03, 2020 which explains the prohibition of controlling domestic waste by burning.
- Documentation of transportation of domestic waste to the landfill.
- Letter of warning to employees who burn domestic waste on October 29 and 30, 2020.

However, there are still notes and questions from auditors that need to be completed by the company, so that the Non Conformance in this indicator are declared Unfulfilled.

Auditor Verification dated January 07, 2021:

The company has completed root cause analysis, corrections and corrective actions according to the auditor's notes and questions. Based on this, the non-conformity of this indicator is stated as fulfilled.

Verified by : Trismadi Nurbayuto

NCR No.	: 2020.12	Issued by	: Trismadi Nurbayuto
Date Issued	: 22 October 2020	Time Limit	: ASA 3
NC Grade	: Minor/Non Critical	Date of Closing	: 04 January 2021
Standard Ref. & Requirement	: 7.3.3 The unit of certification does not use open fire for waste disposal		

Non-Conformance Description & Evidence observed (filled by auditor):

- The results of interviews with residents of PKS employee housing show that domestic waste is collected next to the house by making a hole and then burning it.
- The results of a field visit to PKS employees' housing found piles of domestic waste next to the housing estate and there were burn marks.
- The results of a field visit to Afdeling 6 employee housing found piles of domestic waste and burn marks.
- The results of the field visit to Afdeling 4 employee housing found 2 waste burning spots.
- The results of field visits to the area around the clinic were found by employees burning rubbish.

Non-Conformance Description (filled by auditor):

Based on this evidence, the company has not been able to show evidence of not using open burning for all waste disposal.

Root Cause Analysis (filled by organization audited):

The company already has SOP No. 20 regarding household domestic waste processing, however, some employees still control domestic waste by burning it.

Correction (filled by organization audited):

- The company transports piles of domestic waste in each area to the Landfill and separates organic and inorganic waste.
- The company made a warning to employees for burning domestic waste.

Corrective Action (filled by organization audited):

- The company conducts outreach to all employees not to burn.
- The company made a memo to prohibit domestic waste control by burning it.

Assessor Evaluation and Conclusion (filled by auditor):

Auditor Verification dated December 28, 2020:

There are no repair documents in accordance with the root cause column, corrections and corrective actions.

Auditor Verification dated January 04, 2021:

The company has sent evidences of improvement in the form of:

- Root cause analysis, correction, and corrective action.
- Minutes of socialization of SOP for Domestic Waste Management to PKS, Afdeling IV and VI employees on December 17 and 23, 2020.
- Memo for controlling domestic domestic waste with number BER / M-143 / XII / 2020 dated December 03, 2020 which explains the prohibition of controlling domestic waste by burning.
- Documentation of transportation of domestic waste to the landfill.
- Letter of warning to employees who burn domestic waste on October 29 and 30, 2020.

Based on the evidence of improvement, the Non-Conformance on this indicator is declared Fulfilled and will be re-observed in the next assessment.

Verified by : Trismadi Nurbayuto

NCR No.	: 2020.13	Issued by	: Trismadi Nurbayuto
Date Issued	: 22 October 2020	Time Limit	: ASA 3
NC Grade	: Minor/Non Critical	Date of Closing	:
Standard Ref. & Requirement	<p>7.8.3 Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p>		
Non-Conformance Description & Evidence observed (filled by auditor):			
<ul style="list-style-type: none"> • The company has a permit for utilizing palm oil waste water on land in accordance with the Decree of the Regent of North Labuhanbatu Number: 660/68 / DLH / 2017, valid for five years since it was stipulated in 2017. The permit states that the application area is 97 ha and control land is 2 ha. • Based on the results of field visits to WWTP and interviews with WWTP officers, it was found that the outlet flow meter was damaged and not installed. So far, the company has performed a manual calibration to determine the amount of mill effluent applied to the Land Application. • Total POME Utilization for the period of July 2020 was 7,550 M3, August 2020 was 9025 M3, September 2020 was 9750 M3. 			
Non-Conformance Description (filled by auditor):			
<p>Based on this evidence, the company has not been able to show evidence that monitoring the volume of mill effluent applied to the land uses accurate data.</p>			

<i>Root Cause Analysis (filled by organization audited):</i>	
<i>Correction (filled by organization audited):</i>	
<i>Corrective Action (filled by organization audited):</i>	
<i>Assessor Evaluation and Conclusion (filled by auditor):</i>	
<i>Verified by</i>	:

NCR No.	: 2020.14	Issued by	: Trismadi Nurbayuto
Date Issued	: 22 October 2020	Time Limit	: ASA 3
NC Grade	: Minor/Non Critical	Date of Closing	:
Standard Ref. & Requirement	: 7.8.4 Mill water use per tonne of FFB is monitored and recorded.		
<i>Non-Conformance Description & Evidence observed (filled by auditor):</i>			
<ul style="list-style-type: none"> Records of water use for FFB processing in the period July 2020 totaling 20,429 M3; August 2020 as many as 23,142 M3 and September 2020 as many as 23,256 M3. Based on the results of field visits and interviews with WTP station officers, it was found that the water flow meter to the processing station was damaged and had not functioned for more than 1 year. 			
Non-Conformance Description (filled by auditor):			
Based on this evidence, the company has not been able to show evidence of the amount of calculated water use for processing accurately.			
<i>Root Cause Analysis (filled by organization audited):</i>			
<i>Correction (filled by organization audited):</i>			
<i>Corrective Action (filled by organization audited):</i>			
<i>Assessor Evaluation and Conclusion (filled by auditor):</i>			
<i>Verified by</i>	:		

NCR No.	: 2020.15	Issued by	: Trismadi Nurbayuto
Date Issued	: 22 October 2020	Time Limit	: 21 January 2021
NC Grade	: Major/Critical	Date of Closing	: 12 January 2021
Standard Ref. & Requirement	: 7.12.4 Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and		

	any relevant wider landscape level considerations (where these are identified).
<p>Non-Conformance Description & Evidence observed (filled by auditor):</p> <ul style="list-style-type: none"> The company has an HCV management and monitoring plan for the period of Semester 1 of 2020 which includes: Signboard Conditions, Biodiversity of Flora and Fauna, Intensity of disturbance to river boundaries and springs from fire hazards, Changes in river width, and river water quality. The company has carried out management and monitoring of HCV such as Monitoring Signboard in July 2020, Monitoring Flora and fauna in July 2020, conducting water quality testing in semester 1 of 2020, Monitoring fire hazard intensity inspection in July 2020, and Monitoring River width monitoring in July 2020. Based on the report on the results of HCV identification carried out by PT Surveyor Indonesia in 2011, it is known that there are areas identified as HCV 4.2, namely areas that are important for erosion and sedimentation control, namely Jagat Hill, Soleh Hill, Jalal Hill, Monyet Hill and Terjal Hill. Based on the results of a field visit to the Jagat Hill HCV area in Block 05 AF Afdeling III, it was found that there were traces of burning wood in the area. Based on interviews with Assistant Afdeling III, it was found that the Jagat Hill HCV area was often used for human activities such as camping. Based on interviews with HCV / PPD Officers, it is known that the HCV Semester 1 2020 management and monitoring plan has not been prepared in consultation with stakeholders. <p>Non-Conformance Description (filled by auditor): Based on this, the company has not been able to show evidence of:</p> <ul style="list-style-type: none"> Results of a review of the HCV management and monitoring plan (min 5 years) Monitoring Program for disturbance of HCV areas 4.2. Evidence that an HCV management and monitoring plan has been developed in consultation with stakeholders. 	
<p>Root Cause Analysis (filled by organization audited): Related officers do not understand the 2020 HCV management and monitoring program</p>	
<p>Correction (filled by organization audited): The company reviews the HCV management and monitoring plan, monitors the disturbance of the HCV 4.2 area and consults with stakeholders for the HCV management and monitoring plan.</p>	
<p>Corrective Action (filled by organization audited): The company conducted training for related officers regarding the 2020 HCV management and monitoring program at the ISO Estate Berangir room on 02 November 2020.</p>	
<p>Assessor Evaluation and Conclusion (filled by auditor): Auditor Verification dated December 28, 2020: There are no repair documents in accordance with the root cause column, corrections and corrective actions.</p> <p>Auditor Verification dated January 04, 2021: The company has sent evidences of improvement in the form of:</p> <ul style="list-style-type: none"> Root cause analysis, correction, and corrective action. HCV Management and Monitoring Training Webinar on November 2, 2020 for 5 Officers, namely Assistant for Plantation personnel, General Assistant, Document Control Officer (PPD) for Estate and Mill. The HCV 4.2 area monitoring program is to monitor the value of ecosystem services in the HCV 4.2 area. based on the results of monitoring carried out on 30 October 2020 on the HCV of Bukit Jagad, Bukit Soleh, Bukit Jalal, Bukit Monyet and Bukit Terjal, it is known that there is no indication of disturbances such as landslides, encroachment and tree felling, etc. Review of the Management Plan and monitoring of HCV areas with the community for the first semester of 2020. Based on the results of the review, the HCV management and monitoring plan is still relevant and is still being continued in the 2020 HCV area management and monitoring. The HCV Semester II 2020 management and monitoring plan, namely: 	

- a. Monitoring the Condition of the HCV Signboard.
- b. Diversity of flora and fauna species.
- c. The intensity of the disturbance to the area of river boundaries and springs from the danger of fire.
- d. Change in river width.
- e. River water quality.
- f. Monitoring the intensity of disturbances such as landslides, encroachment and logging in HCV 4.1 & 4.2 areas.
- g. Monitoring of discharge, sedimentation and water quality.
- h. Monitoring the success rate of the river border rehabilitation program.
- i. Umbul Monitoring.
- j. Monitoring the existence of graves and ensuring the condition of the security fence.

However, there are still auditor notes that need to be completed by the company (in the correction column), so that the Non-Conformance on this indicator is declared Unfulfilled.

Auditor Verification dated January 12, 2021:

- Review of the Management Plan and monitoring of HCV Areas with the community for the Semester I 2020 period which was conducted on 30 October 2020.
- Documentary evidence of activities and attendance list of the people involved.

Based on this evidence, the non-conformity on this indicator is declared Fulfilled.

Verified by	:	Trismadi Nurbayuto
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3.4.4. Opportunity for Improvement

No	Ref.	Description
1	2.3.2	Complete information regarding geolocation and proof of land ownership status by farmers who supply fruit through PT Deggan Agrojaya Labuan and Perkasa Aidil Zukiansyah
2	5.1.1 – 5.1.4, 5.1.8	Providing support for smallholders (independent smallholders or plasma farmers) around PTPN IV Berangir to participate in the RSPO certification program
3	5.2.1- 5.2.2; 5.2.5	Conducting consultation and outreach and publicly reporting the progress of support to smallholders to be interested in joining RSPO certification.
4	5.2.3	Provide support to farmers to fulfill the legality of FFB production
5	5.2.4	The company has received FFB from 3 suppliers since July 2020. The company has the opportunity to provide training / socialization on the handling of pesticides to the FFB supplier.
6	7.2.7.	Based on field observation to the chemical warehouse sighted that there are MSDS for each of chemical with English and <i>Bahasa</i> version. However the unit of certification to be consider to providing all MSDS in <i>Bahasa</i> versions.
7	7.8.4	Following up the extension of the water resources exploitation permit to the local government.

3.4.5. Noteworthy Positive Components

No	Ref. Std.	Description
1		The unit of certification commitment to managing oil palm plantations in a sustainable manner.
2		Berangir POM as obtain PROPER certificate with blue category from Environment and Forestry Ministry for period of 2018/2019.
3		The unit of certification has obtained ISPO certificate with number TNI.ISPO-L-1612 (valid from 6 December 2016 until 5 December 2021).



3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Environmental Agency of Labuhanbatu Utara Regency</p> <ul style="list-style-type: none"> - The company has reported mandatory reports to the Environment Agency such as management and environmental plans (RKL-RPL), Mill Effluent Monitoring Reports and Hazardous and Toxic waste Management Reports. - Hazardous and Toxic waste temporary storage Permit and Mill Effluent Permit are still valid. - In March 2019, there was a report on the issue of environmental pollution by the community and local NGOs to the Environmental Office regarding allegations of environmental pollution carried out by PTPN IV unit Berangir. The Environmental Agency has conducted direct verification of the field. Based on the results of the Office's verification, it was stated that the PTPN IV Unit was unlikely to pollute the waste because the company's location was far from the location of the pollution, namely the Marbau River. The agency said that this case has been completed and has been verified directly in the field. - During 2020 there were no environmental issues carried out by the company. 	<p>It has been described in the report as in indicator 2.1.1; 7.3.1; and 7.8.3</p>
<p>Labor Agency of Labuhanbatu Utara Regency.</p> <ul style="list-style-type: none"> • The CH have CLA that has been verified by the agencies. • The CH 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 CH was in 2019 with discussions related to the "BPJS" Program. • The CH has labor unions which have been registered by the Labor Agency • The CH 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 CH are fairly well established. 	<p>There is no negative issue related to labor. The management unit has comply with RSPO standard.</p>
<p>Plantation Agency of Labuhanbatu Utara Regency</p> <ul style="list-style-type: none"> - Company has reported the Plantation Development Report to Agency regularly. 	<p>Auditor has verified related to legal, social, and best practice aspect.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> - Fire Fighting equipment is necessary - There is no customary rights in PTPN IV Berangir. There is no land conflict with surrounding village. - Company already achieve plantation class - There is no complaint from surrounding village regarding operational activity of PTPN IV Berangir 	
<p>Land National Agency of Labuhanbatu Regency</p> <ul style="list-style-type: none"> - Company already has land use rights and still valid. - There is no customary rights in PTPN IV Berangir. There is no land conflict with surrounding village - There is no complaint from surrounding village regarding operational activity of PTPN IV Berangir 	<p>Auditor has verified the compliance towards legal aspect.</p>
<p>SP-BUN (Worker Union) Interview with Head of Worker Union</p> <ul style="list-style-type: none"> - There are seven cases of industrial relation conflict resolution during last year. - Currently there are non permanent workers as clerk on the mill and estate. - The minimum wage in accordance to the Province of North Sumatera minimum wages regulation. - The company has provide electricity and water allowance to all workers. - There are no demonstration during last year, all problem can be resolved with bipartite meeting. - There are quarterly bipartite meeting, however if there are special cases. The immediately bipartite meeting will be conducted. - The semi permanent housing is still feasible to live in. - There are work accident cases on September 2020. - The ration rice allowance are giving on rice or money, it's in accordance to the workers demand. - PPE is provided by company. - Company provided source of clean water, houses, education, health, and other facilities to guarantee worker welfare. 	<p>Auditor has verified related to worker welfare and OHS implementation aspects</p>
<p>Women Empowerment Division (Gender Committee)</p> <ul style="list-style-type: none"> - Women worker usually work as pesticide operator, fertilizer application worker, and administration. - Company provides women worker with reproductive rights, such as menstrual leave for about 2 days, maternity leaves for about 3 months, breastfeeding break time. - There is no complaint about sexual harassment. - Women empowerment has socialized about mechanism of complaint to worker, especially women worker. 	<p>Auditor has verified related to reproductive rights for woman worker aspects</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Pasang Lela Village</p> <ul style="list-style-type: none"> - Communication between the company and the village is going well. The complaint and complaint mechanism is well understood by the Village community. - There are no land disputes between the company and the village community. - The company has provided CSR programs to the community. - There are village people who work for the company. - Job vacancies information has been submitted to the village community. - There are no complaints and problems with environmental aspects. 	<p>This is quite clear and there is an explanation in each of the related indicators.</p>
<p>Perkebunan Berangir Village</p> <ul style="list-style-type: none"> - Communication between the company and the village is going well. The complaint and complaint mechanism is well understood by the Village community. - The company has provided CSR programs to the community. - There are village people who work for the company. - Job vacancies information has been submitted to the village community. - There are no land disputes between the company and the village community. - There are no complaints and problems with environmental aspects. 	<p>This is quite clear and there is an explanation in each of the related indicators.</p>
<p>Simpang Marbau Village</p> <ul style="list-style-type: none"> - Communication between the company and the village is going well. The complaint and complaint mechanism is well understood by the Village community. - There are no land disputes between the company and the village community. - In March 2019, there was an issue of environmental pollution by the company, which was related to the problem of disposing of liquid waste into the Marbau river. However, this problem has been resolved and has been recognized by the Environmental Service of North Labuhanbatu Regency and the Environmental Service of North Sumatra Province. - The company has provided CSR programs to the community. - There are village people who work for the company. - Job vacancies information has been submitted to the village community. - There are no land disputes between the company and the village community. 	<p>This is quite clear and there is an explanation in each of the related indicators.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> - There are no complaints and problems with environmental aspects. 	
<p>CV. GAS (FFB Transport Contractor)</p> <ul style="list-style-type: none"> - There is a work agreement between the company and the contractor that has been agreed upon and is in accordance with the applicable regulations. - There are no complaints or violations related to work payments. - Communication between the contractor and the company is well established. - Contractors are required by companies to comply with OHS and PPE procurement by contractors itself. 	<p>This is quite clear and there is an explanation in each of the related indicators.</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> <p>PT Perkebunan Nusantara IV Kepala Bagian Perencanaan dan Sustainability</p>  <p>Dison Girsang Wednesday, 20 January 2021</p> <p>Mutuagung Lestari Lead Auditor</p>  <p>Trismadi Nurbayuto Wednesday, 20 January 2021</p>

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	Plantation Agency of Labuhanbatu Utara Regency	District Labuhanbatu Utara Province North Sumatera	-	Interview	20 October 2020	✓	
2	Environment Agency of Labuhanbatu Utara	District Labuhanbatu Utara Province North Sumatera	-	Interview	20 October 2020	✓	
3	Land National Agency of Labuhanbatu Regency	Labuhanbatu Regency, Sumatera Utara Province	-	Interview	20 October 2020	✓	
4	Pasang Lela Village	District of North Labuhanbatu	-	Interview	20 October 2020	✓	
5	Perkebunan Berangir Village	District of North Labuhanbatu	-	Interview	20 October 2020	✓	
6	Simpang Marbau Village	District of North Labuhanbatu	-	Interview	20 October 2020	✓	
7	CV GAS	District of North Labuhanbatu	-	Interview	20 October 2020	✓	
8	Gender Committee	Berangir POM & Estate	-	Interview	20 October 2020	✓	
9	Worker Union	Berangir POM & Estate	-	Interview	20 October 2020	✓	
10	Estate: - 5 spraying team - 1 global telling - 2 ganoderma census - 1 foreman - 1 Division Assistant - 1 Landfill Operator.	Berangir POM & Estate	-	Interview	21 October 2020	✓	
	Mill - 2 securities - 1 weighbridge operator - 2 grading worker - 1 dispatch worker - 1 WTP operator - 2 welders - 1 hazardous and toxic waste officer - 1 warehouse officer - 1 POME				20 October 2020	✓	

	operator - 1 WWTP Operator - 1 Land Application Operator - 1 Pump room Operator						
11	AMAN	-	rumahaman@cbn.net.id	✓	14 October 2020		
12	Sawit Watch	-	info@sawitwatch.or.id	✓	14 October 2020		
13	Walhi	-	informasi@walhi.or.id	✓	14 October 2020		

Appendix 2. Assessment Program

Date	Remote Audit: 28 and 29 July 2020	
Audit Program	PROCESSES / CLAUSES TO BE AUDITED	Auditor
Tuesday, 28 July 2020		
08.00 – 09.00	Remote Audit Opening Meeting (recorded video conference) <ul style="list-style-type: none"> Opening speech and discussion of remote audit mechanism Presentation of audit objective, audit scope, audit plan discussion, audit sample, transparency and confidentiality clarification) 	All Auditor
09.00 – 12.00	Document verification	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 16.30 16.30 – 17.00	Document verification Daily audit progress meeting	All Auditor
Wednesday, 29 July 2020		
08.00 – 12.00	Document verification	All Auditor
12.00 – 16.00	Break & auditor internal discussion for closing meeting preparation	All Auditor
16.00 – 17.00	Remote Audit Closing Meeting (recorded Video Conference) <ul style="list-style-type: none"> Presentation of audit findings (noteworthy positive component, non conformities, OFI, timeline of CAR's, conclusion) Comments, responses and questions 	All Auditor

DATE	Onsite Audit: 19 – 22 October 2020	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 19 October 2020		
07.45 – 10.15	❖ Jakarta – Medan	❖ All Auditor
08.00 – 16.00	❖ Medan – Mess Berangir	
Tuesday, 20 October 2020		
08.00 – 09.00	Opening Meeting	❖ All Auditor
09.00 – 12.00	Verification on previous assessment and document review	❖ RAB/TNB
	<ul style="list-style-type: none"> ❖ Environment, Social, GHG Aspects ❖ Legal, Contractor, SCCS, Time Bound Plan, Partial Certification ❖ Best Management Practices & Transparencies Aspects ❖ OHS & Worker Welfare Aspects 	<ul style="list-style-type: none"> ❖ AAS ❖ TNB ❖ YYT
	<ul style="list-style-type: none"> ❖ Stakeholders Consultation to Government Agency in Labuhanbatu Utara Regency (Kantor Pertanahan, Dinas Kehutanan dan Perkebunan, Dinas Sosial dan Tenaga Kerja, Dinas Lingkungan Hidup Kabupaten Labuhanbatu Utara) by phone ❖ Stakeholder Consultation to Nearest Community, Previous Land Owners, Smallholders, & Contractors) by phone 	<ul style="list-style-type: none"> ❖ AAS/YYT ❖ RAB/TNB
12.00 – 14.00	❖ Break	❖ All Auditor
14.00 – 16.30	Field Observation to BERANGIR POM	❖ TNB
	<ul style="list-style-type: none"> ❖ Workshop, Chemical Storage, WTP, Fire Fighting Simulation, EFB station ❖ Loading Ramp (Grading), Grading Station, Processing Station ❖ Security, Weighbridge Station, CPO Storage Tank, Palm Kernel Silo/Bulk (Supply Chain) ❖ Effluent Ponds, Land Application (LA), WTP, Water Inlet, Housing Complex 	<ul style="list-style-type: none"> ❖ YYT ❖ AAS ❖ RAB/TNB
16.30 – 17.00	❖ Daily progress & field visit clarifications	❖ All Auditor
Wednesday, 21 October 2020		
08.00 – 12.00	Field Observation to BERANGIR ESTATE	❖ YYT
	<ul style="list-style-type: none"> ❖ Replanting, Nursery, Manuring, Spraying, Harvesting, Integrated Pest Management (IPM), OHS aspects, Worker Welfare (payments, complaint mechanism) ❖ Legal operational & High Conservation Value Area, Empty Fruit Bunch Application, Fragile Soil Management, Domestic Waste Management ❖ Worker facilities (housing, health clinic, clean water, etc) and Hazardous Waste Material (B3) management, Fire Fighting facilities, Storage, etc. 	<ul style="list-style-type: none"> ❖ RAB/TNB ❖ AAS
12.00 – 14.00	❖ Break	❖ All Auditor
14.00 – 16.30	Verification on previous assessment and document review	❖ RAB/TNB
	<ul style="list-style-type: none"> ❖ Environment, Social, GHG Aspects ❖ Legal, Contractor, SCCS, Time Bound Plan, Partial Certification ❖ Best Management Practices & Transparencies Aspects ❖ OHS & Worker Welfare Aspects 	<ul style="list-style-type: none"> ❖ AAS ❖ TNB ❖ YYT
16.30 – 17.00	❖ Daily progress & field visit clarifications	❖ All Auditor
Thursday, 22 October 2020		
08.00 – 12.00	Verification on previous assessment and document review	❖ RAB/TNB
	<ul style="list-style-type: none"> ❖ Environment, Social, GHG Aspects 	

	<ul style="list-style-type: none"> ❖ Legal, Contractor, SCCS, Time Bound Plan, Partial Certification ❖ Best Management Practices & Transparencies Aspects ❖ OHS & Worker Welfare Aspects 	<ul style="list-style-type: none"> ❖ AAS ❖ TNB ❖ YYT
12.00 – 14.00	<ul style="list-style-type: none"> ❖ Break 	<ul style="list-style-type: none"> ❖ All Auditor
14.00 – 15.00	<ul style="list-style-type: none"> ❖ Closing Meeting 	<ul style="list-style-type: none"> ❖ All Auditor
15.00 – 18.00	<ul style="list-style-type: none"> ❖ Mess Berangir – Mess Air Batu 	<ul style="list-style-type: none"> ❖ All Auditor