

ASSESSMENT REPORT

Roundtable on Sustainable Palm Oil Certification R S P O

[✓] Surveillance

Name of Management: Dolok Ilir Palm Oil Mill PT Perkebunan Nusantara IV subsidiary of PT

Organisation Perkebunan Nusantara III

Plantation Name : Dolok Ilir Estate & Laras Estate

Location : Village of Babolon, Sub District of Dolok Batunanggar, District of Simalungun,

Province of Sumatera Utara, Indonesia

Certificate Code : **MUTU-RSPO/075**Date of Initial Registration : 29 September 2015

Date of Certificate Issue : 22 March 2021 Date of License Issue : 29 May 2022

Date of Certificate Expiry : 28 September 2025 Date of License Expiry : 28 September 2022

Assessment	Assessment	PT. Mutuagung Lestari	Reviewed	Approved	
	Date	Auditor	by	by	
ASA-1.1	20 to 24 September 2021	Rizliani Apianita Hsb (Lead Auditor), Briyogi Shadiwa, Afiffuddin and Septian Maulana	Ardiansyah	Leonada	

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.1	06 January 2022

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on March 12th, 2014 with registration number ASI-ACC-055



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Figure 1. Location Map of PT Perkebunan Nusantara IV -Dolok Ilir Unit

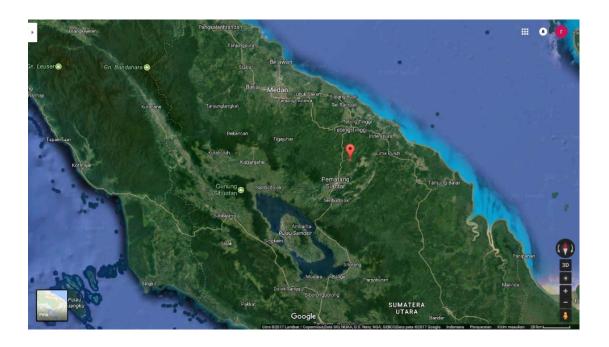




Figure 2. Operational Map of PT Perkebunan Nusantara IV - Dolok Ilir Unit

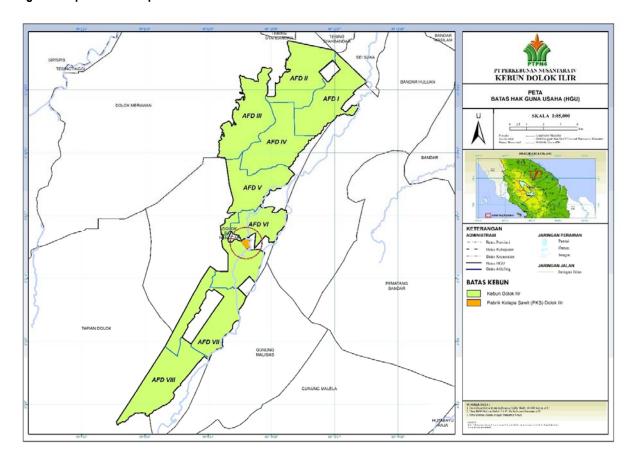
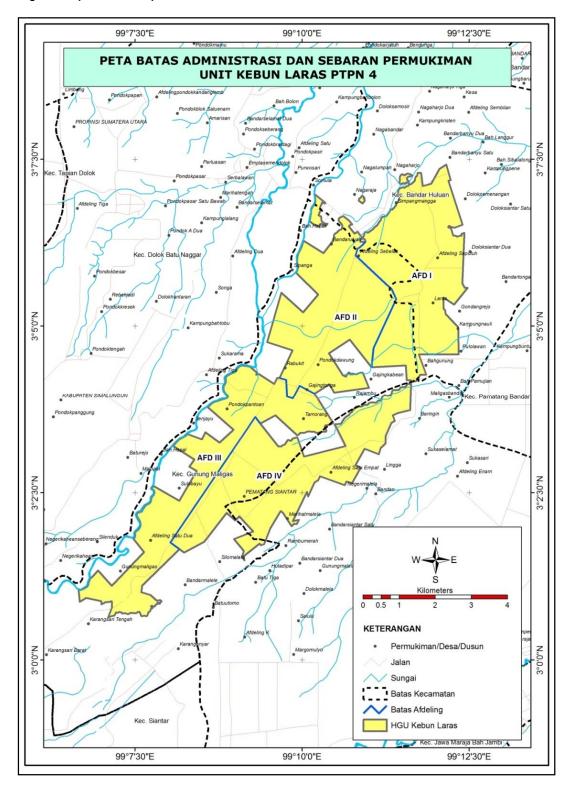




Figure 3. Operational Map of PT Perkebunan Nusantara IV - Laras Unit





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Abbreviations Used

AMDAL		Analista Daniel Lington and (Engineering Analysis)
AMDAL	Ė	Analisis Dampak Lingkungan (Environmental Impact Analysis)
ASA	<u> </u>	Annual Surveillance Assessment
BOD	:	Biological Oxygen Demand
BPJS	:	Badan Penyelenggara Jaminan Sosial/ Social Security Administrator
BPN	:	Badan Pertanahan Nasional (National Land Agency)
CCTV	:	Closed Circuit Television
CEC	:	Capacity Exchange Cation
CLA	:	Collective Labor Agreement
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR		Corporate Social Responsibility
DELH		Dokumen Evaluasi Lingkungan Hidup/Environmental Evaluation Document
EFB	ŀ	Empty Fruit Bunch
EIA	÷	Environment Impact Analysis
FFB	<u> </u>	Fresh Fruit Bunch
GHG	-	Green House Gasses
HCV	+	High Conservation Value
	<u> </u>	
HGU	Ŀ	Hak Guna Usaha (Land Use Title)
IK	:	Instruksi Kerja Work Instruction
ISPO	<u> </u>	Indonesia Sustainable Palm Oil
IUP	:	Izin Usaha Perkebunan (Plantation Business Permit)
JWM	:	Jaya Wira Manggala
LA	:	Land Application
NGO	:	Non Government Organization
OER	:	Oil Extraction Rate
OFI	:	Opportunity for Improvement
OHS	:	Occupational Health and Safety
P2K3	:	Panitia Pembina Keselamatan dan Kesehatan Kerja /OHS Committee
PK	:	Palm Kernel
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPD	:	Personil Pengendali Dokumen (Document Control Officer)
PPE	ŀ	Personal Protective Equipment
PT	ŀ	Perseroan Terbatas
PTPN IV	Ė	PT Perkebunan Nusantara IV
RKL-RPL	<u> </u>	Rencana Kelola Lingkungan-Rencana Pemantauan Lingkungan (Environmental Management and
IXIXL-IXI L	•	Monitoring Plan)
RSPO		Roundtable on Sustainable Palm Oil
SCCS	+	
	H	Supply Chain Certification System
SEIA	Ŀ	Social Environmental Impact Assessment
SIA	Ŀ	Social Impact Assessment
SMK3	Ŀ	Sistem Manajemen Kesehatan dan Keselamatan Kerja (OHS System Management)
SOP	1:	Standard Operational Procedure
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant of Effluent Plant





1.0	SCOPE of the CERTIFICATION ASSESSMENT								
1.1	Assessment Standard I	Jsed	The Indonesia Na Board of Governor RSPO Certification	iteria for Sustainable Palm Oil Production 2018, ational Interpretation, Endorsed by the RSPO ors on 20 April 2020. Ons Systems for Principles & Criteria and RSPO allholders Standard (Endorsed by RSPO Board 12 November 2020)					
1.2	Organisation Information	nn .							
1.2.1	Organisation name listed		Dolok Ilir POM PT Perke	ahunan Nusantara IV					
1.2.2	Contact person	in the certificate	Pirgok Panggabean	bullati Nusantara iv					
1.2.3	Organisation address and	d site address	Head Office:	2 Medan 20151, Sumate	ra I Itara Indonesia				
1.2.4	Telephone		(62-61) 415 4666	2 Wodan 20101, Gamato	ra otara, maoneola				
1.2.5	Fax		(62-61) 457 3117						
1.2.6	E-mail		perencanaan@ptpn4.co	.id					
1.2.7	Web page address		www.ptpn4.co.id						
1.2.8	Management Representa completed the application		Pirgok Panggabean						
1.2.9	Registered as RSPO me	mber	1-0082-09-000-00 dated	29 June 2009					
1.3	Type of Assessment								
1.3.1	Scope of Assessment an	d Number of Mana	gement Unit	One (1) unit of Palm Oil Mill (Dolok Ilir Mill) supplied by two (2) estates, i.e.: Dolok Ilir Estate and Laras Estate					
1.3.2	Type of certificate			Single					
1.4	Locations of Mill and P	lantation							
1.4.1	Location of Mill	iantation							
	Eddatori di iviiii		Coordinate						
	Name of Mill	L	-ocation	Latitude	Longitude				
	Dolok Ilir	District, Simalur	Dolok Batunanggar Sub ngun District, Sumatera ovince, Indonesia	N 03° 07' 20"	E 99° 09' 42"				
1.4.2	Location of Certification S	Scope of Supply Ra	250						
1.7.2	Location of Gertification (осоре от опррту ве	13G	Coordinate					
	Name of Supply Base	L	_ocation	Latitude	Longitude				
	Dolok Ilir Estate	District, Simalur	Dolok Batunanggar Sub ngun District, Sumatera ovince, Indonesia	N 03° 07' 09.8"	E 99° 09' 38.7"				
	Laras Estate	Laras Village, Ba Simalungun Di	ndar Huluan Sub District, istrict, Sumatera Utara ice, Indonesia	N 03° 06' 02"	E 99° 11' 56"				
1.5	Description of Area Sta	tement							
1.5.1	Tenure								



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	State	11,411.47 ha				
	Community	- На				
1.5.2	Area Statement					
	Total area	11,411.47	ha			
	Mature area	8,105.00	ha			
	Immature area	1,440.00	ha			
	Replanting Plan Area	749.00	ha			
	Occupation	121.00	ha			
	Emplacement, Mill	129.88	ha			
	 Infrastructure (road, bridge, WWTP) 	284.39	ha			
	• Canal	19.16	ha			
	Public road	144.00	ha			
	Unplanted Area (Hyaten)	147.57	ha			
	Unplanted (low-lying area)	3.47	ha			
	Symbolics Plant	8.79	ha			
	• HCV	251.97	ha			
	Golf Court	5.6	ha			
	Ex-Mill area	1.64	ha			

1.6 Planting Year and Cycles

1.6.1 Age profile of planting year

	Hectarage (Ha)							
Planting Year	Dolok Ilir Estate	Laras Estate	Total					
1997	447	312	759					
1998	228	571	799					
1999	573	216	789					
2000	90	-	90					
2004	8	-	8					
2005	-	14	14					
2010	19	7	26					
2011	263	174	437					
2012	106	440	546					
2013	451	-	451					
2014	-	398	398					
2016	2,898	616	3,514					
2017	274	-	274					
Sub Total Mature	5,357	2,748	8,105					
2018	314	-	314					
2019	272	311	583					
2020	348	195	543					



	Sub Total Immature			34				506			1,440			
	TOTAL		6,2	91				3,254			9,545			
1.6.2	New Planting area	after Januai	ry 2010									Ha		
1.6.3	Planting Cycle		,			2 nd Cycle								
	, ,													
1.7	Description of Mill	and Supp	ly Base											
1.7.1	Description of Mill													
		Capacit	v	B Dro	cessed			СРО				alm Kei	rnel	
	Name of Mill	(tonnes/ ho	•		s/year)			t put nes)	Extraction (%		Out p		Extraction (%)	
	Dolok Ilir	60		175,6	47.71	;	39,4	52.71	22.	46	7,596	.08	4,3	
	*Production data soul	rce from Sep	otember 20	020 to i	August 2021	1								
1.7.2	Description of Certi													
<u> </u>					Due due 4				V	اداءا		اممالمس	4a M:II	
	Name of Esta	ate	Total Ar	ea	Production Area	on		FFB		ield nnes/		upplied	to will	
	Name of Esta		(Ha)		(Ha)		(to	nnes/year)		year)		FB	%	
	Dolok Ilir Estate		7,348.8	31	5,357		1(05,736.48		9.74	i i	es/year) 235.06	96.69	
	Laras Estate		4,062.6		2,748			5,043.75	23.67			17.53	80.13	
	TOTAL	<u>'</u>		47	8,105	8,105 170,780.23		21.07		154,	154,352.59 90			
	*Production data soul	rce from Sep	otember 20	020 to i	August 2021	1			•		•		•	
1.7.3	FFB description from	FFB description from other source												
	Name of sources/Organisation (RSPO certified / non-certified)			Type of Organisation		n I		Area (Ha)			plied to Mill FFB nnes/year)			
	Tanah Itam Ulu (cer	rt. in 2019)		PTPN IV			-		2.4	15.00	•	956.55		
	Mayang (cert. in 20			PTPN IV		/		-		4,171.00		25.60		
	Marjandi (cert. in 20	•		PTPN IV								2.00 16		
	CV Riana Lim (non-	-cert)		Third Party		ty		-		-		16,351.87 751.21		
	CV Mandiri Arsa Se	jahtera (no	n-cert)		Third Par	rty -								
	CV Nusantara Putra	a Doge(non	n-cert)	Third Party				-		-		2	42.98	
					TOTAL							21,	,295.12	
	*Production data soul	rce from Sep	otember 20	020 to i	August 2021	'								
1.7.4	Product categories							FFB, CPO,	PK					
1.8	Tonnage of Produ	ct												
1.8.1	Past Annual Claim Certified Product							Year Projected Volume (Last	•	ual certif ons/year)	ied product	
	FFB Processed							24	0,739		•		158,501.65	
	CPO Production							5	6,987				35,880.59	
	Palm Kernel (PK) Production								9,687				6,564.82	
1.8.2	Product selling													
	Type of selling prod	luct				Actual selling product for last year (MT)								
												OG: (::::)		



	CSPK sold as R	RSPO certified p	product							5,556.66
	CSPO sold und	er other schem	е							0
	CSPK sold unde	er other scheme	е							0
	CSPO sold as o	conventional								20,899.62
	CSPK sold as c	onventional								0
1.8.3	Estimate of Cer	tified FFB Clain	n							
	Name of	Estates	Total Ar (Ha)	ea	Produ	ction Ar	rea (Ha)		FB es/year)	Yield (tonnes/ha/year)
	Dolok Iliı	7,348.8	1		5,357		109	,000	20.35	
	Laras E	Estate	4,062.6	6		2,784		67,	000	24.00
	ТОТ	AL	11,411.4	1 7		8,105		176	,000	21.71
	*Projected FFB p	roduction for 12	months certificat	te				•	<u>'</u>	
1.8.4	Estimate of Cer	tified Palm Prod	duct Claim							
		Capacity	FFB		CPC)		Palm K		Supply Chain
	Name of Mill	(tonnes/ hour)	Processed (tonnes/year)		t put nes)	Extract (%)		Out put tonnes)	Extraction (%)	Module
	Dolok Ilir	60	176,000		,240	24.0	,	7,040	4.00	MB
	*Projected FFB p	roduction for 12	months certificat	te		<u> </u>			l	
4.0	Other Oratifica	4!								
1.9	Other Certifications ISO 9001:2008									
		ISO 14001: 2004								
	OHSAS 18001:				-					
	ISCC				-					
	Others									
1.10	Time Bound Pla	an								
1.10.1	Time Bound Pla	an for Other Ma	nagement Uni	ts						
	Manageme	ent Unit								
	MILL	Time Bound Plan	Estate (Supply Base)		Time Bound Plan		Locati		on	Status
	Pabatu	2015	Pabatu		201	5	Serda	ing Bedaga Utara	i, Sumatera	Certified
	Dolok Ilir	2015	Dolok Ilir		201	5	Simal	ungun, Sum	natera Utara	Certified
	DOIOK IIII		Laras		2018				natera Utara	Certified
	Pulu Raja	2015	Pulu Raja		201	5		han, Sumat		Certified
	Adolina	dolina 2018		Adolina		8		ang Bedag lang, Suma		Certified
			Bah Jambi		2018	8			natera Utara	Certified
			Marihat		2018	<u> </u>		natera Utara	Certified	
	Bah Jambi	2018	Bah Birung Ul	u	202	1	Simal	ungun, Sun	natera Utara	Stage-1 Audit
			Marjandi		2019	9	Simal	unaun. Sum	natera Utara	





1.10.2

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		Marjandi HGU on process (30 Ha)	2021	Simalungun, Sumatera Utara	-				
		Dolok Sinumbah	2018	Simalungun, Sumatera Utara	Certified				
Dolok Sinumbah	2018	Dolok Sinumbah HGU on progress (35.94 Ha)	2021	Simalungun, Sumatera Utara	-				
		Balimbingan	2018	Simalungun, Sumatera Utara	Certified				
Marrana	2040	Mayang	2019	Simalungun, Sumatera Utara	Certified				
Mayang	2019	Bukit Lima	2021	Simalungun, Sumatera Utara	-				
Curuma Davas	2010	Gunung Bayu	2019	Simalungun, Sumatera Utara	Certified				
Gunung Bayu	2019	Tanah Itam Ulu	2019	Simalungun, Sumatera Utara	Certified				
		Tinjowan	2019	Simalungun, Sumatera Utara	Certified				
Tinjowan	2019	Aek Nauli	2019	Simalungun, Sumatera Utara	Certified				
		Padang Matinggi	2019	Simalungun, Sumatera Utara	Certified				
		Air Batu	2019	Asahan, Sumatera Utara	Certified				
Air Batu	2019	Air Batu HGU on progress (459.02 Ha)	2021	Asahan, Sumatera Utara	-				
Davagaia	0040	Berangir	2018	Labuhan Batu Utara, Sumatera Utara	Certified				
Berangir	2018	Berangir HGU on progress (10 Ha)	2021	Labuhan Batu Utara, Sumatera Utara	-				
		Sawit Langkat	2018	Langkat, Sumatera Utara	Certified				
Sawit Langkat	2018	Sawit Langkat HGU on progress (301.50 Ha)	2021	Langkat, Sumatera Utara	-				
		Pasir Mandoge	2020	Asahan, Sumatera Utara	Certified				
	2020					Sei Kopas	2020	Asahan, Sumatera Utara	Certified
Pasir Mandoge		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	-				
Tilliui	2021	Balap	2021	Mandailing Natal, Sumatera Utara	-				
		Ajamu	2019	Labuhan Batu Utara, Sumatera Utara	Certified				
Ajamu	2019	Meranti Paham	2019	Labuhan Batu Utara, Sumatera Utara	Certified				
		Panai Jaya	2021	Labuhan Batu Utara, Sumatera Utara	-				
Sosa	2021	Sosa	2021	Padang Lawas, Sumatera Utara	-				
PT Agro Sinergi Nusantara	2021	PT Agro Sinergi Nusantara	2021	Aceh Barat, Aceh	-				
PT Sinergi Perkebunan Nusantara	2021	PT Sinergi Perkebunan Nusantara	2021	Morowali Utara, Sulawesi	-				
Last update on Nove	ember 2020								
Progress of Assoc	riated Sma	Ilholders and Out growe	rs for Certifi	able Standard					

The company has no agreement with any associated smallholders and associated out-growers.



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Prepared by Mutuagung Lestari for Dolok Ilir POM PT Perkebunan Nusantara IV subsidiary of PT Perkebunan Nusantara III





2.0	ASSESSMENT PROCESS
-	
2.1	Assessment Team
ASA-1.1	1. Rizliani Aprianita Hasibuan (Lead Auditor). Indonesian Citizen. Bachelor and Magister of Agribusiness, Faculty of Agriculture. She had followed training such as RSPO Lead Auditor Training (2017), SCCS training, lead Auditor ISO 9001;2008, ISO 14001;2004, SA 8000, OHSAS 18001, social audit training by RSPO (verité), ISPO Auditor training and followed several IHT related to environment, BMP etc. She has been involved in several audit activities related to sustainable palm oil certification since 2015 covering legal, social aspect, health and safety aspect, worker welfare, waste management aspect etc. In this audit, she assigned to the Legal, social and SCCS aspect.
	 Briyogi Shadiwa (Auditor). Indonesian citizens. Associate Degree of Oil Palm Plantation, Bogor Agricultural University. He has work experience since 2009 in several private oil palm plantation companies in Indonesia as Assistant Agronomy and Agronomy Quality Control. The trainings that have been attended include: RSPO Lead Auditor Course by Checkmark, ISPO Auditor Training by LPP, Lead Auditor ISO 9001: 2015, RSPO Supply Chain Certification Training Course by Checkmark, Lead Auditor ISO 14001: 2015, SMK3 Awareness, OHSAS 18001 Awareness: 2007, SA 8000 Awareness, ISO 45001: 2018 Awareness and General OHS Expert Training. In this audit, he verified EIA, conservation & GHG aspect. Afiffuddin (Auditor). Indonesian citizen, Diploma III majoring Palm Oil Plantation, Bogor Agricultural University. Five years working experience since 2010 at Oil Palm Plantation Company in Indonesia as agronomy operational staff and followed several trainings namely: Basic Plantation Management Program, Auditor Training Indonesian
	Sustainable Palm Oil (ISPO), Training of RSPO lead auditor, OHS General Expert, OHS System Management based on PP 50 2012 and Management System Certification (ISO 9001-2015/SNI 19011-9001:2015) ISO 17021, ISO 17065, SA 8000 training. He has been involved in several audit activities related to sustainable palm oil certification since 2016 covering Best Management Practices aspect, health and safety aspect and worker welfare aspect. During this audit, he is under supervised to conduct assessment on transparency and worker welfare.
	4. Septian Maulana (Auditor Trainee). Indonesian Citizen, Bachelor of Economic, Pamulang University. Have experience as sustainability staff on oil palm plantation. Training have been followed including Occupational Health and Safety Expert Candidate certification by Ministry of Manpower and Transmigration of Indonesia; Awareness Integrated Management Systems (ISO 9001:2015, ISO 14001:2015, ISO 45001:2018); Basic Fire Fighting; Basic Firs Aid; Understanding the regulations and technical aspects of environmental management; Training of Immobilization after a venomous snake bite; Awareness ISO 19011:2011; Awareness ISO 17065:2012; Awareness ISO 17021:2015; ISO 14001:2015; and ISO 45001:2018; ISO 9001:2015 Lead Auditor, ISPO Lead Auditor, and RSPO Lead Auditor. In this audit activity was verified OHS and Best Management Practices Aspect supervised by Lead Auditor.
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-1.1	Number of auditors: 3 Auditors and 1 Trainee Number of days for ASA-1.1 at site: 5 days Number of working days for ASA.1.1 at site: 15 Working days
222	Account Discours
2.2.2 ASA-1.1	Assessment Process The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT
A3A-1.1	Perkebunan Nusantara IV unit Dolok Ilir Mill to the requirements of RSPO Principles and Criteria For Sustainable Palm Oil Production 2018, The Indonesian National Interpretation, Endorsed by the RSPO Board of Governors on 20th April 2020 and RSPO Certification Systems For Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.
	The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.



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Some opportunities for improvement of the results **ASA-1.1** delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (**ASA-1.2**).

Improvement of findings from previous assessment findings were observed by auditors at this **ASA-1.1** assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of **ASA-1.1**.

The assessment program please find Appendix 2.

2.2.3 Locations of Assessment

ASA-1.1

Dolok Ilir Estate

- Emplacement of Division 1 and Division 2. Observation related to worker facilities and environment aspect.
- Rinse House of Division 1 and Division 2. Observation related to environment and safety aspect
- Fertilizer Warehouse of Division 1 and Division 2. Observation related to environment and safety aspect
- Worship House of Division 1 and Division 2. Observation related to worker facilities.
- Land Application Block 2000, Division 6. Observation and interview with operator related to environment and safety aspect.
- Cleaning work of the collection point Afdeling III Blok 17C. Observation and interview with 1 worker regarding BMP, OHS and worker welfare
- Harvesting Activity Afdeling III Blok 97AJ. Observation and interview with 4 workers regarding BMP, OHS and worker welfare.
- Plant trimming job Afdeling III Blok 16 Bl. Observation and interview with 4 workers regarding BMP, OHS and worker welfare
- Replanting Plan Area Afdeling III Blok 97AM, 97AN & 97AL. Observation related replanting mechanism
- Block of Planting Year 2020 Afdeling IV Blok 20C. Observation related replanting mechanism
- Block 16DD HCV 1 and IV area. Observation and interview regarding management of HCV area and HCV condition.
- Block 16DD, HGU poles (BPN PTPN-IV 59). Observation and interview regarding to HGU boundary.
- Block 16DD, HGU poles (BPN PTPN-IV 58). Observation and interview regarding to HGU boundary.
- Block 16EN HCV 1 and IV area. Observation and interview regarding management of HCV area and HCV condition.
- Block 97F, HGU poles (BPN PTPN-IV 155). Observation and interview regarding to HGU boundary.
- Block 16EL, HGU poles (BPN PTPN-IV 133). Observation and interview regarding to HGU boundary.

Dolok Ilir POM

- WWTP. Observation and interview with operator related to worker welfare, environment and safety aspect.
- Material Warehouse. Observation and interview with operator related to worker welfare, environment and safety aspect.
- **Temporary Hazardous waste Storage Warehouse**. Observation and interview with operator related to environment and safety aspect.
- Water Intake Room. Observation and interview with operator related to environment and safety aspect.
- St. Loading Ramp. Observation and Interview with 1 worker related work procedure, OHS and worker welfare.
- St. Sterilizer. Observation and Interview with 2 workers related work procedure. OHS and worker welfare.
- St. Engine room. Observation and Interview with 1 worker related work procedure, OHS and worker welfare
- St. Clarification. Observation and Interview with 1 worker related work procedure, OHS and worker welfare
- St. Boiler. Observation and Interview with 1 worker related work procedure. OHS and worker welfare
- St. Press. Observation and Interview with 1 worker related work procedure, OHS and worker welfare
- St. Kernel. Observation and Interview with 2 workers related work procedure, OHS and worker welfare
- Guard office. Observations regarding the availability and completeness of the first aid kit.
- Hydrant simulation. Observations related to the function of the hydrant and the alertness of the officers.
- **Empty bunch area.** Observations related to environmental management.
- Security Post. Observation and interview related worker welfare, OHS and others.

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- Weighbridge. Observations and interviews related to workers welfare, training, FFB traceability and supply chain system.
- Grading Station. Observation and interview with sortation operator related OHS, business ethics and worker
- **Despatch CPO.** Observation and interview related worker welfare, OHS and others.
- WTP. Observations and interview related to water management, recording of water use, PPE and waste management.
- **Workshop.** Observation and interview related OHS and workers welfare.

Laras Estate

- **Emplacement of Division 5.** Observation related to worker facilities and environment aspect.
- Rinse House of Division 5. Observation related to environment and safety aspect.
- Fertilizer Warehouse of Division 5. Observation related to environment and safety aspect.
- Landfill, Block 98 AS. Observation related to waste management.
- Temporary Hazardous waste Storage Warehouse. Observation and interview with operator related to environment and safety aspect.
- Fireland Facilities Warehouse. Observation related to fireland facilities.
- **Generator House**. Observation related to environment and safety aspect.
- Spraying Afdeling I Blok 11B. Observation and interview with 4 workers regarding BMP, OHS and worker welfare
- Harvesting Afdeling I Blok 97X. Observation and interview with 3 workers regarding BMP, OHS and worker welfare
- Manuring Afdeling IV Blok 16AE. Observation and interview with 6 workers regarding BMP, OHS and worker
- Picking Oryctes Afdeling II Blok 20K. Observation and interview with 1 worker regarding BMP, OHS and worker welfare
- Replanting Area 2020 Afdeling II Blok 96H/20H. Observation related replanting mechanism
- Replanting Area Plan 2021 Afdeling II Blok 97 AK (River Border of Bah Hapal). Observation related replanting mechanism
- Block 14E, HGU poles (BPN PTPN-IV 160). Observation and interview regarding to HGU boundary.
- Block 16F HCV IV area. Observation and interview regarding management of HCV area and HCV condition.
- Block 16F HCV VI area. Observation and interview regarding management of HCV area and HCV condition.

2.3 Stakeholder Consultation and Stakeholders Contacted 2.3.1 Summary of stakeholder consultation process. **ASA-1.1** Summary of stakeholder consultation process Consultation of stakeholders for PT Perkebunan Nusantara IV Unit Dolok Ilir was held by: Public consultation with NGOs (by email) such as WALHI, WWF, AMAN, Greenpeace and Sawit Watch on 21 September 2021 Public consultation by phone with government institution in Simalungun District on 21 September 2021. Public consultation by phone with communities arround on 21 September 2021. Public consultation by phone with internal stakeholders and local contractor on 21 September 2021. Numbers of input from stakeholders were clarified by PT Perkebunan Nusantara IV Unit Dolok Ilir. 2.3.2 Stakeholder contacted Please find appendix 1 2.4 **Determining Next Assessment** The next visit **ASA-1.2** will be conducted eight (8) months to twelve (12) months after ASA 1.1

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3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Dolok Ilir Palm Oil Mill PT Perkebunan Nusantara IV subsidiary of PT Perkebunan Nusantara III operation consisting of one (1) mill and two (2) estate.

During the assessment, there were six (6) Nonconformities were assigned against Major Compliance Indicators; one (1) nonconformity were assigned against Minor Compliance Indicators were identified and seven (7) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective actions that had been reviewed and accepted by Auditors in form of documentation evidences e.g. (document record/photographic/etc...). Those corrective actions taken that consist of six (6) Major non-conformities had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that Dolok Ilir POM – PT Perkebunan Nusantara 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 Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
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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 & 1.1.2

The types of information that can be accessed by stakeholders are stated in the Decree of the Directors of PTPN IV No. 04.03/Kpts/02/II/2018 regarding the publication of PTPN IV company documents. Information that can be accessed is environmental, social, legal, OHS documents, employment, etc. Companies also submit mandatory reports to agencies, for example:

- Report of RKL-RPL Semester II of 2020 to the Environment Agency of North Sumatra Province on January 5, 2021.
- Quarter II 2021 Report of Palm Oil Liquid Waste to the District Environmental Office. Simalungun on 7 July 2021
- Quarter I 2021 Report of Palm Oil Liquid Waste to the District Environmental Office. Simalungun on April 5, 2021
- Quarter I 2021 Report on Hazardous Waste Balance to the North Sumatra Provincial Environment Agency on April 5, 2021.

The documents provided to the stakeholders are published in Indonesian. Based on the results of consultations with relevant agencies, the stakeholders found it easy to obtain the documents provided by the company.

1.1.3 & 1.1.4

During the surveillance-1.1 activity, there were no changes related to procedures related to the transparency mechanism in providing information to stakeholders as contained in the SPO document. SOP 06 No. Revision 03 Effective Date August 1, 2017.

Regarding the records of requests for information, the company includes the records in the list of recapitulation of Internal



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and External information. One example is an incoming letter on September 6, 2021 by the Pematang Siantar Regional Revenue Service regarding a request for payment of surface water tax for August 2021. The company responded by making the tax payment on September 30, 2021.

The company can show proof of socialization of the Code of Conduct & SPO Communication and Consultation, dated January 2021, which was attended by leadership employees and also relevant stakeholders such as representatives of vendors/contractors, surrounding communities and also representatives of government agencies.

1.1.5

The company shows a document listing the stakeholders in the company's operational area in the Dolok Ilir and Laras Stakeholder Identification Document. The document contains a list of updated stakeholders, such as: Government Agencies, Work Partners, Community Leaders, Vendors/contractors, to representatives of trade unions.

The auditor tries to ensure that the list has been updated according to the latest data by making contact via telephone according to the number listed in the document, and it is known that the number of stakeholders (such as trade union representatives) can be contacted.

Status: Comply

1.2

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

1.2.1

There are policies to act ethically which are stated in the Plantation Management System Policy, which was signed by the Director on November 1, 2020. These policies include stating that the company establishes, implements, maintains and improves anti-bribery programs as stated in ISO 37001 which aims to prevent, detect and dealing with corruption and bribery including providing guidance related to their implementation.

This policy has been implemented and is also included in the cooperation agreement letter, for example the Letter of Agreement between PT PN IV and PT Jaya Wira Manggala regarding the 2021 Integrated Security Management Services, dated 10 May 2021, which states that the parties are committed not to give or promise to give something to employees/equipment in the first party (PT PN IV) as the implementation of Good Corporate Governance.

Based on the results of interviews with contractors, for example representatives from PT Jaya Wira Manggala, it was found that the person concerned was aware of the ethical and anti-corruption policies set by the company. The person concerned can explain that one of the implementations of the prohibition of corrupt practices in the company is the presence of CCTV which is placed in areas prone to corrupt practices or bribery, such as in the weighbridge area and in the sorting station area.

1.2.2

There is a system in place to monitor compliance and the implementation of policies and ethical business practices as a whole, including through a complaint/ reporting mechanism if there are indications or actions of violations related to ethical business. This has been clearly stated regarding the media for complaints/reporting as stated in the Letter of Agreement between PT PN IV and PT Jaya Wira Manggala regarding the 2021 Integrated Security Management Services, dated 10 May 2021, namely through:

• Whistleblowing System: www.ptpn4.co.id/wb

• Complaint email: complaint@ptpn4.co.id

• Complaint SMS: 08116171900

In addition, based on the results of field observations and interviews with workers at mill, it is known that CCTV has been placed in areas prone to actions that violate ethical business, such as in the weighbridge area and grading stations.

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.



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2.1.1

The company shows evidence of implementation of legal compliance for each aspect, for example:

- Dolok Ilir Estate: Revision of Environmental Management Plan and Environmental Monitoring Plan based on the recommendation letter from the Environmental Agency of Simalungun Regency number 213/LINGHUP-2010 dated 27 October 2010 for an operational area of 7,348.81 ha and a mill with a capacity of 60 tons/hour.
- Laras Estate: The company already has an Environmental Evaluation Document (DELH) which was stipulated by the
 Decree of the Environmental Agency of Simalungun Regency No. 188.45/759/linghup/2011 for PT Perkebunan
 Nusantara IV (Persero), Laras Estate with oil palm plantation activities with an environmental impact analysis study
 covering an area of 4,062.66 ha which was approved by Environmental Agency of Simalungun Regency on December
 14, 2011.

Related to OFI on previous assessment, Dolok Ilir POM already have land application permit based on decree No. 503/03/17.4/2021.

Legal

Evidence of ownership of PTPN IV Dolok Ilir Unit for area covers about 11,411.47 ha is presented through document of Business Permit and Land Titles, as follows:

Location Permit

The history of Laras Estate and Dolok Ilir Estate areas comes from concession rights owned by Handless Vereeniging Amsterdam (HVA) which managed *Agave* (or pineapple fibers) that was taken over and nationalized by the Indonesian Government in 1959. This matter is mentioned in Government Regulation No. 19 in 1959.

• Plantation Business Permit (IUP)

- IUP for **Dolok Ilir Mill** and **Dolok Ilir Estate** of PT Perkebunan Nusantara IV (PTPN IV) is presented in Decree of Simalungun *Bupati* (Head of District) No. 183.45/503/113/BPPT-PM/2014 dated 16 December 2014 for Palm Oil Mill with production capacity about **60 ton FFB/hour** and oil palm plantation with total area about **7,348.81 ha**.
- IUP for **Laras Estate** is presented in Bupati of Simalungun Decree No. 183.45/2767/K-PPT/2012 dated 08 August 2012 for oil palm plantation with total area about **4,062.66 ha**.

• Land Title (HGU)

- HGU for **Dolok Ilir Estate** shows through HGU Certificate No. 1 year 2006 for area covers about **7,348.81 ha** as refers to Measurement Letter No. 01/Dolok Ilir I/2006 dated 11 September 2006, where located on Village of Dolok Ilir. HGU of Dolok Ilir Estate is valid up to 31 December 2030.
- HGU for Laras Estate shows through HGU Certificate No. 6 year 2008 for area covers about 4,062.66 ha as refers
 to Measurement Land Map No. 09/Nagori Malela/2008 dated 18 September 2008 and Decree of National land
 Agency Head No. 48-HGU-BPN RI-2008 dated 7 August 2008. The HGU was located on Village of Nagori Gunung
 Malela, Sub District of Gunung Malela, District of Simalungun. HGU of Laras Estate is valid up to 21 September
 2033

BMP

- Do not clear land for replanting activities by burning
- Pesticide management in accordance with Government Regulation no. 74 of 2001 concerning Hazardous and Toxic Materials
- Not using invasive species in biological pest control

OHS and Employment

- The company already has a license for the heavy equipment and machines used and conducts regular OHS testing.
- The company has provided facilities in the form of BPJS Health and employment to workers.
- Collective Labor Agreement (CLA) which has been ratified by the Head of the Manpower Office of North Sumatra Province (No.: 560/04-6/DTK/I/2020) on January 13, 2020
- Wages is given to all workers in accordance with applicable regulations, namely based on the Decree of the Governor of North Sumatra number 188.44/528/KPTS/2020 dated October 30, 2020

2.1.2

Basic guidelines and work instructions for identification and evaluation of compliance with laws and regulations and other



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requirements are available. document 04.01/KOL/P/034 dated August 1, 2018. The people responsible for managing the document are as follows:

- Corporate legal and investor relations departments identify and update regulations at least once a year.
- Document controller recapitulates and uploads a list of regulations in the PTPN IV e-archive application.
- Head of sub-section/affairs/related service/assistant for general HR and district/unit security and/or P2K3 secretary evaluates regulatory compliance. Evaluation is carried out at least once a year
- Implementation is carried out by all sections/districts/units and evaluated by the head of the section/district general manager/unit manager/head of P2K3.

In addition, the company has also provided a list of the latest regulations to be implemented in 2021. The list of regulations includes the latest regulations, for example:

- Government Regulation No. 36 of 2021 concerning Wages.
- Government Regulation No. 35 of 2021 concerning Certain Time Work Agreements, Outsourcing, Working Time and Rest Time and Termination of Employment.
- Government Regulation No. 34 of 2021 concerning the Use of Foreign Workers.

The company carried out adjustment activities to comply with the latest regulations in August 2021.

2.1.3

The Company has procedur related to HGU poles that described in the SOP No. 12 dated January 2, 2015, revision 02. The procedure explain that:

- Monitoring of poles conducted every 6 months.
- If a damaged/non-functioning boundary pole is found, it will be notified to Civil engineering department for repairs.
- If the boundary pole is missing (none) then it is reported to the Unit Manager and then informed to the Legal and Land Section for repair program.

Based on the results of observations to the HGU pole, for example No. 58,59, 160, it is known that the HGU pole are in a well-maintained condition.

The company shows a monitoring record of HGU pole for the 1st semester of 2021 which informs the monitoring date, pole number, location of pole, position of pole, condition of pole in the field, boundary of HGU, coordinates and description of pole. Based on that record, known that there are several missing and damaged pole. Regarding the existence of several missing and damaged pole, the company has shown the 2021/2022 pole repair program to the auditor team. For this reason, the company has the opportunity to ensure the repair/replacement of the missing/damaged BPN boundary pole (OFI)

Status: Comply

2.2

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

2.2.1

A list of contractors is available, which explains that there are 28 contractors collaborating with Dolok Ilir Mill (update August 31, 2021) and 28 contractors collaborating with Dolok Ilir Estate which also informs the company name, object of work, contract number, contact parties and contact number.

2.2.2

The Work Agreement has included a separate clause regarding the fulfillment of relevant legal obligations, as shown in the Agreement Letter between PT PN IV and PT Jaya Wira Manggala regarding Integrated Security Management Services in 2021, dated 10 May 2021, which among other things states that the second party (PT Jaya Wira Manggala) as the contractor provides security personnel and manages labor administration data but is not limited to wages, holiday allowances, BPJS Employment and Health participation, income tax, minimum age limit of 18 years, implementation provisions and the amount of overtime wages and income taxes and other labor provisions are subject to the applicable laws and regulations.

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The contractor can prove that the clause has been implemented according to the agreement, for example related to BPJS Health and Employment participation. The contractor can show a list of active workers in each unit, namely in Laras Estate with 23 personnel and 42 personnel in Dolok Ilir Estate. The contractor shows proof of payment of BPJS Health contributions on August 9, 2021 and proof of payment of BPJS Employment on August 25, 2021. Companies have the opportunity to ensure that documentation of proof of compliance with relevant legal obligations is available at their respective certification units. **OFI.**

2.2.3

The Employment Agreement has included a separate clause that prohibits practices involving child labour, forced labor, and workers from human trafficking as shown in the Letter of Agreement between PT PN IV and PT Jaya Wira Manggala concerning Integrated Security Management Services in 2021, dated 10 May 2021, which states that as a form of compliance with the applicable laws and regulations, the parties are required to comply with provisions such as not employing minors in accordance with labor regulations, not practicing forced labor, not employing workers resulting from human trafficking and others.

Status: Comply

2.3

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

2.3.1: 2.3.2

Based on Dolok Ilir Mill production data for period September 2020 to August 2021, as well as observation and interview with Security Officers and Weighbridge Operator, it was known that Dolok Ilir Mill has received and process FFB from its 2 (two) main supply base, i.e. Dolok Ilir Estate and Laras Estate which mentioned in scope of certification; 3 (three) estates of PTPN IV and three (3) FFB Agents as follows CV Rianalim, CV Mandiri Arsa Sejahtera and CV Putra Doge.

FFB which came from direct producers/estates were only came from PT Perkebunan Nusantara IV unit, as follows Marjandi Estate, Tanah Itam Ulu Estate and Mayang Estate (certified). There is no direct source from smallholders or other growers. List on geo-coordinate of direct FFB suppliers is presented in the following Table:

No.	Source	Coordinate		
		Lat (N)	Long (E)	
1	Marjandi Estate	02° 55' 30"	98° 57' 17"	
2	Tanah Itam Ulu Estate	01° 52' 01"	99° 54' 08"	
3	Mayang Estate	03° 01' 48"	99° 20' 01"	

During the of the ASA 1.1 assessment, the company showed several examples of delivery notes/letters from the village where the FFB originates that informing the delivery date, person in charge, vehicle number and others. In addition, the letter also stated that the FFB brought was FFB sourced from the village area and signed by the Village Head where the FFB was obtained. As for the coordinate points, evidence of land ownership and other permits are still being collected by the company.

Up to the surveillance assessment 1.1, the company is still collecting information on FFB suppliers (agent) such as geolocation, evidence of land ownership and permits. The time requirement to fulfill the indicator is three years from November 15 2018. In this regard, the company has the opportunity to ensure information such as geolocation, land ownership, and others for FFB from collectors/agents (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 can show a Long-term plan document for the period 2017 - 2023 that informs production projections (FFB, CPO and PK), price estimates and financial indicators. The achievement of the long-term plan that has been prepared by the company is also evaluated, one of which is through management review activities.

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3.1.2

The company can show the replanting plan documents, as follows:

Dolok Ilir Estate:

Plan of Replanting (Ha)							
2016	2016 2017 2018 2019 2020 2021						
3,060	290	331	257	376	325		

Laras Estate:

Plan of Replanting (Ha)						
2019 2020 2021 2022 2023 2024						
314	63	118	855	571	216	

The company can also show the progress of achieving the replanting work, for example as stated in the lamp document. No. TAN/BASTPB/TU/01/XI/2020 on November 30, 2020 for replanting activities in Afdeling IV Dolok Ilir Estate with details of work as examples below:

- Land Preparation Activities:
- Cutting down the tree, Chipping 81.49%
- Chipping staple 61.86%
- Unloading bowl of fallen tree 37.99%
- Uprooted ravine soil 27.19%
- Arrange the trunk area of the ravine 27.19%
- Crusted oil palm trunk 27.19%

3.1.3

The company can show that it has carried out a management review, for example a management review activity carried out on February 19, 2021. The activity was attended by the Administration, Manager, Administrative Assistant and Assistant Head, while the management review briefly discusses related:

- ISO, ISPO and RSPO audit results 2020
- customer feedback
- Process performance and product conformity
- Follow up management review
- FFB quality complies with SCCS
- Community social
- OHS Commitment
- Ecosystem preservation

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

Companies can show evidence of the implementation of sustainable improvement action plans by considering social and environmental impacts and opportunities, for example by carrying out participatory CSR activities, conducting environmental monitoring and management activities, and realizing social impact management plans, in addition to best management practices. The company has also implemented biological pest control and has not used pesticides with the active ingredient paraquat dichloride.

3.2.2

The company has presented annual report documents using the RSPO Metric Template. (File will be attached). The company has shown the auditor regarding the RSPO metric template Version 2 that has been filled in according to data in the company's record documents, such as the number of workers, the area of production. Based on team auditor's review, the information has been match.

Status: Comply



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3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

Based on the results of the interviews, it is known that until the surveillance audit 1.1 activity was carried out, there were no changes to the procedures.

The company already has procedures regarding mills and plantations as set out in the Standard Operating Procedures (SPO), Work Instructions (IK) and policies on Plantation/Palm Oil Mills issued by PT. Perkebunan Nusantara IV in July 2007. The SOP is written in Indonesian and is stored in the Dolok Ilir Estate, Laras Estate and Dolok Ilir POM business units.

These SOPs and policies include:

- SOP for Oil Palm Plants (SPO 00 on Background)
- SOP for Oil Palm Plants (SPO 01 on Land Development)
- SOP for Oil Palm Plants (SPO 02 on New Plants)
- SOP for Oil Palm Plants (SPO 03 on Nurseries)
- SPO for Oil Palm Plants (SPO 04 on Immature Plants)
- SOP for Oil Palm Plants (SPO 05 on Mature Crops)
- SOP for Palm Oil Plants (SPO 06 regarding Harvest)
- Palm Oil Mill SPO (SPO-01 on Weighbridges)
- Palm Oil Mill SPO (SPO-02 on Loading Ramp)
- Palm Oil Mill SOP (SPO-03 on Boiling Station)
- Palm Oil Mill SOP (SPO-04 on threshing)
- SPO for Palm Oil Mills (SPO-05 on Handling Empty Fruit Bunches)
- Palm Oil Mill SPO (SPO-06 regarding Press Station)
- Palm Oil Mill SOP (SPO-07 on Oil Processing and Refining)
- SPO for Palm Oil Mills (SPO-08 regarding Oil Delivery Tanks and Palm Kernel Shipping Storage)
- Palm Oil Mill SPO (SPO-09 on How to produce low ALB CPO; ALB <2.5 %, Super CPO/Golden CPO)
- Palm Oil Mill SOP (SPO-10 on Quality)
- Palm Oil Mill SOP (SPO-11 on Laboratory Equipment and Regents)
- Palm Oil Mill SOP (SPO-12 on Care and Use of Analytical Scales)
- Palm Oil Mill SOP (SPO-13 on Security/Protection of Laboratory Equipment/Materials)
- Palm Oil Mill SOP (SPO-14 on Depericarter)
- Palm Oil Mill SOP (SPO-15 on Seed Mill)
- Palm Oil Mill SOP (SPO-16 on Steam Boilers)
- Palm Oil Mill SOP (SPO-17 on Water Purification)
- Palm Oil Mill SOP (SPO-18 on Engine Room)
- Palm Oil Mill SOP (SPO-19 on MILL Electrical System)
- Palm Oil Mill SOP (SPO-20 on Workshop Machinery/Equipment)
- Palm Oil Mill SOP (SPO-21 on Liquid Waste Treatment)

Copies of the SOPs are readily available at each plantation and mill in Indonesian, and the entire procedure covers every plantation and mill operational activity.

3.3.2

The company has a routine inspection/monitoring mechanism for operational activities in the form of an internal audit which is carried out every 6 months. The internal audit activity is carried out by the Internal Audit Unit (SPI).

Regarding the assessment of the suitability of the work carried out by the contractor, an inspection is carried out at the time of completion of the work before the contractor submits each stage of payment.

3.3.3

Companies can show monitoring and follow-up records, for example as follows:

- Confirmation of the results of routine audits of Laras Estate No. Dir./LAR/R/26/VIII/2020 dated August 25, 2020, on the Audit Result Report No. 04.02/LHA/Rt/R/15/VIII/2020 dated August 10, 2020. The document informs the findings, criteria



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and follow-up improvements. The matters examined include: the performance of Laras Estate (production and costs); Operational Audit (plants, maintenance, engineering, licensing, administration, waste management).

- RSPO Internal Audit Report on activities carried out on 23 – 24 August 2021, based on the report it was found that there were 6 non-compliances. The company can also show proof of improvement for non-conformities found

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

Regarding SIA, the company has conducted a previous study in 2009, the following is a detailed explanation:

The company has carried out a social impact assessment which is stated in the social impact analysis report document which was prepared in collaboration with PT. Surveyor Indonesia, Indonesian Sustainable Palm Oil Foundation in 2009. This document describes the positive and negative impacts of plantation operations and recommendations for managing social impacts by companies. The report is also equipped with recorded evidence during the implementation of activities. Recorded evidence in the form of documentation of photos of the Social Impact Assessment team from YASBI during interviews and Focus Group Discussions in villages around the plantation. The Social Impact Study covers socio-economic and cultural issues of the surrounding community, covering aspects of: Improving infrastructure such as roads and bridges and other facilities, creating open and transparent mechanisms, Making community development programs in a planned and targeted manner according to needs of local communities Create a special task division to build harmonious relationships and more in-depth mapping of stakeholders of PTPN IV Dolok Ilir & Laras Estates Unit.

In the document, the social impact analysis has been equipped with recommendations for follow-up that needs to be carried out by the company. The Social Impact Analysis is carried out by involving various parties including: employees and the surrounding community (community representatives, community leaders and village government). There is documentary evidence of the Social Impact Assessment team from PT Surveyor Indonesia during interviews and Focus Group Discussions in villages around the plantation. Based on stakeholder consultations in the surrounding villages, there is no indication of any significant problems from the surrounding community.

For the environmental aspect management plan, the company already has environmental permits in the form of AMDAL (Dolok Ilir) and DELH (Laras) which have been signed by the local government. the document contains the Environmental Management Plan and environmental monitoring, such as:

- Erosion management and monitoring.
- Surface water management and monitoring.
- Ground water (wells) quality management and monitoring.

3.4.2

In 2018 to 2020 the company has carried out replanting, so with this the company has identified the impact of replanting activities. The management plan and monitoring of the impact of replanting are as follows:

- Job Opportunities for the community
- The impact of heavy equipment mobilization and material trucks causing dust and noise.
- Changes in temperature due to uprooted palm oil stands.
- Prevent landslides due to construction of isolated trenches.
- Oryctes pest attack on community plantations adjacent to the replanting area.

The company has updated the latest SIA program review in January 2021. In this document, the company collects information from various stakeholders through the collection of questionnaires and discussions with community representatives (Communities, Worker Union) and related agencies. From the results of the collection of information, there are several social impact management plans that have been determined by the company, for example:

- Improve communication with stakeholders in the village to discuss participatory village development programs based on a priority scale from the point of view of the villagers.
- Disseminate if there is acceptance of labor to the surrounding villages around the plantation.
- Directing vendors/contractors to prioritize local workforce absorption.



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- Dissemination to the community around the plantation regarding the law that is treated in the company against the perpetrators of theft
- Conducted noise testing in the factory area due to complaints from several people about the noise generated by the processing of the Dolok Ilir POM.

3.4.3

The implementation of environmental documents as described in Indicator 3.4.1 has been carried out by the company and is reported periodically every semester to the relevant agencies. Based on the study of the RKL/RPL Semester 1 report for the January-June 2021 period, several management and monitoring activities that have been carried out by PTPN IV Dolok llir & Laras business unit include physical-chemical components, biological components, social, economic, cultural and social components, as well as fire prevention and control. land. The description of the management and monitoring of these components is as follows:

- Air quality and noise management.
- Management of the impact of water quality degradation.
- Management of impacts on terrestrial biota/flora and fauna.
- People's attitudes and perceptions as well as job opportunities.
- Public health, occupational safety and health.
- Economic activities and community income.
- Emission air quality monitoring.
- Monitoring of ambient air quality and noise.
- Monitoring the quality of wastewater, surface water and clean water.
- Monitoring of terrestrial biota/flora and fauna.
- Etc.

Based on the results of the review of the monitoring and management documents, no test results were found that exceeded the quality standard. The Report has been sent to related stakeholder namely Environmental Agency of Sumatera Utara on 15 July 2021.

Related to implementation of social impact management plan, based on document review and public consultation, here is some evidence in the company:

- Conducting socialization to the surrounding community regarding the prohibition of stealing FFB belonging to the company and placing warnings accompanied by government regulations regarding theft sanctions.
- Conducted a noise test with an accredited laboratory in the area around the factory, it was found that the test result was 69.6 dB. The test results have also been sent to villages around the company (Dolok Batu Nanggar, Dolok Tenera and Bandar Selamat) on August 6, 2021.
- Carry out road repairs in Nagori Bandar Selamat. This was also confirmed by the results of interviews with village representatives.

Status: Comply

3.5

A system for managing human resources is in place.

3.5.1

The procedures for recruitment, selection, acceptance, promotion, retirement and termination of employment have been documented as stated in the Collective Labor Agreement between PT PN IV and the Plantation Workers Union of PT PN IV, dated January 13, 2020. Based on the results of the document review, it is known that the CLA has accommodated recruitment procedures in article 12, promotion in article 16, retirement in article 73 and termination of employment in article 70. The CLA is also available to workers and their representatives in accordance with applicable laws and regulations.

3.5.2

Employment procedures are carried out and records are maintained, including the following:

Promotion

Document of the List of Proposed Employee Class Increases/ Periodicals for the 2020 Period of Laras Estate, which explains



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the proposal for 380 employees to be promoted along with information on the date of work and the results of their assessment. For example, on behalf of AGB (initials), the date of work entry is November 1, 2013, the position of harvester, the old group IA/8 and proposed to be the IA/9 group with the results of an assessment of discipline, work knowledge, quality, teamwork, honesty and others.

The company shows the Attachment List to the Decree of the Board of Directors of PT PN IV. number 04.07/Kpts/R/12/III/2021, dated March 8, 2021, Laras Estate, which explains the decision to accept the proposed promotion, for example on behalf AGB (initials) of the old group IA/8 and proposed to be group IA/9 and has been approved to be upgraded to class IA/9.

The company shows the Attachment List of PT PN IV's SEVP (Senior Executive Vice President) Decree, number 04.07/Kpts/R/12/III/2021, dated March 8, 2021, Dolok Ilir Mill, which explains the decision to accept the proposed promotion. for example on AGS (initials) was the old group IIB/5 and it was proposed to be group IIB/7 and it was approved to be upgraded to class IIB/7.

Status: Comply

3.6

An Occupational Health and Safety (H&S) plan is documented, effectively communicated and implemented.

Document Review:

Based on the results of the document review, it is known that the company already has a risk management document for 2021 (Estate and Mill) which informs about Types of Activities, Hazards, Risks, Risk Assessment, Risk Control, Risk control implementation plans, risk control reviews.

Field Visits and interviews:

- Based on the results of interviews and field visits at the Laras Estate, Dolok Ilir Estate and Dolok Ilir Mill, it is known that there are activities such as HGU Mark Monitoring Activities, HCV Area Monitoring Activities, Pesticide Mixing Activities, and WTP Water Intake Activities.
- The results of field visits and interviews at the Spray Afdeling I Block 11B Estate Laras activity, it was found that the spraying activity was around the causeway that was passed by people. Meanwhile, during the activity, there were no warning signs that spraying was being carried out, this is in line with the study of the spraying work instruction document and the review of the risk management document for the spraying activity that has not identified the potential danger to other people entering the area being sprayed.
- The results of field visits and interviews of workers in the water intake area of the WTP, it is known that the area has been flooded, but based on the results of the study of risk management documents in the WTP area, there has not been any information regarding the potential hazards of OHS due to flooding. In addition, it is known that these activities have not been listed in the Estate and Factory risk management documents.

Based on the description above, it is concluded that the Company has not been able to show evidence that all operating activities have been assessed for risk to identify OHS problems, and mitigation plans and procedures are documented, so this is a non-compliance with NCR No. 2021.01

3.6.2

Medical examination:

Laras Estate:

- Health Checkup on 1 4 December 2020 by PT Prima Medica Nusantara Laras Hospital for 65 workers (pesticides, maintenance, fertilization officers, chemical officers, Pomset operators, generator operators, pool drivers, pesticide mixers, chemical warehouse officers). Based on the results of the examination, it was known that there were 15 workers with abnormal results (7 Hypertension, 5 Mild Cholinesterase Decrease, 1 Stage II Hypertension, 1 Anemia, 1 VES).
- It has been re-examined on 12-14 July 2021.
- Hyperkes: dr. Muhammad Hanafi Coal No. 5/354/AS.02.02/X/2020 October 2020, dr. Taty Sulystiani No. 5/356/US.02.02/X/2020 October 2020.

Dolok Ilir Estate:



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- Health Checkup on 23 26 November 2020 by PT Prima Medica Nusantara Hospital Laras for 62 workers (chemical, maintenance, transport, warehouse officers). Based on the results of the examination, it was found that 12 workers had problems (decreased cholinesterase, mild to moderate toxicity, HHD, Bronchitis, GHF congestive heart failure ec HHD Hypertensive heart disease, decreased cholinesterase).
- It has been re-examined on January 11, 2021 and the overall results are healthy.
- Hyperkes: dr. Muhammad Hanafi Coal No. 5/354/AS.02.02/X/2020 October 2020, dr. Taty Sulystiani No. 5/356/US.02.02/X/2020 October 2020.
- Examination in 2021 by PT Sucofindo on August 31, 2021 according to the Minutes of Testing the Work Environment and Health Examination in 2021 (cholinesterase 32 maintenance personnel, chemist and audiometry 3 technical operators.
- Health examiner in 2021, Dr Muhammad Sofyan, who already has the SKP for the Doctor for the Health Examiner for Manpower No. 5/125/AS.02.02/III/2020 in March 2020 is valid for 3 years.

Dolok Ilir Mill:

- Health Examination on September 1, 2021 by PT Sucofindo in accordance with the Official Report of the Work Environment Testing and Health Examination in 2021 (10 cholinesterase lab staff, WTP and Audiometry 18 Boilers, press, engine room, kernel, felt, clarification).
- Health examiner in 2021, Dr Muhammad Sofyan, who already has the SKP for the Doctor for the Health Examiner for Manpower No. 5/125/AS.02.02/III/2020 in March 2020 is valid for 3 years.

Field Visits and Interviews:

- Based on the results of field visits to the CPO despatch location, it was found that the CPO despatch floor was in a porous condition.
- Based on the results of a field visit at PKS Dolok Ilir, it was found that people who were not workers entered the WWTP pond area. Meanwhile, based on the results of the interview, it is known that other unauthorized persons are prohibited from entering the WWTP pond area.
- Based on the results of field visits and interviews in St. In the engine room, the contractor's oxygen cylinder was found without a safety chain.
- Based on the results of the field visit at the workshop of Dolok Ilir Mill, it was found that the access to the workshop was covered in mud and flooding. In addition, the conditions in the workshop area were found to be placed not paying attention to the OHS aspect.
- Based on observations of refueling activities at St. The boiler is known that there is 1 worker not wearing heat-resistant gloves. The PPE has been provided by the company and is available at the location.
- Results of interviews with 2 workers at St. Kernel, it is known that 1 worker does not use PPE in the form of glasses and ear plugs. The PPE has been provided by the company and is available at the location.
- The results of field observations revealed that employees have been equipped with face shields but face shields are not used because they interfere with vision while working.
- Based on the explanation above, it is concluded that the Company has not been able to demonstrate that the effectiveness of the OHS plan to deal with OHS risks in people has been monitored. So this is a non-compliance with **NCR No. 2021.02**.

Based on the results of the visit to the Engine room, it was found that the company has an electric power generator with a capacity of > 200 KVA and the company can show that it has personnel who have attended the Electrical OHS Expert training from OHS Service Company but the certificate is still in process. For this reason, the Company has the opportunity to follow up with OHS Service Company to ensure the follow-up to the issuance of the Decree Electricity OHS Expert. (OFI)

3.6.1	Status: Nonconformity No. 2021.01 with Major Category
3.6.2	Status: Nonconformity No. 2021.02 with Major Category

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

3.7.1

There is a documented training program available, which is shown in the 2021 Dolok Ilir POM Internal Training Materials Delivery Program document on January 2, 2021, which explains

Boiling station training was programmed in July, realized on August 22, 2021, which was attended by 5 participants and



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the results of the training evaluation were shown with good conclusions.

- The SCCS training was programmed in January, the realization of February 5, 2021, which was attended by 9 participants and the results of the evaluation of the training were shown with good conclusions.
- The plantation management system policy was programmed in February, the realization of March 30, 2021, which was attended by 15 participants
- Hazardous Waste Management Training is scheduled for November 2021.

The company shows the 2021 Internal Unit Training Program document, which includes programming the type of Oil Palm FFB Security training in March 2021 involving security service contractors. The company also showed the attendance list for the Internal Oil Palm FFB Safeguarding Training, which was conducted on March 25, 2021, and was attended by 3 PT JWM contractor workers.

3.7.2

Records of training are maintained, where possible available to each individual, of which the following is indicated:

- Training on palm midrib trimming, January 29, 2021
- FFB security training on March 25, 2021
- Training on building bridges and culverts on 29 may 2021
- Tool calibration training on 27 August 2021
- Training on the implementation of fertilization for mature crops on September 2, 2021

Based on the results of interviews with workers in mill and estate, including mill security officers (contractor workers), weighbridge officers and WTP operators, it is known that workers have received training such as training in handling fire emergencies.

3.7.3

The company shows evidence that training for Supply Chain Certification Standard ("SCCS") personnel has been carried out, including SCCS Internal Training, on 5 February 2021 in the Dolok Ilir Mill Meeting Room, which was attended by 9 participants consisting of assistants processing, Quality Assurance assistant, production clerk, weighbridge clerk and security.

Based on the results of interviews with security officers and weighbridge officers at the mill, it is known that they understand the acceptance of RSPO certified FFB which is indicated by the presence of a CSPO stamp and the weighing clerk informs that the minimum document storage period is 2 years.

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1: 3.8.2

Based on Dolok Ilir Mill production data for period September 2020 to August 2021, as well as observation and interview with Security Officers and Weighbridge Operator, it was known that Dolok Ilir Mill has received and process FFB from its 2 (two) main supply base, i.e. Dolok Ilir Estate and Laras Estate which mentioned in scope of certification; 3 (three) estates of PTPN IV and three (3) FFB Agents. The Non- certified RSPO FFB sources are CV Rianalim, CV Mandiri Arsa Sejahtera and CV Putra Doge. Thus, it could be concluded that Dolok Ilir Mill has claim its RSPO certified products (CPO and PK) from processing of the RSPO certified FFB as Mass Balance (MB).

3.8.3

Estimation of RSPO certified products (CSPO and CSPK) for period 2020/2021 license period is presented in the certificate appendix (annex) and could be accessed through RSPO Palm-trace and this surveillance-1.1 report. Record of RSPO certified production and its estimation for the next license period is presented in the following Table:

Previous Certificate	Last year actual	Estimation for the	
Claim (tons/year) 29	certified product	next 12 months	
September 2020 – 28	(tons/year) (from		
September 2021 + Ext	September 2020 –		
Volume	August 2021)		

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FFB Processed	240,739	158,501.65	176,000
CSPO production	56,987	35,880.59	42,240
CSPK production	9,687	6,564.82	7,040

3.8.4

The mill has meet the requirement regarding to the reporting of its supply chain, as it has been registered as RSPO member and on RSPO IT Platform:

License ID CB116755

Member Name Dolok Ilir POM PTPN IV
Member ID RSPO PO1000002539

RSPO Membership Number 1-0082-09-000-00 (PT Perkebunan Nusantara IV)

Issued On 07/04/2021

Issued By PT Mutuagung Lestari

Start Date 05/04/2021 End Date 28/09/2021

For license period (05/04/2020 - 18/09/2021), it was known that Dolok Ilir POM has reported sales transactions (announcements) through the RSPO IT Platform, as follows:

- CSPO volume sold: 2,800 MT: 5 transactions were reported, as follows: Transaction ID TR-8182bba6-c394 on August 19 2021, TR-cbd4e65a-42fd on July 28 2021, TR-41025259-216d on June 4 2021, TR-3b741020-1776 on May 31, 2021, TR-9080e36b-e0de on April 8 2021 to the buyer PT. PT Musim Mas and PT Industri Nabati Lestari.
- CSPK volume sold: 2,840.03 MT: 6 transactions were reported, as follows: Transaction ID No TR-80cebb5a-7534 on August 16 2021, TR-1cb854b1-5d3a on August 18 2021, TR-2039a3be-c28b on July 21 2021, TR-32baa363-81cf on June 8 2021, TR-eba5fefa-057b on May 7 2021, TR-063c3108-1901 on April 8 2021 to the buyer PT. Perkebunan Nusantara IV Pabrik Pengolahan Inti Sawit Pabatu.

3.8.5

Unit management has the documents of supply chain procedures for Mass Balance models No. document 04.03/UNIT/SUS/P/001 dated 1 Augustus 2018, revised 1 March 2020. The procedures established and covering all elements of the supply chain model requirements, records and reports of compliance with supply chain requirements including responsibilities of each key personnel involved, definition, the FFB reception process, weighing, checking quality, processing, monitoring refined products, mass balance calculations, delivery of the product. The procedure is according to latest RSPO SCCS (RSPO Supply Chain Certification Standard on 1 February 2020). This procedure includes delivery of certified FFB from the estate to receipt of certified FFB at Mill, delivery of certified CPO / PK from mill and others.

Based on document verification and interview with weighbridge operator, was known that mill has receive FFB from owned estates which already RSPO certified and another PTPN IV estates which certified (Tanah Itam Ulu Estate, Mayang Estate & Marjandi Estate). Dolok Ilir POM also receive FFB from third parties as follows CV Riana Lim, CV Mandiri Arsa Sejahtera & CV Nusantara Putra Doge. Information of RSPO certified and non-certified product is shows through CSPO or CSPK Stamp

3.8.6

The Procedure to conduct annual internal audit including supply chain refers to Procedure No. 21 dated 2 January 2018. In the SOP mentioned that internal audit is done annually. Internal audit of SCCS describe the requirements in the RSPO SCCS and the RSPO market communications and claims documents and effectively implements and maintains the standard requirements.

Company has conducted internal audit for RSPO standard, including supply chain conducted by Strategic Planning and Sustainability Division from Head Office Medan. Internal audit held on 23 – 24 August 2021. Based on result of internal audit, known that there is no finding related supply chain indicator.

3.8.7

The mill has a record of the tonnage of FFB certified and FFB Noncertified. The recorded FFB entered the mill during the last 1 year period are as follows:



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Month		FFB (MT)	
IVIOTILI	Certified	uncertified	Total
Sep-20	16,267.69	362.67	16,630.36
Oct-20	13,432.40	960.21	14,392.61
Nov-20	12,769.81	2,099.74	14,869.55
Dec-20	11,185.38	182.14	11,367.52
Jan-21	7,276.19	827.05	8,103.24
Feb-21	6,820.22	526.61	7,346.83
Mar-21	13,706.54	1,729.84	15,436.38
Apr-21	14,329.20	1,617.13	15,946.33
May-21	15,611.48	2,744.62	18,356.10
Jun-21	15,169.47	2,052.10	17,221.57
Jul-21	15,417.63	2,168.12	17,585.75
Aug-21	16,515.64	1,875.83	18,391.47
Total	158,501.65	17,146.06	175,647.71

	Previous Certificate Claim (tons/year) 29 September 2020 – 28 September 2021 + Ext	Last year actual certified product (tons/year) (from September 2020 – August 2021)	
	Volume	August 2021)	
FFB Processed	Volume 240,739	August 2021) 158,501.65	
FFB Processed CSPO production		•	

Based on the table above, there is no over production for CSPO and CSPK.

3.8.8

The company showed documentation of certified products, such as shipping announcements, FFB weighing slip and sales contracts. These documents explain the name and contact person of the buyer and seller, date of delivery, product description, quantity, member ID, certificate number and others.

PTPN IV - Dolok Ilir POM sells CSPO certified products to PT Musim Mas and PT Industri Nabati Lestari and CSPK to PT. Perkebunan Nusantara IV Pabrik Pengolahan Inti Sawit Pabatu.

3.8.9

Dolok Ilir POM uses third party services to transport CSPO and CSPK, as follows:

- Agreement with PT ESW Nusantara Tiga for CPO transporter No. 04.05/S.Perj/Pem/03/I/2021 dated 15 January 2021 and valid until 31 December 2021.
- Agreement with CV Karya Mandiri for PK transporter No. 04.05/S.Peng/S.Perj/02/I/2021 dated 29 January 2021 and valid until 31 December 2021.

In agreement, for example, agreement for PK transporter No. 04.05/S.Peng/S.Perj/02/I/2021 dated 29 January 2021 article 8 explains that the contractor must comply with all requirements of the management system of OHS, ISO, RSPO / ISPO, supply chain systems and are willing to be audited by an independent certification body appointed by the company.

3.8.10; 3.8.11

Dolok Ilir POM informs CB of the names of contractors used for RSPO certified palm products. The third party services/ contractors to transport CPO and PK, namely PT ESW Nusantara Tiga (CPO transporter) and CV Karya Mandiri (PK transporter). Meanwhile, PT ESW Nusantara Tiga is the new contractor to handle CPO certified (CPO transport). The company has shown the details of the contact number, PIC, contract number, address of the transporter and also their contact details.

3.8.12



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Dolok Ilir POM have maintain accurate, complete and update FFB received, processed and CPO and PK production from its supply base. The record keeping saves in "Mass Balance Report" for example on period September 2020 to August 2021, as follows:

FFBs received

Month		FFB (MT)	
IVIOTIUT	Certified	uncertified	Total
Sep-20	16,267.69	362.67	16,630.36
Oct-20	13,432.40	960.21	14,392.61
Nov-20	12,769.81	2,099.74	14,869.55
Dec-20	11,185.38	182.14	11,367.52
Jan-21	7,276.19	827.05	8,103.24
Feb-21	6,820.22	526.61	7,346.83
Mar-21	13,706.54	1,729.84	15,436.38
Apr-21	14,329.20	1,617.13	15,946.33
May-21	15,611.48	2,744.62	18,356.10
Jun-21	15,169.47	2,052.10	17,221.57
Jul-21	15,417.63	2,168.12	17,585.75
Aug-21	16,515.64	1,875.83	18,391.47
Total	158,501.65	17,146.06	175,647.71

CSPO Production & sales

Month	CPO Proc	roduce (MT) CPO Sales (MT)		CPO Sales (MT)	
Worth	Certified RSPO	Uncert	RSPO	Conventional	Total
Sep-20	3,441.33	633.20	-	365.97	365.97
Oct-20	3,116.60	182.53	4,250.00	995.90	5,245.90
Nov-20	2,695.57	385.77	-	1,219.42	1,219.42
Dec-20	2,504.84	32.29	1,750.00	828.30	2,578.30
Jan-21	1,529.20	145.92	-	1,314.16	1,314.16
Feb-21	1,433.74	86.62	500.00	1,003.42	1,503.42
Mar-21	3,182.86	308.26	-	2,628.32	2,628.32
Apr-21	3,390.87	291.78	300.00	3,040.87	3,340.87
May-21	3,682.09	486.52	500.00	3,800.75	4,300.75
Jun-21	3,443.45	359.93	1.000.00	2,806.93	3,806.93
Jul-21	3,471.56	361.00	500.00	3,046.75	3,546.75
Aug-21	3,988.48	298.29	500.00	3,420.95	3,920.95
Total	35,880.59	3,572.12	9,300.00	24,471.74	33,771.74

CSPK produce and sales

Month	PK Produ	ce (MT)		PK Sales (MT)	
WOTH	Certified RSPO	Uncert	RSPO	Conventional	Total
Sep-20	750.81	354.35	428.15	-	428.15
Oct-20	576.70	38.41	575.42	185.90	761.32
Nov-20	549.86	88.42	-	74.55	74.55
Dec-20	464.82	7.38	1,069.18	39.05	1,108.23
Jan-21	275.72	33.08	643.88	26.15	670.03
Feb-21	262.53	19.80	-	23.40	23.40
Mar-21	554.01	72.89	-	77.48	77.48
Apr-21	574.69	64.31	999.08	65.89	1,064.97
May-21	643.56	108.71	456.30	61.12	517.42
Jun-21	613.43	82.08	-	89.15	89.15
Jul-21	605.77	86.80	1,384.65	99.64	1,484.29
Aug-21	692.93	75.04	-	29.02	29.02
Total	6,564.82	1,031.26	5,556.66	771.35	6,328.01

Based on the Tables above, it could be concluded that delivery of RSPO certified product (CSPO and CSPK) has only derived



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from a positive stock.

3.8.13: 3.8.14

Dolok Ilir POM uses the last 12 months actual conversions for OER and KER. The Extraction rate for production projections will be update annually based on the actual production of CPO and PK.

3.8.15

Dolok Ilir Palm Oil Mill has only implemented RSPO mass balance supply chain system. Separation has only conducted through administrative recording and checked by Weighbridge Operator.

Procedure of CSPO and CSPK handling is presented in document No. 07B (Rev. 03) dated 02 January 2017 about Certified CPO/PK Handling. The procedure mentioned that if Mill uses the Mass Balance (MB) model with the Fixed system Inventory Periods which means RSPO stock may be negative in period 3 month, must be balanced. Record of certified and noncertified product is using application namely "Weigh Bridge Scale" (WBS V.1.0.0.0.0). Information of RSPO certified and non-certified product is shows through CSPO or CSPK Stamp.

3.8.16

The mill has meet the requirement regarding to the reporting of its supply chain, as it has been registered as RSPO member and on RSPO IT Platform:

License ID CB116755

Member Name Dolok Ilir POM PTPN IV Member ID RSPO PO1000002539

RSPO Membership Number 1-0082-09-000-00 (PT Perkebunan Nusantara IV)

Issued On 07/04/2021

Issued By PT Mutuagung Lestari

Start Date 05/04/2021 End Date 28/09/2021

For license period (05/04/2020 - 18/09/2021), it was known that Dolok Ilir POM has reported sales transactions (announcements) through the RSPO IT Platform, as follows:

- CSPO volume sold: 2,800 MT: 5 transactions were reported, as follows: Transaction ID TR-8182bba6-c394 on August 19 2021, TR-cbd4e65a-42fd on July 28 2021, TR-41025259-216d on June 4 2021, TR-3b741020-1776 on May 31. 2021, TR-9080e36b-e0de on April 8 2021 to the buyer PT. PT Musim Mas and PT Industri Nabati Lestari.
- CSPK volume sold: 2.840.03 MT: 6 transactions were reported, as follows: Transaction ID No TR-80cebb5a-7534 on August 16 2021, TR-1cb854b1-5d3a on August 18 2021, TR-2039a3be-c28b on July 21 2021, TR-32baa363-81cf on June 8 2021, TR-eba5fefa-057b on May 7 2021, TR-063c3108-1901 on April 8 2021 to the buyer PT. Perkebunan Nusantara IV Pabrik Pengolahan Inti Sawit Pabatu.

From shipping announcement verification, known that shipping announcement carried out not more than 3 months after dispatch. For example, Shipping announcement of CSPO as much as 300 MT, with shipping date on 5 April 2021 and confirmation date on 8 April 2021.

3.8.17

Based on transaction report documents, all CSPO and CSPK are claims as Mass Balance and the claim has been conducted in accordance with RSPO on communication and claim rules.

Status: Comply

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

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

4.1.1

Policies are in place to respect human rights. Based on the results of document review and interviews with management regarding human rights policies, it is known that there has been no change since the previous assessment, which is stated

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in the PT PN IV Dolok Ilir Business Unit Corporate Commitment document on Human Rights, set on March 14 2018, which explains the following: as follows:

- The company guarantees the freedom of employees to embrace religion and worship according to their beliefs.
- The company does not employ and reject underage workers.
- The company protects the rights of women workers
- The company provides freedom of association or organization and assembly.
- The company guarantees and protects workers and their families in their work safety and health.

4.1.2

The unit of certification does not initiate acts of violence or any form of intimidation in its operations. This is evident, among other things, based on the results of interviews with representatives of workers and also the manpower office which stated that there were no acts of violence or any form of intimidation by the company.

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

Based on the results of document review and interviews with management regarding the dispute resolution system, it is known that there has been no change since the previous assessment, which is explained as follows:

- The company provides a channel for reporting violations in writing or by email: pengaduan@ptpn4.co.id or through an electronic room portal managed by the violation complaint management unit/ *Unit Pengelola Pengaduan Pelanggaran* (UP3).
- Each reporter will receive a receipt for reporting that includes the reporting registration number.
- Upon the report received, for further processing it will be reported to the Board of Directors and the Board of Commissioners.
- In conducting verification, if needed, UP3 can communicate with the complainant.
- UP3 verifies the report and decides whether or not further investigation is needed on the report within 30 days and can be extended for 14 working days.
- If, based on the results of the verification, there is an indication of a report, UP3 will not follow up on the report, if there is an indication of a violation, proceed to investigation.
- Protection against whistleblowers is contained in article X of the document.

In addition, there are also SOPs for internal communication and handling employee complaints which are contained in the RSPO Document and ISPO SPO 19 with an effective date of 2 January 2015. If the problem cannot be resolved at the unit level, it will be continued at the board of directors level and subsequently according to the agreement of the parties, including legal or other settlement.

4.2.2

Based on the results of document review and interviews with management regarding procedures to ensure the system is understood by affected parties, including those who cannot read and write, it is known that there has been no change since the previous assessment, namely that the reporter can also submit a report orally or those who are unable to speak can use media suggestion box contained in each unit of the company.

4.2.3.

The unit of certification informs the parties of the progress of complaint handling, including the agreed timeframe, and the results are available and communicated to the relevant stakeholders. This has been documented, including in the Dolok Ilir Plantation Unit Entry & Exit Letter Book. Based on this document, it is known that during the 2021 period (until the audit is carried out) there are no incoming letters in the form of complaints from stakeholders, but what is documented is related to invitations and requests for assistance in road repairs.

Based on the results of interviews with workers and workers' representatives (worker unions and gender committees), it was stated that complaints can be submitted to their direct superiors, to the worker unions or to the gender committee (specific complaints on women's issues). Based on the results of interviews with the Gender Committee, it is known that the

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mechanism for submitting complaints can be done in person or through letters. To date, no reports have been submitted to the Gender Committee.

4.2.4

Based on the results of document review and interviews with management regarding conflict resolution mechanisms including options for obtaining legal and technical assistance from independent parties, it is known that there have been no changes since the previous assessment, including those listed in the SOP for internal communication and handling employee complaints contained in the RSPO and ISPO documents SPO 19 with an effective date of 2 January 2015 explained that the complainant (employee) can submit a complaint in writing or verbally through the labor union (*Serikat Pekerja Perkebunan*) as a third party bridging conflict resolution.

Status: Comply

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

The company has contributed to community development based on the results of consultations with the surrounding community. The contributions made by the company are as follows:

- Carry out road repairs in Nagori Bandar Selamat. This was also confirmed by the results of interviews with village representatives.
- Assistance in the procurement of TV and CCTV at the Serbalawan Police Headquarters on March 19, 2021.
- Assistance for the construction of the AL Imran Waki' Islamic boarding school in Serbelawan Village on May 24, 2021.
- Road repair in Nagori Aman Sari Village in October 2020.

The previous contribution made by the company has involved communication with external stakeholders. This is in line with the results of public consultations with village representatives and related agencies.

Status: Comply

4.4

Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their Free, Prior and Informed Consent (FPIC).

4.4.1

No change until surveillance 1.1

PTPN IV Dolok Ilir Unit has HGU of 11,411.47 Ha and manages an area of 11,290.47 Ha and has shown evidence of land ownership which is shown through the Business Permit and Land Tittle documents, as follows

Location Permit

The history of Laras Estate and Dolok Ilir Estate areas comes from concession rights owned by Handless Vereeniging Amsterdam (HVA) which managed *Agave* (or pineapple fibers) that was taken over and nationalized by the Indonesian Government in 1959. This matter is mentioned in Government Regulation No. 19 in 1959.

Plantation Business Permit (IUP)

- IUP for Dolok Ilir Mill and Dolok Ilir Estate of PT Perkebunan Nusantara IV (PTPN IV) is presented in Decree of Simalungun Bupati (Head of District) No. 183.45/503/113/BPPT-PM/2014 dated 16 December 2014 for Palm Oil Mill with production capacity about 60 ton FFB/hour and oil palm plantation with total area about 7,348.81 ha.
- IUP for **Laras Estate** is presented in Bupati of Simalungun Decree No. 183.45/2767/K-PPT/2012 dated 08 August 2012 for oil palm plantation with total area about **4,062.66 ha**.

• Land Title (HGU)

- HGU for **Dolok Ilir Estate** shows through HGU Certificate No. 1 year 2006 for area covers about **7,348.81 ha** as refers to Measurement Letter No. 01/Dolok Ilir I/2006 dated 11 September 2006, where located on Village of Dolok Ilir. HGU of Dolok Ilir Estate is valid up to 31 December 2030.
- HGU for Laras Estate shows through HGU Certificate No. 6 year 2008 for area covers about 4,062.66 ha as refers to Measurement Land Map No. 09/Nagori Malela/2008 dated 18 September 2008 and Decree of National land Agency Head No. 48-HGU-BPN RI-2008 dated 7 August 2008. The HGU was located on Village of Nagori Gunung Malela, Sub District of Gunung Malela, District of Simalungun. HGU of Laras Estate is valid up to 21 September 2033.

4.4.2; 4.4.4

The history of Laras Estate and Dolok Ilir Estate areas comes from concession rights owned by Handless Vereeniging

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Amsterdam (HVA) which managed *Agave* (or pineapple fibers) that was taken over and nationalized by the Indonesian Government in 1959. This matter is mentioned in Government Regulation No. 19 in 1959.

Based on information from National Land Agency and village representatives, it was known that there is no new compensation and planting on local peoples land. Based on the results of the interview, it was also stated that the company's operational area is a Dutch plantation area that has been nationalized and there is no customary right within estate operational areas.

4.4.3

No change until surveillance 1.1

Unit of certification shows Operational map with scale 1 : 25,000. The map has clearly informed coordinate line, legal boundary, as well as location of conservation area, occupation area, rivers distribution, mill, building and infrastructures, etc.

4.4.5;4.4.6

Company has occupation for about 121.00 ha in Dolok Ilir Estate and about 131.00 ha in Laras Estate. Process of negosiation has conducted through FPIC approach with involving related stakeholder from Government Institutions, that shows in several documents as follows:

Occupation about 121.00 ha with Smallholder Group of Karya Mandiri in Dolok Ilir Estate

- The conflict started in 30 September 2004 proposed by Jumadi Group as occupant. Field checking and verification has
 conducted involving Occupant representative, Head of Bah Damar Village, Head of Dolok Merawan Sub District, BPN
 Head from Simalungun and Deli Serdang District, Director of PTPN IV and Estate Manager. However, legal ownership
 evidence from Jumadi Group (under smallholder group of Karya Mandiri) is not available.
- Physical occupation through land clearing by heavy equipments from Jumadi Group (under smallholder group of Karya Mandiri) has conducted in 2017 to 2018. Total area cleared was about 121.00 ha. As response, mediation had conducted initiated by PTPN IV Dolok Ilir Unit as shows through minutes of meeting dated 02 May 2017 that involving Police Resort Head of Tebing Tinggi.
- Planting of Cassava and Rubber started carried out by occupants on 15 August 2017. Report to Police Resort and Police Province on this matter has been made on 29 December 2017, resulting Police Resort report No. B/251.f/III/2018/RESKRIM dated 09 March 2018.
- Additional report to Police Resort of Tebing Tinggi has also shows through company Letter dated 19 May 2018, 04 June 2018, 03 July 2018 and 10 July 2018.
- Report of BPN of Simalungun No. 2/BAPU/02.09/VII/2018 about field checking and measurement that resulting total occupied area planted in Block 98 AP and 98 AS were about 30.00 ha and 17.10 ha, respectively (or total 47.10 ha).
- Decree of Rampah District Court No. 27/Pid.B/2018/PN Srh dated 20 May 2019 and Decree of Sumatera Utara Province Court in Medan No. 839/Pid.Sus/2019/PT MDN dated 06 August 2019 stated that the occupants are guilty.
- In 2019, the claimer sued the company with a civil lawsuit. Based on the decision of the Sei Rampah district court No. 14/Pdt.G/2019/PN Srh dated January 30, 2020, the court rejected the plaintiff's claim (claimer). Then the party claiming the land claimer appealed to the Medan high court. Based on the decision of the Medan High Court No. 266/Pdt/2020/PT MDN dated July 21, 2020 stated to strengthen the decision of the Sei Rampah District Court No. 14/Pdt.G/2019/PN Srh dated January 30, 2020. However, field execution has still not carried out by the government authorized parties.
- Based on observation to occupation area in Afdeling 3 Block 98 A Dolok Ilir Estate, it was known that the occupation
 area was separated by bamboo/woods made fence, and already planted by cassavas. Furthermore, some nonpermanent housing/buldings has still existed.

Occupation about 131.00 ha with Smallholder Group of Mekar Jaya in Laras Estate (completed).

- Claim on 131.00 ha by Senen as representative of smallholder group of Mekar Jaya has started proposed on May 2018, as bases of claims refers to Governor of Sumatera Utara Decree No. SK.208/HM/LR/1968 together with Collective Map 1968, Decree No. SK 592.1-208/SIM/I/1985 about Land Reform Object and Appointment Letter of Land Ownership for about 10.000 m² that legitimate by Head of Nagori Jaya Village.
- As response, there were mediation process as shows through minute of meeting with related parties (police resort, sub-district head of Bandar Haluan, dated 23 January 2018, 03 February 2018, 07 February 2018 and 09 February 2018.
 Area of occupation situated in Block 10A, 92 A, 97 AB, 97 AC, 97 AD, 97 AE and 97 AF. On the meeting released that Head of Nagori Jaya Village was under pressure by Smallholder Grup when signing legitimation statement as mentioned



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in the above point.

- Statement Letter of Head of Nagori Jaya Village No. 474/40/NJI/IV/2018 dated 17 April 2018 mentioned that list of smallholders of Mekar Jaya proposed by Senen is not a true member of Mekar Jaya Group nor part of community of Nagori Jaya Village (outsider from nowhere).
- Statement Letter of Head of Nagori Naga Soppa Village No. 470/40/NS/IV/2018 dated 18 April 2018 which mentioned that community of HUTA IV Sweembath of Nagori Naga Soppa Village do not support Mekar Jaya Smallholder Group movement on occupation for about 131.00 ha.
- Up to recertification assessment in 2020, there is no more movement and legal process conducted by Mekar Jaya Smallholder Group. Furthermore, based on observation to occupation area in Afdeling 2 Block 97 AD Laras Estate, it was known that the occupation area was fully managed and controlled by estate management.
- Up to September 2021, there is no more movement and legal process conducted by Mekar Jaya Smallholder Group and all occupation area was fully managed and controlled by estate management.

Status: Comply

4.5

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

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

The history of Laras Estate and Dolok Ilir Estate areas comes from concession rights owned by Handless Vereeniging Amsterdam (HVA) which managed *Agave* (or pineapple fibers) that was taken over and nationalized by the Indonesian Government in 1959. This matter is mentioned in Government Regulation No. 19 in 1959.

Based on legal document verification, interview with National land Agency and village representative known that no new planting or area expansion by unit management. Furthermore, there is no customary right within estate operational areas.

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

Procedure of land compensation, identification of land owners and land conflict management is presented in document No. 04 (Rev. 02) dated 02 January 2015, which explaining that the settlement of land disputes is carried out through negotiation process involving deliberation of regional leaders, respective government agencies. Value of compensation should be agreed by both parties and recorded on the agreement. Calculations carried out with reasonable prices in accordance with the taxable value and state of the areas. Procedure do not distinguish the compensation calculation based on gender, local community or ethnic groups.

The history of Laras Estate and Dolok Ilir Estate areas comes from concession rights owned by Handless Vereeniging Amsterdam (HVA) which managed Agave (or pineapple fibers) that was taken over and nationalized by the Indonesian Government in 1959. This matter is mentioned in Government Regulation No. 19 in 1959. So that compensation payment process is not applicable. Related to land disputes/occupation with several smallholder groups, it has involving government institutions and community representatives through FPIC approach, as verified in Indicator 4.4.5.

Based on legal document verification, interview with National land Agency and village representative known that no new planting and area expansion by unit management. Based on the results of the interview, it was also stated that the company's operational area is a Dutch plantation area that has been nationalized and there is no customary right within estate operational areas.

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.



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4.7.1; 4.7.2; 4.7.3

Procedure of land compensation, identification of land owners and land conflict management is presented in document No. 04 (Rev. 02) dated 02 January 2015, which explaining that the settlement of land disputes is carried out through negotiation process involving deliberation of regional leaders, respective government agencies. Value of compensation should be agreed by both parties and recorded on the agreement. Calculations carried out with reasonable prices in accordance with the taxable value and state of the areas. Procedure do not distinguish the compensation calculation based on gender, local community or ethnic groups.

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Based on legal document verification, interview with National land Agency and village representative known that the company's operational area is a Dutch plantation area that has been nationalized.

Status: Comply

4.8

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

4.8.1; 4.8.2; 4.8.3

Based on legal document verification, interview with National land Agency and village representative known that no new planting and area expansion by unit management. Based on the results of the interview, it was also stated that the company's operational area is a Dutch plantation area that has been nationalized.

Company has land conflict/occupation for about 121.00 ha in Dolok Ilir Estate and about 131.00 ha in Laras Estate. Process of negosiation has conducted through FPIC approach with involving related stakeholder from Government Institutions, that shows in several documents as follows:

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 Head from Simalungun and Deli Serdang District, Director of PTPN IV and Estate Manager. However, legal ownership
 evidence from Jumadi Group (under smallholder group of Karya Mandiri) is not available.
- Physical occupation through land clearing by heavy equipments from Jumadi Group (under smallholder group of Karya Mandiri) has conducted in 2017 to 2018. Total area cleared was about 121.00 ha. As response, mediation had conducted initiated by PTPN IV Dolok Ilir Unit as shows through minutes of meeting dated 02 May 2017 that involving Police Resort Head of Tebing Tinggi.
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- Decree of Rampah District Court No. 27/Pid.B/2018/PN Srh dated 20 May 2019 and Decree of Sumatera Utara Province Court in Medan No. 839/Pid.Sus/2019/PT MDN dated 06 August 2019 stated that the occupants are guilty.
- In 2019, the claimer sued the company with a civil lawsuit. Based on the decision of the Sei Rampah district court No. 14/Pdt.G/2019/PN Srh dated January 30, 2020, the court rejected the plaintiff's claim (claimer). Then the party claiming the land claimer appealed to the Medan high court. Based on the decision of the Medan High Court No. 266/Pdt/2020/PT MDN dated July 21, 2020 stated to strengthen the decision of the Sei Rampah District Court No. 14/Pdt.G/2019/PN Srh dated January 30, 2020. However, field execution has still not carried out by the government authorized parties.
- Based on observation to occupation area in Afdeling 3 Block 98 A Dolok Ilir Estate, it was known that the occupation



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area was separated by bamboo/woods made fence, and already planted by cassavas. Furthermore, some non-permanent housing/buldings has still existed.

Occupation about 131.00 ha with Smallholder Group of Mekar Jaya in Laras Estate

- Claim on 131.00 ha by Senen as representative of smallholder group of Mekar Jaya has started proposed on May 2018, as bases of claims refers to Governor of Sumatera Utara Decree No. SK.208/HM/LR/1968 together with Collective Map 1968, Decree No. SK 592.1-208/SIM/I/1985 about Land Reform Object and Appointment Letter of Land Ownership for about 10.000 m² that legitimate by Head of Nagori Jaya Village.
- As response, there were mediation process as shows through minute of meeting with related parties (police resort, sub-district head of Bandar Haluan, dated 23 January 2018, 03 February 2018, 07 February 2018 and 09 February 2018. Area of occupation situated in Block 10A, 92 A, 97 AB, 97 AC, 97 AD, 97 AE and 97 AF. On the meeting released that Head of Nagori Jaya Village was under pressure by Smallholder Grup when signing legitimation statement as mentioned in the above point.
- Statement Letter of Head of Nagori Jaya Village No. 474/40/NJI/IV/2018 dated 17 April 2018 mentioned that list of smallholders of Mekar Jaya proposed by Senen is not a true member of Mekar Jaya Group nor part of community of Nagori Jaya Village (outsider from nowhere).
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- Up to recertification assessment in 2020, there is no more movement and legal process conducted by Mekar Jaya Smallholder Group. Furthermore, based on observation to occupation area in Afdeling 2 Block 97 AD Laras Estate, it was known that the occupation area was fully managed and controlled by estate management.
- Up to September 2021, there is no more movement and legal process conducted by Mekar Jaya Smallholder Group and all occupation area was fully managed and controlled by estate management.

4.8.4

No change until surveillance 1.1

Participatory mapping on land conflict for about 121.00 ha in Dolok Ilir Estate and for about 131.00 ha in Laras Estate has conducted on 30 September 2004 and 03 February 2018, respectively. Mapping process has involving Claimants, Company representatives, Head of respective Villages, Head of Sub-District, Head of National Land Agency of Simalungun District, Head of Police Resort of Tebing Tinggi, etc.

Status: Comply

PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION

5.1

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

5.1.1; 5.1.2; 5.1.4; 5.1.8

PT. Perkebunan Nusantara IV - Dolok Ilir POM does not have a plasma/smallholder scheme. The company also does not receive FFB directly from independent smallholders. Based on Dolok Ilir Mill production data for period September 2020 to August 2021, as well as observation and interview with Security Officers and Weighbridge Operator, it was known that Dolok Ilir Mill has received and process FFB from its 2 (two) main supply base, i.e. Dolok Ilir Estate and Laras Estate which mentioned in scope of certification; 3 (three) estates of PTPN IV and three (3) FFB Agents as follows CV Rianalim, CV Mandiri Arsa Sejahtera and CV Putra Doge.

Based on the results of interviews with FFB suppliers and management, known that the determination of FFB prices for third parties is determined by the company in accordance with the agreement. FFB prices follow fluctuations in palm oil and palm kernel prices. Information on FFB prices is provided by telephone, sms and others.

5.1.3; 5.1.5

The company shows an example of a FFB purchase agreement with CV Nusantara Putra Doge No. PKS DOI/CV.NPD/SP-TBS/01/V/II2021 dated 1 July 2021 (valid until 30 September 2021) which has been signed by both parties. In the agreement it is explained that:

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- The FFB purchase price is determined and announced by the first party (PTPN IV)
- FFB prices follow fluctuations in palm oil and palm kernel prices informed by the PTPN IV head office
- Changes in FFB prices will be informed to the supplier every day.

Based on the results of interviews with FFB suppliers and management, known that the determination of FFB prices for third parties is determined by the company in accordance with the agreement. FFB prices follow fluctuations in palm oil and palm kernel prices. Information on FFB prices is provided by telephone, sms and others.

5.1.6

The company can show evidence of payment to the FFB supplier for example for CV. Rianalim for payments for the May 2021 period on June 2021. Based on the review of CV Rianalim's FFB Purchase Recapitulation document, it is known that the payment has been in accordance with the amount of FFB. Based on interviews with FFB suppliers, it was found that there were no complaints related to payments and payments were in accordance with the work agreement and the amount of FFB sent.

5.1.7

Company can show a Test Result Certificate Number 510.3 / 705 / ML.PS / X / 2020 from the Office of Cooperatives, Small and Medium Enterprises and Trade UPTD Legal Metrology Pematang Siantar which explains the results of testing the electronic weigh bridge. The results are as follows:

- Equipment examined: Electronic Bridge Scales with a capacity of 40,000 Kg
- Brand: GSC
- Type: GST 9600
- Serial number: 967456
- Smallest Capacity / Scale: 40,000 / 10 Kg
- Review by: UPTD Legal Metrology Pematang Siantar
- Examination Date: October 24, 2020
- Audit Results: Ratified under the Law of the Republic of Indonesia Number 2 of 1981 concerning Legal Metrology.
- This Certificate is valid until October 2021.

5.1.9

The company shows an example of a FFB purchase agreement with CV Nusantara Putra Doge No. PKS DOI/CV.NPD/SP-TBS/01/V/II2021 dated 1 July 2021. In article 9 of the agreement, it is explained that if there is a complaint, the supplier can submit the complaint through the whistle blowing system mechanism, complaint email and complaint SMS. The email and sms number of the complaint have also been included in the agreement. Based on interviews with FFB suppliers, it was found that there were no complaints related to payments and payments were in accordance with the work agreement and the amount of FFB sent.

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

It has been verified that there are 3rd party FFB received by the Mill. The mill has record the origins of all third-party sourced Fresh Fruit Bunches (FFB) such as CV Riana Lim and CV Nusantara Putra. Unit Certification has consults with the above stakeholders to assess their needs for support to improve their livelihoods with CSR/PKBL programs. The Company has participated in the development of community around the estate through education, health, infrastructure, productive business, sports, art, culture and religious activities. The company has several records related to the local development contribution, based on the results of the consultation.

On May 2021, company has conducted socialization on sustainable palm oil standards to FFB Supplier. Material:

- Perform identification, mapping (mapping) and development of farmer databases
- Provide technical support to FFB Supplier in the form of consultation and training

5.2.2.



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Unit Certification has consults with the above stakeholders to assess their needs for support to improve their livelihoods with CSR/PKBL programs. The Company has participated in the development of community around the estate through education, health, infrastructure, productive business, sports, art, culture and religious activities. The company has several records related to the local development contribution, based on the results of the consultation.

5.2.3

On May, 2021, company has disseminated sustainable palm oil standards to FFB Suppliers by Palm Oil Mill, among the materials presented are identifying, mapping (mapping) the location of the plantations of farmers who sell FFB to collectors and encourage oil palm plantations to have legality.

5.2.4 & 5.2.5

No scheme smallholder in company. So this indicator NA (Not Applicable). The company only received FFB from collector, there's no FFB from independent/scheme smallholder.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1

Any form of discrimination is prohibited.

6.1.1

Based on the results of the document review and interviews with management regarding the non-discrimination policy and equality of opportunity, it is known that there has been no change since the previous assessment, which is stated in SOP number 04.02 regarding the equal employment policy which states that PT Perkebunan Nusantara IV provides equal opportunities and opportunities as widely as possible. breadth without discrimination for all employees to carry out their work in order to achieve the company's vision and mission.

Based on the results of field observations, interviews with workers, interviews with trade unions and gender committees as well as the results of consultations with the manpower office, it is known that the certification unit has implemented policies related to non-discrimination and equality of opportunity such as employees who work vary from race/ethnicity, religion, gender, educational background, etc.

6.1.2

There is evidence that workers and groups including local communities, women and migrant workers are not discriminated against. This evidence includes the non-payment of recruitment fees to migrant workers. Based on the results of the review of employee list documents, such as the Dolok Ilir Mill Manpower document in August 2021, information is known that there are local communities and female workers. There are no migrant workers in the unit of certification.

Based on the results of interviews with workers, interviews with internal stakeholders, interviews with representatives of surrounding villages and interviews with the Manpower Office, it is known that workers come from surrounding villages (local residents) and workers who come from outside the region such as Java and Sumatra.

6.1.3

There is evidence that recruitment selection, employment, access to training, and promotions are made on the basis of skills, abilities, qualities and medical eligibility as required for the available jobs. As an example, the document Form for Supervision and Evaluation of Intenal Education and Training on Fertilization Implementation, dated September 2, 2021, at Afdeling V Dolok Ilir Estate, which explains that the training has been carried out and its evaluation as outlined in the form of an evaluation of the results of the evaluation of 16 fertilization workers along with suggestions regarding the results of the evaluation, such as on behalf of the RS (initial), getting an assessment score of 75 with suggestions regarding the results of the evaluation of good grades but needing to be applied in work in the field.

Based on this explanation, it is evident that the provision of fertilization work and access to fertilizer training is carried out on the basis of skills, abilities and quality for fertilization work. Based on the results of the assessment, it can be concluded that the training provided by the company can be understood where it is proven that the evaluation value obtained is 75, where for scores 71 to 89 it is concluded that the understanding and work quality of the workers are good.

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6.1.4

Based on the results of the document review, interviews with workers and interviews with the management of the gender committee in each unit, it is known that there is no treatment for pregnancy testing which is a discriminatory measure.

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The company has a gender committee in each unit, which is shown as follows:

- Structure of the Gender Committee for the Laras Estate Unit 2021 2022, updated June 7, 2021
- Structure of the Gender Committee of the Dolok Ilir Mill Unit 2021, updated January 7, 2021

Based on the results of interviews with representatives of the Gender Committee, it was found that there were no incidents of sexual harassment or domestic violence, the gender committee conducted socialization to female workers and people in housing through morning apples and other housing activities and provided menstrual leave with a mechanism for reporting to the foreman, and will be examined by the medical team.

Based on the results of document review and interviews with representatives of the gender committee of the Dolok Ilir Mill, Dolok Ilir Estate, it is known that the gender committee has programs and activities that focus on equality, prevention of harassment and the implementation of reproductive rights.

The company also monitors incidents of sexual harassment and others, which are stated in the Dolok Ilir Mill Sexual Harassment Monitoring document in 2021, which explains that until August 2021, there have been no incidents of sexual harassment in all activities. The work program of the Dolok Ilir Mill gender committee, including socialization in the Dolok Ilir Mill emplacement environment, including those related to human rights.

Based on the Organizational Structure of the Dolok Ilir Mill Unit Gender Committee 2021, it is known that the committee structure consists of male and female workers. The representatives of the gender committee also explained that in terms of work there was no differentiation between male workers and female workers. Every worker has equal rights in terms of employment opportunities.

OFI: The company has the opportunity to further increase socialization regarding the existence of the Gender Committee for female workers and male workers in the field.

6.1.6

The company shows proof of payment for workers with the same coverage, for example:

Employees of NIK 4003638 (maintenance of Afdeling 3 Laras Estate, class IC/04) and employees of NIK 4003579 (maintenance of Afdeling 4 Laras Estate, class IC/08), where both are employees in the maintenance department, get wages not much different, namely each basic wage of Rp. 2,002,171 and Rp. 2,003,118 and the wages transferred are Rp. 1,692,861 and Rp. 1,692,387. This difference is due to differences in the class of workers, where the class of workers is distinguished based on years of service and achievement. This can also be seen from the value of wages for other types of work, such as harvest workers and weighing operators.

Based on the results of interviews with workers such as work in estates, namely fertilizing and spraying, it is known that the workers have understood the difference in wages between them which is caused by length of work and assessment of work performance.

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

Based on the results of interviews with workers and workers' representatives (worker union and gender committee), it is known that employees have understood several points stated in the work agreement and CLA, such as those related to wages, social security and so on.

6.2.2



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Based on the results of interviews with workers both in the estate and in the mill regarding the wages received, it is known that workers have understood that the wages earned are based on the minimum wage set by the government and for 2021 there will be no increase in wages from the previous year.

The company shows the Basic Guidelines and Work Instructions for Premiums and Fines (Sanctions) for Harvesting, Loading/Unloading, Transporting, document number 04.04/KS/TAN/P/008, dated June 2013, revision number 1, revision date February 24, 2020. The document including explaining work instructions for harvesting premiums, loading/unloading and transporting FFB premiums, Harvesting Penalties (Sanctions), Loading/Unloading and Transporting FFB Fines (Sanctions), Generate Premiums, Harvest Supervision and others. The sanctions are not deducted from the basic salary but from the premiums earned. Regarding the mechanism of sanctions, including harvest fines (sanctions) given for field quality assessments such as loose fruit not being picked, ripe FFB not being harvested and others whose nominal value has been determined. In addition, it is also based on an assessment at the *Tempat Pengumpulan Hasil* such as unripe FFB whose nominal value has been determined. The calculation of the fine is carried out every day by the Production Clerk and conveyed to the harvesters at the morning briefing.

Based on the results of a review of payroll documents, for example from Laras Estate, it is known that payroll documents provide accurate information about compensation for all work performed, such as basic salary, special allowances, workers' rice supplies, BPJS contributions and deductions such as union dues, contributions BPJS and others.

OFI. The company has the opportunity to ensure that all documents related to overtime are in accordance with the provisions of the CLA for the 2020-2021 period regarding overtime work.

Based on the results of field observations on maintenance activities at Dolok Ilir Afdeling 3 Block 16 Bl, it was found that three people were carrying out plant maintenance activities. From the results of the interview, it was known that there was 1 worker who was not an employee of the company and stated that he was replacing his mother who did not come to work because of illness. In addition, the person concerned also uses PPE and uniforms like other employees.

Based on the explanation above, it can be concluded that there are still people who carry out the company's operational activities without having a work agreement. This becomes **Non-conformity No. 2021.03**.

6.2.3

There is a Collective Labor Agreement (CLA) which has been ratified by the Head of the Manpower Office of North Sumatra Province (No.: 560/04-6/DTK/I/2020) on January 13, 2020. The Collective Labor Agreement is effective as of January 10, 2020 until January 9, 2022 and has been registered with the number: 6/DFT/PKB/6/SU/I/2022. The CLA has detailed wages (Article 33), work requirements (Article 12), regular working hours (Article 20), deductions (Article 41), overtime (Article 21), sick leave (Article 29), the right to vacation (Article 29). 25-26), maternity leave (article 20), reason for dismissal (article 70), notification period before work termination (article 74), etc.

There is evidence of legal compliance, including regarding overtime. The company shows proof of legal compliance regarding overtime, which is shown in the Overtime Work Order, dated August 19, 2021, for example on behalf of AS (initials) of a security employee, who does 2 hours of actual overtime. Then, the Overtime List document on behalf of that name was also shown, which explained the recapitulation of overtime work for the period August 2021, which among other things explained the total overtime hours on August 19, 2021 was 3.5 hours. Based on the August 2021 Employee Salary document, it is known that the wages paid to the AS (initials) are appropriate and include overtime pay during August 2021.

Based on the results of interviews with workers and workers' representatives (worker unions and gender committees), it is known that there is a work agreement along with related documents that regulates the details of wages and work requirements, such as regular working hours, deductions, overtime, sick leave, the right to vacation (leave), maternity leave, reasons for dismissal and salary breakdown documents.

6.2.4

Based on the results of document review, interviews with workers, interviews with worker representatives (worker union and gender committee) and field observations at the Laras Estate and Dolok Ilir Estate units, it is known that the certification unit



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provides adequate housing, sanitation facilities, water supplies, medical needs, education and public facilities, which are briefly described as follows:

- House building (residential): Staff house and employee house
- Educational Facilities: Kindergarten, Elementary School, Sekolah Menengah Pertama, Madrasah Aliyah, Madrasah Tsanawiyah
- Clean water facilities: wells, public baths,
- Health facilities: Laras Hospital
- Facilities for worship: mosque, prayer room, church
- Sports facilities: volleyball court, soccer field, badminton hall, table tennis court, mini golf course, tennis court
- Public facilities: baby/child day care

6.2.5

Based on the results of interviews with workers and workers' representatives (worker unions and gender committees) as well as field observations regarding access to basic needs, it is known that workers' access to adequate, and affordable food is very easy to obtain because the location of the work unit and housing is close to the center of the crowd so it's easy to find traders, shops and vegetable sellers to fulfill daily basic needs.

6.2.6

Payment of minimum wages in accordance with applicable regulations

A decent living wage (DLW) is given to all workers in accordance with applicable regulations, namely based on the Decree of the Governor of North Sumatra number 188.44/528/KPTS/2020 dated October 30, 2020, which stipulates the 2021 North Sumatra UMP at Rp. 2,499,423.06/ month. The company has implemented it with a wage component consisting of basic wages and fixed (special) allowances of 80% plus rice supply plus special allowances.

The Company presented the Decree of the Board of Directors (No. 04.08/Kpts/32/IV/2020) on April 27, 2020 regarding the Adjustment of the Basic Salary and Special Benefits for Goal Employees. IA-IVD Year 2020 which takes effect from January 1, 2020, include:

- Basic Salary for Group I.A is Rp. 1,999,538, Group I.B is Rp. 2,000,035, Group II.A is Rp. 2,261,308, etc.
- Class I.A special allowances of Rp. 323,885, Group I.B of Rp. 324,069, Group II.A of Rp. 388,987, Group II.B of Rp. 449.757, etc.

For 2021, because there is no increase in the minimum wage from the government, the structure and scale of wages will still use 2020.

Assessment of wages paid (prevailing wages) and in-kind benefits.

The company shows the 2021 Salary Scale document for employees of Group IA to s.d. II D PTPN IV, which explains in detail about the basic salary, the value of the workers' own rice supply is Rp. 11.000,-/ Kg, allowances (specifically, house rent, electricity 25% from house rent, water 15% from house rent, electricity + water 40%, transportation 35% from basic salary), benefits (school facilities, extrafooding, clothes work). For example, the lowest employee class is broken down as follows:

- Group: IA/0
- Basic Salary: Rp. 1.999,538,- (80% of minimum wage province 2021)
- The value of the workers' own rice supply is Rp. 11.000,-/ Kg: Rp. 176.000,- (16 kg)
- Special allowance: Rp. 323,885,-
- Rent a house: Rp. 499,885,-
- Electricity 25% of house rent: 124.971,-
- Water 15% of house rent: Rp. 74,983,-
- Electricity + water 40%: Rp. 199,954,-
- Transport 35% of basic salary: Rp. 699,836,-
- Benefits of school facilities: Rp. 247,128,-
- Extrafooding benefits: Rp. 129,450,-
- Work clothes benefits: Rp. 75,650,-



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Total: Rp. 4,351,328,-.

6.2.7

Based on the results of the document review, including the Peak Harvest Specific Time Work Agreement document number DOI/S.Perj/01./VII/2021, dated July 1, 2021, it is explained that there are temporary workers who are limited to temporary or seasonal work, The work agreement (article 2) states that the second party (initials RK) is employed as a labor agreement for a certain time with the type of peak harvest work at Dolok Ilir Estate from July 1, 2021 to December 31, 2021.

6.2.2 Status: Nonconformity No. 2021.03 with Major Category

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

Serikat Pekerja Perkebunan PT PN IV has been registered at the Department of Social and Manpower and Transmigration of Medan City, registration number 567/5/DSTKM/2001.

The company shows evidence of the implementation of the freedom of association policy, including:

- 1. Letter from the Manpower Office of Simalungun Regency, number 560/580/23.4/2019, dated October 2, 2019, which explains that the composition of the management of the Plantation Workers Union (*Serikat Pekerja Perkebunan*) PT PN IV Basis Laras Masa Bhakti 2019-2024 has been received, with the composition of the Chairman an Tugiman and Secretary an Risdianto.
- 2. Letter from the Manpower Office of Simalungun Regency, number 560/108/23.4/2020, dated March 16, 2020, which explains that the composition of the management of the Plantation Workers Union (*Serikat Pekerja Perkebunan*) PT PN IV Basis Dolok Ilir for the 2019-2024 period has been received, with the composition of which includes Chairman and Elfian Yus Purba and Secretary Khairul Suhada Nasution.
- 3. A letter from the Simalungun Regency Manpower Office, number 560/150/23.4/2020, dated June 17, 2020, which explains that the Registration Certificate (No.13/LKS Bipartite-HIJ/2020) by the Head of the Simalungun Regency Manpower Office on June 17, 2020 for Dolok Ilir Estate. Chairman Fadlan Fahmi Simatupang, secretary Leonard Bakkara.

Based on the results of interviews with workers and workers' representatives (worker unions and gender committees) and the Manpower Office, it is known that there are policies related to freedom of association and have been implemented well in the field. Based on the results of interviews with workers, it is known that worker union membership is voluntary.

6.3.2

Minutes of meetings between the certification unit and worker unions or workers' representatives freely chosen by workers are available, in the national language. The minutes are available in the management unit. For example, the minutes of the meeting on 22 May 2021 which discussed the proposed CLA for the 2022 – 2024 period, which was attended by 13 meeting participants from the company and the labor union.

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Based on the results of interviews with representatives of worker unions, it is known that the management does not interfere in the formation or activities of registered organizations/labor unions.

Status: Comply

64

Children are not employed or exploited.

6.4.1 & 6.4.2 & 6.4.4

The company also shows Employee List documents, for example Dolok Ilir Mill in August 2021, which among other things explains that there is no child labour. Based on the results of interviews with contractors, such as PT Jaya Wira Manggala, results of field observations and interviews in Estate and Mill, as well as interviews with representatives of workers such as worker unions and gender committees, it is known that there is no child labour.

6.4.3



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Based on the results of document review, interviews with management and field observations in estate and mill, it is known that there are no young workers or students who are practicing field work.

Status: Comply

6.5

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

The company's policy on preventing sexual harassment and violence and other forms has been documented, including in the CLA for the period 2020-2021, it is stated that committing immoral acts in the work environment is included in the category of serious violations with the consequences of termination (termination of employment).

Based on the results of interviews with representatives of the Gender Committee, it is known that the company has a policy on preventing sexual harassment and violence. The policy has been communicated to all workers during the morning briefing or a special time specified. The gender committee also explained that so far there have been no incidents of sexual harassment and violence.

6.5.2

Based on the results of interviews with the Chairman and Secretary of the Dolok Ilir Estate Gender Committee and the Chairman of the Dolok Ilir Mill Gender Committee, it is known that the company has a policy on the protection of reproductive rights, especially for women, such as menstrual leave (H1). They explained that if a female employee wants to take H1 leave, the medical team must check.

The gender committee consists of representatives of each gender (male and female), consisting of staff and workers.

6.5.3

Based on the results of interviews with representatives of the gender committee from the Dolok Ilir Estate and Mill. it is known that currently there are no mothers who have just given birth. All female workers who work have entered old age, so that no one is pregnant or has just given birth. However, the representatives of the gender committee explained, as for the implementation that has been implemented in the field, if there are new employees who give birth or are about to give birth, they are given permission for 45 days before and after delivery, giving permission to breastfeed according to the baby's needs by being allowed to leave work with the foreman known, hospitals are available, barrel as a treatment facility, supplementary feeding, and others

Based on the results of interviews with the Gender Committee, it is known that when a new mother gives birth, the company provides light work which is located close to the housing so that the workers for new mothers can give exclusive breast milk to their children.

6.5.4

Based on the results of interviews with workers and workers' representatives (worker unions and gender committees), it was stated that complaints can be submitted to their direct superiors, to the worker unions or to the gender committee (specific complaints on women's issues).

Based on the results of interviews with the Gender Committee, it is known that the mechanism for submitting complaints can be done in person or through letters. To date, no reports have been submitted to the Gender Committee.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1

Based on the results of the review of employee list documents, interviews with worker unions and gender committees, interviews with management and the results of field visits at the Estate and Factory, it is known that there are no migrant/foreign workers. Based on the results of the review of employee list documents, interviews with the worker union and gender committee, interviews with management and the results of field visits, it is known that there are no migrant/foreign workers.



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6.6.2

No migrant workers are employed.

The company employs temporary workers (Specific Time Work Agreement/PKWT) for peak harvest, which is shown in the Peak Harvest PKWT document, number LARAS.Perj/01/VII/2021, dated July 1, 2021, on behalf of SBN (initial) with a validity period of up to 31 December 2021. There are 12 PKWT workers employed for the peak harvest.

There are special employment policies and procedures that are compiled and listed in the PKWT work agreement, which are explained as follows:

- Describe the type and location of work
- Working time 1 week 6 days
- Wages in the form of basic salary, special allowances in the amount of Gol IA/0 wages in the decision of the Board of Directors regarding the applicable basic salary and special allowances
- Receive rice supply allowance
- Entitled to a premium for work performance from excess results against normal performance
- Participated in the BPJS program
- Etc

There is evidence of implementation related to special employment policies and procedures, including BPJS membership and payment of wages according to regulations.

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

P2K3 Organization

Dolok Ilir Estate:

Decree of the Head of the North Sumatra Province Manpower Office No. 566/215-7/DTK/SU/VII/2021 dated August 6, 2021, Secretary of P2K3 an. Khairul Suhada Nasution, SP according to SKP No. KEEP. 7046/NAKER-BINWASK3/IX/2017 dated September 4, 2017 valid until September 4, 2020. There is a certificate from OHS Service Company No. 7046/NAKER-BINWASK3/IX/2017. FSI061/SK-FSI/PRP/VIII/21 dated 20 August 2021 which states that the certificate extension is in process at the Indonesian Ministry of Manpower. There is a recording of the P2K3 meeting, for example on August 4, 2021 which was attended by 11 participants, the meeting briefly discussed related:

- Follow-up on audits of the estate management system
- Phase 2 vaccination schedule

Dolok Ilir Mill:

Decree of the Head of the North Sumatra Province Manpower Office No. 566/556-7/DTK/SU/WIL.III/2021 dated August 30, 2021, secretary of P2K3 an. Khairul Suhada Nasution, SP according to SKP No. KEEP. 7046/NAKER-BINWASK3/IX/2017 dated September 4, 2017 valid until September 4, 2020. There is a certificate from PJK3 No. 7046/NAKER-BINWASK3/IX/2017. FSI061/SK-FSI/PRP/VIII/21 dated 20 August 2021 which states that the certificate extension is in process at the Indonesian Ministry of Manpower. There is a recording of the P2K3 meeting, for example on August 12, 2021 which was attended by 6 participants, the meeting briefly discussed related:

- Conducting noise level testing
- Implementation of audiometric examination
- Implementation of cholinesterase examination

Laras Estate:

Decree of the Head of the North Sumatra Province Manpower Office No. 188.45/325/23.4/2021 dated August 31, 2021, secretary of P2K3 an. FDP Saragih with SKP No. KEP.7045/NAKER-BINWASK3/IX/2017 is valid for 3 years (2020) and the company can show a recording of the extension process by OHS Service Company to the Manpower and Transmigration Office so that the Company has the opportunity to ensure the follow-up to the extension of the SKP AK3 secretary of P2K3 to OHS Service Company and related agencies (**OFI**). There is a recording of the P2K3 meeting, for example the recording



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of the meeting on August 28, 2021 which was attended by 19 participants, the meeting discussed related matters.

- Implementation of Hiperkes fulfills the existing quota with immediate follow-up to make a list of employees to take part in the examination in accordance with the GMCU a few months ago.
- Many of the writings on OHS appeals are outdated and torn so that they are difficult to read with immediate follow-up to make a memo to the manager for the making of the warning.

6.7.2

Accident and emergency response procedures are described in:

- Procedure for Handling Accidents and Medical Examinations effective April 23, 2013
- Emergency and Post-Emergency Handling Procedures no. Document 4.3.16 No. Revision 04.
- Emergency Control Document (No.: PKSDOI/K3/P/002 dated 1 December 2019).
- SOP for overcoming Land Fires (No. SPO 01 No. Rev. 02 dated January 2, 2015).

These documents discuss the company's procedures for handling emergency situations (fires, natural disasters, riots) and post-emergency actions that can threaten lives, property, production processes and environmental damage.

Based on the results of field visits at the Estate and Mill, it is known that the company has completed warnings on evacuation routes and assembly points and has been known by workers.

The company already has personnel who have received first aid training in the workplace from the Indonesian Ministry of Manpower, for example:

- Muhammad Joni No. 17-7/P3K/DTK/2018 valid until September 2021
- Citra Sukma Surva No. 52-7/P3K/DTK/2018 valid until September 2021
- Norma Bangun No. 44-7/P3K/DTK/2018 valid until September 2021

In addition, the company also appointed a foreman in the field to be responsible for carrying the first aid kit, based on the results of the interview, it was found that the worker concerned could briefly explain the items contained in the first aid bag and in case of a first aid situation in his work area.

6.7.3

Dolok Ilir Mill:

- Results of interviews with 2 workers at St. Sterilizer, it is known that 1 worker bought his own PPE in the form of boots. The PPE provided by the company is in the form of safety shoes but is currently in a damaged condition.
- Results of interviews with 1 St. Clarification, it is known that the worker bought his own PPE in the form of boots. The PPE provided by the company is in the form of yellow safety shoes but is currently in a damaged condition.

Dolok Ilir and Laras Estate:

- The results of an interview with 1 collection point scratching worker in Afdeling III Blok 17C Estate Dolok Ilir, it was found that the workers bought their own PPE in the form of short rubber boots. The PPE provided by the company is in the form of boots, but currently it is wet and damaged.
- The results of an interview with 1 harvest worker in Afdeling I Blok 97X Estate Laras, it was found that the workers bought their own PPE in the form of boots. The shoe PPE provided by the company is currently wet and damaged.
- The company shows evidence of improvement on the results of field observations, including the following:
- Evidence of submission of PPE in the form of safety shoes to 1 worker at St. Clarification on September 23, 2021
- Proof of providing PPE in the form of heat-resistant gloves to 1 St. Boiler dated September 23, 2021
- In addition, the results of interviews and document review, it is known that the company conducts inspections every month, one of which is monitoring the completeness of PPE. However, it has not been informed regarding the condition / feasibility of PPE.

Based on the explanation above, it is concluded that the Company has not been able to ensure that PPE is available to all workers so this is being a Nonconformity No. 2021.04 with Major Category

Based on field observation, it is known that company has provided sanitation facilities that can be used by workers to clean



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themselves, change clothes and store work tools

6.7.4

BPJS

The company has a policy to include employees in the Collective Labor Agreement Document for the Period 2020 to 2021, especially in Chapter VIII on Social Security and Labor Welfare. The document describes some of the following information:

- For prospective employees, the Company registers the BPJS Employment Program in accordance with applicable regulations, which consist of: Work Accident Insurance, Death Security, Old Age Security and Pension Security.
- The company through BPJS Employment registers a social security program for employees in accordance with applicable regulations, which consists of: Work Accident Insurance, Death Security, Old Age Security and Pension Security.
- The settlement process for obtaining allowances/compensation from the labor social security administering agency is the responsibility of the company.

The company can show proof of payment for BPJS Health and Employment, for example as follows:

Dolok Ilir Estate and Mill:

Health:

- August Fee (Honorary) on August 13, 2021 in the amount of IDR 121,049,467, -
- Employee's August contribution on April 13, 2021 in the amount of Rp. 2,841,005,263, (474 participants including 59 PKWT)
- August Contribution (Retired) on August 13, 2021 in the amount of IDR 4,403,500,000, -

Employment:

Dues for August 2021 on September 16, 2021 are IDR 136,859,000, - (JKK: 7,750,948, JHT: 81,815,566, JKM: 4,306,083, JPN: 42,986,403) for 558 participants.

Laras Estate:

Employment:

- Dues for August 2021, Contribution Code 210900363623, September 16, 2021 amounting to Rp 86,730,172 (JKK: 4,909,255, JHT: 51,819,914, JKM 2,727,364, JPN: 27,273,639), for a total of 353 employees.
- In July 2021, Contribution Code 210801282186, August 13, 2021 amounting to Rp 87,869,125 (JKK: 4,973,724, JHT: 52,500,421, JKM: 2,763,180, JPN: 27,631,800), for 357 employees.

Based on the results of interviews with workers at Estate and Mill, it is known that workers have been registered in the BPJS Health and Employment program, so far there have been no obstacles when using BPJS for treatment.

In addition, the company can show examples of reporting work accidents to BPJS, for example, for harvest workers' work accidents on June 14, 2021, chronology minutes and evidence of reporting stages 1 and 2.

6.7.5

The company can show a work accident record using LTA for each unit, for example for Dolok Ilir Estate in July 2021 as follows:

Dolok Ilir Estate July 2021

- FR: 0
- SR: 0
- Employee working hours: 186 Hours
- Number of Employees: 466 people

6.7.3 Status: Nonconformity No. 2021.04 with Major 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.



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7.1.1

In relation to the integrated pest control plan, the Company has procedures as set out in the Basic Guidelines and Work Instructions for Controlling Pests and Diseases of Oil Palm Plants with document number: 04.04/KS/TAN/P/005 revision 1 on 24 February 2020. Pest and disease control is first carried out with a pest and disease census (early observation) and then pest and disease eradication is carried out after that an evaluation is carried out.

Based on the results of the document review, it is known that the company has implemented an IPM plan, for example the company conducted a global telling to determine whether or not there was a pest attack, for example on August 2, 2021 at Dolok Ilir Estate Block 2016 A, it was found that there was a pocket caterpillar with a population of 1 caterpillar per stem, the young stadia. In addition, the company also uses beneficial plants as a biological pest control tool.

7.1.2

Based on the results of the field visit, it was discovered that the company uses beneficial plants in the form of Turnera Subulata, Turnera Ulmifolia, and Antigonon planted on the roadside. Turnera Ulmifolia is an invasive species based on the LHK Ministerial Regulation No. 94 of 2016, but the company has taken care to control its spread.

7.1.3

In controlling pests and diseases, the company has taken countermeasures, among others, using manuals and chemicals, the company did not take countermeasures by using fire. This can be seen in field visits that have been carried out during the audit process and based on interviews with employees and management.

Status: Comply

7.2

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

7.2.1

Based on the results of document review and visits to the pesticide storage warehouse, it is known that the company uses selective pesticides according to the target pests/weeds to be controlled.

7.2.2

Based on the results of the document review, it was found that the company had recorded every use of pesticides, for example for the Round Up Laras Estate brand pesticide as of August 2021 as follows:

Active Ingredients: Isopropylamine glyphosate 480 g/l

Ammount of Active Ingredients: 376,800 g

LD50: 4.460

Amount of Usage: 785 L

Usage Ha: 853

Active Ingredients: 441.73 g/Ha

WHO Class: II

7.2.3

Based on document study it is known that The Company has using pesticide to handling pest as follow Needle Worm, Bag Worm and Oryctes. But, as part of reducing the use of pesticides, the company implements integrated pest control, one of which is by using beneficial plants as biological pest control. In addition, the company carries out pest control using chemicals if the number of attacks exceeds the economic threshold.

7.2.4

The company does not apply pesticides prophylactically, this is evidenced by the pest and disease control mechanism based on the results of the detection and census. The use of pesticides is based on the results of the EWS and the census which is carried out regularly every week. If the results of the census are especially effective at telling above the threshold, pest eradication is carried out with the main priority using the manual method and if it is no longer possible to use the manual method, it is carried out using chemical methods (chemist).

7.2.5



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Based on the review of the list of pesticide use documents as well as interviews and visits to the pesticide storage warehouse, it is known that the company does not use pesticides that are included in the World Health Organization (WHO) Class 1A or 1B or are included in the Stockholm or Rotterdam Conventions and paraguat.

7.2.6

Based on the results of interviews with Chemist workers, for example in Afdeling I Block 11B, it is known that workers can explain the stages of work from spraying procedures to handling equipment after work, first aid in the event of an accident, as well as the function of the PPE used.

7.2.7

Based on the results of field visits at the pesticide storage warehouse, it was found that the storage warehouse was equipped with hazard symbols, emergency response facilities and infrastructure, adequate ventilation and lighting. This is in accordance with Government Regulation no. 74 of 2001 concerning Hazardous and Toxic Materials.

7.2.8

Based on observations to the chemist's house (a place for the spray team), storage of spray equipment, and PPE in Dolok Ilir and Laras, it is known that the chemist's house has a rinse room (the water channel is functioning well), there is a storage room for spray equipment, there is a room for drying the apron and spray clothes. The water that results from rinsing the spray equipment and spray clothes is also collected in the trap.

In addition, based on the results of a field observation at the Hazardous Waste Temporary Storage of Dolok Ilir and Laras it showed that all hazardous waste (including pesticide package) had been managed properly in accordance with SOPs and laws and regulations, for example;

- Hazardous waste is grouped according to its type and character.
- Hazardous Waste Temporary Storage is equipped with emergency response procedures, PPE, first aid kit, fire extinguisher, hand washing place and second containment.
- The condition of the room is neatly arranged, protected from rain or heat and an alarm is available.
- The number of hazardous wastes is in accordance with the monitoring logbook owned by the company.

Based on field observations in employee emplacement, the auditor did not find any traces of pesticide packaging that were managed carelessly. all used pesticide packages are returned to their proper places.

Based on this evidence, the company already implemented storing and handling pesticide and it waste accordance with procedures.

7.2.9

Based on the results of interviews and field observations, it is known that the company does not apply pesticides through air spraying.

7.2.10

Laras Estate:

- Health Checkup on 1 4 December 2020 by PT Prima Medica Nusantara Laras Hospital for 65 workers (pesticides, maintenance, fertilization officers, chemical officers, pump machine operators, generator operators, pool drivers, pesticide mixers, chemical warehouse officers). Based on the results of the examination, it was known that there were 15 workers with abnormal results (7 Hypertension, 5 Mild Cholinesterase Decrease, 1 Stage II Hypertension, 1 Anemia, 1 VES).
- It has been re-examined on 12-14 July 2021 and the overall result is healthy
- Hyperkes: dr. Muhammad Hanafi Coal No. 5/354/AS.02.02/X/2020 October 2020, dr. Taty Sulystiani No. 5/356/US.02.02/X/2020 October 2020.

Dolok Ilir Estate:

 Health Checkup on 23 – 26 November 2020 by PT Prima Medica Nusantara Hospital Laras for 62 workers (chemical, maintenance, transport, warehouse officers). Based on the results of the examination, it was found that 12 workers had problems (decreased cholinesterase, mild to moderate toxicity, HHD, Bronchitis, GHF congestive heart failure ec HHD

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Hypertensive heart disease, decreased cholinesterase).

- It has been re-examined on January 11, 2021 and the overall results are healthy.
- Hyperkes: dr. Muhammad Hanafi Coal No. 5/354/AS.02.02/X/2020 October 2020, dr. Taty Sulystiani No. 5/356/US.02.02/X/2020 October 2020.
- Examination in 2021 by PT Sucofindo on August 31, 2021 according to the Minutes of Testing the Work Environment and Health Examination in 2021 (cholinesterase 32 maintenance personnel, chemist and audiometry 3 technical operators.
- Health examiner in 2021, Dr Muhammad Sofyan, who already has the SKP for the Doctor for the Health Examiner for Manpower No. 5/125/AS.02.02/III/2020 in March 2020 is valid for 3 years.

7.2.11

Policies for not employ pregnant and breastfeeding women in handling pesticides include written in Circular Letter of Dolok Ilir and Laras Business Unit Managers. For example, SE No DOI / SE / 50 / X / 2012 dated October 4, 2012 which states not to employ employees who are pregnant / breastfeeding because it is dangerous to the health and safety of their fetus.

Based on the results of interviews with Chemist workers in Afdeling I Block 11B, it is known that workers who are pregnant or breastfeeding are not allowed to work related to chemicals and will be transferred to other jobs.

Status: Comply

7.3

Waste is reduced, recycled, reused and disposed of in ways that are environmentally and socially responsible manner.

7.3.1

There are no changes related to the existing waste management procedures/mechanisms in the company's operational areas, the procedures are contained in:

- 1. Standard operating procedures for the management of hazardous and toxic waste, No. SPO 02, revision 3 issued Jan 2 2017, explained in the procedure section that:
 - There must be a temporary storage area in accordance with applicable regulations.
 - Identify sources of waste, including used oil, used batteries, used jerry cans for chemical packaging, cloth rags, used sacks of fertilizers and chemicals and used light bulbs.
 - Provide emergency response facilities at Hazardous Waste Temporary Storage.
- 2. SOP for domestic waste management document No. SPO-20 2nd revision, effective January 2, 2015, the procedure is explained related to waste management from offices and housing, provision of trash bins (garbage cans) in offices and housing, construction of landfills temporary waste, the construction of a final waste disposal site with a size of 1.5 x 2 x 9 meters with a minimum distance of 1 KM from housing.

All waste (including hazardous waste) and pollutions sources from mill and estate are identified and recorded on waste identification risk assessment 2021 such as effluent are managed at effluent treatment plant before it distributed to land application bed, hazardous waste was kept at hazardous waste storehouse, etc.

Based on field visit Hazardous Waste Temporary Warehouse in Dolok Ilir and Laras Estate it known the hazardous waste currently stored in storage such as: pesticides containers, drum of used oil, etc.

When surveillance-1.1 activities were carried out, the company showed evidence of improvement for minor nc on recertification, such as:

- Records of socialization of hazardous waste management and household domestic waste in January 2021 at the Dolok Ilir and Laras Units.
- Dolok Ilir Plantation Unit Manager's Decision Letter regarding Special Officers for Monitoring Domestic Waste Management for Dolok Ilir Plantation Units.

The auditors made field observations at Division 1, Division 2 of Dolok Ilir Estate and Division 1 Laras Estate emplacement; it is known that the company has provided a trash can for each door. The auditors also did not find piles of unmanaged waste in the employee's housing. The company also transports waste to the central housing estate of Laras Estate by truck to the



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landfill as part of its commitment to domestic waste management in the company's area.

Based on the objective evidence, the non-conformity is closed.

7.3.2

Based on the results of interviews with plantation and mill managers, all domestic and hazardous waste must be managed responsibly according to company procedures. However, Dolok Ilir POM has not been able to show if the liquid (solid) and solid waste (empty bunch) of palm oil has been handled properly, based on field observations, information is obtained if:

- There is liquid waste (liquid from the empty bunch) from the empty bunch area which flows into the rain ditch around the factory (office) environment.
- There is solid waste that fills the rain ditch around the workshop area.

Based on those objective evidences, the processing waste has not yet been fully managed in the Dolok Ilir POM. NCR No.2021.05

7.3.3

Based on the results of field observations in the emplacement area, there is no waste burning activity. All domestic waste is managed and placed in the bins provided at each employee's residence and transported periodically to the final waste disposal site (landfill).

7.3.2 Status: Nonconformity No. 2021.05 with Minor 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

The company already has procedures and work instructions related to good cultivation practices to manage soil fertility, several SOPs and IK which include:

- Basic guidelines and work instructions for fertilization management with the number: Business unit A.10 which came into
 effect on February 24, 2020. In the IK it explains about maintaining soil fertility by providing fertilizer into the soil as a
 substitute for nutrients that have been taken by plants both with organic fertilizers as well as single and compound
 inorganic fertilizers.
- 2. SPO on Leaf and Soil Sample Analysis with number: 05.4. This procedure explains that soil analysis is carried out every 3-5 years or once a year if needed, while leaf analysis is carried out once a year and on young plants if necessary, leaf samples can be taken twice a year with the consideration that changes in nutrients in young plant leaves are very important. change guickly.

Based on document studies and field visits, for example Harvest Activities in Afdeling III Block 97AJ Dolok Ilir Estate, it is known that to provide complete nutrients to the soil, the company has utilized empty fruit bunches, POME, solids from Mill waste and fertilization using compound and single inorganic fertilizers.

To obtain optimal results in maintaining soil fertility so that the nutrients needed by plants are properly available, the company has also carried out an analysis of the soil and of oil palm leaves in collaboration with the Palm Oil Research Center (PPKS) Medan.

7.4.2

The company already has an SOP document on Leaf and Soil Sample Analysis with the number: 05.4. This procedure explains that soil analysis is carried out every 3-5 years or once a year if needed while leaf analysis is carried out once a year and on young plants, if necessary, leaf samples can be taken twice a year with the consideration that changes in nutrients in young plant leaves are very fast. changed. The following is an example of the results of soil analysis and leaf analysis:

Soil Analysis

Dolok Ilir Estate



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Certificate of soil analysis result from PPKS No. 344/0.1/Sert/III/2018 dated February 13, 2018 with a total of 9 samples. The parameters examined include % Fraction (Sand, Dust, Clay); pH (H2O, KCl); C; N; C/N; P; K; Ca; Na; Mg; JKB; CEC; KB; Al-dd.

Laras Estate

Certificate of soil analysis result from PPKS No. 2054B/0.1/Sert/X/2020 dated October 22, 2020 with a total of 7 samples. The parameters examined include % Fraction (Sand, Dust, Clay); pH (H2O, KCl); C; N; C/N; P; K; Ca; Na; Mg; JKB; CEC; KB; Al-dd.

Leaf Analysis

Dolok Ilir Estate

Certificate of leaf analysis from PPKS No. 1267/0.1/Sert/IX/2021 on September 9, 2021 with a total of 153 samples. The parameters examined include N; P; K; Ca; Mg; B.

Laras Estate

Certificate of leaf analysis from PPKS No. 1369/0.1/Sert/IX/2021 on September 2021 with a total of 67 samples. The parameters examined include N; P; K; Ca; Mg; B.

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Based on the results of document studies and field visits, it is known that the company has implemented a nutrient recycling strategy, including through the use of solid, land applications, empty fruit bunch and the use of pruning palm fronds.

7.4.4

The company already has documentation related to the realization of fertilization, the fertilizers used include Dolomite; NPK12.12.17.2+1.0TE; NPK 14.8.21+1TE; MOP; Urea and Boron, for example:

- Dolok Ilir Estate as of August 2021 totaling 2,960,658.58 Kg and FFB production (January August 2021) totaling 70,247,357 Kg.
- Laras Estate as of August 2021 totaling 1,697,756.86 Kg and FFB production ((January August 2021) totaling 43,694,690 Kg.

Status: Comply

7.5

Practices minimise and control erosion and degradation of soils.

7.5.1

The company has shown maps that identify the distribution of soil types in the Dolok Ilir Estate and Laras Estate with a scale of 1:25,000, the slopes identified throughout the Estate units are sloping/flat with slopes of 2-8% dominating around 92% of the total area, the remaining about 8% has a choppy slope of 9-15%. From the map it is known that in the company's operational area there is no land with steep slopes.

Dolok Ilir Estate

Estate management has topography, slope and soil map with scale 1:25,000. The map was prepared by IOPRI in 1999. The map informed that in general slope condition in Dolok Ilir Estate were dominantly flat to undulating and there was no presence of hilly to steep area (>40%). Furthermore, soil type was fully mineral, consist of six type, e.g.: Typic Tropopsamment (brown alluvial), Typic Dystropept (yellowish brown podzolic), Typic Hapludult (yellowish red podzolic), Typic Tropaquent (alluvial) and Typic Dystropept (yellowish brown podzolic) which covers about 1,132 ha; 2,135 ha; 407 ha; 2,080 ha; 673 ha; and 138 ha, respectively. Thus, main limitation of soil properties in Dolok Ilir was mainly due to low fertility soil.

Laras Estate

Information on topography and soil type in Laras Estate is presented in soil survey report which conducted by IOPRI in 1999. Furthermore, it also informed in HCV report which conducted by PT Surveyor Indonesia in 2011. Based on document review, it could be concluded that slope condition in Laras Estate were mainly flat to undulating (0-8 %), followed by rolling. Furthermore, soil type was fully mineral, consist of Typic Hapludult, Fluventic Dystropept, Typic Dystropept and Typic Dystropept. Same as Dolok Ilir Estate, main limitation of soil properties in Dolok Ilir was mainly due to low fertility soil.

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7.5.2

Based on the results of field visits to replanting locations, for example Dolok Ilir Estate Afdeling IV Block 20C and Laras Estate Afdeling II Block 20H, it is known that in general the area is dominated by flat-sloping to flat-waves without any indication of steep areas.

7.5.3

Based on the results of the document review and field visits, it was found that the company did not carry out any new planting activities.

Status: Comply

7.6

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

7.6.1

The company has shown maps that identify the distribution of soil types in the Dolok Ilir Estate and Laras Estate with a scale of 1:25,000, the slopes identified throughout the Estate units are sloping/flat with slopes of 2-8% dominating around 92% of the total area, the remaining about 8% has a choppy slope of 9-15%. From the map it is known that in the company's operational area there is no land with steep slopes.

Dolok Ilir Estate

Estate management has topography, slope and soil map with scale 1:25,000. The map was prepared by IOPRI in 1999. The map informed that in general slope condition in Dolok Ilir Estate were dominantly flat to undulating and there was no presence of hilly to steep area (>40%). Furthermore, soil type was fully mineral, consist of six type, e.g.: Typic Tropopsamment (brown alluvial), Typic Dystropept (yellowish brown podzolic), Typic Hapludult (yellowish red podzolic), Typic Tropaquent (alluvial) and Typic Dystropept (yellowish brown podzolic) which covers about 1,132 ha; 2,135 ha; 407 ha; 2,080 ha; 673 ha; and 138 ha, respectively. Thus, main limitation of soil properties in Dolok Ilir was mainly due to low fertility soil.

Laras Estate

Information on topography and soil type in Laras Estate is presented in soil survey report which conducted by IOPRI in 1999. Furthermore, it also informed in HCV report which conducted by PT Surveyor Indonesia in 2011. Based on document review, it could be concluded that slope condition in Laras Estate were mainly flat to undulating (0-8 %), followed by rolling. Furthermore, soil type was fully mineral, consist of Typic Hapludult, Fluventic Dystropept, Typic Dystropept and Typic Dystropept. Same as Dolok Ilir Estate, main limitation of soil properties in Dolok Ilir was mainly due to low fertility soil.

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Based on the results of the document review and field visits, it was found that the company did not carry out any new planting activities.

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 – 7.7.7

Based on the results of the study of the Dolok Ilir Estate and Laras Estate soil type maps as well as the results of field visits, it is known that there is no peat soil type in the company's concession area.

Status: Comply

7 8

Practices maintain the quality and availability of surface and ground water

7.8.1

The Dolok Ilir and Laras Management Units have a water quality monitoring program contained in environmental documents (where monitoring is carried out every 6 months in the Upper Bah Bolon River, the Middle Bah Bolon River, and the Bah Bolon Hilir River), Land Application permits and Surface Water Utilization permits by KAN-accredited laboratory. There are as many as 26 parameters tested, namely:

- Physics (temperature, dissolved residue, suspended residue)



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- Inorganic chemistry (pH, BOD5, COD, DO, total phosphate, NO3, Nitrite, NH3N, Cobalt, dissolved cadmium, dissolved chromium, dissolved iron, dissolved zinc, chloride, fluoride, sulfate, sulfur H2S
- Organic chemistry (oils and fats, detergents, phenolic compounds)

The Dolok Ilir and Laras Management Units have records of monitoring water quality on August 9, 2021 by an accredited laboratory, which includes:

- The water quality of the Upper Bah Bolon River, the middle Bah Bolon River, and the Lower Bah Bolon River. which is still below the quality standard value (Dolok Ilir).
- The water quality of the Upper Waringin River, Waringin Hilir River, Upper Bah Apal River and Bah Apal Hilir rivers are still below the quality standard value (Laras).
- The quality of groundwater in the Control Area Monitoring Well which is still below the quality standard value.
- The quality of groundwater in the Monitoring Well in the Land Application area which is still below the quality standard value.

7.8.2

The plan for the protection of watersheds and wetlands in the form of river borders is described in SOP No. SPO 05 revision 03 effective August 27, 2018 regarding river border management mechanisms. The river border management plan includes:

- Identification of river type classification consisting of: runnel (< 1 m), small river (1-10 m), medium river (10-20 m), river (40-80 m), large river (80-220 m), and rivers (> 220 m).
- Determine minimum boundaries: 100 m large river border, 50 m small river/tributary border, 100 m area around lake/reservoir, 200 m radius area around springs.
- Re-allocation of river borders, swamps, springs into protected areas with the following procedures: conduct an inventory
 of the location, area and then mapped.
- Restore the boundaries according to their designation.
- On riverbanks where oil palm has been planted, the vegetation should be maintained by promoting vegetation growth in the riverbank areas by prohibiting chemical spraying.

The company has identified the wet stream as described in the 2011 Indonesian Sustainable Palm Oil High Conservation Value Identification Report Document, Laras Estate. Based on the results of the identification of the HCV area, information is obtained which are water flow areas and wetlands including:

Division	Name
III	Karang Anyar Springs
	Bah Longgur Springs
	Sweembad Nagasoppa Springs
Ш	Tumorang / Mentaling Springs
IV	Lingga Springs
Ш	Tumorang Riparian
	Longgur Riparian
IV	Waringin Riparian
II & III	Bah Hapal Riparian

Based on field observation, there's indication river/springs borders area not maintained well, such as:

- Based on the results of field observations at the Laras Estate Division II Block 97AK, it is known that there is an HCV 4
 area, namely the Bah Hapal River border being processed on for replanting (but not yet planted with oil palm trees) and
 there are no boundary markings.
- Based on the results of field observations at the Laras Estate Division II Block 96H, it is known that there is an HCV 4
 area (riparian) which has been planted by oil palm trees with a planting year of 2020 (< 50 m) and there are no boundary
 markings.
- Based on field observations at the Laras Estate Division III Block 16F, it is known that there is an HCV 4 area, namely
 the Tumorang Springs area which has been planted with oil palm trees (< 200 m) and there are no boundary markings.

Based on those objectives, the company has not been able to show evidence that the management of the river border has been managed according to its plan. **NCR No.2021.06**



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Meanwhile, based on a field visit at the Division III Dolok Ilir estate, found riparian or water flows guarded by the company, for example there is a buffer limit for spraying activities.

Field observation on Dolok Ilir POM shown that effluent pond is maintained well. All palm oil mill effluent is managed on waste water treatment plant before its distributed to estates as land application. Regarding this Dolok Ilir POM already have land application permit based on decree No. 503/03/17.4/2021 by Head of One-stop integrated investment and licensing Agency of Simalungun Regency valid until 2026. Mill effluent has been monitored every month and monitoring period Jan-Mar 2021 indicates that all of effluent testing parameters is compliant to the standards quality, for example BOD on Februari 2021 was 503 mg/l. Mill Effluent management also was reported and submitted quarterly to environmental agency of Simalungun Regency regularly.

7.8.4

Water usages monitoring for Dolok Ilir POM are conducted daily and listed on monitoring of water usage for FFB process recorded on 2020/2021 budget projected 1,20-1,50 m³/MT FFB process. Evidence for water usage monitoring periodically is available and recorded, for example on January 2021 FFB processed was 12,150.60 mt, process water usage 14,580.72 m³, and water usage efficiency was 1.2 m³/mt FFB process.

Status: Nonconformity No. 2021.06 with Major Category 7.8.2

7.9

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

The company has a Standard Operating Procedure for Utilizing Oil Palm Oil Mill Waste (SPO No. 17, Rev 2 dated January 02, 2015) in which the description is well related to;

- The purpose of using POM waste is to reduce the use of fossil fuels so that it can reduce greenhouse gas emissions. The waste in question is the Utilization of Empty Bunch, Shells, Solids, Fiber and Liquid wastes left over from the production of palm oil processing.
- All solid waste in the form of shells and fibers are used for boiler fuel.

Realization of renewable energy have been monitored every day and documented on monthly report for fiber and shell usage. For example, on July 2021, the company has summary of fiber efficiency as amount as 0.13 MT/FFB and shell efficiency as amount as 0.06 MT/FFB.

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

Dolok Ilir POM has calculated GHG emissions for the period January-December 2020. The GHG calculation is still being carried out with calculations from 9 supply bases, namely Dolok Ilir Estate, Laras Estate, Marjandi Estate, Bah Birong Estate, Tanah Itam Estate, Marihat Estate, Gunung Bayu Estate, Mayang estate and Balimbingan Estate. Dolok Ilir POM has conducted GHG emission calculations period 2020 use of Calculator Palm GHG version 4.0. Accurate data has been input to the RSPO Palm GHG Calculator (Palm GHG version 4.0) and has been verified. Summary of net GHG emissions from Palm GHG calculator of the audit report which calculation option is applied "Apply full Version".

Summary Emissions:

Emission per product	tCO2e/tProduct
CPO	0.82
PK	0.82
Extraction	%
OFR	23.54

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KER	4.26
Land use	На
Planted area on mineral soil	34851.67
Planted on peat	0.00
Total oil palm planted area	34851.67
Conservation Area (Forested)	0.00
Conservation Area (Non Forested)	854.20
FFB Production per hectarage	4.59 t/ha

Estate/Plantation field emission and Sinks

Description	Owi	n	Gro	ир	3rd Pa	ırty	Total
Emissions Sources	tCO2e	tCO2e/ tFFB	tCO2e	tCO2e/ tFFB	tCO2e	tCO2e/ tFFB	
Land conversion	95289.71	0.64	240314.87	22.34	0.00	0.00	335604.58
CO2 emissions from fertilizer	1442.07	0.01	8958.01	0.83	0.00	0.00	10400.08
N2O emissions from peat	0.00	0.00	0.00	0.00	0.00	0.00	0.00
N2O from Fertilizer	702.20	0.00	3714.71	0.35	0.00	0.00	4416.90
Fuel consumption	943.40	0.01	358.92	0.03	0.00	0.00	1302.32
Peat oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sinks	•						
Crop sequestration	-90321.97	-0.60	- 215129.17	-20.00	0.00	0.00	-305451.14
Sequestration in Conservation area	0.00	-0.00	0.00	0.00	0.00	0.00	0.00
Total	8055.42	0.05	38217.34	3.55	0.00	0.00	46272.75

Mill Emissions and Credits

Emission Source	tCO2e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumption	0.00
Total Crusher Emissions	0.00

Palm Oil Mill Effluent (POME) Treatment

Divert to compost			0 %
Divert	to	anaerobic	100 %
digestio	n		

POME Diverted to Anaerobic Digestion:

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

7.10.2

The unit of certification did not carry out any new developments after 2014.

7.10.3

The Certification unit has identified sources of pollution and emissions generated from all operational activities of the plantation



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and factory. They are also has plans to reduce or minimize these emissions. This is contained in the Mitigation document and efforts to reduce GHG emissions, such as:

- Providing appropriate training to spraying team
- Planting beneficial plants (cassia cobanensis, tunera spp and antigonon spp) in empty areas.
- EFB application
- Perform routine services on vehicles and generators
- Plant trees around generator houses and riparian belt areas.
- Perform leaf analysis to determine the type and dosage of fertilizer
- Land monitoring that has the potential to be fire-prone

The Certification unit has also conducted an assessment of activities that cause pollution or emissions, for example:

- Liquid Waste quality testing
- Air quality testing
- Testing of emissions of boilers and generators
- Noise testing
- Odor testing
- Vibration testing

Mitigation measurements and plan to reduce waste, pollution, and emission including GHG from Mill and estate are identified and recorded on waste/pollution identification document and GHG identification document. Fossil fuel reducing have been implemented by fiber and shell usage. Realization of renewable energy have been monitored on monthly report for fiber and shell usage. Waste water has been monitored every months and monitoring periods Jan-June 2021 sighted that all of waste water testing parameters is compliant to the standards quality. Based on the results of the review of environmental monitoring records above and also the GHG calculations, the company has been quite effective in reducing emissions and pollution.

Status: Comply

7.11

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

7.11.1 & 7.11.2

Based on the results of the review of the 2021 Land Fire Prevention and Management Report document and field observations at both the Dolok Ilir and Laras Estate, there were no land burning activities in the plantations. In addition, the company has a fire prevention and control policy which is contained in Circular No. 04.07/SE/56/VI/2020 dated June 24, 2020 which contains fire prevention and control activities determined by the company including the formation of firefighting teams, installation of fire extinguishers and hydrants, building fire monitoring towers, providing firefighting facilities and infrastructure, and perform fire prevention behavior.

Auditors conduct field observations in replanting areas, for example in Afdeling III Block 97AM, 97AN & 97AL (Dolok Ilir) and Afdeling II Block 96H/20H (Laras). From the results of field observations, the company does not carry out replanting activities by means of open burning. All activities are carried out mechanically.

7.11.3

Based on the results of the review of the 2021 Land Fire Prevention and Management Report document, there is no land burning activity in the company operational area. Based on the report, the company has an organizational structure for emergencies such as fires in the Dolok Ilir and Pulu Raja Business Units consisting of Plantation/Factory Managers, Estate Assistants, Administrative Train Assistants, Processing Assistants, etc.

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

Based on documents review and interviews with village heads, it is known that the company had been there from the time of

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the Dutch governance and there are no land clearing activities in new areas from 2005 to the present. So the HCS not applicable.

7.12.2

There are no changes related to the HCV area owned by the company until the surveillance-1.1 audit is carried out, here are more detailed explanations:

Estate Dolok Ilir has conducted an HCV identification assessment in collaboration with PT Surveyor Indonesia and the Indonesian Sustainable Palm Oil Foundation. Based on the results of HCV identification, there are 16 protected species with a total area identified as an HCV area of 51.45 Ha with the identified HCV types being HCV 1, 4 and 6. As for Estate Laras, the HCV identification assessment was carried out in 2011 in collaboration with PT Surveyor Indonesia. Based on the results of HCV identification, there are 11 protected animal species with a total identified HCV area of 200.52 hectares with the identified HCV types being HCV 1, 4, 5 and 6.

Based on document review and public consultation, there are no land clearing activities in new areas from 2005 to the present. So the HCS not applicable.

7.12.3

The HFCL concept is not yet applicable in Indonesia.

7.12.4

The company has identified the conservation area (HCV) which is described in the 2011 Indonesian Sustainable Palm Oil High Conservation Value Identification Document Report, Laras Estate. Based on the identification of the HCV area, information on the location of HCV 4 in Laras Estate was obtained, including:

Division	Name
III	Karang Anyar Springs
II	Bah Longgur Springs
II	Sweembad Nagasoppa Springs
III	Tumorang / Mentaling Springs
IV	Lingga Springs
III	Tumorang Riparian
II	Longgur Riparian
IV	Waringin Riparian
II & III	Bah Hapal Riparian

The certification unit has HCV management year of 2020, such as:

- Red painting on the oil palm plant.
- Prohibition of pesticide usage along riparian zone monitoring.
- Growth percentage recording of rehabilitation plants.
- HCV socialized to all communities and stakeholders.
- Riparian zone signboard condition monitoring.

The programs and plans are made based on the results of public consultations with various parties, for example village representatives, as well as relevant government agencies

As a follow-up effort to identify the HCV area in 2011 Laras Estate, the company has developed a management plan and monitor the HCV area for Semester 2021, while the management and monitoring plan includes:

- 1. Management Plan
 - Rehabilitation and Enrichment in river and spring border areas.
 - Boundary marking maintenance
 - Create an HCV Plank
 - Planting "Mindi trees" around the pennant to keep the water clean.
- 2. Monitoring Plan

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- · Monitoring the intensity of disturbances.
- Monitoring the success rate of river border rehabilitation.
- Monitoring of springs used by the public.

The company also has procedures related to HCV management in the SOP for Management and Monitoring of High Conservation Value Areas (No. SPO 08 Rev. 04, January 2, 2018). The document informs the determination of the buffer zone width for all protected areas, such as:

TYPES OF PROTECTED AREAS	MANAGEMENT AREA
Protected Forest Area	Maximum 500 meters from forest area
Coastal Border Area	100 meters from the highest tide point towards the land
Great River Riparian	100 meters from the left and right of the river
Small River Riparian	50 meters from the left and right of the river
Area Around the lake/reservoir	50 – 100 meters from the highest tide point towards the land
Area Around the spring	At least with a radius of 200 meters around the spring
Mangrove Coastal Area	Minimum 130 times the average value of the difference
	between the highest and lowest annual tides measured from
	the lowest low tide line towards the land

Based on field observation, there's indication conservation area not maintained well, such as:

- Based on the results of field observations at the Laras Estate Division II Block 97AK, it is known that there is an HCV 4
 area, namely the Bah Hapal River border being processed on for replanting (but not yet planted with oil palm trees) and
 there are no boundary markings.
- Based on the results of field observations at the Laras Estate Division II Block 96H, it is known that there is an HCV 4
 area (riparian) which has been planted by oil palm trees with a planting year of 2020 (< 50 m) and there are no boundary
 markings.
- Based on field observations at the Laras Estate Division III Block 16F, it is known that there is an HCV 4 area, namely
 the Tumorang Springs area which has been planted with oil palm trees (< 200 m) and there are no boundary markings.

Based on those objectives' evidences, the implementation of the HCV area management and monitoring plan has not been carried out according to the plan. **NCR No.2021.07**

Meanwhile, based on a field visit at the Block 16F HCV IV area Dolok Ilir estate, the condition of the conservation area is protected and there is no indication of damage by any party.

7.12.5

Based on the results of public consultations with the surrounding community, there were no negative issues or complaints related to the management of HCVs in the company's operational areas. One of the HCVs is used and utilized by the community as a public bath, namely at Sweembad Naga Soppa Afdeling II Estate Laras. In addition, there are on reduction of these rights to use the water for communities.

7.12.6

The company has procedures/policies related to the protection of flora and fauna that have been previously identified in the company's operational areas in the SOP for identification and protection of flora and fauna (No. SPO 09 Revision 02 dated August 01, 2017) which states that it is not allowed to capture, maintain or kill animals, whether protected or unprotected, are not allowed to trade wild animals, the company conducts supervision in the form of regular monitoring. If there are still employees and non-employees who catch, maintain or kill animals, they will be reported to the authorized agency

From the results of interviews with workers in Dolok Ilir and Laras and also based on public consultation with representatives of the surrounding community, it is known that the workers have understood and learned about the existence of rare plants and animals in the company through socialization by direct leaders and warning posters.

7.12.7

From the results of the latest flora and fauna monitoring on July 6, 2021, both in the Dolok Ilir and Laras units, there was no



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change in species composition, there were still some animals such as squirrels (Tupaia javanica), Musang (Prionodon linsang), and Kalong (Pteropus vampires), coconut, jengkol, mango, to rambutan. The types of flora found are not protected species but there is protected species of fauna such as Musang (Prionodon linsang).

The company conducts an evaluation related to the monitoring in the Evaluation Document for Management and Monitoring of High Conservation Values for Semester I 2021, which is prepared by the HCV PIC and approved by the unit manager. One of the directions from the evaluation is to ensure that the installation of signs/warnings at HCV locations is easily monitored by the community.

7.12.8

There was no new developments November 15th 2018 in the operational area. All plantings after 2005 are replanting activities.

7.12.4 7.12.4 7.12.4



RSPO ASSESSMENT REPORT

3.2 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or √
ASA-1.1	The company didn't use trademark on the product.	$\sqrt{}$
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use	X or √
ASA-1.1	The company didn't use trademark on the product.	$\sqrt{}$
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or √
ASA-1.1	The company didn't use trademark on the product.	$\sqrt{}$
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or √
ASA-1.1	The company didn't use trademark on the product.	V
	Status: Comply	



RSPO ASSESSMENT REPORT

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:

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

	n-Certified Units or Holdings				
Section	Requirement	Concerns to Discuss, if any			
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Yes and positive assurance is produced for these units.			
		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.			
0.1.0		Positive assurance is produced for these units.			
2.1.2	No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance with RSPO criterion 7.3 (it has changed be Criterion 7.12 in P&C 2018)	PTPN IV has submitted liability disclosure to RSPO.			
		Based on PTPN IV disclosure of liability there is one (1) estate that has liability which is PT Sinergi Perkebunan Nusantara.			
		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 also			
		sent LUCA on 2018. There is one (1) unit that has			
		non-compliant land clearance.			

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2.1.3	Any new plantings since January 1st 2010 must comply with the RSPO New Plantings Procedure.	Auditor verification Auditor has verified the supporting evidence of above the company statement. The above statement in accordance with the supporting evidence provided. 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).
		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.
2.1.4	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO criteria 2.2, 6.4, 7.5 and 7.6 (it has changed be Criterion 4.8, 4.7 and 4.5 in P&C 2018).	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.
		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.
		There is evidence of documented land dispute resolution for the uncertified units.
2.1.5	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3 (it has changed be Criterion 4.2 in P&C 2018).	Auditor verification There is no information from public source and RSPO website on any labor conflict for uncertified unit of the group subsidiaries.
		The company has a mechanism for dealing with complaints and dissatisfaction in the SOP of Internal Communication and Employee Grievance Handling (internal) (No. 19 Rev 3 on 6 November 2018), SOP Handling Customer Complaints and Environment (external) (No. 13

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		Rev. 1 on 2 January 2015) and there are SOP of Communication and Public Consultation (No. SPO 03, Rev. 02, on 2 January 2015). 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.
2.1.6	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).	Yes, there is legal non-compliance is being processed i.e. HGU, consist of: Marjandi Estate: 30 Ha Dolok Sinumbah Estate: 35.94 Ha Air Batu Estate: 459.02 Ha Berangir Estate: 10 Ha Sawit Langkat Estate: 301.50 Ha Sei Kopas Estate: 763 Ha Panai Jaya Estate Auditor verification The company has a complete list of regulations in 2020 that includes local regulations, national regulation and international regulation. 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

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RSPO ASSESSMENT REPORT

- 3.4 Identification of Findings, Corrective Action, Observations, Opportunity for Improvement and Noteworthy Positive Components.
- 3.4.1. Identification of Findings, Corrective Actions and Observations at Re-Certification Assessment

NCR No.	:	2020.01	Issued by :	Briyogi Shadiwa	
Date Issued	:	18 December 2020	Time Limit :	Surveillance-1.1	
NC Grade	:	Minor	Date of Closing :	23 September 2021	
Standard Ref. & Requirement	:	6.2.6 Non-Critical A decent living wage (DLW) is given to all workers in accordance with applicable regulations, including workers who work on a piece / quota basis whose wages are calculated based on a quota that can be reached during regular working hours.			

Evidence observed (filled by auditor):

.

Non-Conformance Description (filled by auditor):

The company has not been able to show the calculation of a Living Wage according to the RSPO Guidelines, in relation to the calculation of wages paid and in-kind benefits.

Root Cause Analysis (filled by organization audited):

- The need for monitoring documents related to the application of the RSPO principles and criteria has not been carried out
- There is no PIC appointed to monitor the need for documents related to the application of the RSPO principles and criteria

Correction (filled by organization audited):

Shows the simulation results of the calculation of a living wage that has been set by the company

Corrective Action (filled by organization audited):

- Monitoring the need for documents related to the application of the RSPO principles and criteria
- · Appoint a PIC to monitor the need for documents related to the application of the RSPO principles and criteria

Assessor Evaluation and Conclusion (filled by auditor):

Verification on 22 September 2021

The company shows evidence of improvement in the form of:

- 1. Payment of minimum wages in accordance with applicable regulations
 - A decent living wage (DLW) is given to all workers in accordance with applicable regulations, namely based on the Decree of the Governor of North Sumatra number 188.44/528/KPTS/2020 dated October 30, 2020, which stipulates the 2021 North Sumatra UMP at Rp. 2,499,423.06/ month. The company has implemented it with a wage component consisting of basic wages and fixed (special) allowances of 80% plus rice supply plus special allowances.
- 2. The Company presented the Decree of the Board of Directors (No. 04.08/Kpts/32/IV/2020) on April 27, 2020 regarding the Adjustment of the Basic Salary and Special Benefits for Goal Employees. IA-IVD Year 2020 which takes effect from January 1, 2020, include:
 - Basic Salary for Group I.A is Rp. 1,999,538, Group I.B is Rp. 2,000,035, Group II.A is Rp. 2,261,308, etc.
 - Class I.A special allowances of Rp. 323,885, Group I.B of Rp. 324,069, Group II.A of Rp. 388,987, Group II.B of Rp. 449,757, etc.

For 2021, because there is no increase in the minimum wage from the government, the structure and scale of wages will still use 2020.

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Proported by Mutuagung Loctori for Polick Ilir POM PT Porkobunan Nycantara IIV cubcidiany of PT Porkobunan Nycantara III



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3. Assessment of wages paid (prevailing wages) and in-kind benefits.

The company shows the 2021 Salary Scale document for employees of Group IA to s.d. II D PTPN IV, which explains in detail about the basic salary, the value of the workers' own rice supply is Rp. 11,000,-/ Kg, allowances (specifically, house rent, electricity 25% from house rent, water 15% from house rent, electricity + water 40%, transportation 35% from basic salary), benefits (school plantation facilities, extrafooding, clothes work). For example, the lowest employee class is broken down as follows:

- Group : IA/0
- Basic Salary: Rp. 1,999,538,- (80% of minimum wage province 2021)
- The value of the workers' own rice supply is Rp. 11,000,-/ Kg: Rp. 176,000,- (16 kg)
- Special allowance: Rp. 323,885,-
- Rent a house: Rp. 499,885,-
- Electricity 25% of house rent: 124,971,-
- Water 15% of house rent: Rp. 74,983,-
- Electricity + water 40%: Rp. 199,954,-
- Transport 35% of basic salary: Rp. 699,836,-
- Benefits of unit school facilities: Rp. 247,128,-
- Extrafooding benefits: Rp. 129,450,-
- Work clothes benefits: Rp. 75,650,-

Total: Rp. 4,351,328,-.

Based on the explanation above, it is known that the company has provided a Decent Living Wage (DLW) to all workers in accordance with applicable regulations.

Verified by :	Afiffuddin

NCR No.	:	2020.02	Issued by :	Rahmat Abdiansyah
Date Issued	:	18 December 2020	Time Limit :	Surveillance-1.1
NC Grade	:	Minor	Date of Closing :	23 September 2021
Standard Ref. & Requirement	:	7.3.1 Non-Critical A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characterictics, is documented and implemented in accordance with applicable laws and regulations.		

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

- SOP for Household Domestic Waste Management with SPO Number. 20 dated 02 January 2018 it was explained
 that one of the waste management that is carried out is periodically picking up waste from the garbage collection
 point and bringing it to the Landfills using the tools provided.
- Field observations to the Afdeling 3 Estate Dolok Ilir housing area found that there was a pile of domestic waste behind the employee housing.
- Field observations to the Afdeling 4 Estate Laras housing area found that there was a pile of domestic waste behind the employee housing.
- Based on the results of interviews with residential residents, it is known that residents of housing make holes as
 trash cans behind the housing because there is no schedule for the company to transport domestic waste to the
 Landfills.

Non-Conformance Description (filled by auditor):

Domestic waste management has not been carried out in accordance with established procedures.

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Proported by Mutuaging Loctori for Dolok Ilir DOM DT Dorkobupan Nycantara IV cubcidiary of DT Dorkobupan Nycantara IV



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Root Cause Analysis (filled by organization audited):

Domestic waste management socialization given to workers and their family members did not cover all the important points contained in the Domestic Waste Management SOP.

Correction (filled by organization audited):

Conducting socialization related to domestic waste management and cleaning domestic waste in the residential area of Division III Dolok Ilir and Division IV, Laras Estate, which is then disposed of to the landfill in each Division.

Corrective Action (filled by organization audited):

- Disseminate domestic waste management which includes all important points contained in the Domestic Waste Management SOP to workers and their family members.
- Monitoring the implementation of domestic waste management at each employee housing location.
- Establish a PIC who is responsible for monitoring domestic waste management in each residential area.

Assessor Evaluation and Conclusion (filled by auditor):

Verification September 23, 2021

When surveillance-1.1 activities were carried out, the company showed evidence of improvement, such as:

- Records of socialization of hazardous waste management and household domestic waste in January 2021 at the Dolok Ilir and Laras Units.
- Dolok Ilir Plantation Unit Manager's Decision Letter regarding Special Officers for Monitoring Domestic Waste Management for Dolok Ilir Plantation Units.

The auditors made field observations at Division 1, Division 2 of Dolok Ilir Estate and Division 1 Laras Estate emplacement, it is known that the company has provided a trash can for each door. The auditors also did not find piles of unmanaged waste in the employee's housing. The company also transports waste to the central housing estate of Laras Estate by truck to the landfill as part of its commitment to domestic waste management in the company's area.

Based on the objective evidence, the non-conformity is closed.

Briyogi Shadiwa Verified by



RSPO ASSESSMENT REPORT

3.4.2. Identification of Findings, Corrective Actions and Observations at ASA-1.1 Assessment

NCR No.	:	2021.01	Issued by :	Rizliani Aprianita Hasibuan	
Date Issued	:	24 September 2021	Time Limit :	23 December 2021	
NC Grade	:	Major	Date of Closing :	29 November 2021	
Standard Ref. & Requirement	:	3.6.1 All operational activities risks assesed to identify the H&S issues. Mitigation plans and procedures are documented and implemented			

Evidence observed (filled by auditor):

- Based on the results of interviews and field visits at the Laras Estate, Dolok Ilir Estate and Dolok Ilir Mill, it is known that there are activities such as HGU Mark Monitoring Activities, HCV Area Monitoring Activities, Pesticide Mixing Activities, and WTP Water Intake Activities.
- The results of field visits and interviews at the Spray Afdeling I Block 11B Estate Laras activity, it was found that the spraying activity was around the causeway that was passed by people. Meanwhile, during the activity, there were no warning signs that spraying was being carried out, this is in line with the study of the spraying work instruction document and the review of the risk management document for the spraying activity that has not identified the potential danger to other people entering the area being sprayed.
- The results of field visits and interviews of workers in the water intake area of the WTP, it is known that the area has been flooded, but based on the results of the study of risk management documents in the WTP area, there has not been any information regarding the potential hazards of OHS due to flooding. In addition, it is known that these activities have not been listed in the Estate and Factory risk management documents.

Non-Conformance Description (filled by auditor):

The company has not been able to show evidence that all operating activities have been assessed for risk to identify OHS problems, and mitigation plans and procedures are documented

Root Cause Analysis (filled by organization audited):

There has been no socialization of HIRAC to PICs due to the negligence of the PIC who is responsible for risk management documents for Monitoring HGU Pole, HCV Areas, While pesticide mixing has been included in risk management in Chemical work.

Correction (filled by organization audited):

- Making HIRAC outreach
- Creating a Risk Management PIC
- Create risk management for monitoring HGU stakes, HCV areas, pesticide activities and water intake activities of WTP
- A review has been carried out regarding the Risk Management document and it is available in each Unit
- PIC Risk Management also covers all Work Units

Corrective Action (filled by organization audited):

HIRADC monitoring for all work in the Unit every year

Assessor Evaluation and Conclusion (filled by auditor):

Verification November 4, 2021:

The company can show evidence of improvements including the following:

- Record of Risk Management socialization on October 9, 2021 to the relevant PIC
- Decree of the Manager of the Laras Plantation Unit No. MU/Kpts/.../X/2021 dated 4 October 2021 regarding the appointment of a PIC who is responsible for reviewing the Laras Estate risk identification

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document

Based on the results of verification of the adequacy of the Root Problem Analysis, Corrective Actions and Preventive Actions that have been made by the Auditee, the non-conformance is declared Unfulfilled.

Verification November 29, 2021

The company can show evidence of improvements including the following:

- Risk management document for Pesticide Mixing, Monitoring of Protected Areas or HCV activities, which had previously been socialized on 9 October 2021 to the relevant PIC.
- Decree on the Appointment of Special Officers for Risk Management for the Dolok Ilir PKS and Dolok Ilir **Plantations**

Based on the verification of the adequacy of the Root Problem Analysis, Corrective Actions and Preventive Actions that have been made by the Auditee, the non-conformance is declared Fulfilled.

Verified by	: : :	Rizliani Aprianita Hasibuan
	-	Miznani Abinanita Hasibaan

NCR No.	:	2021.02	Issued by :	Rizliani Aprianita Hasibuan		
Date Issued	:	24 September 2021	Time Limit :	23 December 2021		
NC Grade	:	Major	Date of Closing :	29 November 2021		
Standard Ref. & Requirement	:	3.6.2 The effectiveness of the H&S plan to address health and safety risks to people is monitored				

Evidence observed (filled by auditor):

- Based on the results of field visits to the CPO despatch location, it was found that the CPO despatch floor was in a porous condition.
- Based on the results of a field visit at Dolok Ilir Mill, it was found that people who were not workers entered the WWTP pool area. Meanwhile, based on the results of the interview, it is known that other unauthorized persons are prohibited from entering the WWTP pool area.
- Based on the results of field visits and interviews in St. In the engine room, the contractor's oxygen cylinder was found without a safety chain.
- Based on the results of the field visit at the workshop of Dolok Ilir Mill, it was found that the access to the workshop was covered in mud and flooding. In addition, the conditions in the workshop area were found to be placed not paying attention to the OHS aspect.
- Based on observations of refueling activities at St. The boiler is known that there is 1 worker not wearing heat-resistant gloves. The PPE has been provided by the company and is available at the location.
- Results of interviews with 2 workers at St. Kernel, it is known that 1 worker does not use PPE in the form of glasses and ear plugs. The PPE has been provided by the company and is available at the location.
- The results of field observations revealed that employees have been equipped with face shields but face shields are not used because they interfere with vision while working.

Non-Conformance Description (filled by auditor):

The Company has not been able to demonstrate that the effectiveness of the OHS plan to deal with OHS risks in people has been monitored.

Root Cause Analysis (filled by organization audited):

- Monitoring of the HIRAC implementation has not been carried out to minimize OHS risks in the work
- There is no PIC that monitors the implementation of the effectiveness of HIRAC to minimize OHS risks

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in the work area

Correction (filled by organization audited):

- Make a proposal letter for improvement related to the CPO despatch floor
- Make signs regarding limited access in the WWTP pool area and provide socialization to all workers
- Make a warning letter to a third party related to the work tools placed at the Mill location that are not in accordance with the SOPs in PTPN IV
- Make a plan for cleaning activities at the workshop location in connection with the location being covered in mud and flooding as well as tidying and labeling items at the workshop location
- Provide socialization to workers to always use PPE when doing work
- Hirac documents related to damaged CPO despatch floors, unauthorized parties entering the WWTP, Contractor's Oxygen Cylinders placed without safety chains, workshops covered in mud and flooding, and Hirac not wearing PPE at the work site

Corrective Action (filled by organization audited):

- Propose repair costs at all Mill stations in the budgeting every year
- Monitoring all workers and guests regarding limited access locations
- Provide an introduction to OHS for third parties who will carry out work at the PKS location
- Make a waste flow improvement plan at the workshop location
- Give a warning letter to workers if you don't use the PPE that has been given at work
- PIC that monitors the implementation of the effectiveness of HIRAC to minimize OHS risks in the work area
- Monitoring the use of PPE Workers at work and setting a PIC related to making the monitoring

Assessor Evaluation and Conclusion (filled by auditor):

Verification November 4, 2021:

The company can show evidence of improvements, including the following:

- MEMO No. PKS DOI/M/04/X/2021 dated October 1, 2021 regarding the request for repair of the CPO delivery floor and the Request for the Releasing of Used Goods Ms Plate for the repair of the CPO despatch floor
- MEMO No. PKS DOI/X/06/X/2021 dated October 2, 2021 to Contractor CV Ridho Jaya Persada regarding the placement of Oxygen and Elpiji Tubes
- Installation of "Restricted Access" warnings in the WWTP pool area
- Factory Cleaning Banchat for October 2021
- Record of socialization of the use of PPE and OHS Policy in the Laras Estate
- Decision of the Manager of the Laras Plantation Unit No. MU/Kpts/.../X/2021 dated October 4, 2021 regarding the appointment of a PIC who is responsible for supervising the use of PPE

Based on the results of verification of the adequacy of the Root Problem Analysis, Corrective Actions and Preventive Actions that have been made by the Auditee, the non-conformance is declared **Unfulfilled**.

Verification November 29, 2021

The company has shown the Root Problem Analysis, Corrective Actions and additional evidence of improvement including the following:

- Record of monitoring the use of PPE in October 2021 which informs the type of PPE used by each worker along with information on their condition.
- Documentation of the placement of the contractor's oxygen cylinder equipped with a chain.
- Documentation of the preparation and labeling of goods in the workshop
- SK Dolok Ilir Mill Unit Manager No. PKS DOI/SK/02/X/2021 dated October 14, 2021 regarding the appointment of a Special Officer for PPE Monitoring Every Time Dolok Ilir Mill Unit Work.

Based on the assessment of the adequacy of the root cause analysis, preventive actions and evidence of improvement that have been shown by the company, the non-conformance is declared to have been **fulfilled**.





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Verified by	: Rizliani Aprianita Hasibuan	

NCR No.	:	2021.03	Issued by :	Afiffuddin	
Date Issued	:	24 September 2021	Time Limit :	23 December 2021	
NC Grade	:	Major	Date of Closing :	22 November 2021	
Standard Ref. & Requirement	•	6.2.2 Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.			

Evidence observed (filled by auditor):

Based on the results of field observations on maintenance activities at Dolok Ilir Afdeling 3 Block 16 Bl, it was found that three people were carrying out plant maintenance activities. From the results of the interview, it was known that there was 1 worker who was not an employee of the company and stated that he was replacing his mother who did not come to work because of illness. In addition, the person concerned also uses PPE and uniforms like other employees.

Non-Conformance Description (filled by auditor):

Based on the explanation above, it can be concluded that there are still people who carry out the company's operational activities without having a work agreement.

Root Cause Analysis (filled by organization audited):

- 1. Workers without asking permission from the local leadership make job changes to other people
- 2. When doing work activities in the morning, the employee suddenly gets sick. It was suggested by the supervisor to seek treatment or leave but the employee refused. So that when the field supervisor is not there because the supervisor is called, without asking the local supervisor/leader for permission, the employee orders his child to come to replace his parents' work.
- 3. The supervisor communicates with the workers to be able to attend to do the work, but the workers have not arrived until the audit activity takes place

Correction (filled by organization audited):

- 1. Make a guilty plea regarding employees who give permission to other parties to work within the Company
- 2. The local leadership gives a letter of warning to the employee concerned
- 3. Make a circular regarding the prohibition of absorbing jobs
- 4. Making facts of integrity to all employees regarding the prohibition of giving work to others

Corrective Action (filled by organization audited):

- 1. Giving sanctions according to company regulations to workers if it is found that workers give their work to other people
- 2. Supervise/ check all workers in the field by supervisors in the field according to their respective duties.
- 3. To ensure that there will be no more job replacement treatment to other people who are not related by the Company, the Field Supervisor and Foreman I

Assessor Evaluation and Conclusion (filled by auditor):



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Verification on October 22, 2021

The company shows evidence of improvement as follows:

- 1. Letter of Error Statement, dated 22 September 2021, which among other things explains that the worker (initials NRI) admits his guilt for hiring a member of his family to replace him on 22 September 2021.
- Warning letter number: AfdIII/ST/01/IX/2021 from Afdeling Plantation Assistant III Dolok Ilir to workers (initials NRI), dated September 23, 2021, for employing family members without permission from the local leadership.
- Letter from the Dolok Ilir Plantation Unit Manager number: DOI/SE/26/XI/2021, dated September 23, 2021, regarding the Prohibition of transferring responsibility for Work, which among other things states that:
 - All employees are prohibited from replacing / transferring / transferring responsibility their work to other people for any reason.
 - If an employee is found who replaces / transfers his work to someone else without the knowledge of the company, all risks that arise are the responsibility of the employee concerned.
 - All Assistants, Foreman I and Foreman Afdeling / Section to supervise the implementation of work in the field as well as possible while still guided by the SOP.
- 4. Letter from the Unit Manager number DOI/SE/29/X/2021, dated October 1, 2021, regarding the Signing of the Employee Statement, which among other things explains the signing of the statement as a form of worker commitment regarding the Letter from the Dolok Ilir Plantation Unit Manager number: DOI/SE/26/XI/2021, dated September 23, 2021, regarding the Prohibition of transferring responsibility for Work.
- 5. Proof of signing the statement by 288 workers.

Based on the results of verification of the adequacy of the Root Problem Analysis, Corrective Actions and Preventive Actions that have been made by the Auditee, the non-conformance is declared **Unfulfilled**.

Verification on November 22, 2021

Based on the results of the root cause analysis submitted, evidence of improvements shown and preventive actions taken, this non conformity is declared to be complied by observation in the next assessment.

Verified by	:	Afiffuddin

NCR No.	:	2021.04	Issued by :	Rizliani Aprianita Hasibuan
Date Issued	:	24 September 2021	Time Limit :	23 December 2021
NC Grade	:	Major	Date of Closing :	29 November 2021
Standard Ref. & Requirement	:	provided free of charge thazardous operations, soland preparation, and	o all workers in the work such as pesticides appli harvesting. Sanitation f so that workers can char	equipment (PPE) which is place, to cover all potentially cation, machine operations, acilities for those applying age out of PPE, wash and put

Evidence observed (filled by auditor):

Dolok Ilir Mill:

- Results of interviews with 2 workers at St. Sterilizer, it is known that 1 worker bought his own PPE in the form of boots. The PPE provided by the company is in the form of safety shoes but is currently in a damaged condition.
- Results of interviews with 1 St. Clarification, it is known that the worker bought his own PPE in the form

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Proported by Mutuaging Loctori for Dolok Ilir DOM DT Porkobupan Nycantara IV cubcidiary of DT Porkobupan Nycantara IV



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of boots. The PPE provided by the company is in the form of yellow safety shoes but is currently in a damaged condition.

Dolok Ilir and Laras Estate:

- The results of an interview with 1 TPH scratching worker in Afdeling III Blok 17C Estate Dolok Ilir, it was found that the workers bought their own PPE in the form of short rubber boots. The PPE provided by the company is in the form of boots, but currently it is wet and damaged.
- The results of an interview with 1 harvest worker in Afdeling I Blok 97X Estate Laras, it was found that the
 workers bought their own PPE in the form of boots. The shoe PPE provided by the company is currently
 wet and damaged.
- The company shows evidence of improvement on the results of field observations, including the following:
- Evidence of submission of PPE in the form of safety shoes to 1 worker at St. Clarification on September 23, 2021
- Proof of providing PPE in the form of heat-resistant gloves to 1 St. Boiler dated September 23, 2021

In addition, the results of interviews and document review, it is known that the company conducts inspections every month, one of which is monitoring the completeness of PPE. However, it has not been informed regarding the condition / feasibility of PPE.

Non-Conformance Description (filled by auditor):

The Company has not been able to ensure that PPE is available to all workers.

Root Cause Analysis (filled by organization audited):

Lack of understanding of workers regarding damaged PPE mechanisms

Correction (filled by organization audited):

Provide understanding to workers related to PPE

Corrective Action (filled by organization audited):

- Replace workers' PPE if something is damaged
- Make a Decree for PIC to monitor the PPE of each worker

Assessor Evaluation and Conclusion (filled by auditor):

The company has shown evidence of improvements including the following:

- Decree Dolok Ilir Mill Manager No. PKS DOI/SK/02/X/2021 dated October 14, 2021 regarding the appointment of a Special Officer for Monitoring PPE for Every Worker of the PKS Dolok Ilir Unit.
- Decree of the Dolok Ilir Plantation Manager No. DOI/SK/03/X/2021; No. DOI/SK/04/X/2021; No. DOI/SK/05/X/2021; No. DOI/SK/06/X/2021; No. DOI/SK/07/X/2021; No. DOI/SK/09/X/2021; No. DOI/SK/10/X/2021; October 14, 2021 regarding the appointment of a Special Officer for Monitoring PPE for Every Worker of the Dolok Ilir PKS Unit.
- Decree Manager of the Laras Plantation Unit No. MU/Kpts/.../X/2021 dated October 4, 2021 regarding the appointment of a PIC who is responsible for monitoring the condition of PPE for employees at the Laras Plantation Unit
- Monitoring document on the use and condition of PPE in Dolok Ilir and Laras plantations that informs the availability of PPE and its condition
- Proof of handover of PPE boots to harvesters

Based on the results of verification of the adequacy of the Root Problem Analysis, Corrective Actions and Preventive Actions that have been made by the Auditee, the non-conformance is declared **Unfulfilled**.

Verification November 29, 2021

Based on the results of the root cause analysis submitted, the preventive measures taken and additional evidence of improvement in the form of recordings of socialization of the use and mechanism for replacing

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Proposed by Mutuaging Lectori for Polak Ilir POM RT Porkobupan Nycontara IV cubaidiary of RT Porkobupan Nycontara IV



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PPE to workers, this discrepancy is declared to be fulfilled by observations in the next assessment.		
Verified by	:	Rizliani Aprianita Hasibuan

NCR No. :	2021.05	Issued by :	Briyogi Shadiwa
Date Issued :	24 September 2021	Time Limit :	Surveillance-1.2
NC Grade :	Minor	Date of Closing :	
Standard Ref. :	7.3.2 There is evidence of waste disposal according to procedures that are fully understood by workers and managers.		

Evidence observed (filled by auditor):

The Dolok Ilir POM has not been able to show if the liquid (solid) and solid waste (empty bunch) of palm oil has been handled properly, based on field observations, information is obtained if:

- There is liquid waste (liquid from the empty bunch) from the empty bunch area which flows into the rain ditch around the factory (office) environment.
- There is solid waste that fills the rain ditch around the workshop area.

Non-Conformance Description (filled by auditor):

Based on those objective evidences, the processing waste has not yet been fully managed in the Dolok Ilir POM.

Root Cause Analysis (filled by organization audited):

Lack of transport fleet, such as Wheel loaders (Secopel) and trucks transporting solid waste and tanks

Correction (filled by organization audited):

Make an application letter to the PTPN IV Medan Head Office for additional transportation fleets

Corrective Action (filled by organization audited):

Coordinate with Estate Unit for waste management in the POM.

Assessor Evaluation and Conclusion (filled by auditor):

Verification November 29, 2021

The company shows evidence of improvement in the form of a Wheel Loader Request Letter (No.: PKS DOI/04.05/59/IX/2021) which was issued on September 14, 2021. However, no response has been shown regarding the request letter. The auditee also has not shown the current actual conditions related to waste management in the POM area which has been managed properly.

The non-conformities still open.

Verified by :	Briyogi Shadiwa
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NCR No. :	2021.06	Issued by :	Briyogi Shadiwa
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RSPO ASSESSMENT REPORT

Date Issued	:	24 September 2021	Time Limit :	23 December 2021
NC Grade	:	Major	Date of Closing :	23 December 2021
Standard Ref. & Requirement	:	restoration of riparian zon accordance with the 'RS rehabilitation of riparian	,	

Evidence observed (filled by auditor):

The plan for the protection of watersheds and wetlands in the form of river borders is described in SOP No. SPO 05 revision 03 effective August 27, 2018 regarding river border management mechanisms. The river border management plan includes:

- Identification of river type classification consisting of: runnel (< 1 m), small river (1-10 m), medium river (10-20 m), river (40-80 m), large river (80-220 m) and rivers (> 220 m).
- Determine minimum boundaries: 100 m large river border, 50 m small river/tributary border, 100 m area around lake/reservoir, 200 m radius area around springs.
- Re-allocation of river borders, swamps, springs into protected areas with the following procedures: conduct an inventory of the location, area and then mapped.
- Restore the boundaries according to their designation.
- On riverbanks where oil palm has been planted, the vegetation should be maintained by promoting vegetation growth in the riverbank areas by prohibiting chemical spraying.

The company has identified the wet stream as described in the 2011 Indonesian Sustainable Palm Oil High Conservation Value Identification Report Document, Laras Estate. Based on the results of the identification of the HCV area, information is obtained which are water flow areas and wetlands including:

Division	Name
III	Karang Anyar Springs
II	Bah Longgur Springs
II	Sweembad Nagasoppa Springs
Ш	Tumorang / Mentaling Springs
IV	Lingga Springs
III	Tumorang Riparian
II	Longgur Riparian
IV	Waringin Riparian
II & III	Bah Hapal Riparian

Based on field observation, there's indication river/springs borders area not maintained well, such as:

- Based on the results of field observations at the Laras Estate Division II Block 97AK, it is known that there is an HCV 4 area, namely the Bah Hapal River border being processed on for replanting (but not yet planted with oil palm trees) and there are no boundary markings.
- Based on the results of field observations at the Laras Estate Division II Block 96H, it is known that there
 is an HCV 4 area (riparian) which has been planted by oil palm trees with a planting year of 2020 (< 50
 m) and there are no boundary markings.
- Based on field observations at the Laras Estate Division III Block 16F, it is known that there is an HCV 4
 area, namely the Tumorang Springs area which has been planted with oil palm trees (< 200 m) and there
 are no boundary markings.

Non-Conformance Description (filled by auditor):

Based on those objectives, the company has not been able to show evidence that the management of the river border has been managed according to its plan.

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Root Cause Analysis (filled by organization audited):

- The management has not determined the PIC who is responsible for identifying the HCV area and monitoring the management of the HCV area in accordance with the program plan that has been made/compiled.
- Lack of understanding of officers in identifying HCV areas which are water flow areas and wetlands according to the existing HCV map.
- The management of the plantation unit has not carried out socialization related to the procedures for Supervision and Management of HCV/HCV Areas to workers in Division. Those who provide socialization related to the Supervision and Management of HCV/HCV Areas to workers in Division are the Work Units/Estate, on the basis of SE or Memo from the Planning & Sustainability Section and the Plant Section of the Head Office (memo attached)

Correction (filled by organization audited):

- Made a commitment not to plant oil palm plantations in the Bahapal river border area at the Laras Estate
 Division II Block 97 AK Plantation which is in the process of replanting
- Create a program for planting protected plants and managing the Bahapal river border at Laras Estate
 Division II Block 97 AK
- Create a river border program in the Laras Estate Division II Block 96H and Division III Block 16F
- Attach evidence of budget for manual maintenance work in the river border area at Laras Estate Division II Block 96H and Division III Block 16F. (<50m)

Corrective Action (filled by organization audited):

- Establish a PIC who is responsible for identifying HCV areas and monitoring the management of HCV
 areas in accordance with the program plan that has been made/compiled.
- Provide socialization to the PIC on the procedure for identifying HCV areas in accordance with the identification documents owned by the plantation
- Provide socialization on the procedures for managing the HCV area to workers in Division, especially
 activities that have the potential to pollute/damage the HCV area such as chemical and fertilizing workers
- Evaluating training participants to socialize HCV area management procedures to workers in division, especially activities that have the potential to pollute/damage HCV areas, such as chemical and fertilizing workers.
- The planning and sustainability department conducts an internal audit of the plantation management system as a form of periodic monitoring to see the realization of the implementation of the HCV area management program that has been carried out by the plantation management and reports The results of the internal audit are reported to the company's Board of Directors.

Assessor Evaluation and Conclusion (filled by auditor):

Verification Nov 29th, 2021

The company shows evidence of improvement in the form of:

- Commitment to the Mutual Agreement on September 24, 2021 which was agreed by all employees of the management of Laras Estate. The document describes a commitment not to plant oil palm in areas with potential HCV in riverbank areas.
- Environmental management program to plant hard trees along the Hapal River Division II Block 97AK and River on Laras Estate Division II Block 96H and Division III Block 16F.

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Proported by Mutuaging Loctori for Dolok Ilir DOM DT Porkobupan Nycaptara IV cubcidiary of DT Porkobupan Nycaptara IV



RSPO ASSESSMENT REPORT

 Documentation of HCV rehabilitation activities in Block 97 AK of the Laras Estate Unit by planting perennials (mahogany).

Based on the evidence submitted, the non-conformance with this indicator has not been fulfilled, the company needs to show proof of improvement in the form of:

- Inventory of HCV areas that have been exposed due to replanting, including hectares and principal amount affected by replanting activities and the basis for determining the types of plants to be rehabilitated.
- The company needs to re-ensure compliance with regard to the loss of riverbank HCV areas due to replanting activities as described in the RaCP procedure Approved by Consensus of Compensation Task Force on November 12th, 2015. https://rspo.org/certification/remediation-and-compensation.

Verification on Dec 20th, 2021

The company shows evidence of improvement in the form of:

- Inventory data on HCV area in the Laras Estate unit.
- Recording of Environment Agency of Simalungun Regency visit on December 6, 2021 related to river border rehabilitation activities/conservation areas.

The current non-conformance has not been met. Please make sure the company re-analyzes the root of the problem and corrective action.

Verification on Dec 23th, 2021

The company shows evidence of improvement in the form of:

- Memo No.: 04.04/KOL/eM-651/XII/2021 concerning Monitoring and Management of HCV Areas for River Border Water Flows, Springs and Wetlands made on 20 December 2021. The memo informs technical directions for managing HCV areas and river/wetland boundaries to all units of the company PT Perkebunan Nusantara IV.
- Record of socialization of Monitoring & Management of HCV Areas on 17 December 2021 to estate management employees and PPD.

In addition, the company has established a root cause analysis and future corrective actions.

Based on the objective evidence, the non-conformance has been met and will be monitored further regarding the consistency of rehabilitation and management of river/wetland border areas in the next assessment.

Verified by	: E	Briyogi Shadiwa
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NCR No. :	2021.07	Issued by :	Briyogi Shadiwa
Date Issued :	24 September 2021	Time Limit :	23 December 2021
NC Grade :	Major	Date of Closing :	23 December 2021
Standard Ref. & :	areas that have been	identified, protected	eatlands and other conservation and/or enhanced. Integrated ICV and HCS forests, peatlands



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and other conservation areas are developed, implemented, and adapted where necessary, and supplemented with monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and covers the areas directly managed and takes into account the relevant broader landscape level (if such landscapes have been identified).

Evidence observed (filled by auditor):

The company has identified the conservation area (HCV) which is described in the 2011 Indonesian Sustainable Palm Oil High Conservation Value Identification Document Report, Laras Estate. Based on the identification of the HCV area, information on the location of HCV 4 in Kebun Laras was obtained, including:

Division	Name
Ш	Karang Anyar Springs
	Bah Longgur Springs
II	Sweembad Nagasoppa Springs
III	Tumorang / Mentaling Springs
IV	Lingga Springs
III	Tumorang Riparian
	Longgur Riparian
IV	Waringin Riparian
II & III	Bah Hapal Riparian

As a follow-up effort to identify the HCV area in 2011 Laras Estate, the company has developed a management plan and monitor the HCV area for Semester 2021, while the management and monitoring plan includes:

- 1. Management Plan
 - Rehabilitation and Enrichment in river and spring border areas.
 - Boundary marking maintenance
 - Create an HCV Plank
 - Planting "Mindi trees" around the pennant to keep the water clean.
- 2. Monitoring Plan
 - · Monitoring the intensity of disturbances.
 - Monitoring the success rate of river border rehabilitation.
 - Monitoring of springs used by the public.

The company also has procedures related to HCV management in the SOP for Management and Monitoring of High Conservation Value Areas (No. SPO 08 Rev. 04, January 2, 2018). The document informs the determination of the buffer zone width for all protected areas, such as:

TYPES OF PROTECTED AREAS	MANAGEMENT AREA
Protected Forest Area	Maximum 500 meters from forest area
Coastal Border Area	100 meters from the highest tide point towards
	the land
Great River Riparian	100 meters from the left and right of the river
Small River Riparian	50 meters from the left and right of the river
Area Around the lake/reservoir	50 - 100 meters from the highest tide point
	towards the land
Area Around the spring	At least with a radius of 200 meters around the
	spring
Mangrove Coastal Area	Minimum 130 times the average value of the
	difference between the highest and lowest
	annual tides measured from the lowest low tide
	line towards the land

Based on field observation, there's indication conservation area not maintained well, such as:

Based on the results of field observations at the Laras Estate Division II Block 97AK, it is known that there
is an HCV 4 area, namely the Bah Hapal River border being processed on for replanting (but not yet planted



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with oil palm trees) and there are no boundary markings.

- Based on the results of field observations at the Laras Estate Division II Block 96H, it is known that there
 is an HCV 4 area (riparian) which has been planted by oil palm trees with a planting year of 2020 (< 50 m)
 and there are no boundary markings.
- Based on field observations at the Laras Estate Division III Block 16F, it is known that there is an HCV 4
 area, namely the Tumorang Springs area which has been planted with oil palm trees (< 200 m) and there
 are no boundary markings.

Non-Conformance Description (filled by auditor):

Based on those objectives' evidences, the implementation of the HCV area management and monitoring plan has not been carried out according to the plan.

Root Cause Analysis (filled by organization audited):

- The management has not determined the PIC who is responsible for identifying the HCV area and monitoring the management of the HCV area in accordance with the program plan that has been made/compiled.
- Lack of understanding of officers in identifying HCV areas which are water flow areas and wetlands according to the existing HCV map.
- The management of the plantation unit has not carried out socialization related to the procedures for Supervision and Management of HCV/HCV Areas to workers in Division. Those who provide socialization related to the Supervision and Management of HCV/HCV Areas to workers in Division are the Work Units/Estate, on the basis of SE or Memo from the Planning & Sustainability Section and the Plant Section of the Head Office (memo attached)

Correction (filled by organization audited):

- Made a commitment not to plant oil palm plantations in the Bahapal river border area at the Laras Estate
 Division II Block 97 AK Plantation which is in the process of replanting
- Create a program for planting protected plants and managing the Bahapal river border at Laras Estate Division II Block 97 AK
- Create a river border program in the Laras Estate Division II Block 96H and Division III Block 16F
- Attach evidence of budget for manual maintenance work in the river border area at Laras Estate Division II Block 96H and Division III Block 16F. (<50m)

Corrective Action (filled by organization audited):

- Establish a PIC who is responsible for identifying HCV areas and monitoring the management of HCV
 areas in accordance with the program plan that has been made/compiled.
- Provide socialization to the PIC on the procedure for identifying HCV areas in accordance with the identification documents owned by the plantation
- Provide socialization on the procedures for managing the HCV area to workers in Division, especially
 activities that have the potential to pollute/damage the HCV area such as chemical and fertilizing workers
- Evaluating training participants to socialize HCV area management procedures to workers in division, especially activities that have the potential to pollute/damage HCV areas, such as chemical and fertilizing workers.
- The planning and sustainability department conducts an internal audit of the plantation management system as a form of periodic monitoring to see the realization of the implementation of the HCV area management program that has been carried out by the plantation management and reports The results of the internal audit are reported to the company's Board of Directors.

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Proported by Mutuaging Loctori for Polok Ilir POM PT Porkobupan Nucantara IV subsidiary of PT Porkobupan Nucantara III



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Assessor Evaluation and Conclusion (filled by auditor):

Verification Nov 29th, 2021

The company shows evidence of improvement in the form of:

- Commitment to the Mutual Agreement on September 24, 2021 which was agreed by all employees of the management of Laras Estate. The document describes a commitment not to plant oil palm in areas with potential HCV in riverbank areas.
- Environmental management program to plant hard trees along the Hapal River Division II Block 97AK and River on Laras Estate Division II Block 96H and Division III Block 16F.
- Documentation of HCV rehabilitation activities in Block 97 AK of the Laras Estate Unit by planting perennials (mahogany).

Based on the evidence submitted, the non-conformance with this indicator has not been fulfilled, the company needs to show proof of improvement in the form of:

- Inventory of HCV areas that have been exposed due to replanting, including hectares and principal amount affected by replanting activities and the basis for determining the types of plants to be rehabilitated.
- The company needs to re-ensure compliance with regard to the loss of riverbank HCV areas due to replanting activities as described in the RaCP procedure Approved by Consensus of Compensation Task Force on November 12th, 2015. https://rspo.org/certification/remediation-and-compensation.

Verification on Dec 20th, 2021

The company shows evidence of improvement in the form of:

- Inventory data on HCV area in the Laras Estate unit.
- Recording of Environment Agency of Simalungun Regency visit on December 6, 2021 related to river border rehabilitation activities/conservation areas.

The current non-conformance has not been met. Please make sure the company re-analyzes the root of the problem and corrective action.

Verification on Dec 23th, 2021

The company shows evidence of improvement in the form of:

- Memo No.: 04.04/KOL/eM-651/XII/2021 concerning Monitoring and Management of HCV Areas for River Border Water Flows, Springs and Wetlands made on 20 December 2021. The memo informs technical directions for managing HCV areas and river/wetland boundaries to all units of the company PT Perkebunan Nusantara IV.
- Record of socialization of Monitoring & Management of HCV Areas on 17 December 2021 to estate management employees and PPD.

In addition, the company has established a root cause analysis and future corrective actions.

Based on the objective evidence, the non-conformance has been met and will be monitored further regarding the consistency of rehabilitation and management of river/wetland border areas in the next assessment.

Broyogi Shadiwa Verified by



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3.4.3. Opportunity for Improvement

No	Ref. Std.	Description
1	2.1.3	The company has the opportunity to ensure the repair/replacement of the missing/damaged BPN boundary pole
2	2.2.2	Companies have the opportunity to ensure that documentation of proof of compliance with relevant
		legal obligations is available at their respective certification units.
3	2.3.2	the company has the opportunity to ensure information such as geolocation, land ownership, and
	2.3.2	others for FFB from collectors/agents
4	3.6.2	The company has the opportunity to follow up with PJK3 to ensure the follow-up to the issuance
	3.0.2	of the Decree on the Appointment of Electricity OHS Expert.
5	6.1.5	The company has the opportunity to further increase socialization regarding the existence of the
		Gender Committee for female workers and male workers in the field.
6	6.2.2	The company has the opportunity to ensure that all documents related to overtime are in
		accordance with the provisions of the CLA for the 2020-2021 period regarding overtime work.
7	0.74	The company has the opportunity to ensure the follow-up to the extension of the Decree on the
	6.7.1	Appointment of OHS Expert P2K3 secretary to PJK3 and related agencies.

3.4.4. Noteworthy Positive Components

No	Ref. Std.	Description
1		Have used the digitization system for operational activities in the field



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3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
 Environment Agency of Simalungun Regency There's no issue related to pollution. Dolok Ilir and Laras unit routinely reporting environment monitoring report (every 6 months). There's no issue related to land fire. Laras dan Dolok Ilir already had fire prevention system management. 	No negative issues need to further verification.
Head of Rabuhit Village The company routinely had socialization related to environment management. There's no issue related to land fire. Many communities from village become worker in Laras unit. No issue related to pollution. No land conflict issues.	No negative issues need to further verification.
Head of Serbalawan Village Dolok Ilir had good relation with agency. No Land conflict issues. There are many positive aspects for communities, such as FFB receipt and job vacancy. No complaint from communities related to environment aspect.	No negative issues need to further verification.
National Land Agency Company has reported Land Use Title Utilization report. Company already land use title. There's no land expansion on PTPN IV – Dolok Ilir POM Any problem related to legal occupation has involve BPN for mediation process. Occupation case with Petani Jaya Smallholder Group has resulting the land is belonging to PTPN IV Dolok Ilir Unit. The claimant has propose an appeal case to the Province Court. National Land Agency has not received further information regarding the progress	Auditor has been verified legal aspect which is explained in Criteria 4.4 – 4.8
Worker Cooperation Based on the results of interviews with the management of employee cooperatives, it is known that the company supports the development of employee cooperatives. In this case the company has a contribution in the form of cooperative buildings. as for cooperative businesses in the form of providing basic necessities for employees.	No negative issues need to further verification.





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Public Issues	Auditor Verification
(Institution/ NGO/Community) Community leader of Bandar Selamat Village & Nagari	
Dolok Tenera	
 Many local communities work on company. There's no negative impact from company operational. There's no land fire issues on surrounding company operational area. Company has realized many assistance. Company has socialized related to company procedure, policies etc. No Land conflict issues. 	No negative issues need to further verification.
FFB Supplier (CV Riana Lim)	
 The agreement has been agreed by both parties. There were no complaints regarding payments and payments in accordance with the work agreement and the amount of FFB sent. FFB from contractors is FFB that comes from local farmers and agents. 	There's no negative issue needs to further verification
Plantation Office of Simalungun Regency	
 The company has been obedient in sending mandatory reports on a regular basis The standard of fire control facilities and infrastructure is considered adequate and there is no history of fire incidents in the last 2 years No complaints have been submitted to the relevant agencies regarding conflicts with the community There is no information on the use of limited pesticides, especially those with the active ingredient paraquat dichloride Communication between companies and agencies runs smoothly. 	There are no negative issues that need further verification
FFB Transport Contractor (CV Angkasa)	
 Contractors working with companies since 2021 The scope of the Cooperation is the transportation of FFB for Afdeling III, Afdeling IV and Afdeling V The contractor provides transportation of 10 – 11 units of trucks following the actual conditions in the field, each unit consists of 1 driver and 2 officers loading and unloading FFB Truck drivers are permanent employees with monthly wages and have been registered by BPJS, but all FFB loading and unloading workers are casual daily employees Communication between the contractor and the company has been well established and runs smoothly and there are no complaints regarding late payments 	There are no negative issues that need further verification

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	Public Issues							
	(Institution/ NGO/Community)			Auditor \	/erificat	ion		
Dol	ok Ilir Estate Gender Committee							
	ok Ilir POM Gender Committee							
•	There were no incidents of sexual harassment or domestic	There are	no	negative	issues	that	need	further
	violence	verification		Ū				
•	The gender committee conducts outreach to women							
	workers and people at home through the morning briefing,							
	posyandu activities and other housing activities							
•	Menstrual leave is available with a mechanism to report to							
	the foreman and will be examined at the clinic							
•	Maternity leave is given 1.5 month before and 1.5 month							
	after giving birth							
•	As far as the representatives of the gender committee							
	know, there are no workers who are pregnant, have just							
	given birth and are breastfeeding because as far as they							
	know they are currently menopausal.							
•	The socialization of policies on the handling of sexual							
	harassment in companies was carried out, with discussions							
	on handling policies, sexual harassment, women's							
	committee structure and reporting lines for sexual harassment.							
	There is no difference between male workers and female							
•	workers. Every worker has equal rights in terms of							
	employment opportunities and also anonymity protection.							
•	If there is a mother who is breastfeeding, then report to the							
	foreman if it takes time to leave work.							
•	Due to the Covid-19 pandemic, the meeting is held once a							
	month							
•	The spraying workers are all male.							
•	For female workers whose husbands have died or have							
	divorced or whose husbands have retired, the status of the							
	female worker is to become the head of the family by							
	bearing the batih (person in the household who is							
	someone's dependent) by receiving income and other							
	income in accordance with the employee's income which							
	requires marital status. This has also been stated in the							
	PKB for the period 2020-2021 article 44 concerning female							
	employees as heads of families.							
•	Wage structures and scales have been implemented. There is a representation of men in the organizational							
•	structure of the gender committee.							
	Structure of the genuer committee.							
рт	Jaya Wira Manggala (contractor)							
' ' '								
•	The wages of PT JWM workers are in accordance with the	There are	no	negative	issues	that	need	further
	UMP	verification	-	U				-
•	PT JWM employees have been included in BPJS Health							
	and Employment							
•	There is a work contract between PT JWM workers and PT							
	JWM							

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Public Issues (Institution/ NGO/Community)	Auditor Verification
 The company provides a house and its facilities for PT JWM workers. No complaints 	



4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT	OF INTERNAL RESPONSIBILITY			
4.1	Formal Sign-off of Assessment Findings				
	Hereunder sign by management representative from insp and agree for all content explained in this assessment rep				
	Signed on b	pehalf of:			
	PT Perkebunan Nusantara IV Head of Planning and Sustainability	Mutuagung Lestari Lead Auditor			
	AR.				
	Pirgok Panggabean Thursday, 23 December 2021	Rizliani Apranita Hsb Thursday, 23 December 2021			



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

No	Institution/ NGO/	Address Phone/ Email Form of Date of			Address Phone/ Er		nono/ Email I		Respo	onse
	Community		1 Hone/ Email	Communication	Contact	Yes	No			
1	Environment Agency of Simalungun Regency	Simalungun Regency	-	Via Telephone	21 September 2021	V	-			
2	FFB Supplier (CV Rianalim)	Simalungun Regency	-	Via Telephone	21 September 2021	V	-			
3	Head of Rabuhit Village	Simalungun Regency	-	Via Telephone	21 September 2021	V	-			
4	Head of Serbalawan Village	Simalungun Regency	-	Via Telephone	21 September 2021	V	-			
5	National Land Agency	Simalungun Regency	-	Via Telephone	21 September 2021	$\sqrt{}$	-			
6	Worker Cooperation	Simalungun Regency	-	Via Telephone	18 June 2021	V	-			
7	Community leader of Bandar Selamat Village & Nagari Dolok Tenera	Simalungun Regency	-	Interview (direct and via Phone)	18 June 2021	V	-			
8	Greenpeace	-	info.id@greenp eace.or.id	Email	14 September 2021	-	V			
9	Sawit watch	Bogor, Indonesia	info@sawitwat ch.or.id	Email	14 September 2021		√			
10	WWF	Jakarta, Indonesia	wwf- indonesia@w wf.or.id	Email	14 September 2021		1			
11	WALHI	Jakarta, Indonesia	informasi@wal hi.or.id	Email	14 September 2021		1			
12	AMAN	Jakarta, Indonesia	rumahaman@ cbn.net.id	Email	14 September 2021		1			



No	Institution/ NGO/	Address	Phone/ Email	one/ Fmail Form of		Respo	nse
NO	Community	Address	Pilone/ Eillan	Communication	Contact	Yes	No
13	Plantation Office of Simalungun Regency	Simalungun Regency	-	Via Telephone	21 September 2021	V	-
14	FFB Transport Contractor (CV. Angkasa)	Simalungun Regency	-	Via Telephone	21 September 2021	V	-
15	Gender Committee	Dolok Ilir POM & Dolok Ilir Estate	-	Direct Interview	21 September 2021	V	-
16	PT Jaya Wira Manggala (Contractor Security Service)	Medan City, Sumatera Utara Province	-	Via Telephone	21 September 2021	V	-



RSPO ASSESSMENT REPORT

Appendix 2. Assessment Program

DATE	DATE 20 – 24 September 2021					
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR				
Monday, 20 September 2021						
07.50 – 10.20	JAKARTA → MEDAN	All Auditor				
10.30 – 14.30	MEDAN → PTPN IV Dolok Ilir Unit Site					
14.30 – 15.00	Medical Screening in PTPN IV Dolok Ilir Unit Site					
14.00 – 15.00	 Opening meeting Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) 	All Auditor				
15.00 – 17.00	 Confirmation of Time Bound Plan Review of Partial Certification Verification of Basic Information Mill and Estate Document review and completing audit checklist. 					
Tuesday, 21 Septe	mber 2021					
08.00 – 12.00	 Public consultation with stakeholder Dolok Ilir Mill, Dolok Ilir Estate and Laras Estate public consultation with stakeholder to relevant agency in Simalungun Regency (by Phone) Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier Stakeholder consultation to affected communities surrounding the plantations and previous land owner 	All Auditor				
12.00 – 14.00	Break	All Auditor				
14.00 – 17.00	 Field observation to Dolok Ilir Mill: Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Despatch CPO) Occupational Health & Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond) Implementasi Prosedur dan mekanisme Aspek Ketenagakerjaan / Implementation of Employment Procedure and Mechanism Aspect 	All Auditor				
Wednesday, 22 Se						
08.00 – 12.00	Field Observation to Dolok Ilir Estate Aspect to be verified: Implementation of Legal Aspect (Land Ownership, Legal Boundaries); Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)	All Auditor				



DATE	20 – 24 September 2021	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	 Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) / Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect Observation of Workers Facilities (Housing, School, Worship Place). 	
12.00 – 14.00	Break	
14.00 – 17.00	 Interview with related personnel during field observation (teleconference), document review and completing audit checklist. Document review and completing audit checklist. 	All Auditor
Thursday, 23 Augu	ist 2021	
08.00 – 12.00	Field Observation to Laras Estate Aspect to be verified: Implementation of Legal Aspect (Land Ownership, Legal Boundaries); Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect Observation of Workers Facilities (Housing, School, Worship Place).	All Auditor
12.00 – 14.00	Break	
14.00 – 17.00 Friday, 24 Septemb	 Interview with related personnel during field observation (teleconference), document review and completing audit checklist. Document review and completing audit checklist. 	All Auditor
08.00 – 10.00 10.00 – 11.30	Internal discussion by auditor team preparing for Closing Meeting Closing Meeting: Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timeline of CAR's, Conclusion)/ Comments, Responses and Questions	All Auditor
13.00 – 17.00	PTPN IV Dolok Ilir Unit Site → Medan	All Auditor
17.00 – 19.00	PCR Test in Medan as flight requirement for Flight to Jakarta.	All Auditor