

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

[✓] Surveillance

Name of Management Organisation : Tanah Gambus Palm Oil Mill – PT Socfin Indonesia subsidiary of Socfin SA
 Plantation Name : PT Socfin Indonesia : Tanah Gambus Estate
 Location : Tanah Gambus Village, Sub District of Lima Puluh, District of Batubara, Province of Sumatera Utara, Indonesia
 Certificate Code : **MUTU-RSPO/164**
 Date of Initial Registration : 04 November 2011
 Date of Certificate Issue : 25 November 2021 Date of License Issue : 04 December 2022
 Date of Certificate Expiry : 03 November 2026 Date of License Expiry : 03 November 2023

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-2.1	22 to 26 August 2022	Briyogi Shadiwa, Rindu Galih Rezza Rachmansyah, and Fauzi Prima Sanusi	Ardiansyah	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-2.1	23 September 2022

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Figure 1. Location Map of PT Socfin Indonesia – Tanah Gembus

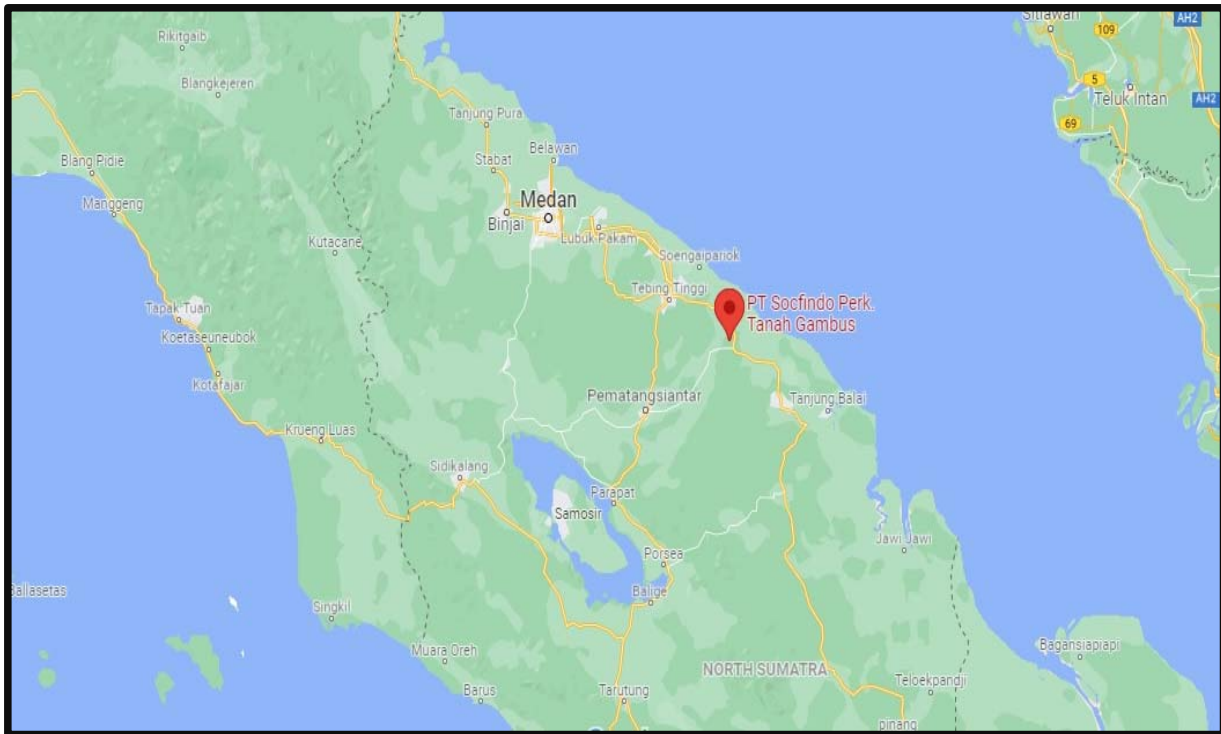
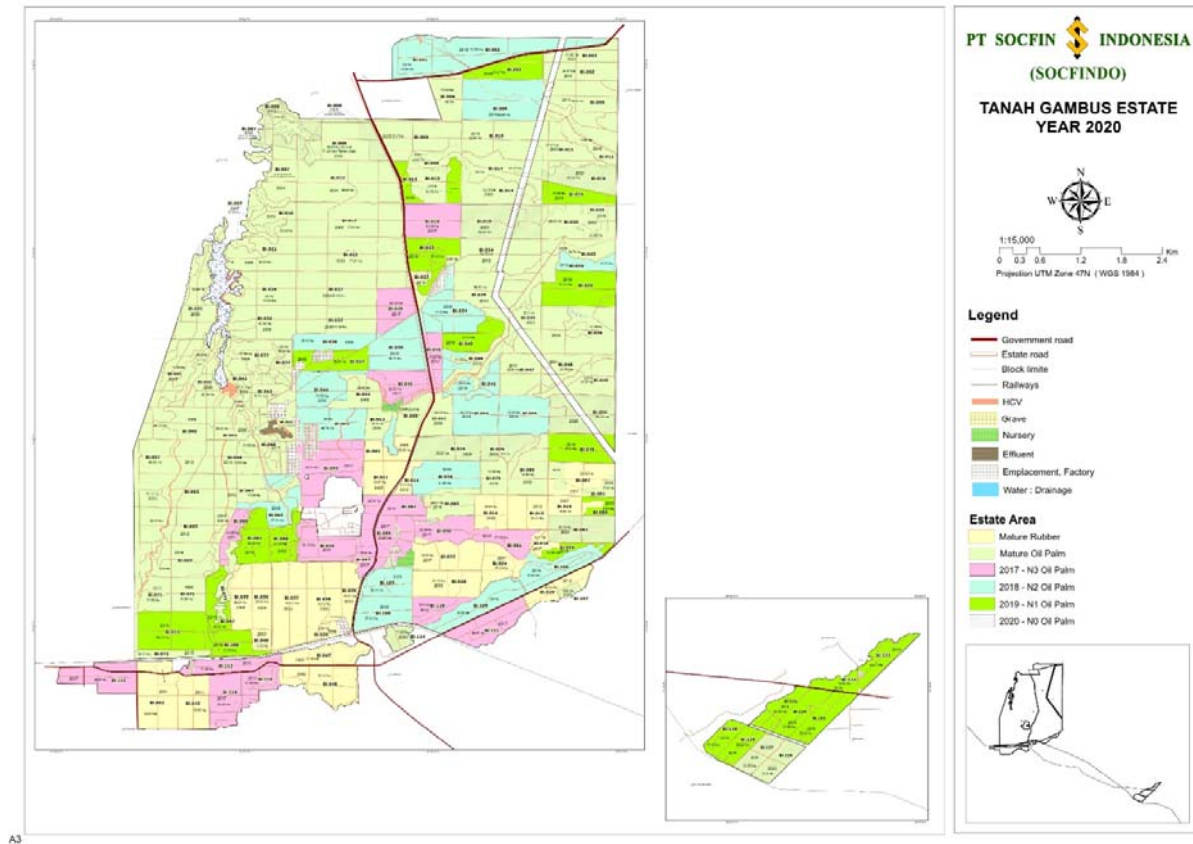


Figure 2. Operational Map of PT Socfin Indonesia – Tanah Gambus



Abbreviations Used

AMDAL	:	<i>Analisis Mengenai Dampak Lingkungan</i>
BMP	:	Best Management Practice
BOD	:	Biological Oxygen Demand
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Social Security Administrator)
BPN	:	<i>Badan Pertanahan Nasional</i>
COD	:	Chemical Oxygen Demand
Covid-19	:	Corona Virus Disease 2019
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate Social Responsibility
EFB	:	Empty Fruit Bunch
EHS	:	Environmental Health and Safety
EIA	:	Environment Impact Assessment
FFB	:	Fresh Fruit Bunch
FPIC	:	Free Prior Inform and Consent
GHG	:	Green House Gas
HCS	:	High Carbon Stock
HCV	:	High Conservation Values
HGU	:	<i>Hak Guna Usaha</i>
IHT	:	In House Training
KLHK	:	<i>Kementerian Lingkungan Hidup dan Kehutanan</i>
LTA	:	Lost Time Accident
NGO	:	Non Government Organization
OHS	:	Occupational Health and Safety
PEL	:	<i>Penyajian Evaluasi Lingkungan</i> (environment evaluation presentation)
PLB3	:	<i>Pengelolaan Limbah Bahan Berbahaya dan Beracun</i> (Hazardous dan Toxic materials waste management)
PPA	:	<i>Pengendalian Pencemaran Air</i> (water pollution control)
PPU	:	<i>Pengendalian Pencemaran Udara</i> (air pollution control)
RKL-RPL	:	<i>Rencana Kelola Lingkungan – Rencana Pemantauan Lingkungan</i> (environment management and monitoring plan)
SIMPEL	:	<i>Sistem Pelaporan Elektronik</i> (electronic system report)
SOP	:	<i>Standard Operation Procedure</i>
TTE	:	<i>Tanda Terima elektronik</i> (electronic receipt)
UKL-UPL	:	<i>Upaya Kelola Lingkungan – Upaya Pemantauan Lingkungan</i>

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none"> • RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020. • Indonesia National Interpretation of Principles and Criteria for Sustainable Palm Oil Production 2018, endorsed on 20th April 2020. 	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	PT Socfin Indonesia – Socfin SA	
1.2.2	Contact person	Andria Zulmanitra	
1.2.3	Organisation address and site address	<ul style="list-style-type: none"> • RSPO registered company: Societe Financiere des Caouthchoucs 4, Avenue Guillaume 1650, Luxembourg. • Liaison Office: Jl. K.L. Yos Sudarso No. 106, Medan 20115, Province Sumatera Utara. 	
1.2.4	Telephone	(+62-61) 6616066	
1.2.5	Fax	(+62-61) 6614390	
1.2.6	E-mail	andria@socfindo.co.id	
1.2.7	Web page address	www.socfindo.com	
1.2.8	Management Representative who completed the application for certification	Andria Zulmanitra Head of Sustainability Sub Department	
1.2.9	Registered as RSPO member	1-0269-19-000-00, 06 December 2004	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Tanah Gambus POM, Tanah Gambus Estate	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude Longitude
	Tanah Gambus Mill	Tanah Gambus Village, Sub District of Lima Puluh, District of Batubara, Province of Sumatera Utara, Indonesia	N 03° 12' 14" E 99° 24' 16"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude Longitude
	Tanah Gambus Estate	Tanah Gambus Village, Sub District of Lima Puluh, District of Batubara, Province of Sumatera Utara, Indonesia	N 03° 12' 14" E 99° 24' 16"
1.5	Description of Area Statement		
1.5.1	Tenure		
	<ul style="list-style-type: none"> • State 		4,974.29 Ha

	• Community	- Ha
1.5.2	Area Statement	
	• Total area	4,974.29 Ha
	• Mature area	3,648.40 Ha
	• Immature area	832.10 Ha
	• Rubber Area	279.40 Ha
	• Emplacement	34.65 Ha
	• Nursery	5.49 Ha
	• Riparian Area	12.38 Ha
	• HCV	4.30 Ha
	• Swamp	39.50 Ha
	• Effluent Area	3.81 Ha
	• Bamboo Area	2.58 Ha
	• Budwood Garden	1.40 Ha
	• PLN Line	6.66 Ha
	• Isolation Drain	11.46 Ha
	• Latex Collection	0.18 Ha
	• Government Office	39.64 Ha
	• Toll Road	52.34 Ha

* The current total HCV area according to the HCV delineation in June 2021 is 65.70 Ha consisting of Riparian Area is 12.38; Swamp is 39.50; HCV in Planted Area is 9.52 Ha and HCV is 4.30 Ha.

1.6 Planting Year and Cycles

1.6.1 Age profile of planting year

Planting Year	Hectarage (Ha)	
	Tanah Gambus Estate	Total
2003	72.60	72.60
2004	175.76	175.76
2005	225.32	225.32
2006	232.86	232.86
2007	38.00	38.00
2008	88.18	88.18
2009	84.27	84.27
2010	118.05	118.05
2011	183.00	183.00
2012	177.74	177.74
2013	185.22	185.22
2014	131.96	131.96
2015	167.31	167.31
2016	109.38	109.38
2017	584.92	584.92
2018	593.59	593.59

	2019		480.24		480.24		
	Sub Total Mature		3,648.40		3,648.40		
	2020		320.96		320.96		
	2021		173.87		173.87		
	2022		337.27		337.27		
	Sub Total Immature		832.10		832.10		
	TOTAL		4,480.50		4,480.50		
1.6.2	New Planting area after January 2010		-		Ha		
1.6.3	Planting Cycle		2 nd Cycle				
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	Tanah Gambus	37	81,165.24	19,028.24	23.44	2,565.85	3.16
	<i>*Production data source from August 2021 to July 2022</i>						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ ha/year)	Supplied to Mill	
						FFB (tonnes/year)	%
	Tanah Gambus	4,974.29	3,648.40	81,165.24	22.25	81,165.24	100
	<i>*Production data source from August 2021 to July 2022</i>						
1.7.3	FFB description from other source						
	Name of Sources/Organisation (RSPO certified / non- certified)	Type of Organisation	Number of Smallholders	Production Area (Ha)	Supplied to Mill		
					FFB (tonnes/year)		
	-	-	-	-	-		
	TOTAL						-
	<i>*Production data source from August 2021 to July 2022</i>						
1.7.4	Product categories			FFB, CPO, PK			
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product			Last Year Projected Certified Volume (MT)		Last Year Actual Certified Volume (August 2021 to July 2022) (MT)	
	FFB Processed			83,000		81,165.24	
	CPO Production			19,250		19,028.83	
	Palm Kernel (PK) Production			3,025		2,565.85	
1.8.2	Product selling						
	Type of selling product			Actual selling product for last year (August 2021 to July			

		2022) (MT)					
CSPO sold as RSP0 certified product		17,160.19					
CSPK sold as RSP0 certified product		2,508.58					
CSPO sold under other scheme		0					
CSPK sold under other scheme		0					
CSPO sold as conventional		0					
CSPK sold as conventional		0					
1.8.3 Estimate of Certified FFB Claim							
Name of Estate		Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)		
Tanah Gambus		4,974.29	3,648.40	85,000	23.30		
<i>*Projected FFB production for 12 months of certificate</i>							
1.8.4 Estimate of Certified Palm Product Claim							
Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		Supply Chain Module
			Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	
Tanah Gambus	37	85,000	19,550	23.00	2,975	3.5	IP
<i>*Projected CSPO and CSPK production for 12 months of certificate</i>							
1.9 Other Certifications							
ISO 9001:2008		-					
ISO 14001: 2004		-					
OHSAS 18001:2007		-					
ISCC		-					
Others							
1.10 Time Bound Plan							
1.10.1 Time Bound Plan for Other Management Units							
Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
MILL	Time Bound Plan						
Indonesia							
Tanah Gambus	2011	Tanah Gambus	2011	Lima Puluh Sub-District Batu Bara District.	Certified on November 4, 2011 Certified in November 2016		
Bangun Bandar	2011	Bangun Bandar	2011	Dolok Masihul Sub-District, Serdang Bedagai District	Certified on November 11, 2011 Certified in November 2016		
Negeri Lama	2014	Negeri Lama	2014	Bilah Hilir Sub District, Rantau Prapat Labuhan Batu District	Certified on March 10, 2016 Certified on May 29, 2019		

Mata Pao	2014	Mata Pao	2014	Teluk Mengkudu Sub District, Serdang District	Certified on April 25, 2014 Certified on April 25, 2016 Certified on July 19, 2019
Sungai Liput	2014	Sungai Liput	2014	Kejuruan Muda Sub District, Aceh Tamiang District	Certified on May 5, 2014 Certified on May 5, 2016 Certified on July 10, 2019
Aek Loba	2014	Aek Loba	2014	Aek Kuasan Sub District, Asahan District	Certified on April 14, 2014 Certified on April 15, 2016 Certified on July 21, 2019
Seunagan	2014	Seunagan	2014	Purwodadi Village, Kuala Pesisir Sub District, Nagan Raya District	Certified on November 30, 2015
	2018	Blok 52 B (30,63 ha) dan 69 B (21,93 ha)	2018		Certified on December 31, 2019
Seumanyam	2014	Seumanyam	2014	Simpang Deli Village, Makmur Sub District, Nagan Raya District	Certified on October 17, 2015
Lae Butar	2014	Lae Butar	2014	Rimo Village, Gunung Meriah Sub District, Aceh Singkil District	Certified on November 30, 2011
	2020	Divisi 5 of Lae Butar Estate	2020		Certified on February 2, 2018
Africa					
Okomu Oil Palm Company Limited	2021	Okomu Main Estate	2021	Nigeria, Africa	Certified
Okomu Oil Palm Company Extension 2 Mill	2022	Okomu Oil Palm Company Extension 1 Estate	2022	Nigeria, Africa	Non Certified
Safacam	2021	Safacam Estate	2021	Cameroon, Africa	Certified
		Safacam TF129, TF136, TF180, TF, Bail Ossa	2021	Cameroon, Africa	Certified
		Safacam TF151	2022	Cameroon, Africa	Not Certified
		Safacam Provisional Concession	2022	Cameroon, Africa	Not Certified
SAC Mill	2021	SAC Estate	2021	Sierra Leone	Certified
SOGB Mill	2021	SOGB TF464	2021	Côte d'Ivoire	Certified
		SOGB TF465, TF466, TF467	2022	Côte d'Ivoire	Not Certified

Socapalm Mbambou Mill	2021	Socapalm Mbambou Estate	2021	Cameroon, Africa	Certified
		Socapalm Edea Mill	2021	Cameroon, Africa	Certified
		Socapalm Edea Estate	2021	Cameroon, Africa	Certified
Socapalm Dibombari Mill	2021	Socapalm Dibombari Estate	2022	Cameroon, Africa	Certified
Socapalm Kienké Mill	2022	Socapalm Kienké Estate	2022	Cameroon, Africa	Not Certified
Brabanta Mill	2021	Sanga Sanga, Kadima and Kanangai Estates	2021	RD Congo	Certified
		Lumbundji and Savannah Estates	2021	RD Congo	Certified
Agirpalma Mill	2021	Titulo 409	2021	SAO TOMÉ E PRINCIPE	Certified
		Titulo 410	2022	SAO TOMÉ E PRINCIPE	Not Certified
PSG Mill	2022	PSG Manso	2022	Ghana	Not Certified
		PSG Subri	2022	Ghana	Not Certified
<p>Based on internal audit of uncertified unit on 23 June 2022, most of unit still have LUCA in progress, such as:</p> <ul style="list-style-type: none"> • Okomu Extension 1 & 2 Mill and Estate: LUCA status still reviewed by RSPO. • Socapalm Kienke Mill and Estate: LUCA status still reviewed by RSPO. • Socapalm Eseka Mill and Estate: LUCA PASS and still RaCP process • Brabanta Mill and Estate: LUCA PASS and still RaCP process • PSG Mill and Estate: LUCA status still not complete. • Agripalma mill and Estate: LUCA status still reviewed by RSPO. • Safacam Mill and Estate: LUCA status still reviewed by RSPO. • SOGB Mill and Estate: LUCA status still reviewed by RSPO. 					
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard				
	The Company didn't have associated smallholders and out growers.				

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-2.1	<p>1. Briyogi Shadiwa (Lead Auditor). Indonesian citizens. Associate Degree of Oil Palm Plantation. 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 worker welfare, conservation, GHG, Environment and social.</p> <p>2. Rindu Galih Rezza Rachmansyah (Auditor) Indonesian citizen, Bachelor of Agriculture with major in Plant Pest and Disease. Has one year experience as Field Expert in Pesticide Company and 3 years' experience in Industrial Forest Management, Forest Rehabilitation and Reclamation on Indonesia Stated Owned Company as Assistant. Training which had attended including Lead Auditor ISO 9001, ISO 14001, ISO 17021, ISO 19011, SA 8000, Lead Auditor ISPO, Lead Auditor RSPO, RaCP & NPP Awareness and OHSAS 18001:2007. Has involved in several audit activities related to sustainable palm oil since 2017 in the aspects of Best Management Practices (BMP), social, worker welfare and OHS. During assessment, he verified legal, supply chain, OHS, BMP and partial aspect.</p> <p>3. Fauzi Prima Sanusi (Trainee Auditor). Indonesian citizens. Bachelor of Forestry. Has work experience in HSE for 8 years, Environmental NGO for 4 years. Trainings he has attended include Proper Training, General OHS Expert, Biodiversity Study, HCV, Water and Air Monitoring Management, ISO 14001:2004 Auditor, FSC Auditor, PHPL Auditor 2014, ISPO Auditor 2018, Forest and Land Fire Control Training 2014, has participated in audit activities for PHPL Since 2016 FSC Audit 2017, ISPO Audit 2019 In this recertification audit activity, verification in the field of OHS and BMP under supervision of Lead Auditor</p> <p>Curriculum vitae (CV) of the members and the assessment team is available at the PT Mutuagung Lestari office</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-2.1	<p>Number of auditors: 2 auditors and 1 Auditor Trainee Number of days for ASA-2.1 at site: 5 days Number of working days for ASA-2.1 at site: 10 Working days</p>
2.2.2	Assessment Process
ASA-2.1	<p>The assessment was conducted by measuring the implementation of certification system and standard conducted by Tanah Gambus Palm Oil Mill – PT Socfin Indonesia subsidiary of Socfin SA Unit Certification based on:</p> <ul style="list-style-type: none"> • 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 • RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020 <p>The scope of certification of Tanah Gambus Palm Oil Mill – PT Socfin Indonesia consist of one mill (Tanah Gambus Mill) and one estate (Tanah Gambus Estate)</p> <p>The audit program is included as Appendix 2. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site. Some opportunities for improvement of the results RC by the MUTU auditor to the management unit and the results are the</p>

subject will be verified at the next assessment phase Recertification. Improvement of findings from RC findings were observed by auditors at this ASA-2.1 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-2.1.

The opening meeting was held on 22 August 2022. As for the participants who attended the opening meeting included the General Manager, Estate and Mill Managers, Support Team from Jakarta and other staff. Closing meeting was held on 26 August 2022 attended by the same participants as the opening meeting. Management Tanah Gambus Palm Oil Mill – PT Socfin Indonesia accept all the onsite ASA-2.1 audit results.

During the COVID-19 pandemic, there were several modifications to the audit activity due to health protocols. Audit process carried out with high safety protocol procedure that developed by Certification Body and the unit of certification. Before an onsite audit carried out, there are several meetings to discuss health protocol procedures. There are several activities that are not possible to do face to face, such as public consultations with government agencies, communities, or previous landowners so that these activities are carried out by telephone. Furthermore, during field observation auditor only verification the activity and interview process carried separately by telephone. Document verification conducted separately through the electronic files.

Public Stakeholder Notification was made on MUTU and RSPO Website. There is no written negative feedback receive. Stakeholder consultation involved internal and external stakeholders. Discussion was held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each discussion, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings. The comments made by external stakeholders were also taken into account in the assessment.

Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix III.

Commonly, the audit activities went smoothly with good cooperation from the unit management. The presentation of documents is presented quite well by involving related personnel.

All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU).

The assessment program please find Appendix 2.

2.2.3	Locations of Assessment
ASA 2.1	<p>The sampling location consider the issue arose from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:</p> <p>Tanah Gambus POM</p> <ul style="list-style-type: none"> • Security Post. Observations and interviews related to work procedures, supply chain, employment, complaint mechanisms and OHS aspects. • Weighbridge Station. Observations and interviews related to work procedures, supply chain, employment, complaint mechanisms and OHS aspects. • Transport Workshop. Observations and interviews related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects. • Rice Storage. Observations and interviews related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects. • Material Storage. Observations and interviews related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects. • Firefighting Storage. Observations and interviews related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects.

- **Engineer Workshop.** Observations and interviews related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects.
- **Electrical Workshop.** Observations and interviews related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects.
- **Civil Workshop.** Observations and interviews related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects.
- **Hazardous Waste Temporary Storage.** Observations and interviews related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects.
- **Central Storage.** Observations and interviews related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects.
- **Chemical Storage.** Observations and interviews related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects.
- **Pesticide Storage.** Observations and interviews related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects.
- **Central Workshop.** Observations and interviews related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects.
- **Water treatment plant :** field observations regarding the conditions of WTP, interviews with officers regarding aspects of OHS, labor, training, operations of WTP
- **Wastewater treatment plant :** Field observations related to Ban to entry to WWTP, run off, testing of effluent and interviews with WWTP officers
- **Empty Bunch Station :** Filed observation of empty bunch conditions
- **Employee Housing :** field observations of housing conditions, sanitation, domestic waste disposal, availability of water and lighting facilities, as well as interviews with residents.
- **Boiler Station.** Observations and interviews related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects.
- **Engine Room.** Observations and interviews related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects.
- **Sterilization Station.** Observations and interviews related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects.

Tanah Gambus Estate :

- **HCV Area Riparian Zone Blok 065 :** Observation of river border conditions, river water conditions, boundary markers, warning and prohibition boards, reforestation and indications of disturbance
- **HCV Area Riparian Zone Blok 063 :** Observation of river border conditions, river water conditions, boundary markers, warning and prohibition boards, reforestation and indications of disturbance
- **HCV Area Riparian Zone Blok 046 :** Observation of river border conditions, river water conditions, boundary markers, warning and prohibition boards, reforestation and indications of disturbance
- **Spraying Activites. Division V Blok 65.** Field observation related to pesticide spraying, OHS and environment aspect.
- **Pole HGU No. Va, IVb, XVIII, XIV and HGU auxiliary poles :** Observations related to monitoring and condition of HGU stakes, land boundaries and potential land disputes/conflicts with the community/external parties
- **Pole HGU 508:** Observation of boundaries with road construction
- **Central Fertilizer Storage.** Observations and interviews related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects.
- **Rinse House and PPE Storage Division 3.** Observations and interviews related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects.
- **Central Clinic Division 3.** Observations and interviews related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects.
- **Pest Census. Block Division III Blok 53.** Observations and interviews related to work procedures, environmental management, employment, complaint mechanisms and OHS aspects.
- **Harvesting. Block Division I Blok 5/18.** Observations and interviews related to work procedures, environmental

	<p>management, employment, complaint mechanisms and OHS aspects.</p> <ul style="list-style-type: none"> • Housing Complex Division 3. Observation of the availability of infrastructure such as employee housing facilities, clean water facilities, educational facilities, religious facilities, health facilities and sports facilities. • Child Daycare Division 3. Observations and interviews related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects. • Kindergarten Division 3. Observation related to education facility for workers family. • Landfill at Block 44 Division 3. Observations related to domestic waste management. • Rinse House and PPE Storage Division 5. Observations and interviews related to work procedures, housekeeping, environmental management, employment, complaint mechanisms and OHS aspects. • Housing Complex Division 5. Observation of the availability of infrastructure such as employee housing facilities, clean water facilities, educational facilities, religious facilities, health facilities and sports facilities. • Child Daycare Division 5. Observations and interviews related to work procedures, housekeeping, environmental
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-2.1	<p>Consultation of stakeholders for PT Socfin Indonesia was held by:</p> <ul style="list-style-type: none"> • Public Notification on PT Mutuagung Lestari Website on 01 August 2022 • Public consultation meeting with government institution (Environment Agency, Plantation Agency, Manpower Agency, and Land National Agency of Batubara Regency) on 23 August 2022. • Public consultation meeting with communities on 23 August 2022. • Public consultation meeting with internal stakeholders and contractor (Worker Union, gender committee, CPO Transporter, local contractors (civil engineering, supplier) on 23 August 2022. <p>Numbers of input from stakeholders were clarified by PT Socfin Indonesia</p>
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit (ASA-2.2) will be conducted eight (8) month to twelve (12) month after license issued.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Tanah Gambus POM – PT PT Socfin Indonesia, Socfin SA operation consisting of one (1) mill and one (1) oil palm estate.

During the assessment, there were two (2) Nonconformities were assigned against Minor Compliance Indicators; and Five (5) 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.

MUTUAGUNG LESTARI found that Tanah Gambus POM – PT Socfin Indonesia, Socfin SA Group complied with the requirements of **RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020 and Indonesia National Interpretation of Principles and Criteria for Sustainable Palm Oil Production 2018, endorsed on 20th April 2020.**

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is continued.

Ref Std.	VERIFICATION RESULT of MUTU-Certification
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY	
1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
<p>1.1.1 The company shows the SOP for Social Communication with the document number SOC/PSM/9.01 Edition 01, Rev.06, which was legalized on April 1, 2020. The procedure explains the following:</p> <ul style="list-style-type: none"> o Requests for information can be submitted by letter, email, or other document forms. o All decisions regarding requests for information from stakeholders must be informed back to the party requesting information. o The time limit for responding to requests for information is one month from the time the request for information is received o The Head of Administration (KTU) as a public relations officer, is responsible for receiving and responding to letters of information request. <p>The procedure also explains:</p> <ul style="list-style-type: none"> o Communication between plantation management and stakeholders is built through public consultation, limited socialization, media letters, and consultation o The scope of communication and consultation includes: socialization of company policies, procedures and activities that have an impact on the community o Requests for information or aspirations need to be communicated and consulted with the community o Social impact assessment and management and monitoring plan o Types of HCV present in the company area o CSR Program o Other forms of information related to company operations <p>The company shows a list of stakeholders for the Tanah Gambus Estate for the 2022 period, the list is available in detail including the agency/institution, the name of the person in charge, telephone, address and the distance between the company and the location of the stakeholder. Stakeholders involved in the company include:</p>	

- Village heads in 9 villages around the company area
- Government Agencies as many as 20 Agencies with examples of Manpower Office, Plantation Service, Environment Service
- Trade Union Organization
- Contractors as many as 6 contractors
- Community leaders
- Media
- Women's Representative
- Religious Figures
- NGOs

The company also has documents for public information including HCV assessment documents, social impact assessment documents (SIA), company policies, communication and consultation procedures, environmental documents, complaint logbooks.

Companies can also show evidence of submitting information to the public, including:

A. Environmental Aspects:

- Report on water usage for the period July 2021 to May 2022, dated 28 June 2022 No TG/X/BI/199/22, to the Governor of North Sumatra, received on 14 July 2022
- Introductory list of the Monitoring Report for Liquid Waste and Hazardous Waste for the Period of April – June 2022, to the Department of Housing for Settlement Areas and the Environment of Batubara Regency, July 25, 2022
- Electronic Receipt of Hazardous Waste Management ID 1658830870 – 1550, 2nd quarter (01 April 2022 to 30 June 2022), reporting date 26 July 2022, Local Government of Batubara Regency
- KLHK SIMPEL Electronic Receipt, TTE ID 1658891592-2195, TTE period 01 January 2022 to 30 June 2022, 27 July 2022, RKL-RPL report, PPA report, PPU report, PLB3 report, status already reported
- KLHK SIMPEL Electronic Receipt, ID TTE 1658830829-1550, Quarter 2 period (01 April 2022 2022 to 30 June 2022), 26 July 2022, Hazardous Waste report
- KLHK SIMPEL Electronic Receipt, ID TTE 1658830849-1550, 2nd quarter period (01 April 2022 to 30 June 2022), 26 July 2022, PLB3 Report, North Sumatra Province
- Manifest KLHK-1644950629, dated January 5, 2022, type of contaminated waste B3, code B108d, volume 0.015 Ton, PT AMindy Barokah SUMUT, NOPOL BK 9169 MO
- Manifest -1644950062, dated January 5, 2022, type of Bekasi packaging waste B3, code B104d, volume 0.18 Ton, PT AMindy Barokah SUMUT, NOPOL BK 9169 MO
- Manifest -1644949397, dated January 5, 2022, type of used filter waste, code B109d, volume 0.061 Ton, PT AMindy Barokah SUMUT, NOPOL BK 9169 MO
- Manifest -1645469977, dated January 5, 2022, type of clinical waste, code A337-1, volume 0.0105 Ton, PT AMindy Barokah SUMUT, NOPOL BK 9169 MO
- Manifest -1644950062, dated January 5, 2022, type of used lubricant waste, code B105d, volume 0.27 Ton, PT AMindy Barokah SUMUT, NOPOL BK 9169 MO
- Report on monitoring and condition of land fires, Report on Implementation of RKL-RPL semester I January – June 2022, SA No TG/X/Di/195/22, dated July 25, 2022, to the Regent of Batu Bara, Department of Manpower, Industry and Trade, Department of Housing, Residential Areas and the environment
- Report on Investment Activities (LKPM) for the period of Quarter 2 2022 (April-June) of PT Socfin Indonesia – Tanah Gambus to the Investment and One Stop Service Agency (*Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu*) of the Batubara Regency on August 08, 2022.
- Plantation Business Development Report (LPUP) for Semester 1 2022 (January-June) PT Socfin Indonesia – Tanah Gambus to the Agriculture and Plantation Agency of Batubara Regency on July 25, 2022.
- Report on the Land Use Title (HGU) of PT Socfin Indonesia – Tanah Gambus in 2022 to the Representative of the National Land Agency of Batubara Regency on 21 June 2022.

1.1.2

Based on the results of document reviews and interviews with agencies such as the Batubara District Plantation Service, the Environment Service, Land Office and Manpower Office, it is known that the information submitted by the certification unit has been presented in an appropriate language and can be accessed by the agency.

The unit of certification has provided evidence that the information has been received in an appropriate form and language for the relevant stakeholders, for example the report on the implementation of environmental management & monitoring (RKL-RPL) semester 1 of 2022 with the following evidence:

- Letter number, SA No TG/X/DI/195/22, dated July 25, 2022, to the Regent of Batu Bara, Department of Manpower, Industry and Trade, Department of Housing, Settlement Areas and the environment.
- KLHK SIMPEL Electronic Receipt, TTE ID 1658891592-2195, TTE period 01 January 2022 to 30 June 2022, 27 July 2022, RKL-RPL report, PPA report, PPU report, PLB3 report, status already reported

The company also conveys information through the following activities:

- Socialization of PT SOCFINDO's policies and procedures for communication and social complaints on June 14, 2022, at the Taman Sari Village Hall, attended by 13 community representatives from the Village Government, residents and to the Dusun
- Policy dissemination to third parties, on 04 June 2022, attended by 11 contractor representatives
- Socialization of Ethics policy to contractors, on March 14, 2022, attended by 5 contractor representatives

1.1.3

The company shows Records of Information Records for Internal and External, in 2022 it is known as follows:

a. Internal

- Minutes of the opening of the suggestion box and complaints of employees of the Tanah Gambus Estate, dated August 2, 2022, period January to July 2022, no complaints
- Employee Complaint Logbook for the period of 2022 no complaints were recorded

b. External

Records of requests for information in the period January to July 2022, there are 12 records of requests for information, for example:

- On January 17, 2022, a request for an internship application from the Department of Industrial Mechanical Engineering at SMK Negeri 1 Medan Deras, the date was responded to January 25, 2022
- On May 19, 2022, a request for a research application from the USU Faculty of Agriculture, responded on May 19, 2022, in the form of approval for research
- Letter Number 001/SEK/PKL/FP-UNA/VI/2022, dated 11 July from Asahan University, Faculty of Agriculture, regarding the application for field work practice from 01 to 31 August 2022, has been responded to by management through letter No. TG/X/BI/222/22, dated 20 July 2022, approval for acceptance of street vendors activities.
- Letter Number 551/0912/DISHUB/VI/2022, dated June 20, 2022, from the Department of Transportation of the Government of Batubara Regency, regarding requests for transportation data, the company has responded to through Letter Number. TG/X/BI/192/22, dated 28 June 2022, regarding the submission of transportation data accompanied by a list of 2022 vehicle transports in the Company

1.1.4

The company shows the SOP for Social Communication with the document number SOC/PSM/9.01 Edition 01, Rev.06, which was legalized on April 1, 2020. The procedure explains the following:

- Requests for information can be submitted by letter, email, or other document forms.
- All decisions regarding requests for information from stakeholders must be informed back to the party requesting information.
- The time limit for responding to requests for information is one month from the time the request for information is received
- The Head of Administration (KTU) as a public relations officer, is responsible for receiving and responding to letters of information request.

The procedure also explains:

- Communication between plantation management and stakeholders is built through public consultation, limited socialization, media letters, and consultation
- The scope of communication and consultation includes: socialization of company policies, procedures and activities that have an impact on the community
- Requests for information or aspirations need to be communicated and consulted with the community
- Social impact assessment and management and monitoring plan
- Types of HCV present in the company area
- CSR Program
- Other forms of information related to company operations

The company makes efforts to convey information through :

- Socialization of PT SOCFINDO's policies and procedures for communication and social complaints on 14 June 2022, at the Taman Sari Village Hall, attended by 13 community representatives from the Village Government, residents
- Socialization of Policy dissemination to third parties, on 04 June 2022, attended by 11 contractor representatives
- Socialization of Ethics policy to contractors, on March 14, 2022, attended by 5 contractor representatives

1.1.5

The company shows a list of stakeholders for the Tanah Gambus Estate for the 2022 period, the list is available in detail including the agency/institution, the name of the person in charge, telephone, address and the distance between the company and the location of the stakeholder. Stakeholders involved in the company include:

- Village heads in 9 villages around the company area
- Government Agencies as many as 20 Agencies with examples of Manpower Service, Plantation Service, Environment Service
- Trade Union Organization 6 contractors
- Community leaders
- Media
- Female Representative
- Religious Figures
- NGO

For example, auditors may contact contractors and government agencies, trade union representatives

Status : Comply

1.2

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

1.2.1

The company's commitment to ethical behavior has been stated in the Non-Discrimination and Equal Opportunity Policy made by PT. Socfindo in June 2019 and renewed in April 2021 which was approved by the Principal Director of PT. Indonesian Socfin. The policy states that at Socfindo, every employee is entitled to equal treatment and Socfindo does not discriminate based on religion, race, sexual orientation, gender, national origin, caste, disability, gender identity, union membership, political affiliation, or age.

Socialization related to the policy has been carried out in each plantation and mill unit, for example, the socialization for contractor workers it has been contained in the workers' agreement (example: SPK No.: 154/SI-BS/SPK-LB3/VII/2021), where in the rights and obligations clause, the contractor must understand and implement the company's code of ethics.

Based on interviews with employees, representatives of internal and external stakeholders, it is known that the policy has been understood and implemented in all business operations and transactions, including recruitment and contracts.

1.2.2

The company has a mechanism to monitor compliance and the implementation of ethical business policies and practices through compliance checks and evaluations. For example, the company conducts regular internal audits to ensure operational units comply with policies and SOP. The scope of the internal audit is the compliance of each unit in the plantation and mill to all aspects contained in the RSPO P&C such as aspects of employment, environment, BMP and

other aspects. The latest internal audit was conducted on 6 June 2022.

In addition, the company ensures that its contractors and suppliers know and comply with the company policy as shown in Form the Contractor Inspection Form No. SOC/Form/4.16-02. Aspects assessed in the evaluation are the quality of work, work environment, compliance with the application of OHS, emergency response conditions, work equipment, work in hazardous areas, safety signs, contractor competence, business ethics, timeliness of work completion, compliance with labor regulations, housekeeping and compliance with environmental regulations.

Based on the results of interviews with workers in factories and plantations, information was obtained that they are aware of the company's policies to respect human rights and commitment to ethical behavior in all work operations. In addition, interviews with contractors revealed that the policy had been socialized when the contract was made.

Status: Comply

PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS

2.1

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

2.1.1

Certification unit has been fulfilled the law requirement in Indonesia in related aspect, such as:

Legal Aspect

- PT Socfin Indonesia – Tanah Gambus had land use title in the form of HGU (*Hak Guna Usaha*) based on Decree of the Agrarian Ministry / Head of National Land Agency No: 76/HGU/BPN/97 dated 6 July 1997 about extension of land use rights on behalf PT Socfin Indonesia consist of:
 - ❖ Certificate of HGU No.02 issued on 28 January 1998, covering an area of **3,373.11** Ha located at Tanah Gambus village, Lima Puluh Sub District, Asahan Regency, North Sumatra Province. Valid until 31 December 2023.
 - ❖ Certificate of HGU No. 2 dated 28 January 1998 covering an area of **1,418.65** Ha located at Lima Puluh Village, Lima Puluh District, Asahan Regency, North Sumatera. Valid until 31 December 2023.
- PT Socfin Indonesia – Tanah Gambus had land use title in the form of HGU (*Hak Guna Usaha*) based on Decree of the Agrarian Ministry / Head of National Land Agency No: 8/HGU/22.07/97 dated 24 September 1997 regarding extension of land use rights on behalf of PT Socfin Indonesia covering area of **182.53 Ha** located in Binjai Baru Village, Talawi District, Asahan Regency. Certificate of HGU No. 2 dated 23 July 1997, valid until 24 September 2023.
- PT Socfin Indonesia – Tanah Gambus had work permit in the form of SPUP (*Surat Pendaftaran Usaha Perkebunan*) No.: HK.350/82/Dj.Bun.5/II/2002. This permit covers **3,373.11** Ha palm oil area with POM capacity 37 ton FFB/hour.
- PT Socfin Indonesia – Tanah Gambus had Commodity Conversion Permit (rubber to oil palm) from Batubara Governor Decree (No.: 525/3702, dated March 15th, 2016). This permit covers **1,601.18** Ha area.

Environment

EIA and other permit:

- Environment Impact Assessment (Penyajian Evaluasi Lingkungan hidup) of Tanah Gambus Plantation and Mill, Asahan Regency, North Sumatra Province, approved on March 17, 1994 with no RC.220/476/B/III/94
- Hazardous Waste Warehouse Permit based on Decree of the Head of the Environmental Agency Batubara Regency No. 660/1052 dated May 25, 2018 and is valid for 5 years (.
- Hazardous Waste Warehouse Permit based on Decree of the Head of the Environmental Agency Batubara Regency No. 660/644/TPS-LB3/2017 dated June 5, 2017 and is valid for 5 years.
- Liquid Waste Disposal Permit based on the Decree of the Batubara Regency No. 660/196/IPLC/2016 dated 7 December 2016 concerning Industrial Wastewater Disposal Permit. The permit is valid for up to 5 years.

Worker Welfare

- Basic wage for workers in accordance with minimum wage of Batubara Regency for 2022.
- Overtime payment for workers in accordance with Decree of the Minister of Manpower No. 102/2004 about Overtime and Overtime Payment
- Workers already registered to health services and work accident insurance

OHS

- Dump truck operator on behalf IS has operator license No. 176356-OPK3-LT/PAA/XI/2020 issued on 23 November 2020 valid until 23 November 2025
- Dump truck operator on behalf AS has operator license No. 176343-OPK3-LT/PAA/XI/2020 issued on 23 November 2020 valid until 23 November 2025
- Dump truck operator on behalf LGM has operator license No. 1763461-OPK3-LT/PAA/XI/2020 issued on 23 November 2020 valid until 23 November 2025
- Secretary of OHS organization is an OHS expert and has received a letter of appointment of a general OHS expert from the Ministry of Manpower of the Republic of Indonesia based on Decree No. 5/33440/AS.02.04/XII/2020 dated December 22, 2020

Best Management Practices

In terms of best management practices, it is known that plantation and mill management has implemented several compliances with Indonesian laws and regulations, for example not using the burning method in the land clearing process, trees planted are from seed producers which are recognized by the Indonesian government. Company has implemented integrated pest management, biological control and only uses pesticides that are listed on the pesticide government website and no longer using pesticides with active ingredient paraquat dichloride in 2020 – 2022

2.1.2

The certification unit has documents related to legal compliance in the Law Register Document with the last updated by Head of General Affair on 01 July 2022 with the total of 160 regulation, the register has divided into several aspects, such as:

- Identification and evaluation regulations and requirements against OHS Aspect
- Identification and evaluation regulations and requirements against Environmental Aspect
- Identification and evaluation regulations and requirements against others aspect (Legal, Worker Welfare and others)

In the latest regulation update above, there are 41 new regulations that have been added to the PT Socfin Indonesia – Tanah Gampus Law Register document is Government Regulations No. 35 and 36 in 2021.

As guidance for updated law register, the company has a procedure Identifications and evaluating the compliance of regulations (SOC/PSM/4.05 rev 01 dated 17 May 2017) with the purpose of guidance during identifications and evaluations of the compliance of the requirements against environmental, OHS and other relevant laws and regulations in the operational activity PT Socfin Indonesia – Tanah Gampus as well as ensuring all regulations and requirements has been complied, updated and communicated to all relevant parties. In the procedure mentioned if legal staff have a responsibility to identify and update the regulations and legal staff with estate/mill staff have a responsibility to conduct an evaluation of the compliance of regulations.

To ensure compliance with law or regulations, the certification unit conducts an internal audit. Internal audits (ISPO, RSPO and SCCS) have been conducted continuously and are documented and reviewed in the management review activities, latest audit was carried out on 06-08 June 2022 that carried out by the Sustainability department.

2.1.3

The certification unit has procedures and mechanisms related to the maintenance of boundary markers in the OHS and Environment Patrol Document (No. SOC/PSM/4.12, revision 6 dated 1 September 2021). The document informs several things related to monitoring of boundary markers, where patrol activities are carried out once a month. The procedure described that boundaries monitoring is carried out monthly by an officer appointed by the assistant.

During the audit, the unit of certifications presented the result of boundaries monitoring where the last activity was conducted in August 2022. Based on document verifications all boundaries pole are in good condition with total poles are 58 poles. During the audit team auditor visited several boundaries poles (Pole No 5A, 4B, 14, and 18), and based on field observations it was known all poles are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries. At the pole there is also a boundary ditch that separates the company's operational area from neighboring companies (PTPN IV Block 60).

	Status: Comply	
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2.2**All contractors providing operational service and supplying labour, and Fresh Fruit Bunch (FFB), comply with relevant legal requirements.****2.2.1**

The company has a list of contractors included in the list of stakeholders of Tanah Gambus April 2022. In the document there are 6 contractors who currently have cooperation with the company, starting from Cooperation in the field of transporting certified products to replanting activities. The list of third parties / contractors also includes parties who work together in the LB3 management process, as well as parties who carry out inspection and inspection activities for factory machines.

2.2.2

The company shows the Work Agreement (*SPK*) document with the contractor. In the cooperation contract, it is explained that there is an article that stipulates that the contractor is obliged to follow the applicable labor laws. For example, in the *SPK* document, the FFB leasing agreement between PT Mustika Karya Buana and the company with No. TG-LP/SPK/X/Bi/006/2022. The document explains that both parties must comply with applicable labor regulations, such as:

- The second party (contractor) complies with the regulations on the payment of wages and the age of the worker, which must be over 18 (eighteen) years of age.
- The second party (contractor) guarantees the safety and health of all workers and is obliged to equip their workforce with PPE in accordance with applicable regulations.
- The second party (contractor) is required to register its workforce in the *BPJS* Employment and *BPJS* Health programs.
- Contractors are prohibited from practicing forced labor and human trafficking.
- Contractors must comply with relevant laws and regulations.
- The contractor does not discriminate.
- Contractors are required to pay minimum wages for their workers in accordance with the wage provisions.

The company also demonstrates the implementation of compliance with labor regulations by contractors, including:

- Possess an OHS license for lift and transport aircraft operators, for example on behalf of Agus S. and Sugianto from the Karya Mandiri Sukses Bersama Contractor.
- Proof of payment of *BPJS* Employment on March 15, 2022 for 66 contractor employees on behalf of Karya Mandiri Sukses Bersama.

Based on the description above, the company can demonstrate the fulfillment of legal obligations by third parties.

2.2.3

In the Work Agreement (*SPK*) document with the contractor, it has been explained regarding the fulfillment of the applicable labor laws. For example:

- The second party (contractor) complies with the regulations on the payment of wages and the age of the worker, which must be over 18 (eighteen) years of age.
- The second party (contractor) guarantees the safety and health of all workers and is obliged to equip their workforce with PPE in accordance with applicable regulations.
- The second party (contractor) is required to register its workforce in the *BPJS* Employment and *BPJS* Health programs.

To prove the implementation of the employment contract and applicable policies, the company evaluates the contractor's performance as indicated in the Contractor Inspection Form No. SOC/Form/4.16-02. Aspects assessed in the evaluation are the quality of work, work environment, compliance with the application of OHS, emergency response conditions, work equipment, work in hazardous areas, safety signs, contractor competence, business ethics, timeliness of work completion, compliance with labor regulations, housekeeping and compliance with environmental regulations. The latest monitoring for example has done on 23 June 2022 for CV Mustika Karya Buana. The contractor is also able to show evidence that the workers already have work contracts as employees which explain their rights and obligations.

Based on interviews with local contractors, it is known that contractors can explain some of the prohibitions in accordance

with the labor law.

Status: Comply

2.3

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

2.3.1 & 2.3.2

PT Socfin Indonesia – Tanah Gambus does not accept FFB from other parties or from farmers/smallholders and only accepts FFB from Tanah Gambus Estate (company’s operational area). This is evidenced by the review of FFB receipt documents from January 2021 to August 2022 in which Tanah Gambus Mill only received FFB from Tanah Gambus Estate and did not receive FFB from other parties. This is also consistent with the results of interviews with management and workers (weighbridge officers and sortation workers) who stated that the FFB received only came from Tanah Gambus Estate.

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 PT Socfin Indonesia's Long Term Plan document for the period 2021 – 2025. Based on the review of the long term plan document, for the Gambus Tanah unit, the following information is known:

Descriptions	2021	2022	2023	2024	2025
Planted Area (Ha)					
	4,695	4,928	5,208	5,208	5,208
Mature	3,573	4,116	4,375	4,574	4,731
Immature	1,122	821	833	634	495
Production (Ton)					
FFB	84,677	95,416	105,436	110,803	117,349
CPO	20,365	22,947	25,357	26,648	28,222
PK	2,879	3,244	3,585	3,767	3,990
OER (%)	24,05	24,05	24,05	24,05	24,05
KER (%)	3,40	3,40	3,40	3,40	3,40
Production Cost (Rp/Kg)	2,119	2,267	2,426	2,595	2,777
Price (Rp/Ton)					
CPO	7,500,000	7,600,000	7,700,000	7,800,000	7,900,000
PK	5,000,000	5,300,000	5,600,000	5,900,000	6,100,000

3.1.2

The management of Tanah Gambus Plantation PT. Socfindo shows the 5-Year Replanting Program from 2021-2025 as follows:

Program Replanting 5 Tahunan Kebun Tanah Gambus Tahun 2021-2025					
Year	Div.	Block	HA Area	Planting Year	AGE
2022	2	027	69.88	2005	17
	3	071	12.71	2004	18
	4	035	29.30	2004	18

2023	1	014	10.25	2003	20
	2	007	41.86	2004	19
	2	007	15.78	2007	16
	2	017	77.09	2005	16
2004	1	014	23.44	2003	21
	2	022	77.91	2005	19
	3	051	26.02	2006	18
	4	036	72.09	2004	20
2005	1	011	37.35	2003	22
	2	008	39.65	2003	22
	2	008	15.39	2010	15
	2	012	88.89	2004	21

3.1.3

From the results of interviews and document verification, the company's Sustainable Team can show records of management review activities that were carried out on March 16, 2022 at the Tanah Gambus Estate office. The management review meeting was attended by 11 participants consisting of Group Manager, Internal Auditor, Assistant Head, KTU, Head of Distribution, Technical Staff, HO and AI Sustainability.

The Management Review is regulated and defined in the SOP that has been made by the Company with document number SOC/PSM/5.01 edition 03, revision 05 which has been in effect since May 15, 2017.

The agenda briefly discussed is as follows:

1. Results of previous management reviews
2. Audit results
 - Discussion of the results of the Internal Audit carried out in 2021 as many as 4 findings and closed status
 - The RSPO external audit was carried out on 02 to 06 August 2021, with 2 major findings, the findings have been followed up with closed status, then ensured to run consistently so that there are no repeated findings.
 - The SCCS audit was carried out on 7 July 2021 and there were no findings.
3. Process performance
 - FFB production in 2021 amounted to 76,882 MT
 - 2021 CPO production of 17,825 MT
 - PK production in 2021 amounted to 2,430 MT
 - OER 23.1%
 - KER 3.1%
4. Regulatory Compliance
5. HCV management.
6. GHG Management
7. Hazardous Waste Management
8. SMK3, Reducing the number of work accidents
Work accidents in 2021 were 3 decreased compared to 2020 5 cases and have been investigated.
9. Opportunity for Improvement
10. Internal/External Issues, workers with PKWT status
11. Performance of External Providers, is evaluated once a year.
12. Adequacy of Resources
Infrastructure and PPE needs are complete and appropriate
13. SCCS
The SCCS audit has been carried out with results in accordance with the Principles and Criteria.
14. Recommendation for improvement
15. Period of 2022 internal audit has been carried out on 6-8 June 2022.
The audited standards are, RSPO, ISPO and SCCS
The number of findings is 09 findings with the status of major findings, all findings have been followed up.

Status: Comply

3.2

The unit of certification regularly monitors and reviews their economic, social and environmental performance

and develops and implements action plans that allow demonstrable continuous improvement in key operations.

3.2.1

The company can show the continuous improvement program document for the Tanah Gambus Estate for the period 2021 and 2020 along with a recording of its realization. Included in the continuous improvement program are the following:

- Replacing the use of pesticides with the active ingredient paraquat with Ally pesticides.
- Reducing the use of pesticides with active ingredients brodifacoum by providing owls in cages provided by the company.

The company can show monitoring data on the condition of the owl cage for the period 2021.

3.2.2

The company has shown the auditor regarding the RSPO metric template that has been filled in according to the facts and data in the company's record documents, such as the number of workers, the area of production to the record of work accidents. For examples:

- Total workers in mill is 112 people and estate is 775 people.
- Total area of production is 3,657.92 Ha.
- Total work accidents for mill is 1 accident and for estate is 3 accidents

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

The unit of certification shows Standard Operating Procedures (SOP) and Work Instructions (IK) to ensure that all plantation activities and processes are carried out correctly and by the right personnel.

Consists of 143 SOPs and 252 IK, including the following:

No	Document No	Document Name
1	SOC/PSM/4.02	<i>Prosedur Pengendalian Dokumen</i>
2	SOC/PSM/4.03	<i>Prosedur Pengendalian Rekaman</i>
3	SOC/PSM/4.04	<i>Prosedur Aspek LK3</i>
4	SOC/PSM/4.05	<i>Prosedur Identifikasi dan Evaluasi Pemenuhan Peraturan</i>
5	SOC/PSM/4.07	<i>Prosedur Komunikasi, Partisipasi dan Konsultasi</i>
6	SOC/PSM/4.08	<i>Prosedur Kesiapsiagaan dan Tanggap Darurat</i>
7	SOC-POM/PSM/7.09	<i>Prosedur Proses Pengolahan MKS dengan sistem prebusan horizontal</i>
8	SOC-POM/PSM/7.12	<i>Prosedur Pengiriman CPO Seumanyam ke Stok Tank Pelabuhan Susoh dan Pengapalan di Pelabuhan Susoh</i>
9	SOC-POM/PSM/7.13	<i>Prosedur Pencucian Tangki Timbun MKS</i>
10	SOC-POM/PSM/7.15	<i>Prosedur Pengendalian Produk Sampingan dari Proses Pengolahan TBS</i>

SOPs are written in Indonesian. All master documents are stored and controlled at the Sustainability section of the Medan Head Office.

SOPs are available at the audit location in accordance with the needs of the estate office and POM, such as SOP No.: SOC-POM/PSM/7.10.13 concerning Procedures for Integrated Pest Control of Oil Palm Leaf-eating Caterpillars issued

on 13 January 2020, 01 edition.

The SOP is approved which is prepared by the Agronomy Staff, reviewed by the Head of Agronomy, approved by the General Manager and Principal Director.

Regarding the previous non-conformities regarding the use of warnings related to the activity of spraying pesticides, the auditor made field observations in Division V Block 65, it was found that there had been use of warnings of herbicide spraying activities as a reminder for employees.

3.3.2

The company management explains the mechanism to ensure all policies, documents such as SOPs, IK and evidence of their implementation or records are carried out and related records are maintained properly, consistently and can be traced monitoring:

1. Document Control Procedure number : SOC/PSM/4.02
 2. Record Control Procedure number : SOC/PSM/4.03
 3. Management Review Procedure number : SOC/PSM/5.01
 4. Internal Audit Procedure Management System Number : SOC/PSM /8.02
 5. The company also makes regular visits to the plant section of the Tanah Gambus Plantation
- And the findings are made a report on the consistency of implementation, recording SOP reporting, IK and field notes.

3.3.3

Based on the review and verification of evidence in the field, it was found that monitoring records and every action taken were properly maintained and available and traceable, such as:

- Internal Audit Report
- Management review report.
- Monitoring of pest census results and pest control
- Nozzle calibration report
- Maintenance and Harvest reports.
- Equipment certificates and permits such as host cranes.
- Nursery reports.
- Transport and Lifting Vehicle OHS License on behalf of Eko Abadi Putra Reg. 112037-OPK3- QC/PAA/XII?2021.
- The report for the 2022 Health Examination Period as many as 220 participants, for example on behalf of Juari (Worker no. 1806795), Sri Marlina Damanik (Worker no. : 19044233)
- Gambus Ground Plant Cutting Premium for 2022

To prove the implementation of the employment contract and applicable policies, the company also evaluates the contractor's performance as indicated in the Contractor Inspection Form No. SOC/Form/4.16-02. Aspects assessed in the evaluation are the quality of work, work environment, compliance with the application of OHS, emergency response conditions, work equipment, work in hazardous areas, safety signs, contractor competence, business ethics, timeliness of work completion, compliance with labor regulations, housekeeping and compliance with environmental regulations. The latest monitoring for example has done on 23 June 2022 for CV Mustika Karya Buana.

	Status: Comply	
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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

The Company already has Environmental documents which consist of :

- Presentation of Environmental Evaluation (PEL) for Oil Palm and Rubber Plantations and their processing plant, Tanah Gambus Plantation, Asahan Regency, North Sumatra Province, approved on March 17, 1994 with ratification number RC.220/476/B/III/94. The Presentation of Environmental Evaluation document was prepared by the Research Center for Natural Resources and the Environment, University of North Sumatra in 1993. The Presentation of Environmental Evaluation covers an area of 3,919.02 Ha (for Tanah Gambus) and 1,741.60 Ha (for Limapuluh) with a capacity of 22 Tons FFB/hour. The actual installed capacity is 23 tons of FFB/hour. Based on the results of

interviews with the Batubara Regency Environmental Agency, it is known that the difference in capacity is not a problem.

- Environmental management dan monitoring plan (RKL-RPL) document ratified on 24 May 1994 No. RC. 220/907/B/V/1994
- Revised Environmental management dan monitoring plan document for Tanah Gambus Estate based on Approval of Environmental management dan monitoring plan document Number 660.1/0213/LH/2005, dated August 19, 2005, Office of Environment and Tourism of Asahan Regency Government, with components of environmental management and monitoring plan including: air quality, emissions immovable sources, noise, ground water liquid waste, solid waste, hazardous waste, job opportunities, public perception and public health
- Revision of environmental management and monitoring efforts Documents for Kebun Lima Puluh, Decree of the Regent of Batubara No. 201/HK/V/2016, ladder; 16 May 2016, regarding the environmental permit for oil palm plantation activities of PT SOCFINDO Indonesia Kebun Lima Puluh,
- Approval of environmental management and monitoring efforts Document number 660/032, dated 12 April 2016, from the Environmental Office of Batu Bara Regency :
 - Air quality every 6 months
 - Liquid waste monitoring 1 month 1 time
 - Hazardous waste
 - Noise every 6 months
 - Annual erosion
 - Pests and plant diseases according to company procedures
 - Public perception once a year
 - Public health once a year
- Environmental and Social Impact Assessment Report on the Conversion of Bangun Bandar and Limapuluh on May 2016 Estates from Aksenta
- Green House Gas Assessment for new planting, Kebun Limapuluh December 2016 (Scenario Reduction of inorganic fertilizers and reduction of fossil fuels,
- Final Carbon Stock Assessment Report July 2016
- Final Report Verification and delineation of the HCV area of PT Socfin Indonesia Tanah Gambus Estate, June 2021

The preparation of environmental documents has involved various parties. This has been explained in the method of preparing the Environmental Evaluation Presentation which consists of methods of data collection, data analysis and identification and prediction of impacts. One way to collect data is by interviewing local residents and workers/laborers.

In the process of the Social and Environmental Impact Assessment conducted by the Consultant (Aksenta) in 2016 for the Bangun Bandar and Kebun Lima Puluh (currently Tanah Gambus Estate). The report has attached documentation of the implementation of activities such as photos of the implementation and attendance of stakeholder consultations.

3.4.2

The company shows the environmental management and monitoring matrix contained in the document:

1. Environmental Management Plan Revision Document _ Environmental Monitoring Plan for Tanah Gambus Plantation based on Approval of Environmental Management Plan Document-Environmental Monitoring Plan Number 660.1/0213/LH/2005, dated August 19, 2005, The environmental components monitored are as follows:
 - Outdoor air quality is done every 6 months
 - Indoor air quality is carried out once a year
 - Quality of emission from immovable sources is carried out every 6 months
 - Noise is done every 6 months
 - Liquid waste (Wastewater Treatment Plant outlet) is carried out once a month
 - Ground water (population wells) is carried out once a year
 - Solid waste is carried out every 6 months
 - Hazardous waste is carried out every 6 months
 - Job Opportunities are held every 3 years
 - Perception of the surrounding community is carried out every 3 years
 - Public health is conducted once a year

2. Revision of Environmental Management Efforts for Limapuluh Estate Environmental Monitoring Efforts, Decree of the Regent of Batubara No. 201/HK/V/2016, ladder; 16 May 2016, the environmental components monitored are as follows:
- Air quality every 6 months
 - Liquid Waste monitoring 1 month 1 time
 - Hazardous waste
 - Noise every 6 months
 - Annual erosion
 - Pests and plant diseases according to company procedures
 - Public perception once a year
 - Public health once a year

As for social impacts, there is a revised SIA Document Report 2022. In the report, it is explained about the social impact analysis along with the impact management and monitoring plan, such as:

- Replanting: land clearing with a mechanical system and routine maintenance of heavy equipment, not applying chemicals along river border areas and others
- Potential land ownership claims: maintenance of boundary markings and management of the Hak Guna Usaha
- Decreased air quality: installation of cyclone fans, optimizing the use of organic fertilizers (Empty bunch and solid).
- Collecting public perceptions through the distribution of questionnaires

Based on the results of consultations with the Environment Agency and representatives of the FFB transport contractor, the maintenance service provider stated that there were no complaints regarding the existence of the SOCFIN plantation, economically PT SOCFIN provides many job opportunities, one of which is the absorption of labor in the maintenance sector, the company gives priority to contractors local workers and workers around the Estate, payments are never late at competitive prices

The company identifies social impacts in the study of social impacts for the community around the plantation, including the impact on the community's economy, the impact on the noise disturbance of FFB transportation, as well as business opportunities.

In the preparation of the AMDAL and SIA documents, starting from the impact assessment activities and public consultation as material for the preparation of management and monitoring of environmental and social impacts

Overall social impacts have been identified in the social impact assessment

3.4.3

Based on the results of the verification of the RKL-RPL Realization Report for semester 1 of 2022. It is known that environmental management and monitoring activities that have been carried out include:

- Testing the emission quality of stationary sources at 2 points (boilers), evidence is shown:
 - a. Certificate 03374/CLACAP, dated March 25, 2022, the quality standard refers to the Minister of Environment Regulation 07/2007 appendix I, Boiler 1, the test results have no parameters that exceed the quality standard
 - b. Certificate 03375/CLACAP, dated March 25, 2022, the quality standard refers to the Minister of Environment Regulation 07/2007 appendix I, Boiler 2, the test results have no parameters that exceed the quality standard
- Ambient air testing in front of the PMKS office, Employee Settlement, Factory Outside Fence, with evidence of:
 - a. Certificate 02424/CLACAP, dated March 25, 2022,
 - b. Certificate 06275/BLAEAO, dated November 1, 2021,
 - c. The test results show that there are no parameters that exceed the quality standard values stipulated in PP RI No. 22 of 2021, carried out by the laboratory
- Noise measurement is carried out at the location in front of the PMKS office, Employee Settlement, Factory Outside Fence, with evidence of:
 - a. Certificate 02424/CLACAP, dated March 25, 2022,
 - b. Certificate 06275/BLAEAO, dated November 1, 2021,
 - c. The test results show that there are no parameters that exceed the quality standard values stipulated in KepmenLH No. 48/MENLH/11/1996
- POME wastewater quality testing, carried out every month with the following examples:

- a. Certificate No.06797/CLACAP, dated 20 July 2022, COD 202.63 mg/l and BOD 98.7 mg/l
- b. Certificate No.05217/CLACAP, dated June 20, 2022, COD 167.92 mg/l and BOD 65.2 mg/l
- c. Certificate No.03971/CLACAP, dated 20 May 2022, COD 170.54 mg/l and BOD 89.4 mg/l
- d. Quality standards refer to PermenLH No. 5 of 2014 attachment III (COD 100 mg/L and BOD 350 mg/L)
- Hazardous waste management, the forms of management are as follows:
 - a. Permit for temporary storage of hazardous and toxic materials waste: Decree of the Head of the Batubara Regency Environmental Service Number: 660/1052, regarding the Right Permit for the Temporary Storage of Hazardous and Toxic Waste to PT SOCFIN Indonesia, dated May 25, 2018 valid for 5 years from the date of stipulation
 - b. Hazardous Waste Manifest, with examples:
 - 1. KLHK-1657361297, dated 27 May 2022, type of used lubricant waste, code B105d, volume 0.598 Ton, PT AMindy Barokah SUMUT, NOPOL BK 8332 MO,
 - 2. KLHK-1657375217, dated 27 May 2022, infectious clinical waste type, code A337-1, volume 0.024 Ton, PT AMindy Barokah SUMUT, NOPOL BK 8332 MO
 - 3. KLHK-1657358180, dated 27 May 2022, type of used packaging B3, code B104d, volume 0.14 Ton, PT AMindy Barokah SUMUT, NOPOL BK 8332 MO
 - 4. 4. KLHK-1657362311, dated 27 May 2022, type of used filter waste, code B109d, volume 0.113 Ton, PT AMindy Barokah SUMUT, NOPOL BK 8332 MO
 - 5. 5. KLHK-1657359221, May 27 2022, type of contaminated waste B3, code B108d, volume 0.087 Ton, PT AMindy Barokah SUMUT, NOPOL BK 8332 MO
 - 6. 6. KLHK-1657363497, dated 27 May 2022, type of used battery waste, code B102d, volume 0.11 Ton, PT Amindy Barokah SUMUT, NOPOL BK 8332 MO
 - c. Minutes of Delivery of hazardous dan toxic Waste from PT Socfindo Kebun Tanah Gambus to PT Amindy Barokah, SUMUT, on 27 May 2022, with the type of waste: Contaminated goods packaging: 87 Kg, Contaminated B3 Packaging: 140 Kg, Medical Waste 24 Kg, Used filter waste: 113 Kg , Used Oil Waste : 650 Liters, Used Batteries : 110 Kg

The company also shows some documentation of the realization of social impact management, such as:

- Boundary mark maintenance records
- Documentation of the use of organic fertilizers in the form of utilization of empty fruit for the period January to July 2022
- Documentation of the percentage of workers who come from the surrounding community
- Realization of CSR programs
- Questionnaires to the community around the first semester of 2022 include: Public facilities and resources, People's amenities, Field and factory operations, GHG emission sources, Utilization of plantation resources, Road access rights.

The company shows the Semester II Environment Management and Monitoring Plan Report document for 2022, which has been submitted to the Related Office with evidence:

1. Letter number, SA No. TG/X/DI/195/22, dated July 25, 2022, to the Regent of Batu Bara, Department of Manpower, Industry and Trade, Department of Housing, Settlement Areas and the environment.
2. KLHK SIMPEL Electronic Receipt, TTE ID 1658891592-2195, TTE period 01 January 2022 to 30 June 2022, 27 July 2022, RKL-RPL reports, PPA reports, PPU reports, PLB3 reports, status has been reported.

The RKL-RPL report contains all aspects of environmental management and monitoring, including employment opportunities, perceptions of the surrounding community, and public health.

The company can prove that the management and monitoring of impacts has been carried out in accordance with the environmental matrix document and the Social Impact Assessment Report.

In general, the results of environmental monitoring do not contain conditions that exceed the quality standards or those specified in the RKL-RPL Matrix

	Status: Comply	
3.5		

A system for managing human resources is in place.

3.5.1

The company has procedures for recruitment, promotion, retirement and termination of employees , here's the detail:

- Daily Worker Admission Procedure with document number SOC/PSM/6.01.01 revision 3 dated February 20, 2020
- Non-Discrimination and Equal Opportunity Policy, passed in June 2019 and updated in October 2021.
- No Forced Labor Policy, passed on June 1, 2019.

In addition, the company has a Collective Labor Agreement (CLA) for the 2018 – 2020 period which was ratified on 4 July, 2018 by a team of employers and a team of labor unions. The document describes all regulatory aspects related to employment, such as: recruitment requirements, promotion, retirement, termination of employment, and other provisions. All rights and obligations of employees have referred to the labor regulations currently in force, such as setting minimum wages, determining retirement age and also entitlement to leave. The above mentioned CLA documents are available in Indonesian.

Based on this procedure, it is known that the basic requirements for prospective workers include a minimum age of 18 years, have an ID card, education at least according to the vacancy, and have special skill requirements if needed.

3.5.2

The company always documents all labor procedures that have been carried out properly such as recruitment, promotion, performance appraisal, and others. The following are some examples of labor procedures that have been well implemented and documented by the company, for example:

- Record of promotion of workers (increase in class) on behalf of Rizki Ageng Asmara on January 25, 2022 (No. TG/Div/R/020/22). The letter of appointment is also accompanied by a recording of the employee's appraisal.
- Employment agreement for newly appointed workers in 2022 on behalf of Edi Putra with a work agreement signed by both parties on June 1, 2022. The appointment document is accompanied by a record of the worker's legal identity as well as the rights and obligations of the worker.
- Records of termination of employment on behalf of Poniran II (No. SKP/AMK/PJS/UM/028/2022) on June 30, 2022. The recording is also accompanied by the fulfillment of employee rights such as giving severance pay and pensions.

The explanation above proves that the unit of certification has implemented work procedures properly and is documented for each employee.

Status: Comply

3.6

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

3.6.1

The results of interviews and document verification, available risk assessment documentation and identifying OHS problems of plantation and mill units listed in the document listing important environmental and OHS aspects as well as mitigation plans listed in the document controlling important environmental aspects and OHS which explain the types of important environmental aspects and OHS, significant impacts, and the control hierarchy include:

- elimination, substitution, engineering, administration and PPE.
- The last review on the document was January 7, 2021

In connection with OFI in the previous assessment, the auditor conducted field observations and interviews with workers and supervised spray workers in Division 5, and it is known that workers have understood that there is a prohibition on high-risk workers such as spraying herbicides cannot coincide with other work in the same location. The auditor also saw that there was no work other than spraying activities at the location.

3.6.2

The company has shown the results of monitoring and effectiveness of the OHS plan for the period 2021 to June 2022:

1. Safety Inspection which is planned every month and has been realized according to the program
2. Fire & Emergency Response Simulation planned in April and realized in February.
3. Routine Reporting of P2K3 Activities to the Manpower Office which is planned every quarter and the first quarter of

- January to March 2022 in the month and has been realized according to the program.
4. Monthly Meetings are planned every month and have been realized according to the program
 5. Monitoring work accidents from January to June 2022, there are no work accidents,
 6. The Health Check, which is planned for April, will be held on May 28, 2022 with a total of 171 participants. Attached are the minutes of the Anugerah Ibu Specialist Clinic.
 7. First aid socialization is carried out in each Division and Factory which is led directly by each ASKEP, such as on May 28, 2022 at the Division I office with 8 participants, Division II Office with 14 participants, Division III Office with 8 participants, Division IV office 11 participants, Factory office (POM) on May 10, 2022, 9 participants. Supporting documents are available attendance, briefing minutes and photos.
 8. P2K3 Quarterly Report documents are also available from January 2022 to March 2022, with letter number: 038/SY/VI/2022 containing the performance of SMK# and recordings of periodic meetings between the person in charge of P2K3 and the workers, including the date:
 9. OHS monthly meeting (January, February and March 2022)
 - The P2K3 meeting for the January 2022 period on January 15, 2022, took place on the tennis court and was attended by 16 P2K3 administrators and members.
 - The P2K3 meeting for the period of February 2022 on February 18, 2022, took place on the tennis court and was attended by 18 P2K3 administrators and members.
 - The P2K3 meeting for the March 2022 period on March 11, 2022 took place on the tennis court and was attended by 20 P2K3 administrators and members.
 10. All meetings consistently discuss the socialization of Hazard Source Identification and Risk Control to employees, company OHS performance, cleanliness of public facilities and housing as well as socialization of OHS in company activities.
 11. Minutes of monthly P2K3 meetings are well recorded and documented such as information; list of attendees; meeting agenda and meeting minutes.

The company has made improvements related to work accidents that caused workers to lose one segment of index finger in the factory area by mitigating control engineering using a protector on the cutting machine in the workshop area. Companies are encouraged to ensure these repairs are not only at the workshop location but at other stations such as the Civil Warehouse location. **OFI**

	Status: Comply	
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3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.

3.7.1
The company has identified training programs related to aspects of the RSPO P&C for all staff, workers and local stakeholders in 2022, including:

- Heavy equipment operation training
- First aid training
- SCCS training
- Emergency Response Training
- Chemical spill response training
- Integrated security system training.
- Training on potential electrical hazards.

For out growers and communities, the company has identified training programs for 2022 period, for examples Best cultivation practice training program in several surrounding villages, in Gunung Bandung Village, Titi Merah Village, Pasir Permit Village, Barung-Barung Village and Pematang Panjang Village.

The company has also identified training and outreach programs for local stakeholders such as civil contractors and mechanical contractors. For example, dissemination of understanding on RSPO, OHS, HIRAC and emergency response procedures. The provision of this understanding or training has also been acknowledged by the contractor during the public consultation.

3.7.2

The company shows the minutes of the realization of the training program in 2021 – 2022, for example:

- Work Accident Investigation Training at Division III Office on December 30, 2021.
- Integrated security system training at Division I and IV offices on October 29, 2021.
- Training on spraying the use of pesticides to control pests and diseases at the Division II office on July 3, 2021.

Based on the description above, the company has proven that there are training activities for all staff, workers, and stakeholders. Records of the training activities have been maintained in the official report document.

3.7.3

The unit of certification showed socialization about the supply chain to employees which was last conduct on 25 April 2022. The minutes explained the procedures for managing certified and non-certified products including the responsibilities for each of the personnel who handle products.

Based on the interviews with weighbridge officers and security, the two personnel have been able to explain well about the management of certified and uncertified products, especially regarding the origin of the FFB source.

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1 & 3.8.2

PT Socfin Indonesia – Tanah Gambus does not accept FFB from other parties or from farmers/smallholders and only accepts FFB from Tanah Gambus Estate (company's operational area). This is evidenced by the review of FFB receipt documents from January 2021 to August 2022 in which Tanah Gambus Mill only received FFB from Tanah Gambus Estate and did not receive FFB from other parties. This is also consistent with the results of interviews with management and workers (weighbridge officers and sortation workers) who stated that the FFB received only came from Tanah Gambus Estate.

Based on the explanation and evidence above, it can be concluded that PT Socfin Indonesia – Tanah Gambus has implemented the IP Module and all FFB received/processed were originally from RSPO certified estate (Tanah Gambus Estate).

3.8.3

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

Product	License volume (Tonnes) Including (05 December 2021 to 04 December 2022)	Actual Production (MT) of previous audit (August 2021 to July 2022)	Estimate Production of 12 month (MT) further
FFB	83,000	81,165.24	85,000
CSPO	19,250	19,028.83	19,550
CSPK	3,025	2,565.85	2,975

*Estimated production is taken from the actual production 12 months before the audit activity, namely the period August 2021 – July 2022.

3.8.4

Unit management shows the registration and reporting requirements for the supply chain including a registered in RSPO membership with information detail such as:

Name of RSPO Member	Socfin SA
RSPO Membership Number	1-0269-19-000-00

Name of Certified Unit	Tanah Gambus
RSPO PalmTrace ID Number	RSPO-PO1000000352
Supply Chain Model	Identity Preserved (IP)
Sub License ID	CB126446
Start Date	12-12-2021
End Date	10-11-2022

All transaction has been announced to RSPO IT Platform and confirmed shipped. During license it was known there is product sold as RSPO certified and non-certified/conventional as described in indicator 3.8.8 and 3.8.16.

3.8.5

The company has a mechanism or procedure in the Supply Chain Certification Standard Identity Preserved Procedure Document (No. SOC/PSM/9.10 edition 2 rev 01) which is effective from 15 April 2022. The procedure aims to ensure that certified CPO and Kernel are not physically mixed with uncertified starting from FFB reception, processing, storage of CPO and kernels and their delivery. The document also informs competent officers and their responsibilities, including:

- The factory technician is responsible for the supply chain process in the plantation.
- Sustainability staff and Sales Staff are responsible for palm trace transactions.
- Weigh Clerk ensures that the incoming FFB comes from their own plantation by identifying the number of the truck carrying the fruit and the documents brought by the truck. Data on the receipt of the number of FFB is inputted into the FFB menu and processed in Harvest Plus Application.

The procedure already referred to latest SCCS standard (RSPO Supply Chain Certification Standard endorsed by the RSPO Board of Governors on 1 February 2020).

Records related to SCCS, such as FFB weighing records, production quantity calculation records, production delivery records, daily production reports, 3-monthly production reports, sales documents (contracts, DO and Invoice) and other related documents are kept for at least 2 years by estate document controller. The procedure also regulates abnormal conditions such as disturbances in the reporting system or errors in inputting recorded data.

Based on observation and interviews with the PIC in specific activities (i.e. security/receiving FFB, weighbridge, and mass balance data PIC), they have been provided SCCS training and are able to demonstrate awareness of the procedures related to SCCS implementation.

3.8.6

The Procedure to conduct annual internal audit are describe in SOP *Prosedur Audit Internal Sistem Manajemen* (No. Doc. SOC/PSM/8.02, Rev. 08) dated 1 July 2020 covering all audit for sustainable palm oil including SCCS. In the SOP mentioned that internal audit is done annually. Internal audit of SCCS conforms to the requirements in the RSPO SCCS and the RSPO market communications and claims documents and effectively implements and maintains the standard requirements. Sustainability Staff responsible for establish an Audit Programs for every year.

Latest internal audit has conducted on 06-08 June 2022, which also resulting there is no non conformities identified towards SCCS indicators. Summary report of internal audit becomes one of many aspects which discussed on management review annually, for example internal audit in 2021 has been review from management in meeting on 16 March 2022 and for internal audit in 2022 will be review at the end of 2022 or early 2023.

3.8.7

PT Socfind Indonesia – Tanah Gambus Mill has record the production of FFB received from certified source. Below is the detail of FFB received for period of **(August 2021 to July 2022)**:

Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total

Aug-21	6,479.03	NA	6,479.03
Sep-21	7,415.91	NA	7,415.91
Oct-21	6,116.20	NA	6,116.20
Nov-21	6,492.25	NA	6,492.25
Dec-21	6,131.71	NA	6,131.71
Jan-22	5,741.15	NA	5,741.15
Feb-22	5,486.15	NA	5,486.15
Mar-22	8,248.48	NA	8,248.48
Apr-22	8,269.71	NA	8,269.71
May-22	7,559.04	NA	7,559.04
Jun-22	6,078.49	NA	6,078.49
Jul-22	7,147.12	NA	7,147.12
Total	81,165.24	NA	81,165.24

Estimated certified product recorded in the last assessment report (RC). Actual certified produced has been verified during this assessment and not exceed the estimate. The data are shown in the following table:

Product	License volume (Tonnes)	Actual Production (MT) of
	Including (05 December 2021 to 04 December 2022)	previous audit (August 2021 to July 2022)
FFB	83,000	81,165.24
CSPO	19,250	19,028.83
CSPK	3,025	2,565.85

According to the data during the certification period, Actual certified produced has been verified during this assessment, and not exceed the estimate

Mechanisms for handling unsuitable FFB and / or documents have included in the supply chain certification standard Identity preserved procedure with document number SOC/PSM/9.10, edition 02 revision 01 dated 15 April 2022.

3.8.8

Based on document verification and interview with management representative obtained information in last 12 months before audit (August 2021 – July 2022) it was known the product only sold under certified product as described in table below:

	Dispatch period (MT)	
	August 2021- July 2022	Total
CSPO sold under RSPO Scheme	19,028.83	19,028.83
CSPO sold under other scheme	-	-
CSPO sold as conventional	-	-
CSPK sold under RSPO Scheme	2,565.85	2,565.85
CSPK sold under other scheme	-	-
CSPK sold as conventional	-	-

The company shows documentation of certified products, such as sales contracts, shipping announcements, delivery

orders, etc. These documents describe the names and contacts of the buyers and sellers, delivery dates, product descriptions, quality, quantity, member ID, and others. For examples:

- Product delivery record No. WT/AWTE1205/2022/000186 for CSPO, buyer name (PT Multimas Nabati Asahan) and address of buyer, shipping date on 02 February 2022, volume as amount as 435.00 MT and stamped of RSPO Certified IP. The document also includes the certificate number MUTU-RSPO/164 for Tanah Gambus POM, the sales document also includes the unique ID for the transaction and for Transaction ID is No. TR-8d9a3768-5531.
- Product delivery record No. WT/AWTE1206/2022/000270 for CSPK, buyer name (PT Domas Sawit Inti Perdana) and address of buyer, shipping date on 18 February 2022, volume as amount as 18.00 MT and stamped of RSPO Certified IP. The document also includes the certificate number MUTU-RSPO/164 for Tanah Gambus POM, the sales document also includes the unique ID for the transaction and for Transaction ID is No. TR-fe19e2b4-0533.

3.8.9

All product processing handled by company. Outsource for certified product handling has only for CPO and PK transportation activities, with agreements presented as follows:

- CPO transportation agreement with PT Gunung Kawi Sukses Makmur through Agreement No. PD.GM/X/589/2021 dated 29 November 2021. Clauses that mention contractor's commitment towards several regulation compliance which required by Indonesian Laws and/or Regulations, as well as willingness to be audited by the Certificate Body appointed by PT Socfin Indonesia are presented in Article 4 (l).
- For PK transportation namely PT Gunung Kawi Sukses Makmur with agreement document No. PD.GM/X/590/2021 dated 29 November 2021. Based on the document verification, it informs that the contractor is willing to be audited at any time by an independent certification body.

All the agreement valid till 31 December 2022 and can be extended if needed. The clause on the terms of work has also clearly stated that the contractor is willing to be visited by the certification body to verify operational activity and administration and others things related CPO and PK transportation of PT Socfin Indonesia. Based on interview with CPO and PK Transporter) it was known they willing to interview about SCCS process in the term of CPO transportation, the transportations of RSPO certified products and etc.

3.8.10

The contractor who cooperates with the certification unit to handle certified products is PT Gunung Kawi Sukses Sejahtera. The contact details and company identity are contained in the cooperation contract.

3.8.11

Until the recertification is carried out, there are no new contractors handling RSPO certified products. The contractor used is still the same as the previous assessment.

3.8.12

The company has maintained accurate, complete, up-to-date, and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements. All the record can be accessed by the auditor, such as record of certified product shipping, sales contract, delivery order/invoice, production report and product sales. According to the Traceability Procedure all document and record related to supply chain kept for minimum 2 years

CSPO and CSPK produced and/or claimed records are kept in minimum 12 months. Record of all certified palm oil/palm kernel oil volumes purchased (input) and claimed (output) for period of 12 months before audit (August 2021 – July 2022):

Crude Palm Oil (CPO)

Period	CPO Production (MT)		CPO Delivery (MT)		
	Certified	Uncertified	Certified (Physical)	Other Scheme	Conventional
Opening stock	73.86	-	-	-	-
August 2021	1,544.35	-	816.21	-	-
September 2021	1,743.15	-	2,335.10	-	-

October 2021	1,399.09	-	1,524.00	-	-
November 2021	1,547.47	-	1,579.27	-	-
December 2021	1,443.46	-	1,325.63	-	-
January 2022	1,280.75	-	1,369.90	-	-
February 2022	1,242.59	-	618.39	-	-
March 2022	1,931.04	-	2,501.18	-	-
April 2022	2,002.74	-	1,958.57	-	-
May 2022	1,750.84	-	588.76	-	-
June 2022	1,364.35	-	1,184.96	-	-
July 2022	1,779.01	-	1,358.22	-	-
Total	19,028.83	-	17,160.19	-	-

*Note: License period is from 05 December 2021 – 04 December 2022.

Based on above information, there's CSPO sold as amount as 17,160.19 MT certified product on license period. For information, there's remaining stock of CSPO on the end of 24 August 2022 as amount as 6,190.74 MT.

Palm Kernel (PK)

Period	PK Production (MT)		PK Delivery (MT)		
	Certified	Uncertified	Certified (Physical)	Other Scheme	Conventional
Opening stock	44.43	-	-	-	-
August 2021	219.51	-	205.36	-	-
September 2021	242.05	-	264.17	-	-
October 2021	191.52	-	185.07	-	-
November 2021	209.58	-	200.36	-	-
December 2021	192.10	-	181.18	-	-
January 2022	164.66	-	183.29	-	-
February 2022	145.97	-	133.04	-	-
March 2022	267.01	-	263.67	-	-
April 2022	272.72	-	247.77	-	-
May 2022	238.00	-	259.39	-	-
June 2022	190.63	-	147.19	-	-
July 2022	232.12	-	238.09	-	-
Total	2,565.85	-	2,508.58	-	-

*Note: License period is from 05 December 2021 – 04 December 2022.

Based on above information, there's CSPK sold as amount as 2,508.58 MT certified product on license period. For information, there's remaining stock of CSPK on the end of 24 August 2022 as amount as 851.75 MT.

3.8.13 & 3.8.14

Tanah Gambus Mill has performed FFB processing to produce CPO and PK only. Conversion factors are based on total processing extraction, through average of all FFB processed. Related to extraction procedure mention on Work Instruction Sampling of Quality Analyze on Laboratory POM (No.Doc. SOC-LAB/IK/03-01) dated 1 March 2021. The production of

CPO (OER) and PK (KER) are based on actual daily, monthly, and yearly production.

3.8.15

The mill has set the procedure and implement to verify that the RSPO certified oil palm product is kept separated from non-certified oil palm products, from the receiving verification, processing and transporting. During 12 months previous the audit, the Mill did not process the uncertified FFB.

3.8.16

Documentation for the Sustainable Certified Product (CSPO and CSPK) consists of a daily record of the FFB acceptance, a daily record of certified production, which is classified as the CSPO and CSPK, a sales record, a stock record that has been reconciled with the FFB acceptance, monthly production and sale and annual recapitulation. Based on documents verifications and interviews with management units obtained information since August 2021 – July 2022 there are **17,160.19** MT CSPO and **2,508.58** CSPK sold as certified products

Documents verification and interview during an audit it was known the claimed RSPO product of CSPO and CSPK is no longer than 3 months since the product delivered. Those documents cover information's of delivery date, description of product and supply chain model, product quantity, identification number, certificate number, sender's name, and address of the seller, for example Shipping announcement of CSPK as much as 18.00 MT, with shipping date on 18 February 2022 and confirmation date in shipping announcement on 02 March 2022 (no more than 3 months).

3.8.17

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

Status: Comply

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

4.1

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

4.1.1

The company has established a policy to respect human rights as indicated in the document human rights policy that was approved by the Principal Director on June 1, 2019. The Policy informs that company is committed to resolving any conflict through peaceful means that promote human dignity and respect the rights of all. Violence and threats have no place at socfindo and any form of violence, harassment or intimidation against any individual or group is strictly prohibited, including retaliation against human rights defenders. Also the company must protect individuals from violence, threats, all forms of retaliation, direct or indirect, pressure or other arbitrary actions as a consequence of the legitimate use of individual human rights fundamentals in their relationship with Socfindo.

In those policies, it is stated that the company is committed to human rights for all workers, contractors, indigenous peoples, and surrounding communities throughout the company's operations. This policy is publicly available on the company website in two languages (Indonesian and English) and has been communicated to all workers and local stakeholders.

Based on the results of interviews with representatives of labor unions, contractors and representatives of Tanah Itam Ulu and Simpang Gambus village, it was found that there were no incidents of human rights violations in the company, no employees were intimidated and or were subjected to violent treatment by the certification unit.

4.1.2

The company does not have a record related to the use of force/mercenaries/paramilitary in resolving conflicts/problems that exist between the certification unit and related stakeholders (surrounding communities, workers, or others).

Based on the results of interviews with representatives of labor unions (estate and mill) and representatives of the gender committee, it is known that the company does not use paramilitaries or mercenaries in the company's operational areas.

If there are problems, they will be resolved by means of deliberation without resorting to violence. The resolution of conflicts/problems using this deliberation has been quite effective.

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

The company has a procedure related to complaints and grievances in document number SOC/PSM/9.01 revision 6 and effective from March 1, 2020. These procedures handle external and internal complaints. Based on the procedure, it is known that the deadline for responding to complaints is 1 month. The procedure also describes the handling of Human Rights Defender complaints and related to whistleblowers. Besides, it also explains that if there are stakeholders who cannot read and write, the socialization method is carried out through representatives who can read and write. Head of administration as the person responsible for receiving complaints will maintain the identity of the complainant so that there is no risk of retaliation or intimidation.

The company then shows a record of complaints from internal and external stakeholders along with the resolution of complaints listed in the "*Buku Keluhan periode 2021/2022*". However, based on the review of the document, it is known that there have been no complaints submitted by stakeholders to the company during the past year.

The results of interviews with the workers in workshops and also representatives of trade unions in both plantations and factories it is known that the complaint procedure has been submitted regularly to all employees. Socialization related to handling complaints is also usually delivered during the morning circle. Every employee complaint is also well responded to by the management unit.

From the description above, it can be concluded that the company has a system that regulates complaints and complaints to all parties.

4.2.2

In the policies that have been submitted in indicator 4.2.1, the procedure explains how to submit complaints or suggestions to all parties, including those who cannot read or write. If there are stakeholders who cannot read and write, the socialization method is carried out through representatives who can read and write

4.2.3

The company has also informed the parties about the progress of handling complaints, carried out in several ways, such as through a complaint and dissatisfaction recording form or with a company representative appointed as a liaison between the two parties who can hold formal and informal meetings and communicate in person or by telephone. In Grievance Procedures for Human Rights Defenders / Whistle Blowers shall conform to the requirements as set out in Annex 1 of RSPO Policy on the Protection of Human Rights Defenders, Whistleblowers, Complainants and Community Spokespersons.

Regarding the demonstration incident, based on the explanation of the SPSI PUK Estate management, it was indeed initiated by the plantation workers union. The union held a demonstration regarding the issue of reduced bonuses from previous years. Based on the explanation of the Department of Manpower Batubara Regency, related to bonuses, is the company's prerogative. From the results of the collective bargaining agreement review, it is also known that the bonus is based on a collective agreement between the Federation of Agricultural and Plantation Workers Unions of All Indonesia and the North Sumatran Plantation Company Cooperation Agency, not determined by PUK SP.PP-SPSI. Until the audit activity was carried out, currently all workers have returned to work.

4.2.4

In the policies that have been submitted in indicator 4.2.1, also explains that the complaining party is allowed to choose a settlement that involves an independent legal or technical advisor or choose an individual/group to support or act as an observer or mediator.

	Status: Comply	
4.3		
The unit of certification contributes to local sustainable development as agreed by local communities.		
4.3.1		
<p>The certification unit has identified the needs of the surrounding community through evaluation for CSR Program in 2021 and based on the results of consultations with local communities, among others in the form of providing CSR to the surrounding community and partnership cooperation. The results of the meeting were manifested in the preparation of the CSR program for the period of 2022 which was divided into:</p> <ul style="list-style-type: none"> • Religion • Health • Sports • Education • Infrastructure Development • Human Resources Improvement • Economic Development • CSR Smallholders partnership <p>Some of the contributions to community development in 2022 as follows :</p> <ul style="list-style-type: none"> • Assistance for normalization of drainage channels in Simpang Gambus Village on March 10, 2022. • Assistance of heavy equipment (Road Grader and Compactor) to repair the main road in Pasir Permit Village on 20 February 2022. • Assistance of heavy equipment (Road Grader and Compactor) to repair the main road in Titi Merah Village on 19 June 2022. <p>Partnership The sustainable Partnership Cooperation Agreement with "<i>Kelompok Tani Mutiara Desa</i>" on 24 May 2021 valid for 5 years. The scope of cooperation is Coaching and partnership in oil palm plantation in Pasir Permit Village.</p> <p>Based on the interviews with representatives of the surrounding community, it is known that so far, the existence of the company has had a very positive impact on the community, both in social assistance and community empowerment. The realization of social responsibility has taken into account the results of the meeting in identifying community needs.</p>		
	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		
<p>In 1909, Societe Financiere des Caouchoucs Medan Societe Anonyme (Socfin) was founded by M. Bunge. At the same time, Adrian Hallet founded Plantation Fauconnier & Posth with Henry Fauconnier. On December 7, 1930, based on notarial deed William Leo No.45, the name and legality of PT. Socfin Medan S.A. (Societe Financiere des Caoutchoucs Medan Societe Anonyme) is officially used. Based on the notarial deed, PT. Socfin Medan S.A. domiciled in Medan and manages plantations in East Sumatra, West Aceh, South Aceh and East Aceh. Tanah Gambus estate has established since 1930, and land ownership before HGU was erpacht right.</p> <p>Further developments, based on the Presidential Decree No. 6 years 1965, Dwikora Cabinet Decree No.A/D/58/1965, No.SK.100/Men.Perk/1965 stated that the plantation company managed by PT. Socfin Medan S.A was placed under government supervision, then in 1966 the company's ownership rights were handed over to the Indonesian government on the basis of the sale of plantations and assets of PT. Socfin Medan S.A.</p> <p>PT. Socfin Indonesia was founded on December 7, 1930 under the name Socfin Medan S.A. In 1965, PT. Socfin Indonesia was transferred under the supervision of the Indonesian government based on Presidential Decree No. 6 of 1965. In 1968, PT. Socfin Indonesia is a joint venture between Plantation Nord Sumatra S.A. - Belgium (shareholder of Socfin) with the government of the Republic of Indonesia under the name of PT. Socfin Indonesia (Socfindo), based on the Law on Foreign</p>		

Investment No. 01/1967 with a ratio of 60% ownership of Plantation Nord Sumatra and 40% shares of the government of the Republic of Indonesia. On December 13, 2001, in line with the privatization of several SOEs by the government of the Republic of Indonesia, there was a change in Socfindo's share ownership to 90% of Plantation Nord Sumatra's shares and 10% of the Indonesian government's shares under the ministry of SOEs.

The area of Tanah Gambus Plantation PT. Socfin Indonesia covers an area of 3,373.11 ha, located in Batu Bara Regency, North Sumatra Province. The entire commodity of this plantation is Palm Oil. Since 2015, Lima Puluh Estate which is located in Lima Puluh District, Batu Bara Regency, North Sumatra, covering an area of 1,601.18 hectares, is merger with the Tanah Gambus Estate, where the commodity of Lima Puluh Estate is rubber plantations. Starting in 2017, conversion activities were carried out after obtaining the NPP report approved by the RSPO.

4.4.2

The company shows evidence related to land acquisition that has implemented the FPIC mechanism, for example the following records that PT Socfin had compensated farmers who had legal proof of ownership such as H. Idris had received compensation payments on March 28, 2006 because they had proof of legal ownership of their +/- 8 Ha land.

4.4.3

Based on the review of the environmental permit documents as well as the identification of the presence of HCVs, there is no customary land in the company area. This was also confirmed from the results of public consultations with representatives of Lima Puluh Kota Urban Village, Tanah Itam Ulu Village, Simpang Gambus Village and also National Land Agency of Batubara Regency that there are no customary land, customary land or other land rights above the company's operational area.

Based on the review of the Tahan Gambus Estate operational map document year 2020 (scale 1: 25,000) which has referred to the map of land rights owned, there is no information on the existence of customary rights and other rights over the legality of the land owned by the company. The entire area has been utilized by the company according to its designation.

4.4.4

In line with the explanation in indicator 4.4.3, from the results of the review of the company map document, it is known that the operational map has referred to the HGU map that legally owned. There are no customary rights in the company's operational areas.

4.4.5 & 4.4.6

Based on explanation on indicators 4.4.2, the previous owner represented himself in the land acquisition process.

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 – 4.5.8

Based on the review of the environmental permit documents as well as the identification of the presence of HCVs, there is no customary land in the company area. This was also confirmed from the results of public consultations with representatives of Lima Puluh Kota Urban Village, Tanah Itam Ulu Village, Simpang Gambus Village and also National Land Agency of Batubara Regency that there are no customary land, customary land or other land rights above the company's operational area.

Based on the onsite assessment, there's only new planting activities on ex rubber area which is an area owned by Lima Puluh estates that already have land use title and conversion permits into oil palm plantations.

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

The company has procedures related to the identification of legal rights in the Procedure Document for Identification and Calculation of Land Compensation (No. SOC/PSM/9.05, Rev. 01) which is valid on April 1, 2015. The scope of the procedure starts from conducting land identification, surveying, Analysis up to the final negotiation of payment and land acquisition by the company. there are several PICs in the procedure and their responsibilities, for example:

- Principal Director is responsible for providing final decisions on land acquisition.
- General Manager is responsible for providing final recommendations to the principal director related to land acquisition decisions, land compensation calculations, risk analysis, feasibility evaluation and also negotiating land prices with land owners.
- Relevant divisions (plant, general, shopping, and internal audit) are responsible for providing data, analysis and recommendations related to land acquisition objectives.

In addition, there is also a land acquisition procedure in the Land Acquisition Procedure (No.Doc. SOC/PSM/9.04, Rev. 00) which took effect on January 1, 2010. The procedure contains information related to determining land needs, identification of land owners, negotiations, land acquisition and also the issuance of land rights by the competent authority. The procedure also explains (Point 5.5.3) that the company ensures that the land acquisition plan has received approval from the local community through the FPIC mechanism which must obtain the consent of the local community voluntarily.

PT. Socfin Indonesia Tanah Gambus Estate was established in 1930 therefore the organization did not use document of Location Permit.

4.6.3 & 4.6.4

In the land clearing process, the company also has an acquisition mechanism in the Land Acquisition Procedure (No. Doc. SOC/PSM/9.04) issued on January 1, 2010. The procedure explains that the company ensures that the land acquisition plan has received approval from the local community through FPIC mechanism. The company obtains community consent voluntarily and without coercion. The community also has the right to be represented by representatives appointed by the community itself in the negotiation process.

Based on documents verifications and interview with surrounding village there was no identified the presence of indigenous land or land compensation in the concession area of company. Furthermore, obtained information that there are no land rights in the company operational area, either individually or in groups, both formally and informally. The results of the interview also confirmed that the company area had been controlled before the village was formed. People already know clearly company boundaries. The existence of the company and its boundaries are recognized by the community and no claims have been made by the community on these lands. Since 2020, there's no information about new land acquisition for the past year.

Status: Comply

4.7

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

4.7.1 – 4.7.3

Based on a review of environmental permit documents as well as identification of the presence of HCVs (2011) in collaboration with the Bogor Agricultural Institute, there is no information on the existence of customary lands in the company's area. This was also confirmed from the results of public consultations with representatives of Lima Puluh Village, Sumber Makmur Village and also Land Agency of Batubara Regency that there is no customary land, *ulayat* land or other land rights above the company's operational area.

It was confirmed from the public consultation with Village Head of Lima Puluh and Sumber Makmur there were no land conflict at all land within estate and mill. It was also confirmed that no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations.

The company explained that there had previously been a problem in 2007 which had been resolved, following the chronology:

After the Compensation Committee consisting of the Head of Lima Puluh, District Jupen, Village Heads and village farmers' organizations in 1970/1971 gave compensation to the Tanah Perjuangan Farmers in Simpang Gambus, several people and Farmers Groups appeared who claimed they had not received compensation and were still disputed the land of struggle, namely:

- Mr. Abdul Gani Aceh (represented by Ms. Wardiana) by letter dated 8 November 1999; Mr. Abd Rahman and Mahmud in a letter dated December 14, 1999 claimed that they had not received compensation but they did not have evidence of legal land ownership so they could not be compensated.
- Mr. Idris admitted that he had not received compensation for his +/- 8 ha land but he could show evidence of land ownership. Mr. Idris received compensation according to the land, he owned through a letter of compensation agreement no. TG/SPGRT/01/2006 dated 28/03/2006.
- Tanah Perjuangan Farmers Group claimed to have rights to a land area of +/- 483 Ha. The recognition of land ownership is carried out through:
 - ❖ Submission of letters to the Minister of Home Affairs and the National Land Agency (BPN) through DPD Tri Sula Nusantara letter no. 03/TN-SU/VIII/2007 dated August 16, 2007 without attached proof of land ownership.
 - ❖ Submission of aspirations through speeches at Block 9 in September 2007. PT Socfindo was accompanied by the District Head and the Police of Lima Puluh Regency to listen to these aspirations.
- PT Socfindo's response to the acknowledgment of land ownership by the Tanah Struggle Farmers Group which was carried out through the letter and oration is as follows:
 - ❖ Informing the community at the time of the oration that the recognition of land ownership must be proven by valid land ownership documents.
 - ❖ Consulted with National Land Agency of Medan that recognition of land ownership by the community could be served as long as they could show evidence of legal land ownership.
- On March 10, 2011, a hearing was held with the DPRD of Batubara Regency, PT Socfindo Tanah Gambus and the Tanah Perjuangan Farmers Group represented by Muliono. The summary of the hearings is as follows:
 - ❖ The Tanah Struggle Farmers Group submitted a claim for compensation for their land rights owned by PT Socfindo.
 - ❖ Based on these demands, Commission A of the DPRD of Batubara Regency asked on what basis the Farmers Group submitted their demands.
 - ❖ The Farmer's Group admits that it has no legal evidence of land ownership.
 - ❖ PT Socfindo said that it had compensated farmers who had legal proof of ownership such as H. Idris had received compensation payments on March 28, 2006 because they had proof of legal ownership of their +/- 8 Ha land.
- The attitude of PT Socfindo on the recognition of land ownership of +/- 483 Ha by the Tanah Struggle Farmers Group is as follows:
 - ❖ PT Socfindo already has proof of legal land ownership, namely the HGU certificate.
 - ❖ If there is a person or group of people claiming to have land rights on PT Socfindo's HGU land, they must show proof of legal land ownership.
 - ❖ If the person or group of people can show proof of legal land ownership, the settlement must be carried out legally because there are 2 parties who have the same legal land ownership.
- The conclusion from the chronology and the evidence is that the recognition of ownership of a land area of +/-483 ha by the Tanah Perjuangan Farmer's group is not accompanied by evidences of legal ownership, therefore their demands cannot be followed up.

There is also a land acquisition procedure in the Land Acquisition Procedure (No.Doc. SOC/PSM/9.04, Rev. 00) which took effect on January 1, 2010. The procedure contains information related to determining land needs, identification of land owners, negotiations, land acquisition and also the issuance of land rights by the competent authority. The procedure also explains (Point 5.5.3) that the company ensures that the land acquisition plan has received approval from the local community through the FPIC mechanism which must obtain the consent of the local community voluntarily.

Status: Comply

4.8

The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate

that they have legal, customary, or user rights.

4.8.1 – 4.8.4

Based on the results of interviews with representatives of Lima Puluh Kota Urban Village, Tanah Itam Ulu Village, Simpang Gambus Village and also National Land Agency of Batubara Regency, there is no information about disputes or land problems in the company's operational areas.

Status: Comply

PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION

5.1

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

5.1.1, 5.1.2, 5.1.3, 5.1.6, 5.1.8 & 5.1.9

Based on the document review of FFB supplier data period 2021 until July 2022, interviews with representatives of Tanah Itam Ulu Village, Simpang Gambus Village, Lima Puluh Kota Urban Villages and Plantation Agency of Batubara Regency, information was obtained that the company does not receive FFB from outside parties, but only receives FFB from its own estate. Based on that explanation so that this indicator cannot be applied.

5.1.5

In terms of cooperating with the community in operational activities (mill and plantation), the certification unit always has a written cooperation agreement that is made fairly, transparently, has a period of time and is in accordance with applicable law. This has been proven by the company unit in cooperation with local contractors (PT Mustika Karya Buana contract No. TG-LP/SPK/X/Bi/006/2022 dated 02 June 2022 for immature plant upkeep work), where this is shown with:

- Work agreement made and agreed by both parties.
- There is a fairly clear term of the agreement, for example 1 month.
- There is an explanation of the terms of price and others.
- Each party has a copy of the cooperation agreement.

The explanation above is in accordance with the results of interviews with contractor representatives (PT Mustika Karya Buana and PT Gunung Kawi Sukses Makmur) who stated that the company had acted fairly, transparently and in accordance with applicable legal provisions in cooperating with contractors.

5.1.7

At the time of the audit assessment, the certification unit had 2 weighbridge machines located on the right and left of the Weighbridge Station which are still used today to weigh FFB, CPO and PK. To ensure that the company uses accurate weighing machines, each year the certification unit conducts a calibration test for each weighbridge it owns. The following is evidence from the calibration test carried out by the government on all weighing machines belonging to the company, namely:

- Test Result Certificate No. 510/040/MET-SKHP/VI/2022 dated April 10, 2022 for one unit of electronic bridge scales with a capacity of 40,000 kg owned by PT Socfin Indonesia – Tanah Gambus has carried out a recalibration test and this result is valid until June 7, 2023. The party conducting the test is UPTD Metrology Legal Agency of Tebing Tinggi City.
- Test Result Certificate No. 510/041/MET-SKHP/VI/2022 dated April 10, 2022 for one unit of electronic bridge scales with a capacity of 40,000 kg owned by PT Socfin Indonesia – Tanah Gambus has carried out a recalibration test and this result is valid until June 7, 2023. The party conducting the test is UPTD Metrology Legal Agency of Tebing Tinggi City.

Based on the explanation above, it can be concluded that every weighing equipment owned by the company has been verified or tested regularly every year by an independent party (government).

Status: Comply

5.2

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

5.2.1 – 5.2.5

Based on the document review, interviews with representatives of Tanah Itam Ulu Village, Simpang Gambus Village, Lima Puluh Kota Urban Villages and Plantation Agency of Batubara Regency, information was obtained that the company does not receive FFB from outside parties, but only receives FFB from its own plantations. The agreement with local farmer groups is a form of local development contribution to transfer knowledge and heavy equipment assistance.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1

Any form of discrimination is prohibited.

6.1.1

The company has a non-discrimination and equal opportunity policy which is shown in Non-Discrimination and Equal Opportunity Policy which was approved in April 2019 by the Principal Director. The document explains that every employee is entitled to equal treatment and Socfindo does not discriminate based on religion, race, sexual orientation, gender, national origin, caste, disability, gender identification, union membership, political affiliation, or age. The policy has been socialized in each plantation and factory unit to workers.

The company does not discriminate and treats all workers fairly, the following is evidence that can be shown by the company which is listed in several demographic documents of employee lists, sample documents of worker recruitment and identification and realization of worker training documents:

- Composition of workers consisting of various ethnic groups, religions, genders, and origins of workers.
- Recruitment of workers based on the results of selection, performance appraisal, ability, and expertise of workers.
- The placement and training of workers are carried out according to their skills/type of work, such as prospective harvest workers being placed as harvest workers and receiving regular harvest training.
- Female workers are given the right to reproductive leave, wages, and the same opportunities for promotion as male workers of the same type of work.

The results of interviews with workers, representatives of labor unions (Mill and Estate) and representatives of the gender committee also obtained information that there were no indications of discrimination against religion, ethnicity, gender, and regional origin in the process of accepting employment.

Based on the explanation above, it can be concluded that the company has treated all workers fairly without discrimination based on gender, ethnicity, religion, health condition or others.

6.1.2

Based on the results of the verification of worker recruitment documents, it is known that the recruitment of workers is based on their skills, abilities and recorded medical examination results. Likewise, promotions, in accordance with the results of employee assessments/evaluations. The company has a non-discrimination and equal opportunity policy which is indicated in the Non-Discrimination and Equal Opportunity Policy which was approved in April 2019 by the Principal Director. Based on the explanation on the recruitment policy Daily Worker Admission Procedure with document number SOC/PSM/6.01.01 revision 3 dated February 20, 2020, the company prohibits the practice of charging workers for recruitment and withholding identity documents.

Based on the results of interviews with workers, representatives of labor unions and representatives of the gender committee, information was obtained that there were no issues related to discrimination. Workers come from various regions. Both local and migrant workers are given equal opportunities to find work and promotions are the same. The company also does not withhold identity documents in the worker recruitment process.

6.1.3

The company shows examples of employee performance appraisals and promotions, for example:

- Record of promotion of workers (increase in class) on behalf of Rizki Ageng Asmara on January 25, 2022 (No. TG/Div/R/020/22). The letter of appointment is also accompanied by a recording of the employee's appraisal.

- Employment agreement for newly appointed workers in 2022 on behalf of Edi Putra with a work agreement signed by both parties on June 1, 2022. The appointment document is accompanied by a record of the worker's legal identity as well as the rights and obligations of the worker.

Based on the results of interviews with the company's staff, information was obtained that the recruitment process for all workers is carried out through the same process where prospective workers must meet requirements in the form of administrative selection (application letter, graduation letter, photocopy of identity and family), physical selection, technical selection, interviews and health examination results. To increase the career path, responsibility, authority and scope of an employee the company provides promotions that are carried out on the basis of skills, abilities, leadership, honesty, discipline, loyalty, absenteeism, etc. Employee performance appraisal is carried out through the performance evaluation stage.

6.1.4

Pregnancy tests for workers are carried out only to ensure that pregnant workers are not allowed to work with chemicals, not as a basis to discriminate against these workers in line with company policy in Daily Worker Admission Procedure with document number SOC/PSM/6.01.01 revision 3 dated February 20, 2020, it is known that there is no pregnancy test in the recruitment requirements. If declared pregnant, the worker will be transferred to a safer job but remain the same in terms of wages and other benefits, so there is no discriminatory action. This is made clear by the results of interviews with female spray workers and representatives of the gender committee in each plantation and mill unit which stated that female workers are required to take monthly pregnancy tests at the clinic to ensure that no pregnant/breastfeeding female workers are exposed to the virus. chemical material. Pregnancy testing is not a discriminatory measure given by the company.

Then from the results of a review of the latest employee recruitment documents and interviews with female workers, it was not found that there was an obligation for prospective female workers to take a pregnancy test when recruiting workers. They explained that at the time of acceptance of workers there was no pregnancy test, but only physical health tests, administration and interviews of prospective leaders.

6.1.5

The company has established a gender committee in each unit which has functions including gender equality (man and woman), protection of women's rights, protection from incidents of harassment, and others.

The company shows the latest document for determining the Organizational Structure of the Gender Committee in the units in 21 May 2022. The organizational structure of the gender committee in all units consists of a chairman, vice chairman, secretary, and member consisting of men and women.

The work program of the gender committee in 2022 in all plantation and mill units, such as:

- Gender-related discussion meetings
- Gender and Violence Against Women's Health Service Program
- Socialization program on Workers' Reproductive Rights.

The company shows the realization of the program and the results of the women's commission meetings listed in the minutes of the 2021 – 2022 meeting, for example:

- Records of socialization of the management of the gender committee and responsibilities on 28 May 2022
- Socialization of Violence and Harassment Prevention Policy on 3 June 2022.
- Gender committee outreach to workers on 27 May 2022.

Based on interviews with female workers, it was found that they were aware of the functions, work programs, and mechanisms for submitting complaints through the gender committee. Then, based on the results of interviews with representatives of the gender committee, it is known that until now the work program of the gender committee has been prioritized for women workers. However, it is possible that cases of sexual harassment or violence against male workers can also be submitted through the gender committee.

6.1.6

The company does not discriminate against workers' rights, including in wages. The company has a non-discrimination policy which is indicated in Non-Discrimination and Equal Opportunity Policy, passed in June 2019 and updated in October 2021. It states that the company ensures that all workers receive wages that are equal to or exceeding the legal minimum wage requirements. Workers receive wages in accordance with the Decree of the Governor of Sumatera Utara No. 188.44/778/KPTS/2021. In 2022, workers in Batubara Regency, Sumatera Utara Province will receive a wage of IDR 3,191,570.99.

Fair wages have been paid by the unit of certification correctly, taking into account ability, performance, expertise, length of service, and other factors as the basis for remuneration. The company has also implemented the wage scale structure as contained in the Memo of the Head of General Affairs (No.UM/PB/R/054/22, dated February 3, 2022). In the policy, it contains the composition of the wage scale from the lowest class (I/1) of Rp. 3,231,000 and the highest group (VII/10) of Rp. 5,274,900. Based on the results of interviews with the same type of work, namely harvesting workers, workers admit that they get the same wages, the only difference being their performance is related to the amount of harvest they get on that day.

Status: Comply

6.2

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

6.2.1

The company shows the procedure/policy of wages and work requirements in accordance with the labor provisions that have been contained in the national language (Indonesian) which is contained in several documents, namely:

- Decree of the Governor of Sumatera Utara No. 188.44/778/KPTS/2021. In 2022, workers in Batubara Regency, Sumatera Utara Province will receive a wage of IDR 3,191,570.99.
- Memo of the Head of General Affairs (No.UM/PB/R/054/22, dated February 3, 2022). In the policy, it contains the composition of the wage scale from the lowest class (I/1) of Rp. 3,231,000 and the highest group (VII/10) of Rp. 5,274,900.

The company can show documentation of payment of wages every month that informs the details of Basic Wage, Premium, Overtime, salary, THR/Bonus, Rice Allowance, PPh and BPJS Deductions. Based on the results of interviews, workers can explain the basic wages and allowances and deductions received every month.

6.2.2

Companies can show examples of work agreement documents, including the following:

- Employment agreement for newly appointed workers in 2022 on behalf of Edi Putra with a work agreement signed by both parties on June 1, 2022. The appointment document is accompanied by a record of the worker's legal identity as well as the rights and obligations of the worker.
- Employment agreement for newly appointed workers in 2022 on behalf of Supriadi with a work agreement signed by both parties on June 1, 2022. The appointment document is accompanied by a record of the worker's legal identity as well as the rights and obligations of the worker.

As for the work agreement document shown, it contains information including the name of management representative and company address, employee information in the form of names and other personal information, employee positions, employee work locations, reporting, work duties and responsibilities, work agreement period, probationary period, salary and other benefits. The work agreement document has been signed by the management and employee representatives.

The work agreement and related documents detailing wages and work requirements (working hours, deductions, overtime, sick leave, leave, maternity leave, etc.) have been listed in the Collective Labor Agreement (CLA) for the period 2018 – 2020 which was ratified in on 4 July, 2018, by the team of employers and the team of labor unions.

In connection with the expiration of the CLA period 2018 – 2020 in the Sumatera Utara region and at this time the company and the labor unions are preparing a new period of CLA, both parties agree that the CLA for the 2018 – 2020 period is still

valid until the formation of the CLA which is finalized new.

6.2.3

The company shows evidence of legal compliance related to the fulfillment of labor rights to workers, for example:

- Has implemented the payment of the minimum wage. For example: Document of pay slips for harvest workers with the initials SAW who get a basic salary and rice allowance with total of IDR 3,439,961, - and a in June and July 2022.
- The set and agreed working hours are 7 hours a day and 40 hours a week. If there are excess hours worked, then paid overtime. For example: Document of salary slip for mill operator worker with initial SPL who gets overtime pay of IDR 1,933,681 in January 2022. The worker in question signs an Overtime Order (SPL) with a total of 57.75 hours of overtime.
- Every worker is entitled to annual leave, sabbatical leave and annual holidays. For example: An employee with the initials KTK who applies for leave of 1 days out of the total remaining 8 days of leave entitlement. The application was submitted on 8 August 2022 and was approved by Tanah Gambus mill manager.
- Monitoring of H1 and H2 leave through the foreman's workbook, daily work plan, and clinical monitoring. For example: Maternity leaves application form from Socfindo Clinic for workers with the initials SAS who apply for maternity leave of 45 days before giving birth and 45 days after giving birth starting from 2 March 2022 – 15 April 2022. The application is submitted on 2 March 2022 and was approved by Manager.
- The company has a mechanism related to premiums and fines contained in the General Manager's Letter (No.TN/Gr II-TG/R/207/22) dated April 25, 2022. The letter discusses the calculation of the premium value for cutting fruit, harvesting basis, foreman's premium. harvest, and the value of sanctions/fines for harvests that do not meet the quality, for example a fine for raw fruit of Rp 10,000/FFB.
- Has provided health protection and work accident protection for every employee. For example: involving all workers in the *BPJS* Employment and *BPJS* Health programs.

Based on interviews with estate dan mill workers, it is known that they have 7 working hours starting from 07.00 – 14.00. If there are excess hours worked, the payment of wages has also been adjusted. Workers also have the right to annual leave of 12 days in a year, and specifically for female workers have the right to menstrual leave and maternity leave. It can be concluded that the implementation of working hours, minimum wages, overtime pay, leave rights, and others are in accordance with the provisions of the applicable labor laws.

6.2.4

The company has a list of employee welfare facilities updated in August 2022 for each plantation and factory unit, where there are workers' housing facilities, religious facilities (houses of worship), sports facilities, health facilities in the form of clinics and First Aid Posts, clean water facilities, electricity facilities. in the form of generators, TPA (Child Care Place) and others. Currently, all welfare facilities provided are generally in decent condition and can be used by workers and their families. The company also has an employee housing improvement program which is contained in the Minutes of Home Improvement Document made on January 3, 2022. The document informs the employee's home improvement plans and realization, for example, in the house numbered TG-34, roof and door repairs have been carried out. February 2022.

For example, based on the results of field observations via video in the employee housing area of division 3 and 5, the welfare facilities provided are in decent/good condition, the workers' house consists of 2 bedrooms, 1 bathroom and a kitchen, clean water is provided every day, electricity is provided by the company, worship facilities in the form of mosques and churches, sports facilities (soccer fields, volleyball courts, and tennis courts), educational facilities, transportation facilities in the form of school buses and ambulances, and other facilities. other. Clinics and First Aid Posts are available as workers' health facilities that can be accessed by workers and their families. This is supported by the results of interviews with housing residents who stated that the housing facilities provided were in decent condition, one house was occupied by 1 head of the family and so far, if there were complaints from workers related to housing facilities, the company would respond and make repairs as soon as possible.

In accordance with the description above, it can be concluded that the company already has facilities and infrastructure for the welfare of workers in decent conditions and can be accessed by workers and their families.

6.2.5

Based on the results of interviews with workers, it is known that access to food for daily needs is very easy to reach using a motorbike because the location of the Estate and Mill is close to the city (Batubara Regency) and the market.

6.2.6

Currently, there is no Decent Living Wage for Indonesia, so the company calculates the Prevailing Wage and pays workers' wages in accordance with the 2021 Batubara Regency Minimum Wage. The company has conducted a DLW assessment in accordance with RSPO guidance on 20 January 2022. The following are the details of the assessment carried out:

Parameter	Worker (Rp)	Worker + Wife (Rp)	Worker + Wife + 3 Child (Rp)
Basic Wage + Rice Allowance	3,304,605	3,399,705	3,613,680
Bonus	826,151	826,151	826,151
Holiday Allowance	275,384	283,309	301,140
Medical Insurance	132,184	132,184	132,184
Worker Insurance	216,121	216,121	216,121
Water	98,000	98,000	98,000
Entertainment	230,400	230,400	230,400
Medical care	21,500	21,500	21,500
House	826,151	826,151	826,151
Pension Allowance + Award allowance + Good Will	333,868	344,605	344,605

The price set in the determination of DLW also refers to the average price prevailing in the company's operational area.

6.2.7

Based on the results of document review and field observations, currently the company does not employ PKWT (contract workers) workers. From the results of the document review, the company uses PKWT workers in the period May to July 2022 for fruit cutting workers, this is due to the peak crop experienced by the plantation unit. This is evidenced by the company showing a recording of the PKWT work agreement, for example on behalf of Pairin (No. TG/XI/PKWT/BI/40/2022) which was signed with the company on 6 May 2022 with a contract duration from May to June 2022. The company has also reported the use of this PKWT worker to the Department of Manpower, Industry and Trade of Batubara Regency on May 9, 2022.

Status: Comply

6.3

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

6.3.1

The company has a policy regarding the formation of labor unions which is stated in the Freedom of Association Policy signed by the Principal Director on June 1, 2019. The policy states that Socfindo respects the right of all employees to freedom of association and the right to collective bargaining in Indonesian or another language of their choice as a human right. Based on interviews with workers, it is known that workers are given the freedom to join trade unions in the company.

The company has a union that is incorporated in one *SPSI*/forum as a forum for workers to convey their aspirations to the company. The Federation of Workers Unions has been registered at the Batubara Regency Manpower Office with registration number 560/1991/06/2013 dated July 8, 2013. The following are the documents for the formation of the labor union for each estate:

- Evidence of Ratification of PUK SP.PP-SPSI PKS PT Socfindo Tanah Gambus Plantation (No. SK 322/ORG/PC

- FSP.PP-SPSI-BB/V/2022) on 30 May 2022.
- Proof of Approval of PUK SP.PP-SPSI Plantation PT Socfindo Tanah Gambus Plantation (No. SK 246/ORG/PC FSP.PP-SPSI-BB/VII/2022) on 19 August 2021.

Based on the results of interviews with representatives of labor unions, it is known that the unions hold regular meetings every 3 months. Then workers can submit complaints or complaints through the union, if there is a dispute in terms of the working relationship between workers and the company by involving the union, the union will be responsible for resolving the problem.

6.3.2

The company also shows documents for internal union meetings and Bipartite meetings, for example record of coordination meeting of PUK SPPP.SPSI Tanah Gambus on 27 June 2022. In the recording, the trade unions discussed disputes between management which resulted in a memorandum of peace agreement between the union officials.

6.3.3

Based on the verification of the document on the organizational structure of the labor unions in each plantation and mill unit, it is known that the management of the Labor Union at Tanah Gambus is not a representative of the company's management/staff. Then, based on the results of interviews with representatives of labor unions and union members, it was found that there was no intervention from the company regarding the structural selection of labor unions. Based on the results of interviews with workers, it is known that the company has given the freedom to form and join labor unions. Then, union membership is voluntary without any coercion.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1

The company has a no-employment policy for minors which is contained in the Child Protection Policy which was signed by the Principal Director on 1 June 2019. The document states that Socfindo does not employ or allow any work to be carried out by individuals under 18 years of age. As stated in the policy, the company prohibits the employment of children and will take action to prevent the use of child labor in all line of operations.

Based on the list of employees for the period of August 2022, it is known that none of the workers were under the age of 18 when they first started working. Then, based on the results of the verification of work contract documents with local contractors, it is stated that the minimum age requirements for workers have been stated. For example, in *Surat Perjanjian Pekerjaan Land Clearing 2022* No. PD-GM/X/Bi/597/2021, Date 30 November 2021.

Based on the results of interviews with workers, information was obtained that there was never an issue regarding child labor. In addition, around the company area there are warnings that inform the prohibition for children to be in the work location.

6.4.2

The company shows the Employee List document for the 2022 period, there are no children under the age of 18 who are employed. In addition, the company has also shown the Child Protection Policy which was signed by the Principal Director on 1 June 2019. The document states that Socfindo does not employ or allow any work to be carried out by individuals under 18 years of age

Based on interviews with HR staff, it was explained that in the employee recruitment process, age screening will be carried out before going through a personal identity check (KTP or Birth Certificate) to ensure that the age requirements of workers are met and not violated.

6.4.3

The company shows a list of students and students who are currently participating in Field Work Practice (PKL) activities

in each plantation and factory unit, where there are 14 college students and 6 high school students.

Based on the results of interviews with workers and the company, it is known that these students and students carry out field work practices to meet the needs of fulfilling the learning curriculum. They are placed in harmless work or as observers of plantation and mill activities only.

6.4.4

Based on the results of field observations in mill and estate, it is known that the company has a warning regarding the prohibition of child labor and the prohibition of children being in the plantation/factory area. The results of interviews with factory workers (workshops, warehouses) as well as estate workers (harvesters and maintenance), have understood that there is a prohibition on underage workers.

Status: Comply

6.5

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

6.5.1

The company has a policy on ensuring that workers are free from all forms of harassment, threats, and abuse which are contained in the harassment Prevention Policy signed by the Principal Director on June 1, 2019. The policy contains:

- Socfindo is committed to preventing all violence, abuse, and sexual harassment in any form.
- Ensure that all complaints related to violence and sexual harassment are handled fairly and transparently

To ensure that the policy is implemented, the company has a reporting mechanism in case of harassment in the workplace. Dissemination of the complaint flow if there is a case of harassment in the workplace has been conveyed to all workers in each plantation and factory unit as shown by the socialization at the Division 3 on 3 February 2022. This is in line with the results of interviews with workers who already know to complaint if there is an incident of harassment in the workplace.

Based on the results of interviews with workers and administrators of the gender committee, information was obtained that workers can file complaints through their direct superiors or through the gender committee. In addition, during the past year there were no cases of sexual harassment. This is supported by the absence of complaints related to sexual harassment in the minutes of gender committee meetings in all plantation and mill units during 2021 - 2022.

6.5.2

The company has a policy related to pregnant women as stated in the Reproductive Rights Policy document signed by the Principal Director on June 1, 2019. The policy states that Socfindo is committed to recognizing the reproductive rights of all people, especially women and ensuring that female workers are entitled to these rights.

Evidence of the implementation of the policy is contained in the document recapitulation of H1 and H2 leave in 2021. For example, Maternity leaves application form from Socfindo Clinic for workers with the initials SAS who apply for maternity leave of 45 days before giving birth and 45 days after giving birth starting from 2 March 2022 – 15 April 2022. The application is submitted on 2 March 2022 and was approved by Manager.

Based on the results of interviews with the gender committee management, information was obtained that female workers have H1 and H2 leave rights. The mechanism for giving H1 is done by first being examined by a doctor at the clinic.

6.5.3

The company has identified and carried out activities related to assessing the needs of young mothers through regular monthly meetings and programs with the gender committee. The company has also recapitulated workers who are on maternity leave in each of the plantation and factory units. This is stated in the document registering pregnant women and new mothers for the period 2021 - 2022, where for now there is only one female worker who is breastfeeding with the initials STK.

Based on the results of interviews with the management of the gender committee in each unit, information was obtained that:

- Young mothers are given jobs that do not use chemicals.

- Young mothers are given space to breastfeed at the Child Care Center (*TPA*).
- Young mothers are provided with facilities for pre- and post-natal health checks at the same time as clinic activities.
- Young mothers are provided with clinic facilities for routine health checks and child development every month.
- Socialization related to sexual harassment, women's workers' rights and health is routinely held every 1 – 3 months.

6.5.4

The company has Social Complaint Handling Procedure No. SOC/PSM/9.02 document 6th revision dated March 1, 2020. Based on this document, it is known that the identity of the reporter will be guaranteed confidentiality. It is stated that the company guarantees the anonymity of the whistleblower and whistleblower with the aim of reducing the risk of retaliation. The procedure explains that the steps for submitting a complaint verbally and/or in writing are addressed to the management leadership. Responses to workers are maximum within 2 weeks if approval from the department head is not required and 1 month if approval is required.

Based on the results of interviews with workers, it was conveyed that complaints can be submitted to their direct superiors, to the labor union or to the gender committee (specific complaints on women's issues) and the identity of the complainant will be kept confidential. This aims to provide space for all workers or stakeholders to be able to submit complaints comfortably if there are practices that are not in accordance with the ethical practice policy.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1

Based on the results of interviews with representatives of labor unions, workers (estate and mill), the following information was obtained:

- There are no forced labor acts carried out by the company. For example, for harvesters who work every day for 7 hours of work. The unit of certification provides a target output (base) that can be obtained in less than 7 working hours. If the harvester earns more bases, he will get a harvest premium payment. However, if they do not get results due to natural factors such as rain, they will not get a penalty. Then, based on the list of payments, harvesters have earned wages above the minimum wage.
- There is no retention of identity documents during the worker recruitment process.
- Every overtime worker always signs the overtime warrant (*SPL*).
- Payment of wages to workers is never late. Salary is given every 7th at the beginning of the month.

This evidence is in line with the No Forced Labor policy set by the Principal Director on June 1, 2019.

Based on this evidence, there is no indication of forced labor in the company.

6.6.2

Based on the results of the review of the worker list document, it is known that there is no use of foreign workers at Tanah Gambus. The workers in the company only permanent workers who come from Indonesia. Then from the results of interviews with representatives of the labor unions, it is known that there are no foreign workers in the company.

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

Based on the results of interviews and document review, the P2K3 structure is still the same as the previous year, namely the date based on Decree No. 566/165-7/DTK/SU/VI/2021 dated June 17, 2021. This decree is valid for 2 years as long as there is no change in the composition of the P2K3 management. The composition of the P2K3 management includes a chairman, vice chairman, secretary, and members. The P2K3 secretary is a general OSH expert on behalf with initial S.l.. The General OHS Expert has received a letter of appointment of a general OHS expert from the Ministry of Manpower

of the Republic of Indonesia based on Decree No. 5/33440/AS.02.04/XII/2020 dated December 22, 2020. This decision is valid for 3 years.

In the Decree P2K3 ratification SK No. 566/165-7/DTK/SU/VI/2021 dated June 17, 2021. This decree is valid for 2 years as long as there is no change in the composition of the P2K3 management, with a note that if there is a change in management and/or an error in this decision, it will be corrected accordingly". In this case, the company has the opportunity for improvement to communicate to the relevant agencies to ensure the process of updating the P2K3 ratification decree against the stipulated P2K3 secretary changes.

P2K3 meetings are still running every month. Meetings have been documented in the form of minutes and attendance lists, for example as follows.

- The meeting on 13 June 2022 discussed the review of accidents in May 2022, affirmation and supervision of the proper and correct use of PPE in each work unit by foremen and assistants, maintaining a safe and comfortable work environment, and reporting any potential hazards. K3, the meeting was attended by 22 participants.
- The meeting on July 8, 2022 discussed the review of accidents in June 2022, socialization of safe ways and proper and correct use of PPE, efforts to achieve zero accidents, the meeting was attended by 25 participants.
- The meeting on August 9, 2022 discussed the agenda for maintaining a safe work culture by using good and correct PPE, the need for PPE, during the morning queue to convey about the dangers of drugs, consistency in carrying out SOP/IK and production achievements, the meeting was attended by 25 participants. Personnel who provide briefing is Mr. Saeful Ikrom

The company can show P2K3 reports for the first and second quarters of 2022 and proof of delivery to the UPT of Labor Supervision Region IV of the North Sumatra Province Manpower Office, including:

- P2K3 report for the period January – March 2022 which was submitted to the UPT Labor Inspection Region IV of the Manpower Office of North Sumatra Province on April 28, 2022.
- P2K3 report for the period April – June 2022 which was submitted to the UPT of Labor Supervision Region IV of the Manpower Office of North Sumatra Province on July 25, 2022.

Minutes of monthly P2K3 meetings are well recorded and documented such as information; list of attendees; meeting agenda and meeting minutes.

6.7.2

Results of interviews and document review:

- There are procedures for emergency response and work accidents in Indonesian which are clearly understood by all workers.
- There are workers assigned to the field and other work locations and have received First Aid training (P3K).
- Availability of first aid kits in the workplace.
- Records of all work accidents are kept and reviewed regularly.
- Trial of hydran no.02 in the factory area, in good condition and during the test it can function properly, a monitor card is available which proves that monitoring is carried out every month from January to August 2022.
- There is a City of First Aid in every factory work location and the roar of the Estate Office.
- In the afdeling/division work area, there is a Fist Aid Kit Bag, which is always under the supervision of the work foreman. Such as in FFB harvesting activities, census officers, chemist officers and fertilizing officers.

The unit of certification shows emergency and work accident response procedures that are documented in Indonesian and include:

- SOP for Emergency Preparedness and Response (SOC/PSM/4.08).
- Accident Reporting and Investigation Procedures (SOC/PSM/4.14),
- Procedure for Diagnosis and Reporting of Occupational Diseases (PAK) (SOC/PSM/4.23),
- EHS Monitoring and Measurement Procedure (SOC/PSM/4.09)
- Accident Reporting and Investigation Procedure (SOC/PSM/4.14), Scope includes handling and reporting of work accidents and Occupational Diseases
- SOP for Emergency Preparedness and Response (SOC/PSM/4.08) covers Scope: emergency preparedness and

response activities in plantations, factories and other supporting units.

- Emergency situations: Types of emergency situations include fire, explosion, land fire, earthquake, flood, spill of hazardous chemicals, chemical confusion by mouth, broken waste pool embankment and riots.

Related to OFI in the previous assessment, the auditor made observations on pesticide spray activities in Division 5, it was found that the supervision had brought a first aid box containing items in accordance with the company's paramedic guidelines, one of which was new alcohol that had not been used and had not expired. This is certainly the company's commitment to continuous improvement related to the previous OFI.

Based on the results of field observations at estate and factory locations, it was found that the implementation of emergency response facilities was as follows:

- There are warnings related to evacuation routes along with gathering point areas in offices, housing and factories.
- The installation of warnings and symbols of OHS and danger signs at several points that are identified as dangerous, such as in chemical warehouse areas, diesel tanks and so on.
- Provision of first aid facilities as supporting facilities if needed at any time.
- Placement of fire extinguishers in several fire-prone areas in plantations and factories.

6.7.3

The unit of certification shows the procedure for Identification of Occupational Safety and Health Environmental Aspects Procedure for Identification of Occupational Safety and Health Environmental Aspects (SOC/PSM/4.04) based on this, identification of key OHS aspects is carried out in the document List of Important Occupational Safety and Health Aspects (SOC/Form/4.04) -06) then document the results of the important OHS assessment in the Impact Assessment Table (SOC/Dp/4.04-01).

The company shows the tooling card documents available to each employee. The form explains the historical submission and replacement of PPE for employees, for example as follows:

- Handover of safety boots for employees with the initials SA on March 13, 2022.
- Handover of safety boots for employees with the initials MH on April 12, 2022.
- Furthermore, the company stipulates Guidelines for Personal Protective Equipment (SOC/PSM/4.21).
- Field verification that workers have used appropriate individual Personal Protective Equipment (PPE), which is provided free of charge to all workers in the workplace.
- All Chemist (pesticide) and fertilizing officers are provided with a rinse house so that they can remove their clothes from the house before work and remove PPE and clean themselves and put on their personal clothes after work.
- Such as the pest census officers division III, block 53, namely Mrs. Nuriani, Mrs. Narsyah and Mrs. Surianih, pesticide officers division V Block 65 cpc. Muli Hatin (Foreman), Ms. Yuni and Ms. Aisa, Division I Block 208 Ms., Rukiah, (Foreman) Erviana, Asriaana, Wartinah, Jumina (Applicators such as Helmets, Boots, Glasses, Gloves and especially for chemical and fertilizing officers) Apron as protection in all potentially hazardous operations.
- Likewise the officers and operations at the factory, Ari Kusuma (boiler operator), Mr. Yudianton (hosting crane).

6.7.4

The company has a list of workers that also includes *BPJS* Employment participant numbers for all workers in each plantation and factory unit. As one example, based on a review of the worker list document for June 2022 and proof of *BPJS* Employment payments for the same period, it is known that the company has registered and paid all its workers in the *BPJS* Employment program, which consists of Work Accident Insurance (*JKK*), Life Insurance (*JKM*), Pension Insurance (*JHT*) and Pension Guarantee via Bank Transfer. For example, proof of payment of *BPJS* Employment for the period June 2022 which has been paid for as many as 936 workers on 9 August, 2022, via bank transfer.

The company also includes workers and their dependents (workers' family members) into the *BPJS* Health program for all plantation units and factories. For example, proof of payment of *BPJS* Health for the period July 2022 which has been paid via bank transfer.

The company provides health care insurance to workers whose care and treatment are covered by the company with the following conditions:

- Workers who need care and treatment can be done at the company's Clinic.
- If the worker requires further care and treatment, the company doctor can provide a referral letter to the worker concerned to be able to carry out further care and treatment with the approval of the unit leader.
- The company does not provide care and treatment due to self-misconduct such as attempted suicide, drunkenness and criminal acts.

Based on the results of interviews with estate and mill workers, it is known that the company has provided employment insurance for all workers and health insurance for workers and their families (wife and children). The workers already hold the BPJS card and know the registration number. The worker also added information that the *BPJS* Health card can be used for treatment when a family member is sick.

Based on the above, it can be concluded that the company has provided health services and protected all its workers with work accident insurance (*BPJS* Employment) and health insurance (*BPJS* Health).

The company has also made BPJS claims for work accidents related to major accidents (missing 1 index finger) in April 2022.

6.7.5

Lost Time Accident January – December 2021

Period : January – December 2021

Number of Workers	: 715 people
Number of Work Accidents	: 4 cases
Total Working Hours	: 1,667,813 hours
Total Lost Work Hours	: 1,082 Hours
FR	: 8.08
SR	: 537,40
Number of Work Days Lost	: 51 days
Missing working days up to this month	: 51 days

Lost Time Accident January – July 2022

Period : January – June 2022

Number of Workers	: 829 people
Number of Work Accidents	: 4 cases
Total Working Hours	: 154,440 hours
Total lost working hours	: 165 Hours
FR	: 53
SR	: 4140
Number of Work Days Lost	: 8 days
Missing working days up to this month	: 59 days

- Based on the results of the LTA calculation for the period January – July 2022, there were four (4) workplace accidents (2 accidents at the estate and 2 at the mill) and one of these accidents was a serious accident that caused permanent disability (missing 1 index finger). However, in the calculation of the LTA there are several things to note, including:
 - In January, February, March, and July 2022 there were no work accidents in the plantation unit, but there were lost working hours in those 4 months.
 - In April and July 2022 there were no work accidents at the mill unit, but there were lost working hours in those 2 months.
 - The company uses lost working hours in its LTA calculation and for work accidents that cause disability, the loss of working hours is only 68 hours.
- Calculations related to LTA (calculation of Severity Rate and Frequency Rate) have been regulated in the Decree of the Director General of Industrial Relations and Manpower Supervision of the Indonesian Ministry of Manpower No. KEP.84/BW/1998 on How to Fill in the Accident Statistics Report and Analysis Form. Where in it has been regulated

regarding the calculation of the Severity Rate, Frequency Rate and provisions regarding loss of working days/loss of working days which are regulated for accidents that cause defects for the tip of the index finger is 100 days. The LTA calculation used by the company does not refer to the regulation, starting from the use of lost working days (not working hours) to the determination of lost working days for serious work accidents (disability, loss of organ function, etc.) as well as those that cause death (fatality).

Based on that objective evidence, the company has not been able to show evidence that the implementation of the Lost Time Accident (LTA) calculation is in accordance with the Decree of the Director General of Industrial Relations and Labor Supervision of the Indonesian Ministry of Manpower No. KEP.84/BW/1998 on How to Fill in the Accident Statistics Report and Analysis Form. **NCR No. 2022.01**

Status:	Non-conformance No.2022.01 with Non-Critical/Minor Category.
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PRINCIPLE #7 PROTECT, CONSERVE AND ENHANCE ECOSYSTEMS AND THE ENVIRONMENT

7.1

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

7.1.1

The unit of certification indicates an IPM plan that is implemented and monitored to ensure effective pest control, including shown in the document:

1. Integrated Pesticide and Pest Management Plan 2022, Optimizing the use of natural predators to reduce pesticide use
2. The Program is "
 - a. Beneficial plant planting and monitoring (assistant) Jan – Dec 2022
 - b. Tyto Alba breeding and monitoring (assistant) Jan – Dec 2022
 - c. Application of the fungus Beauveria sp. as biological control of caterpillar pests in MP and TG estate as well as monitoring. (Assistant) Jan – Dec 2022
 - d. Development of Sicanus sp, in MP, TG, BB and AL plantations (assistant) Jan – Dec 2022
 - e. Trial of the introduction of the ant-rang ant (Oecophylla sp. (assistant) Jan – Dec 2022

For the mechanism and method of controlling the certification unit, it also provides and implements the SOP for Integrated Pest Control for Oil Palm Leaf-eating Caterpillars (SOC/PSM/7.10-13).

The company shows pest attack monitoring documents as an example:

1. Map of census division III, Block: 63, 2012 planting year, area 40.03 ha, date of census. 03-08-2022 number of sample points: 54, type of census: normal
2. Palm Leaf-Eating Caterpillar Pest Attack
 - Period January – December 2021: the number of attacks is below the threshold and some are above the threshold.
 - Period January – July 2022: The number of attacks is below the threshold and some are above the threshold.
 - If the results of the census are above the threshold, then control is carried out by fogging.
3. Rat Attack
 - January – December 2021 period: the number of attacks below the threshold
 - Period January – July 2022: Number of attacks below the threshold

Officers who conduct censuses have received special training, at the time of field verification, officers work on a target basis, according to plans and reports are maintained and traceable.

Field verification was carried out on 24-08-2022 in division III, block 53 years of planting 2018 census officers, namely Mrs. Nuriani, Mrs. Narsyah and Mrs. Surianih,

Types of caterpillars in the census (monitoring) are:

Caterpillars: S. Nites, S. Asigna, C. Hosfieldi, D. Inclusa, A. Phidippus, A. Rafflesi

Pocket caterpillar: M. Corbetti, M. Plana and C pendula

7.1.2

After reviewing and verifying documents, the company not use the invasive species listed in Permen LHK No. P94/MENLHK/SEKJEN/KUM.1/12/2016 regarding invasive types. Based on the document list of host plants/natural enemies of the Tanah Gambus Plantation pest in 2022, it is known that the company uses the beneficial plant species *Cassia cobanensis*, *Antigonon leptopus* and *Turnera sulbulata*. The company also carries out biological pest control using *tyto alba*.

7.1.3

The results of interviews, document reviews and field observations, the company has a policy not to use fire in pest control activities, one of which is stated in the SOP for Integrated Pest Control of Oil Palm Leaf-eating Caterpillars Article 5 (Policy) "It is not permissible to use fire to control caterpillar pests."

Based on the results of field visits, document reviews and interviews with caterpillar census workers in Block 29 Division IV of Tanah Gambus Estate, the method used for pest control is using insecticides and there is no use of fire.

Status: Comply

7.2

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

7.2.1

Still the same as the previous year the company used pesticides which did not show the list of pesticides used in the Tanah Gambus Plantation and the target application for each pesticide used in the Gambus Tanah Plantation, for example;

- Use of Starane to control broadleaf weeds, shrubs, and *mucuna brachteata*.
- Use of Cypertop to control the pest *Oryctes rhinoceros*
- Use of Roundup to control weeds of *Culvaria maculana*, *Pestalotiopsis palmarum*, seeds of weeds with narrow and broad leaves.

7.2.2

The results of the verification of company documents on the list of types of pesticides used are::

NO	Type Pesticide	Active Ingredients	WHO Class
1	Ally 20 WG	Metil metsulfuron 20%	U
2	Amistartop 325 SC	Azoxistrobin 200 g/l, Difeconazol 125 g/l	U
3	Becano	Indaziflam 500 g/l	O
4	Cypertop 200 EW	Cypermethrin 21%	II
5	Dacomin 865 SL	2,4-D Dimetil amina 865 g/l	O
6	Gallant 108 EC	Halosifop-R-metil ester :108 g/l, setara dengan haloksifop :104 g/l	II
7	Garlon 670 EC	Triklopir butoksi etil ester 670 g/l	II
8	Garlon Mix	Triklopir butoksi etil ester 670 g/l	II
9	Gulmaron 80 WP	Diuron 80%	III
10	Nordox 86 WG	Tembaga Oksida 86,2%	II
11	Roundup 486 SL	Isopropil amina glifosat 486 g/l	III
12	Santador 25 EC	Lamda Sihalotrin 25 g/l	II
13	Starane 290 EC	Floroksipir 295 g/l	U
14	Starthene 75 WG	Asefat 75%	II
15	Santador 25 EC	'Lamda Sihalotrin 25 g/l'	II
16	Starane 290 EC	'Floroksipir 295 g/l'	U
17	Starthene 75 WG	'Asefat 75%'	II

The company can show records of all pesticides used in the company's operational areas, including information related to the amount used, LD50 and the amount of the active ingredient.

7.2.3

The results of the verification of company documents, the list of types of pesticides used are: Pesticide Plan and Realization 2020-2024

The results of the verification of company documents on the list of types of pesticides used are:

NO	Type of Pesticide	2021	2022	2023 (Plan)	2024 (Plan)	2025 (Plan)

1	Ally 20 WG	354.06	196.54	210.00	200.00	180.00
2	Amistartop 325 SC	6.00	16.50	25.00	18.00	16.00
3	Basta 150 SL		16.00	50.00	30.00	25.00
4	Becano	9.20	2.24	70.00	50.00	20.00
5	Cypertop 200 EW	370.25	1,442.30	2,000.00	1,900.00	1,500.00
6	Dacomin 865 SL	50.70	283.45	800.00	500.00	200.00
7	Gallant 108 EC	82.50	19.86	170.00	150.00	100.00
8	Garlon 670 EC	17.00	1.10	70.00	60.00	
9	Garlon Mix	42.80	7.50	90.00	80.00	
10	Gulmaron 80 WP	757.95	1,179.30	650.00	600.00	500.00
11	Marshal 200 SC		12.20	30.00	20.00	10.00
12	Marshall 5 G		76.35	75.00	50.00	25.00
13	Nordox 86 WG	31.50				-
14	Roundup 486 SL	13,102.47	8,130.40	10,000.00	8,000.00	5,000.00
15	Santador 25 EC	3,895.59	2,561.50	3,000.00	2,800.00	2,100.00
16	Starane 290 EC	206.30	48.20	200.00	150.00	100.00
17	Starthene 75 WG	804.50	257.00	700.00	500.00	100.00
Total		23390.82	14250.44	18140	15108	9876

From these data, there is a reduction in the use of several pesticides, for example Roundup 486 SL and also Starane 290 EC. For some of the increased pesticide use, the company justified the weeds being densely packed in some blocks.

7.2.4

Based on the results of interviews with company management and spray workers, it was stated that it was still running according to company policy, that the use of pesticides was only carried out when pest attacks were on the verge of limiting.

7.2.5

Based on interviews and verification of documents and supporting evidence in the field, company management and field implementation show a list of pesticides used as follows;

The company shows the data on the pesticide stock of the Tanah Gambus in June 2022 and the justification for the use of pesticides, as follows:

No.	Name	Stock	Unit	Application
1	Starane	38.66	Liter	<i>Gulma berdaun lebar, semak belukar, dan mucuna brachteata</i>
2	Amistartop	4.18	Liter	<i>Culvaria maculana, Pestalotiopsis palmarum, biji gulma berdaun sempit dan lebar</i>
3	Starthene	6.7	Kg	<i>Ulat kantong, Ulat Api, Ulat Bulu</i>
4	Becano	6.51	Liter	<i>Rayap tanah</i>
5	Cypertop	11.5	Liter	<i>Oryctes rhinoceros</i>
6	Garlon Mix	16.3	Liter	<i>Anak kayu</i>
7	Gallant	7.35	Liter	<i>Herbisida sistemik purna tumbuh</i>
8	Regent	3.5	Liter	<i>Rayap tanah</i>
9	Racumin	304.1	Kg	<i>Hama tikus</i>
10	Round Up	3187.36	Liter	<i>Alang-alang, gulma berdaun lebar</i>
11	Dacomin	89.8	Liter	<i>Gulma berdaun lebar</i>
12	Ally 20 WG	17.387	Kg	<i>Anak kayu, Mucuna Brachteata, Stenochlaena palustri, Dicronopteris linearis</i>

Based on the review of the list of pesticides used at PT Socfindo in 2021 as well as the planning and realization of pesticides for 2020 – 2024 Tanah Gambus Estate until July 2022, it is known that the company has used specific selective pesticide products to deal with weeds or pests, including the following:

No.	Name	Stock	Unit	Application Target
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1	Garlon Mix	16.3	Liter	<i>Anak kayu</i>
2	Gallant	7.35	Liter	<i>Herbisida sistemik purna tumbuh</i>
3	Ally 20 WG	17.387	Kg	<i>Anak kayu, Mucuna Brachteata, Stenochlaena palustri, Dicronopteris linearis</i>
4	Starane	38.66	Liter	<i>Gulma berdaun lebar, semak belukar, dan mucuna brachteata</i>
5	Regent	3.5	Liter	<i>Rayap tanah</i>
6	Racumin	304.1	Kg	<i>Hama tikus</i>
7	Amistartop	4.18	Liter	<i>Culvaria maculana, Pestalotiopsis palmarum, biji gulma berdaun sempit dan lebar</i>
8	Starthene	6.7	Kg	<i>Ulat kantong, Ulat Api, Ulat Bulu</i>
9	Becano	6.51	Liter	<i>Rayap tanah</i>
10	Cypertop	11.5	Liter	<i>Oryctes rhinoceros</i>
11	Starane	38.66	Liter	<i>Gulma berdaun lebar, semak belukar, dan mucuna brachteata</i>
12	Amistartop	4.18	Liter	<i>Culvaria maculana, Pestalotiopsis palmarum, biji gulma berdaun sempit dan lebar</i>

7.2.6

Based on the results of interviews and verification of documents, the company has handled the use and application of pesticides properly and in accordance with procedures.

- Workers have received sufficient training before carrying out the work of spraying pesticides.
- Pesticide officers are regularly given supervision, socialization and understanding regarding the materials to be used, the use of PPE in accordance with the risks such as helmets, safety shoes, safety glasses and Apron.
- Based on the results of field visits to Divisions I and V, that the pesticide applicators had worked according to the SOP submitted by the company, the applicators and foremen found were workers in Division V Block 65 cpc. Muli Hatin (Foreman), Ms. Yuni and Ms. Aisa, Division I Block 208 Ms. Rukiah, (Foreman) Erviana, Asriaana, Wartinah, Jumina (Applicator) as importers, before work they are given milk, while working using PPE, after work cleaning themselves in a rinse house provided by the company at their respective afdeling offices.
- The pesticide applicator has worked in accordance with the SOP submitted by the company, that the spraying is carried out selectively, according to the density of weeds in the field.
- Based on the results of interviews with spray employees, it was also known that the pesticides used were Round Up and Garlon Mix, the applicator knew and was able to explain well regarding the procedure for spraying, and calibration is carried out periodically and the function of each PPE provided by the company.

7.2.7

The pesticide warehouse is located centrally in the Tanah Gambus Mill, based on the results of field visits, it is known that the pesticide storage has been neatly arranged and well documented. At the pesticide storage area, an MSDS has also been installed with easy-to-understand language and an PPE box for anyone who will enter the warehouse.

7.2.8

Company shows waste management mechanism in Waste Control Procedure no. document SOC/PSM/4.11 edition 01 revision 05 dated October 1, 2018. Specific explanations for handling waste are contained in:

- Guidelines for handling chemical packaging waste no. doc: SOC/DP/4.11-05 revision 08 dated August 1, 2020.
- Guidelines for handling domestic waste no. doc: SOC/DP/4.11-04 revision 08 dated August 1, 2020.
- Waste utilization guidelines no. document SOC/DP/4.11-07 revision 00 dated November 16, 2013. This document explains the use of shells, fiber, Blank Janjang and others.

The company shows records of storage of used pesticide packaging in the log book and Hazardous and Toxic waste balance, with examples of pesticide packaging stored according to these records, including:

1. Log book and Hazardous Waste Balance for January – August 2022 period:

- a. Ex santador bottles 622 pcs transported 05 January 2022, 747 pcs transported 27 May 2022, stock 0, stock after transport until 20 August 2022 1,237 pcs
- b. Ex cypertop, transported on January 5, 2022 618 pcs, transported on May 27, 2022 762 pcs, stock until June 10, 2022 272 pcs
- c. Ex starthene bottles, transported on 05 January 2022 69 pcs, transported on 27 May 2022 47 pcs, stock until 28 June 2022 24 pcs
- d. Ex starane bottles, transported on 05 January 2022 43 pcs, on 27 May 2022 36 pcs, stock until 20 August 2022 38 pcs
- e. Ex ally packaging, transported on 05 January 2022 264 pcs, 27 May 2022 199 pcs, stock up to 20 August 2022 340 pcs
- f. Ex gallan, shipped on 05 January 2022 5 pcs, shipped on 27 May 2022 6 pcs, final stock 0
- g. Burlap ex caustic soda, transported on 05 January 2022 93 pcs, transported on 27 May 2022 114 pcs, remaining stock until 20 August 2022 51 pcs
- h. Ex Nalco transported on 27 May 2022 25 pcs, remaining until 08 August 2022 4 pcs
- i. Used oil drums transported 05 January 2022 3 drums, stock until 12 August 2022 7 drums
- j. Ex-agristick transported May 27, 2022 10 pieces, stock until August 20 2022 25 pieces
- k. Ex garlon transported 27 May 2022 11 pcs
- l. Ex amistartop transported 27 May 2022, 45 pcs
- m. Iner Burlap fertilizer final stock 82 kg (30 May 2022)

Storage of used pesticide packaging at the temporary storage of Hazardous and Toxic Waste that has been licensed with evidence: Decree of the Head of the District Environmental Office Batubara District No. 660/1052 dated May 25, 2018, valid for 5 years from issuance. The types of waste stored include used oil, mercury lamps, TL lamps, used filter filters, used batteries, laboratory waste, rags, used hazardous and toxic material packaging waste, waste contaminated with paint cans, medical waste, used chemical jerry cans.

In the management of hazardous and toxic waste, the company cooperates with the management of hazardous and toxic waste, as evidenced by:

- a. Cooperation Agreement Letter No: 154/SI-ABS/SPK-LB3/VII/2021, dated 02 July 2021, between PT SOCFIN INDONESIA and PT AMINDY BAROKAH SUMUT, valid until 01 July 2022, types of waste in SPK include: used lubricants, used batteries, used filters, used rags, hazardous and toxic material contaminated packaging, used chemicals, used toner/cartridges
- b. Letter of agreement for the management of hazardous and toxic waste between PT Trigunapratama Abadi and PT Amindy Barokah Sumut, Number 008/TPA-ABS/SPK/B3/TP/VII/2021, dated July 1, 2021, valid until July 1, 2022

With proof of delivery and transportation of used pesticide and other chemical packaging waste as follows:

1. KLHK-1657358180, dated 27 May 2022, type of used packaging hazardous and toxic material, code B104d, volume 0.14 Ton, PT Amindy Barokah SUMUT, NOPOL BK 8332 MO
2. Minutes of Delivery of hazardous and toxic material Waste from PT SOCFINDO Kebun Tanah Gambus to PT Amindy Barokah, SUMUT, on 27 May 2022, with the type of waste : Contaminated goods packaging : 87 Kg, Contaminated hazardous Packaging : 140 Kg, Medical waste 24 Kg, Used filter waste : 113 Kg, Used Oil Waste : 650 Liters, Used Batteries: 110 Kg.
3. KLHK-1644950062, dated January 5, 2022, types of used packaging waste hazardous and toxic material, code B104d, volume 0.18 Ton, PT Amindy Barokah SUMUT, NOPOL BK 9169 MO

The results of field observations in the operational areas of the plantations and factories and housing estates show that chemical containers have been managed in accordance with applicable regulations and there is no use of chemicals for other purposes

7.2.9

As a result of interviews, document reviews and field verification, information and data were obtained, that the company did not apply pesticides through the air, but sprayed it with a knapsack sprayer.

Verification results of SOP for Integrated Pest Control of Oil Palm Leaf Feeding Caterpillars No. SOC/PSM/7.10-13, at

Point 5.6 "It is not allowed to spray through the air to control pest attacks".
 Verification with chemist officers in Division I Block 5/18, namely Division III, Block 65, namely: Musli Hatin (Foreman) members: Mrs. Aisa, Mrs. Yani, Sumiati ML, Sarina, Sumiasi and Susiani.
 Socialization related to MSDS, SOPs, used pesticide containers and OHS have also been provided.

7.2.10

Based on document verification at the plantation office and interviews with spray workers and company management representatives, MCU activities have been carried out in 2021 and 2022.

- The MCU 2022 program has been implemented in accordance with the annual program in June 2022.
- There are 365 employees who have participated in the MCU, including:
 - Division I Block 5/18 Mr. Agus Setiawan: Mr. Sujiwanto, Wagiran, Sudarso, Windi Akhiro and Jailani.
 - Division V Block 208 Mrs. Rukiah, Ms. Erviana, Ms. Asriaana, Ms. Wartinah, Ms. Jumina
 - Division III Block 65 cpc. Mrs. Yuni and Mrs. Aisa,

7.2.11

Based on interviews and verification of documents obtained:

- a. No pesticide-related work is carried out by pregnant or lactating women,
- b. The results of checking the MCU, there is no medical record that prevents them from being able to work with chemicals.

The workers interviewed and verified were Mrs. Yuni and Mrs. Aisa (block 65 division III), Mrs. Rukiah, Mrs. Erviana, Mrs. Asriaana, Mrs. Wartinah, Mrs. Jumina Division (block 208 division V).

Status: Comply

7.3

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

7.3.1

The company shows evidence that the waste has been identified based on its toxicity and hazardous characteristics, and then managed in accordance with waste management procedures and government regulations. The identification is stated in the Identification and Waste Management document for the Plantation and Palm Oil Mills Unit for the 2021 period. Sources of waste and pollution have been identified from the Plantations and Mills. For example :

1. Workshop Transport produces used lubricants and cloth contaminated with hazardous and toxic materials
2. Operations Palm oil mills produce between liquid waste, shells and fiber as well as used caustic soda sacks.
3. POM Poison/Chemistry Warehouse, which produces, among other things, waste from used chemical packaging and used chemical drums
4. Loading ramp, resulting in empty vacancies remaining quality inspection
5. The engine room produces emissions from the generator,
6. The sterilization station produces scattered solid waste and loose fruit,
7. Palm oil mill operations, producing empty fruit bunches, fiber, solid, liquid waste and shells

7.3.2

The company demonstrates the waste management mechanism contained in:

- Guidelines for handling domestic waste no. doc: SOC/DP/4.11-04 revision 08 dated August 1, 2020.
- Guidelines for the use of waste no. document SOC/DP/4.11-07 revision 00 dated November 16, 2013. This document explains the use of shells, fiber, empty bunch and others.
- The company has a procedure for the Guidelines for Handling Chemical Packaging Waste (Dok No. : SOC/DP/4.11-05, No. Rev : 08, effective August 1, 2020), which informs the types of B3 packaging waste generated within PT SOCFINDO, among others : waste bottles, sachets, jerry cans, burlap fertilizer, buckets, drums and other chemical packaging. The procedure also explains that:
 - a. Delivery of hazardous and toxic material Packaging Waste & hazardous and toxic material waste located in the producing area, such as: *afdeling*, chemical warehouse, water treatment, is not allowed to be stored in that area.

The Hazardous and Toxic material packaged waste must be submitted to the Hazardous and Toxic material Waste Warehouse whenever Hazardous and Toxic material waste is generated in the area.

- b. Ex-chemical packaging waste from *afdeling* sent to the Hazardous and Toxic material Waste warehouse must be accompanied by a Hazardous and Toxic material Waste submission note initialed by the officer who submits (*afdeling*) and the officer who receives the Hazardous and Toxic material Waste (Warehouse Hazardous and Toxic material waste)

The company shows records of storage of used pesticide packaging in the log book and waste balance of hazardous and toxic materials, with examples of pesticide packaging stored according to these records, including:

1. Log book and balance of hazardous and toxic waste for the period January – August 2022:
 - a. Ex santador bottles 622 pcs transported 05 January 2022, 747 pcs transported 27 May 2022, stock 0, stock after transport until 20 August 2022 1,237 pcs
 - b. Ex cyptertop, transported on January 5, 2022 618 pcs, transported on May 27, 2022 762 pcs, stock until June 10, 2022 272 pcs
 - c. Ex starthene bottles, transported on 05 January 2022 69 pcs, transported on 27 May 2022 47 pcs, stock until 28 June 2022 24 pcs
 - d. Ex starane bottles, transported on 05 January 2022 43 pcs, on 27 May 2022 36 pcs, stock until 20 August 2022 38 pcs
 - e. Ex ally packaging, transported on 05 January 2022 264 pcs, 27 May 2022 199 pcs, stock up to 20 August 2022 340 pcs
 - f. Ex gallan, shipped on 05 January 2022 5 pcs, shipped on 27 May 2022 6 pcs, final stock 0
 - g. Burlap ex caustic soda, transported on 05 January 2022 93 pcs, transported on 27 May 2022 114 pcs, remaining stock until 20 August 2022 51 pcs
 - h. Ex Nalco transported on 27 May 2022 25 pcs, remaining until 08 August 2022 4 pcs
 - i. Used oil drums transported 05 January 2022 3 drums, stock until 12 August 2022 7 drums
 - j. Ex-agristick transported May 27, 2022 10 pieces, stock until August 20 2022 25 pieces
 - k. Ex garlon transported 27 May 2022 11 pcs
 - l. Ex amistartop transported 27 May 2022, 45 pcs
 - m. Iner Burlap fertilizer final stock 82 kg (30 May 2022).

Storage of used pesticide packaging in a temporary storage place Waste Hazardous and toxic materials that have been licensed with evidence: Decree of the Head of the Environmental Agency of Batubara District No. 660/1052 dated May 25, 2018, valid for 5 years from issuance. The types of waste stored include used oil, mercury lamps, TL lamps, used filters, used batteries, laboratory waste, rags, used hazardous toxic material packaging waste, waste contaminated with paint cans, medical waste, used chemical jerry cans.

In hazardous toxic materials waste management, the company cooperates with hazardous toxic materials waste management, as evidenced by:

- a. Cooperation Agreement Letter No: 154/SI-ABS/SPK-LB3/VII/2021, dated 02 July 2021, between PT SOCFIN INDONESIA and PT AMINDY BAROKAH SUMUT, valid until 01 July 2022, types of waste in SPK include: used lubricants, used batteries, used filters, used rags, hazardous toxic materials contaminated packaging, used chemicals, used toner/cartridges
- b. Letter of agreement for the management of hazardous and toxic waste between PT Trigunapratama Abadi and PT Amindy Barokah Sumut, Number 008/TPA-ABS/SPK/B3/TP/VII/2021, dated July 1, 2021, valid until July 1, 2022

With proof of delivery and transportation of used pesticide and other chemical packaging waste as follows:

- a. KLHK-1657358180, dated 27 May 2022, type of used packaging hazardous and toxic material, code B104d, volume 0.14 Ton, PT Amindy Barokah SUMUT, NOPOL BK 8332 MO
- b. Minutes of Delivery of B3 Waste from PT Socfindo Kebun Tanah Gambus to PT Amindy Barokah, SUMUT, on 27 May 2022, with the type of waste: Contaminated goods packaging : 87 Kg, Contaminated hazardous toxic materials Packaging : 140 Kg, Medical waste 24 Kg, Used filter waste : 113 Kg, Used Oil Waste : 650 Liters, Used Batteries : 110 Kg.

- c. KLHK-1644950062, dated January 5, 2022, type of used packaging waste hazardous and toxic material, code B104d, volume 0.18 Ton, PT Amindy Barokah SUMUT, NOPOL BK 9169 MO

During the field visit during the surveillance audit, information was obtained that there was hazardous waste that was not located in a licensed location, for example:

- There is a pile of inner fertilizer in the fertilizer warehouse of the Division 3 center
- There are 2 used drums in the civil workshop
- There are several sacks of fertilizer along with the inner being dumped in the river border area of Blok 065

Based on the above conditions, the Company has not been able to show sufficient evidence that the hazardous waste management (disposal and storage) in the field has been in accordance with the established procedures. According to the observations at the EFB hopper, it is known that the company has made improvements to the EFB transport mechanism, in the form of a timetable for transporting EFB to the plantation along with the mill process running, to avoid EFB piles that have the potential to cause leachate contamination, and not to build up in the field but only to the hopper. and make repairs to the hopper floor in the form of concrete and embankments around the hopper.

The company manages liquid waste by providing wastewater treatment plants, liquid waste is discharged into water bodies during field visits, no wastewater overflowed into the pond embankments, while shells and fiber according to company information are used for boiler fuel and empty tubs for applications. nutrition in the estate. **NCR No. 2022.02**

7.3.3

The company shows the form of waste management of toxic hazardous materials and other waste utilization as follows:

1. Delivery and transportation of used pesticide and other chemical packaging waste as follows:
 - a. KLHK-1657358180, dated 27 May 2022, type of used packaging B3, code B104d, volume 0.14 Ton, PT Amindy Barokah SUMUT, NOPOL BK 8332 MO
 - b. Minutes of Handing over of Toxic Hazardous Materials from PT Socfindo Kebun Tanah Gambus to PT Amindy Barokah SUMUT, on 27 May 2022, with the type of waste: Contaminated goods packaging: 87 Kg, Contaminated packaging Toxic hazardous materials: 140 Kg, Medical Waste 24 Kg, Filter waste Used : 113 Kg, Used Oil Waste : 650 Liters, Used Batteries : 110 Kg.
 - c. KLHK-1644950062, dated January 5, 2022, type of used packaging waste Toxic hazardous material, code B104d, volume 0.18 Ton, PT Amindy Barokah SUMUT, NOPOL BK 9169 MO.
2. Liquid waste management based on the Decree of the Regent of Batubara No. 660/5631/IPLC/2021, concerning the Palm Oil Industry Wastewater Disposal Permit, PT SOCFINDO Perkebunan Tanah Gambus, dated December 31, 2021, valid for 5 years, location at coordinates N 03° 12'14", E 099° 24'34" to the Bah Bolon River through the swamps for approximately 7 (seven) KM
3. Utilization of shells and fiber for boiler fuel: for 2022 shell production is 2,911,808 kg, fiber is 6,066,268 kg, shell consumption is 2,832,758 kg, fiber consumption is 6,066,268 kg
4. Utilization of empty fruit bunches for essential nutrients for palm oil: in 2022 production of empty fruit bunches is 12,602.62 tons with an application area of 643.3 ha.

Based on the results of field observations to the Division III housing, it is known that there is already a garbage disposal site in the housing area. From the observations, no traces of burning were found in the housing. The company has shown documentation of socialization of handling organic and non-organic waste to residents of housing. During the field visit, the handling of domestic waste is managed properly, in the residential area there is a domestic waste bin and there is no domestic waste scattered around.

Companies are encouraged to improvise regarding the following:

- The company has the opportunity to improve the stages of activities in the procedures for the Guidelines for Handling Chemical Packaging Waste (Dok No.: SOC/DP/4.11-05, No. Rev: 08, effective August 1, 2020), in terms of allowing the use of hazardous waste, in accordance with applicable regulations related to the use of hazardous waste.
- The company has the opportunity to immediately follow up the hazardous waste management cooperation process with a third party that has been determined as the winner in the tender. **OFI**

Status: Non-conformance No.2022.02 with Non-Critical Category.

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

7.4.1

The company has procedures aimed at managing soil fertility, which are listed in the following documents:

- Oil Palm Cultivation Procedure No. SOC/PSM/7.10, Revision 02, effective April 1, 2015.
- Marginal Land Management Procedure in Oil Palm Plantation No. SOC/PSM/7.10-14, Revision 02 effective April 1, 2015
- Soil Analysis Procedure No. SOC/PSM/7.10-15, Revision 03 effective 1 November 2018.
- Leaf Analysis Procedure No. SOC/PSM/7.10-16, Revision 01 effective April 1, 2015.
- Fertilization Work Instruction No. SOC-KB/IK/01, Revision 04 effective date October 1, 2016
- Mechanical Fertilization Work Instruction No. SOC-KKS/IK/20, Revision 00 effective date 10 July 2014
- Employment Instructions for Employment Application No. SOC-KKS/IK/12, Revision 04, effective April 1, 2015
- Solid Application Work Instruction No. SOC-KKS/IK/15, Revision 02, effective April 1, 2015
- The company shows the Fertilization Work Instruction No. SOC-KB/IK/01, Edition 01, Revision 02, January 25, 2016. Objective : To ensure that the application of fertilization in the field is carried out properly and correctly according to the recommendations in the PT Socfindo plantation environment. The IK explains the dose of fertilizer, land conditions, application time, and others

7.4.2

Results of interviews and verification of documents. The company conducts leaf analysis every year and at least 2 months after the first fertilization program is completed.

- The company shows the results of leaf analysis. As an example of a Leaf Analysis Report document from the Bangun Bandar Analytical laboratory, samples were received on March 13, 2022

Soil analysis is carried out every six (6) years. The company showed the Soil Analysis Report document from Bangun Bandar Analytical Laboratory on April 16, 2015, the samples tested were 43 samples, the samples were submitted on April 16, 2015. The results of the soil analysis explained about pH-H₂O, pH-KCl, Sand, Silt, Clay, N- Kj, C-Org, P-Bray, P-Olsen, CEC, K, Ca, Mg and Na, as for samples of soil analysis results as follows:.

LABCODE	N-Kjehl	P-Total	K-Total	Ca-Total	Mg-Total
L1903631	2.92	0.16	1.24	0.62	0.17
L1904745	3.07	0.16	1.09	0.64	0.14
L1904746	2.72	0.17	1.29	0.43	0.23
L1904747	2.84	0.15	1.29	0.32	0.22
L1904748	2.91	0.18	0.93	0.59	0.24
L1904749	2.91	0.15	0.95	0.61	0.24
L1904750	3	0.16	1.06	0.48	0.26
L1904751	2.45	0.15	1.01	0.43	0.2
L1904752	2.99	0.15	1.09	0.41	0.23
L1904753	2.96	0.15	0.85	0.57	0.22

7.4.3

The results of verification and interviews with field officers are still going well with efforts to recycle nutrients through the utilization or recycling of empty fruit bunches, oil palm residues, and optimizing non-organic fertilizers.

In the procedure, the mechanism for the nutrient recycling strategy has been set in SOP number: SOC-KKS/IK/12, edition 01, revision 04, which has been in effect since April 1, 2015, in article B.14, it is stated that the dose of EFB mulch is :

- 20 tons per hectare or equivalent to +/- 140 kg per oil palm tree for immature oil palm, and
- 40 tons per hectare or equivalent to 315 – 320 kg per oil palm tree

Nutrient	Realization July 20 2022		
	Ton	Ha	Ton/Ha
EFB	1,427.420	382.68	33.25
Solid	3,279.27	131.68	25.00

7.4.4

The company shows the realization of fertilization in 2020-2021 as follows:

Year 2021

Fertilizer Type	NO (kg)	N1 (kg)	N2 (kg)	TSM (kg)	Total	%
NPK 12-12-17-2	13,500	145,070	543,770	3,631,380	4,333,720	100.00
Urea	14,970	35,420	0	0	50,390	100.00
Rock Phosphate	19,220	0	0	0	19,220	100.00
KCL	0	0	41,560	0	41,560	100.00
Kieserite	6,760	17,460	46,400	251,660	3,22,280	100.00
Borax	890	7,530	20,830	38,800	68,150	100.00
NPK 15-15-6-4	0	0	0	0	0	-
TSP	0	0	0	0	0	-
Dolomite	0	0	0	0	0	-
Jumlah	55,340	205,580	652,560	3,921,840	8,835,320	100.00

January to August 2022

Fertilizer Type	NO (kg)	N1 (kg)	N2 (kg)	TSM (kg)	Total	%
NPK 12-12-17-2	0	0	0	2,079,417	2,079,417	100.00 %
NPK 12-12-17-2+TE	1,250	47,148	165,161	0	466,559	45.73 %
Urea	3,252	0	0	207,273	210,525	26.61 %
Rock Phosphate	30,427	0	0	8,115	38,542	24.75 %
KCL	0	0	0	12,040	12,040	5.24 %
Kieserite	0	11,247	13,071	95,084	118,500	33.59 %
Borax	22	2,993	2,447	6,450	9,907	25.04 %
NPK 15-15-6-4	0	0	0	112,886	112,886	100.00 %
TSP	0	0	0	0	0	-
Dolomite	0	0	0	0	0	-
Jumlah	34,951	58,481	180,679	2,516,880	2,790,991	66.07%

Based on the review of the above documents, it can be seen that the Gambus Tanah Plantation of PT. SOCFINDO has managed records of fertilizer use well. Fertilization realization addressed to the auditor has also referred to the fertilizer recommendation that has been previously determined.

Status: Comply

7.5

Practices minimise and control erosion and degradation of soils.

7.5.1

- Still like the previous audit data, results and verification of documents in the area of the unit of certification, there is no peatland.
- A review of the map data of the certification unit shows a Map of Soil Types for Tanah Gambus Plantation with a Scale of 1:25,000, the map identifies that there is no Marginal Soil in Tanah Gambus Plantation. The types of land contained in the company are as follows:
 - ✓ Typic estrudepts,
 - ✓ Typic Distrudepts,
 - ✓ Typic endoaquepts, and
 - ✓ Rhodic Paleudults
- Land Slope Map 1:25000 Scale, the map describes the slope of the land in the company's location, including:
 - ✓ (0%-4%,
 - ✓ 4%-12%,
 - ✓ 12%-24%

7.5.2

Company information from data verification and document review as well as field visits to Division I, III and V Blocks, obtained information and data that the company only carried out replanting activities and did not carry out new land development activities:

Notes: Conditions at the time of the current audit are still the same as the previous audit.

7.5.3

The results of interviews and verification of document data as well as field visits to divisions I, III and V, obtained information and data that the company only carried out replanting activities and did not carry out new land development.

Status: Comply

7.6

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

7.6.1 & 7.6.2

Still like the previous audit data, results and verification of documents in the area of the unit of certification, there is no peatland. A review of the map data of the certification unit shows a Map of Soil Types for Tanah Gambus Plantation with a Scale of 1:25,000, the map identifies that there is no Marginal Soil in Tanah Gambus Plantation. The types of land contained in the company are as follows:

- ✓ Typic estrudepts,
- ✓ Typic Distrudepts,
- ✓ Typic endoaquepts, and
- ✓ Rhodic Paleudults

There is no development and addition of new land, only conversion from rubber plantations to oil palm plantations.

Notes: Conditions at the time of the current audit are still the same as the previous audit.

7.6.3

Based on the results of document studies and interviews with the company as well as the results of field visits in block 120 division 5, it is known that the company already has a good drainage system and road management.

The company already has a drainage map of the Tanah Gambus Plantation published by the National Mapping and Survey Coordination Agency with a scale of 1:50,000. The map has provided complete information including: relief, waters, growth, buildings, roads and bridges, railroads and others, boundaries, ports, and certain points.

Notes: Conditions at the time of the current audit are still the same as the previous audit.

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 document review, it is known that there is no peatland in the company's area.

The company shows a Map of Tanah Gambus Plantation Soil Types with a Scale of 1:25,000, the map identifies that there is no Marginal Soil in Tanah Gambus Plantation. The types of land contained in the company are as follows District Gleisol, Gleik Kambisol, District Nitosol, District Podsolik, and Gleik Podsolik.

Status: Comply

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

The company shows a water management plan, such as:

- Identification of water sources managed by the company for public consumption.
- Do not apply chemical either spray or fertilizer in the area around the water source
- Installation of water source protection signboards
- Analyze the quality of water sources
- And others.

Based on the results of interviews with representatives of management and cottage residents in division III, it is known that the company does not use river water for processing purposes at the POM and providing clean water for employees, the water source used comes from drilled wells.

The company shows a water utilization permit document for production activities, namely:

1. Decree of the Governor of North Sumatra, Number 546/932, concerning Extension of Groundwater Concession Permit, dated October 28, 2021, Drilling Well III, maximum discharge 5 liters/second, well registration 12.02.59, for POM and Office Toilet needs, valid for 3 years since published N 03° 12'17.87", E 99° 24'23.90"
2. Decree of the Governor of North Sumatra, Number 546/933, concerning Extension of Groundwater Concession Permit, dated October 28, 2021, Drilling Well II, maximum discharge 5 liters/second, well registration 12.02.60, for POM and Office Toilet needs, valid for 3 years since issue N 03° 12'10.01", E 99° 24'18.32"
3. Governor of North Sumatra Decree, Number 546/934, concerning Extension of Groundwater Concession Permit, dated October 28, 2021, Drilling Well IV, maximum discharge 5 liters/second, well registration 12.02.58, for POM and Office Toilet needs, valid for 3 years since published, N 03° 11'34", E 99° 24'19.91"

Based on the results of field visits to the river borders of Block 065 and Block 063, it is known that the river border has been given a boundary sign in the form of yellow stakes and boards prohibiting logging, mining without a permit and treatment using chemicals, and rehabilitation efforts have been carried out by planting trees

7.8.2

The company shows the procedure document for River Border Conservation Area Management No. document SOC/PSM/9.07 edition 01 revision 06 effective January 1, 2021 and Final Report Verification and delineation of HCV area of PT Socfin Indonesia Tanah Gambus plantation, June 2021.

The document states that the width of the river border is 5 meters from the river bank, marked with a yellow border in the form of boundary markers and nameplates for the HCV area as well as a prohibition on chemical treatment activities.

The results of the field visit on the river border in block (BL) 063 have found a river border in the form of yellow stakes and rehabilitation by planting trees. Then in the BL 065 and 046 river border areas, the river border has consistently been given a boundary sign in the form of yellow boundary markers and an appeal board for prohibiting the application of chemicals, cutting down any plant species in the river border area, and prohibiting littering in the river.

In the HCV document the determination of the width of the river border as wide as 5 meters is adjusted to the width of the river which is 3 meters wide on average, in the form of a tributary

7.8.3

The company shows the Batu Bara Regent Decree Number: 660/5631/IPLC/2021, regarding the Palm Oil Industry Wastewater Disposal Permit, PT SOCFINDO Perkebunan Tanah Gambus, dated December 31, 2021, valid for 5 years, location at coordinates N 03° 12'14" , E 099° 24'34" to the Bah Bolon River through the swamps for approximately 7 (seven) KM. The requirements in the permit are for the parameters of BOD max 100 mg/l, COD 350 mg/l, oil and fat 25 mg/l

Wastewater is managed in the WWTP area with a total of 5 ponds for temperature reduction and BOD control.

The company has carried out regular monthly wastewater quality testing, with examples of evidence:

- a. Certificate No.06797/CLACAP, dated 20 July 2022, COD 202.63 mg/l and BOD 98.7 mg/l
- b. Certificate No.05217/CLACAP, dated June 20, 2022, COD 167.92 mg/l and BOD 65.2 mg/l
- c. Certificate No.03971/CLACAP, dated 20 May 2022, COD 170.54 mg/l and BOD 89.4 mg/l

- d. Certificate No. 03143/CLACAP, April 18 2022, COD 145.67 mg/l and BOD 72.9 mg/l
- e. Certificate No. 02081/CLACAP, dated March 18, 2022, COD 188.42 mg/l and BOD 94.1 mg/l
- f. Certificate No. 00798/CLACAP, dated February 21, 2022, COD 150.18 mg/l and BOD 75.3 mg/l

Based on the results of the wastewater quality test above, it shows that there are no COD and BOD parameter values that exceed the quality standards stipulated in PermenLH No. 5 of 2014 attachment III (COD 100, BOD 350)

7.8.4

The company uses water for POM using underground water, the use of ground water is equipped with a permit, with evidence of:

- a. Decree of the Governor of North Sumatra, Number 546/932, concerning Extension of Groundwater Concession Permit, dated October 28, 2021, Drilling Well III, maximum discharge 5 liters/second, well registration 12.02.59, for POM and Office Toilet needs, valid for 3 years since published N 03° 12'17.87", E 99° 24'23.90"
- b. Decree of the Governor of North Sumatra, Number 546/933, concerning Extension of Groundwater Concession Permit, dated October 28, 2021, Drilling Well II, maximum discharge 5 liters/second, well registration 12.02.60, for POM and Office Toilet needs, valid for 3 years since issue N 03° 12'10.01", E 99° 24'18.32"
- c. Governor of North Sumatra Decree, Number 546/934, concerning Extension of Groundwater Concession Permit, dated October 28, 2021, Drilling Well IV, maximum discharge 5 liters/second, well registration 12.02.58, for POM and Office Toilet needs, valid for 3 years since published, N 03° 11'34", E 99° 24'19.91"

The company shows Water Usage Data for 2022, January to July 2022 of 51,745 m3 for processing 48,530 Tons of FFB, domestic use of 41,829, total water for process and domestic 93,574 m3, or 1.93 m3/ton , Water Usage Data 2021, January s /d December 2021 amounted to 88,129 m3 for processing 76,882 Tons of FFB, domestic use 127,444 M3, total water for process and domestic 212,436 m3, or 2.76 m3/ton.

Water usage budget set by the company in 2021, FFB processed 76,882 tons, water usage budget 99,946 M3, or 1.3 m3/ton FFB, in 2022 period January to July FFB by 48,494 tons, water 63,042 M3 or 1.3 m3 /ton.

Based on the information above, the use of water for processing at POM is still below the set budget.

The company shows the payment of water usage retribution with the following evidence:

- a. Certificate of Deposit, Proof of Payment of Cash Receipts, dated August 2, 2022, SUMUT Bank Transfer, Type of deposit for Groundwater Tax, Rp. 7,077,974.00, paid based on the 2022 Regional Tax Assessment Letter, tax period 01 April – 30 April 2022, Volume 5,796 M3 invoiced Rp. 7,077,974, due date June 10, 2022.
- b. Certificate of Deposit, Proof of Payment of Cash Receipts, dated August 2, 2022, SUMUT Bank Transfer, Type of deposit for Groundwater Tax, Rp. 461,459.00, paid based on the 2022 Regional Tax Assessment, tax period 01 April – 30 April 2022, Volume 604 M3 invoiced Rp. 461,459.00 due date 10 June 2022
- c. Deposit Certificate, Cash Receipt Payment Proof, dated 02 August 2022, SUMUT Bank Transfer, Groundwater Tax Payment Type, Rp. 15,694,821.00, paid based on the 2022 Regional Tax Assessment, tax period 01 April – 30 April 2022, Volume 9,453 M3 invoiced Rp. 15,694,821.00 due date 10 June 2022

Status: comply

7.9

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

7.9.1

According to an interview with representatives of POM management, it is known that in the operational process of POM does not use fossil fuels, the company utilizes solid waste in the form of shells and fiber for boiler fuel. For the Mill process, it does not use a generator set, the power source comes from the *PLN* (National Electrical Company) network

The company shows documents on the use of fossil fuels in the process at POM, with the following details:

- a. 2021 period (January to December), FFB Processed 76,881.87 tons, shell production 4,612.91 tons, fiber production 9,610.24 tons, shell usage 4,420.33 tons, fiber 9,610.24 tons, with a total energy consumption per year. tons of CPO 2,201.1 KCAL/TON FFB
- b. For the period of 2022 (January – July), FFB processed 48,530,140 tons, shell production 2,911,808 tons, fiber production 6,066,268 tons, shell usage 2,832,758 tons and Fiber 6,055,268 tons, with a total energy consumption per tonne of CPO of 2,205.25 KCAL/Ton FFB
- c. Utilization of shells and fiber for boiler fuel: for 2022 shell production is 2,911,808 kg, fiber is 6,066,268 kg, shell consumption is 2,832,758 kg, fiber consumption is 6,066,268 kg.

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

The company has a Greenhouse Gas Emissions Reduction Guidelines document no. document SOC/DP/4.1.1-08 revision 00 dated 16 September 2013. Described in the document:

- A. Sources of emissions in plantation and mill management, such as:
 - 1. Plantation: Land clearing, fertilizer, fossil fuel
 - 2. Palm Oil Mill: waste ponds and fossil fuels
- B. GHG emission reduction efforts:
 - 1. Use of fertilizers with the right dose according to soil and leaf analysis, timely application and implementation of fertilization according to work instructions
 - 2. The use of organic fertilizers in the form of empty bunch applications
- C. Utilization of solid waste in the form of shells and fiber as boiler fuel
- D. Electricity production, with own electricity production from steam-driven turbines resulting from the boiler process using fiber and shell fuels

The company also has plans to reduce greenhouse gases, including:

- Manage and monitor energy consumption,
- Allocation of electromotor usage according to unit needs
- Perform preventive maintenance on factory and transport operational units listed in the Truck Unit periodic maintenance document for the July 2022 period

The company also shows monitoring of energy consumption as follows:

- a. 2022:
 - Electricity from Genset 3,280 Kwh
 - PLN electricity 67,608 Kwh
 - Turbine 816,380 Kwh
- b. 2021:
 - Electricity from Genset 5.120 Kwh
 - Electricity PLN 186,037 Kwh
 - Turbine 1,438,600 Kwh
- c. Fuel consumption:
 - Total Jan-July 2022 = 154,094 Liters (for the needs of heavy equipment, chainsaws, lawn mowers, transportation vehicles and generators)
 - Total Jan-December 2021 = 231.075 Liters (for the needs of heavy equipment, chainsaws, lawn mowers, transportation vehicles and generators)

The company has shown the GHG calculation for the period of 2022 using the RSPO palm GHG calculator 4

Summary Emission

Emmission per product	tCO2e/tProduct
CPO	1.12
PK	1.12

Production	t/yr
FFB processed	66,675
CPO produced	15.595
PK produced	2,205

Extraction	%
OER	23.39
KER	3.31

Land use	Ha
Planted area	4.219,14
Planted on peat	0
Conservation Area	30.93

Summary Oil Mill Emissions and Credits

Remarks	tCO2e	tCO2e/t FFB
Emissions sources		
POME	9.358.34	0.14
Fuel consumption	57.81	0.00
Grid electricity	134,04	0.00
Credit		
Export of Excess Electricity to housing & grid	0.00	0.00
Sales of PKS	-176.44	0.00
Sales of EFB	0.00	0.00
Total	9.373,75	0.14

Summary of field emission and Sinks

Description	Own crop		
	tCO2e	tCO2e/ha	tCO2e/tFFB
Emissions Sources			
Land conversion	4.1470.45	9.87	0.62
CO2 emmissions from fertilizer	4.442.35	1.05	0.07
N2O emissions from Peat	0.00	0.00	0.00
NO2 emissions from fertilizer	3.199.92	0.17	0.01
Fuel Consumption	737,52	0.17	0.01
Peat Oxidation	0.00	0.00	0.00
Sinks			
Crop Sequestration	-3.9319,31	-9.36	-0.59
Sequestration in Conservation Area	0.00	0.00	0.00
Total	10512,29	2.49	0.16

Palm Oil Mill Effluent (POME) Treatment

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

POME Divert to Anaerobic Digestion

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

7.10.2

Similar to the previous audit, the Company has conducted a greenhouse gas assessment for new planting activities at the Tanah Gambus Plantation, which was conducted by Aksenta in 2016. From the results of the study that has been carried out, it is concluded that the carbon stock in the Tanah Gambus Plantation area (formerly Kebun Lima Puluh) consists of on biomass carbon stock with a value of 62.3 kilo tonC and soil organic-C carbon stock with a value of 60.2 kilo tonC. The potential for carbon stock emissions in the process of clearing land for new plantings comes from biomass throughout the study area (no HCV area).

Recommendations resulting from the Greenhouse Gas Study such as:

- Carry out planting and maintenance of plants to the maximum
- Carry out land clearing and planting simultaneously
- Monitoring and minimizing carbon and other GHG emissions such as methane capture and zero burning.

Based on the results of the document review and the results of field observations, it is known that the company has implemented a plan to reduce greenhouse emissions in accordance with the GHG study, such as planting trees with examples of tree planting in the river border areas BL 063, BL 065 and BL 046, and not burning at the opening. land and other waste.

After 2014 the company did not plant in new areas, the planting activity carried out was the conversion of commodities from rubber to oil palm starting from 2015 to 2022 with a total area of 2,337.2 Ha.

7.10.3

The company has a Greenhouse Gas Emissions Reduction Guidelines document no. document SOC/DP/4.1.1-08 revision 00 dated 16 September 2013. Described in the document:

- A. Sources of emissions in plantation and mill management, such as:
 2. Estate: Land clearing, fertilizer, fossil fuel
 3. Palm Oil Mill: waste ponds and fossil fuels
- B. GHG emission reduction efforts:
 1. Use of fertilizers with the right dose according to soil and leaf analysis, timely application and implementation of fertilization according to work instructions
 2. The use of organic fertilizers in the form of empty bunch applications
- C. Utilization of solid waste in the form of shells and fiber as boiler fuel
- D. Electricity production, with own electricity production from steam-driven turbines resulting from the boiler process using fiber and shell fuels

The company shows Waste Identification documents for Estate and POM for the period 2022, including: emissions, noise, chemical waste, organic and inorganic waste, as well as infectious waste and liquid waste.

The company shows the document SOC/DP/4.09-01 dated January 1, 2015 regarding Monitoring and Measurement of EHS (environment, health and safety).

Guidelines for handling movable and immovable source disturbances and air waste handling

1. Source of interference:
 - a. Boiler (noise, smoke, dust)
 - b. Genset (noise, smoke)
 - c. Drier (noise, smoke)
 - d. Work tools (chain saw, trunk injection, etc.) (noise & vibration)
 - e. Waste pool (odor & water pollution)
 - f. Vehicle (smoke)
 - g. Waste pool (odor & water pollution)
2. Troubleshooting:
 - a. Boiler: noise (providing PPE earplugs to operators), boiler ash (providing dust collector in each boiler & measuring air emissions every 6 months), dust (measurement of air emissions every 6 months), providing PPE to operators in the form of masks.
 - b. Genset: noise (providing PPE earplugs to operators), smoke: measurement of air emissions every 6 months, reporting the measurement results every 6 months to the relevant agencies.
 - c. Drier: noise: providing PPE to operators, in the form of ear plugs; measurement of air emissions every 6 months, reporting the measurement results every 6 months to the relevant agencies.
 - d. Vehicles: smoke/emissions: measurement of air emissions every 1 year & report it to the relevant agencies.
 - e. Pond: smell: plant plants that can reduce the smell of the sewage pool, take regular odor measurements and provide PPE masks to the waste pool staff.
 - f. Water pollution: analysis of liquid waste every month, treatment of liquid waste in waste ponds according to guidelines (SOC/DP/4.11-01), reporting results of liquid waste management to relevant agencies every 3 months

The evidence shown by the company includes:

- a. Odorant
 - Certificate No. 06290/BLAEAO, dated November 2, 2021, the quality standard refers to Kep 50/MENLH/11/1996, monitoring location for waste ponds, factory yards, settlements near waste ponds, the results have no parameters that exceed the quality standards
- b. Air Emissions:
 - Certificate 03374/CLACAP, dated March 25, 2022, the quality standard refers to the Minister of Environment Regulation 07/2007 appendix I, Boiler 1, the test results have no parameters that exceed the quality standard
 - Certificate 03375/CLACAP, dated March 25, 2022, the quality standard refers to the Minister of Environment Regulation 07/2007 appendix I, Boiler 2, the test results have no parameters that exceed the quality standard
- c. Ambient Air:
 - Certificate 02424/CLACAP, dated March 25, 2022, the quality standard refers to the regulation of PP RI No. 22 of 2021, the location is in front of the POM office, Employee Settlement, Factory Outside Fence, the measurement results do not have parameters that exceed the quality standard
 - Certificate 06275/BLAEAO, dated November 1, 2021, the quality standard refers to the regulation of PP RI No. 22 of 2021, the location is in front of the POM office, Employee Settlement, Factory Outside Fence, the measurement results have no parameters that exceed the quality standard
- d. Noise:
 - Certificate 02424/CLACAP, dated March 25, 2022, quality standard refers to KepmenLH no 48/MENLH/11/1996, location in front of PMKS office, Employee Settlement, Factory Outside Fence, measurement results do not have parameters that exceed the quality standard
 - Certificate 06275/BLAEAO, dated November 1, 2021, standard mutu refers to KepmenLH no 48/MENLH/11/1996 location in front of PMKS office, Employee Settlement, Factory Outer Fence, the measurement results do not contain parameters that exceed the quality standard
- e. POME wastewater (performed by PT Sucofindo laboratory) PermenLH no 5 of 2014 attachment III (COD 100, BOD 350)
 - Certificate No.06797/CLACAP, dated 20 July 2022, COD 202.63 mg/l and BOD 98.7 mg/l
 - Certificate No.05217/CLACAP, dated June 20, 2022, COD 167.92 mg/l and BOD 65.2 mg/l

- Certificate No.03971/CLACAP, dated 20 May 2022, COD 170.54 mg/l and BOD 89.4 mg/l
- Certificate No. 03143/CLACAP, April 18 2022, COD 145.67 mg/l and BOD 72.9 mg/l
- Certificate No. 02081/CLACAP, dated March 18, 2022, COD 188.42 mg/l and BOD 94.1 mg/l
- Certificate No. 00798/CLACAP, dated February 21, 2022, COD 150.18 mg/l and BOD 75.3 mg/l

The results of field visits in the BL 065 and BL 063 river border areas, it is known that tree planting activities have been carried out in the river border areas.

Status: comply

7.11

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

7.11.1

Similar to the previous audit, the Company has a Non-Deforestation, Peat Development and Environment Policy which was adopted in June 2019 and reviewed in April 2021. The policy explains that "There is no practice of burning in new plantings, replanting and other developments".

Based on the results of field observations in the BL 027 replanting area, there is no indication of land burning activities, the land clearing process is carried out mechanically using heavy equipment.

The results of interviews with land clearing contractors revealed that the land clearing process as a whole uses a mechanical system, starting from felling rubber trees, clearing land and piling up waste resulting from land clearing.

7.11.2

Similar to the previous audit, the Company has a Non-Deforestation, Peat Development and Environment Policy which was adopted in June 2019 and reviewed in April 2021. The policy explains that "There is no practice of burning in new plantings, replanting and other developments".

Based on the results of field observations in the BL 027 replanting area, there is no indication of land burning activities, the land clearing process is carried out mechanically using heavy equipment.

The results of interviews with land clearing contractors revealed that the land clearing process as a whole uses a mechanical system, starting from felling rubber trees, clearing land and piling up waste resulting from land clearing.

The company shows documentation related to fire prevention and control in the form of:

- List of land fire facilities and infrastructure for PT Socfin's Plantation unit in 2022. There are additional land fire equipment that refers to the Minister of Agriculture Regulation No. 5 / Minister of Agriculture / KB.410/ 1/2018. As for some land fire equipment that has been added, such as firefighter suits, safety helmets, safety glasses, head lamps, fire boots, leather gloves, hoses, whistles, sharp rakes, and others.
- Land Fire Monitoring Report for the period 2021/2022 which informs that there are no land fires in the company's operational areas and evidence of reporting to the relevant agencies.
- Training and simulation of fire emergency response, on July 22, 2022, POM page, attended by 62 people consisting of employees of 5 community representatives from hamlet VII Taman Sari, hamlet IX, hamlet VIII, Hamlet IV
- Socialization of fire prevention for HCV areas, on October 8, 2021 block 31 division II, attended by 9 workers delivered by assistant division II

7.11.3

The Company entered into an agreement with Desa Perkebunan Tanah Gambus on August 1, 2020 regarding fire control. This agreement is valid for 5 years from the date of agreement.

The results of interviews with representatives of the Environment Service and Plantation Office of Batubara Regency, it is known that there has never been a land fire in PT Socfin – Tanah Gambus or its surroundings. From the results of interviews with representatives of the Plantation Service, information was also obtained that the location of the estate was quite close to the city fire department.

The company also conducted training and simulation of fire emergency response, on July 22, 2022, POM page, attended by 62 people consisting of employees of 5 community representatives from hamlet VII Taman Sari, hamlet IX, hamlet VIII, Hamlet IV.

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

Similar to the conditions in the previous audit, new land clearing/planting on Tanah Gambus Estate conducted after November 2005 did not destroy or replace primary forest or HCV areas identified by the HCV assessment document. The new planting is a conversion from monoculture agriculture (rubber plantations) to oil palm plantations. The company has carried out the NPP before carrying out new plantings which were carried out in November 2016 and are available on the RSPO website. Based on the RSPO NPP summary of Assessment Report, it is known that there is no HCV area in the new development/planting area with zero liability compensation.

7.12.2

Similar to the conditions in the previous audit, for the existing plantations, the Company has identified HCV in 2011 in collaboration with the Faculty of Forestry, IPB. Based on the HCV identification carried out in 2011, the HCVs in the Tanah Gambus operational area are HCV 4 and HCV 6 with the following details:

Name of HCV	Area (Ha)
Riparian zone A	5.75
Riparian zone B	11.64
Riparian Pluit River 1	5.11
Riparian river C (anak Sungai Pluit 1)	4.06
Riparian river Pluit 2	7.01
Swamp border	12.92
Swamp ecosystem	40.66
Grave	1
Total	88.15

For new development / planting areas, an HCV Assessment has also been carried out which has also been described in the RSPO NPP summary of Assessment Report 2016. The HCV assessment was carried out by an assessment team that has registered HCV-ALS, with registration no. ALS15037NM and ALS15039IS, and has been approved by the HCVRN scheme in its first re-submission on 26 Sep 2016, and approved on 11 Nov 2016 with a "Satisfactory" evaluation result from the assessor (<https://hcvnetwork.org/reports/pt-socfin-serdang-bedagai-and-batubara-region-indonesia/>).

Based on the results of the assessment, it was concluded that there were no HCV areas and no RTE species in the new planting/clearing areas. Referring to 7.12.2 attachment 5 for the Certified Plantation scenario, the following is an explanation for the new development/planting area of Tanah Gambus Estate:

- The HCV assessment is carried out by the ALS assessor and approved by the HCVR-ALS scheme as described above.
- Based on the NPP report which also contains LUCA information, it is known that rubber plantation land cover has existed since 7 Dec 1930, with zero liability and compensation results.
- The proposed area for new development/planting is monoculture agriculture (rubber plantation) which has existed since 1930, there is no HCV area so it is categorized as low risk

Referring to indicator 7.12.2 of Annex 5 with low risk, it is known that previous HCV identification is acceptable and does not require an HCV assessment using the HCSA approach

In 2021, the company will verify and delineate the previous HCV documents for Aksenta. Field activities are carried out in the period April – May 2021. The review activity has also involved stakeholders and has been attached to the document. The total area of HCV based on the review includes:

Name Of HCV	Area (Ha)		Total
	HCV	HCVMA	
Swamp Gori – gori (big)	33.5	6.6	40.1
Swamp Gori – gori (small)	6	2.8	8.8
Gambus tributary 2	1.2	4.2	5.4
Gambus tributary 3	0.7	2.3	3
Gambus tributary 1	0.8	2.4	3.2
Dahari tributary	1	3.6	4.6
Grave	0.6	-	0.6
Total	43.8	21.9	65.7

Based on the results of interviews with the company, it is known that the company has re-measured the HCV area. From the re-measurement carried out, the company determined an HCV area of 30.93 Ha which is an HCV area in the form of a river border. As for the HCV area in the form of a swamp, it is included in the planted area. As for the tomb area, enter the facilities and infrastructure area.

7.12.3

Indicator 7.12.3. until now not relevant to Indonesia, until the existence of further decisions from RSPO

7.12.4

The company has demonstrated plans and management of HCV for the period 2021/2022. Based on document verification, it is known that the company has implemented HCV management in accordance with the management plan, such as: installation of signboards, monitoring flora & fauna, socialization to employees, planting woody plants in buffer zones, maintaining HCV boundaries, HCV security patrols etc. The company has a management plan for the 2021/2022 period which is the result of consultation with the surrounding villages and evidence of stakeholder consultation has been shown.

The company has also shown evidence of stakeholder consultation on HCV area management with surrounding communities for the future period, for example:

1. Sumber Makmur Village on 28 April 2021, Simpang Gambus Village on April 2021
2. Socialization of HCV to stakeholders on 11 April 2022, attended by 5 people from the 7-8 Kadus Tanah Gambus and community leaders,
3. Socialization of HCV to surrounding communities, April 11, 2022, Block G, as many as 17 residents of Gambus intersection
4. Socialization of HCV to the community on 4 February an Aodi Prasetio, followed by 6 people, the community of the cottage (M31)

Based on the results of field visits at the riverbanks of Blocks 063 and 046, there was an installation of an HCV 4.1 signage and a warning regarding the prohibition of destroying and cutting down plants on the river border, maintaining the quality of river water by not throwing garbage and any objects in the river, prohibited from spraying with chemicals on riverbanks. In the annual HCV management report document, there is an evaluation section on the implementation of HCV management, including: realization of activities and analysis of problems if the realization of activities is not carried out or does not reach the target.

HCV management is based on the results of the HCV identification study, and related SOPs, including river border demarcation, determination of border width, installation of signage, and tree planting.

Based on the results of field visits at the Block 046 river border, it is known that tree vegetation in the river border area is still sparse and on the right side of the river there is a road directly adjacent to the riverbank

Increasing efforts to reforest/ add stands in river border areas and efforts to restore the function of river borders on the right and left of the river (in block 46), where the border is only on one side.

7.12.5

Same as conditions in the previous audit. There are no community rights in the HCV area. The results of the verification of the HCV document revealed that there were only HCV 4 and HCV 6 in the form of graves at PT Socfin-Tanah Gambus. In addition, based on the HCV document for the new development area, no HCV area was identified. The new development area is the company's area which was previously a rubber plantation.

7.12.6

Based on the HCV assessment document conducted in 2011 by the Bogor Agricultural University, Faculty of Forestry for the existing planting area (except the area proposed for new land clearing), the species categorized as RTE were found, namely:

1. *Lutra sumatrana* is categorized as endangered
2. *Psilopogon rafflesii* is categorized as critically endangered
3. *Turdinus atigularis* is categorized as near threatened

As for new development areas, based on the results of the 2016 HCV assessment, no RTE species were found in the study area.

The company has routinely carried out animal monitoring in the operational area. For example, the company showed footage of animal monitoring in February 2022, which found the Blue King Prawn, Coconut Honey Bird, Buffalo Egret, monitor lizard and long-tailed macaque,

The company has also shown records of socialization of HCV areas and animal protection, including:

- Socialization to workers on April 5, 2021 attended by 10 participants
- HCV socialization to stakeholders on 11 April 2022, attended by 5 people from the 7-8 Tamnah Gambus sub-district and community leaders,
- Socialization of HCV to surrounding communities, April 11, 2022, Block G, as many as 17 residents of Gambus intersection
- Socialization of HCV to the community on 4 February an Aodi Prasetio, followed by 6 people, the community of the cottage (m31) and at the Div II employee office, at the same time at 8 to 7 employees/employees
- Socialization of HCV 4 June 2022 field block 46
- The results of interviews with workers and the surrounding community, it is known that the company has provided socialization related to HCV areas and animal protection. From the results of the interview, it was also known that workers already knew about RTE species, and during 2021 to 2022 when working in the field there were no encounters with RTE species.

7.12.7

The HCV management plan was developed based on the results of previous monitoring. The company can show the results of monitoring HCV areas including RTE species for the period 2021/2022. Based on the results of patrolling the HCV area for the period January to July 2022, it was found that there was no indication of hunting and catching of the HCV area.

The company has also shown an HCV Management Report for the period of February 2022 which also contains information on the results of monitoring animals including RTE species throughout 2021.

Based on the results of field visits to the BL 063 and BL 065 river borders, it is known that the condition of the river border is maintained and reforestation efforts have been carried out by planting trees in the river border area.

There is no peatland in the company concession area

In the annual HCV management report document there is an evaluation section on the implementation of HCV management, including: realization of activities and analysis of problems if the realization of activities is not carried out or does not reach the target

7.12.8

There were no changes related to land clearing from the previous audit. Land clearing in 2022 is an activity for converting plant species from the company's rubber tree stands to oil palm.

The company has not cleared new land since November 2005 and/or new land has been cleared since 15 November 2018 without an HCV assessment. For new development/planting areas, an HCV Assessment has been carried out by an assessment team that has registered the HCV-ALS, with registration no. ALS15037NM and ALS15039IS, and was approved by the HCVRN scheme in its first re-submission on 26 Sep 2016, and approved on 11 Nov 2016 with a "Satisfactory" evaluation result from the assessor (<https://hcvnetwork.org/reports/pt-socfin-serdang-Bedagai-and-Batubara-region-indonesia/>). And based on the results of the assessment, it was concluded that in the new planting/clearing area there were no HCV areas and no RTE species.

Based on the NPP report which also contains LUCA information, it is known that the land cover for rubber plantations has existed since 7 Dec 1930, with the result of zero liability and compensation.

Status: Comply

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-2.1	Tanah Gambus POM – PT. Socfin Indonesia does not use trademark on it sales document or any of communication and promotion paper.	√
	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-2.1	Tanah Gambus POM – PT. Socfin Indonesia does not use trademark on it sales document or any of communication and promotion paper.	√
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or √
ASA-2.1	Tanah Gambus POM – PT. Socfin Indonesia does not use trademark on it sales document or any of communication and promotion paper.	√
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or √
ASA-2.1	Tanah Gambus POM – PT. Socfin Indonesia does not use trademark on it sales document or any of communication and promotion paper.	√
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of Socfin SA against the rules for partial certification was determined through Self-Assessment in accordance with RSPO Certification System clause 4.2.4. A summary of findings is as stated below.

Socfin SA Time Bound Plan (TBP) is explained in table 1.10. Socfin SA has eight (8) management units with twenty-three (23) mills. Socfin SA has informed the TBP progress, MUTU has considered that Socfin SA is complied with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by Socfin SA on 23 June 2022.

MUTU has verified partial certification for un-certified unit's subsidiary of Socfin SA based on their Time Bound Plan. There are three (3) uncertified mills and eleven (11) uncertified estates of Socfin SA. 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 two significant land conflicts which have not been declared above
- The Final LUCA reports have not been sent to RSPO because waiting for meeting and LUCA training with RSPO.
- There are two labour disputes that are not being resolved through an agreed process.
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above.

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	The Company was been conducted internal assessment for uncertified units on July until October 2021 and has a positive assurance statement to certified.
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)	Most of uncertified unit still have LUCA in progress, such as: <ul style="list-style-type: none"> • Okomu Extension 1 & 2 Mill and Estate: LUCA status still reviewed by RSPO. • Socapalm Kienke Mill and Estate: LUCA status still reviewed by RSPO. • Socapalm Eseka Mill and Estate: LUCA PASS and still RaCP process • Brabanta Mill and Estate: LUCA PASS and still RaCP process • PSG Mill and Estate: LUCA status still not complete. • Agripalma mill and Estate: LUCA status still reviewed by RSPO. • Safacam Mill and Estate: LUCA status still reviewed by RSPO. • SOGB Mill and Estate: LUCA status still reviewed by RSPO.
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	Okumu Extension 1 Estate and 2 Estate. Since NPP was not followed for the land clearance since May 9, 2014, remediation and compensation procedures will need to be

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>followed for those areas with a coefficient higher than 0. This will be done after the final LUCA report has been submitted to the RSPO.</p> <p>Agripalma. Since NPP was not followed for the land clearance between Jan 1, 2010, and May 9, 2014, remediation and compensation procedures will need to be followed for those areas with a coefficient higher than 0 (estimated 455 ha). This will be done after the final LUCA report has been submitted to the RSPO.</p> <p>Brabanta. Since NPP was not followed for the land clearance between Dec 1, 2007 – May 9, 2014, remediation and compensation procedures will need to be followed for those areas with a coefficient higher than 0 (estimated at 156 ha). This will be done after the final LUCA report has been submitted to the RSPO. LUCA report not yet completed.</p> <p>PSG. Since NPP was not followed for the land clearance between Jan 1, 2010 – Current, remediation and compensation procedures will need to be followed for those areas with a coefficient higher than 0 (estimated at 1,140 ha). This will be done after the final LUCA report has been submitted to the RSPO.</p> <p>SAC. Since NPP was not followed for the land clearance between Jan 1, 2010 – Current, remediation and compensation procedures will need to be followed for those areas with a coefficient higher than 0 (estimated 100 ha). This will be done after the final LUCA report has been submitted to the RSPO. SAC conducted an HCV assessment in February 2019. The SAC non-ALS HCV report has been approved by RSPO.</p> <p>Safacam Since NPP was not followed for the land clearance between Dec 1, 2007 – Dec 31, 2009, remediation and compensation procedures will need to be followed for those areas with a</p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>coefficient higher than 0 (estimated at 613 ha). This will be done after the final LUCA report has been submitted to the RSPO.</p> <p>Socapalm. Since NPP was not followed for the land clearance between Nov 1, 2005 – Current, remediation and compensation procedures will need to be followed for those areas with a coefficient higher than 0 (estimated at 7,521 ha). LUCA report has been sent to RSPO on August 2020.</p> <p>SOGB. Since NPP was not followed for the land clearance between Nov 1, 2005 – Current, remediation and compensation procedures will need to be followed for those areas with a coefficient higher than 0 (estimated 2,003 ha). This will be done after the final LUCA report has been submitted to the RSPO. A HCV scoping assessment was conducted in April 2019. LUCA report has been approved by RSPO.</p>
2.1.4	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO criteria 2.2, 6.4, 7.5 and 7.6 (it has changed be Criterion 4.8, 4.7 and 4.5 in P&C 2018).	<p>SAC Estate There is currently 1 open land dispute which is undergoing resolution processes. The complaint is from the Malen Affected Land Owners Association (MALOA), who are protesting against the expansion of SAC in the Malen Chiefdom. The discussion for this complaint has been going on for a long time, and to aid in the resolution, the Government has appointed a Technical Committee to examine the issues and make proposals to the mediation team. The first of ten visits were carried out on the 23rd of March.</p> <p>Okumo Extension 1 Estate. There is an ongoing dispute regarding land conflict on Extension 1, which is meant for rubber cultivation. The land was acquired rightfully from its previous tenants for the remainder of the lease, however, upon acquisition, it was identified that 5 different communities had encroached the land. 4/5 communities accepted a compensation, however, one, Hassan Camp, did not.</p> <p>Attempts for negotiations were made, however,</p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Hassan Camp wanted to take the case to court. At this moment it is under sub judice.</p> <p>Once the court has spoken, new attempts can be made to resolve the issue following an acceptable conflict resolution process.</p> <p>For other plantations, there are no Land conflict.</p>
2.1.5	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3 (it has changed be Criterion 4.2 in P&C 2018).	<p>Okumo Extension 1 and 2 Estate.</p> <p>OOPC operations at Extension 1 in Okomu and Extension 2 in the Owan Forest Reserves necessitated both physical and economic displacement. Whiles the Extension 2 only affected economic displacement and the farmers are generally content with the crop compensation process undertaken, there has been an ongoing and protracted issue with some communities affected at Extension 1 on area meant for rubber plantings. Compensation was not required under Nigerian law because the communities were considered illegal settlers on the private property of OOPC. There is evidence (time stamped satellite images) that they settled in the area after the acquisition by Okomu. Whiles four (Fatai, Olowu, Sunday and Olomu Camps) out of the 5 communities that were within the boundaries of the Extension 1 have moved out of the concession after three years of consultations, and after compensations have been paid to the farmers, the people of Hassan Camp which is the largest of the five communities have refused compensations from OOPC because they claim that part of the land belongs to them and therefore will not move out of the land. They have subsequently taken the case to court with the claim that they own the land (Latest court case update: OKOMU_Updates on Court Cases Extension 1). Thus, the whole issue is now sub judice until the court has made its decision.</p> <p>OOPC has a Community Liaison Team, who is the main line of communication of the company with the local communities. The team visits villages within a radius of 10 km around the concession, to disseminate information and to engage in dialogue in order attend to any issues that may arise between the Company and local communities.</p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		There are currently no labour disputes for other plantations.
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).	All plantations are complying to most national laws and regulations and has a system in place to follow all current laws and regulations.

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.	: 2021.01	Issued by	: Rizliani Aprianita Hsb
Date Issued	: 6 August 2021	Time Limit	: 4 November 2021
NC Grade	: Major	Date of Closing	: 14 September 2021
Standard Ref. & Requirement	: 3.3.1 The existence of Standard Operating Procedures (SOP) for the unit of certification.		
Evidence observed (filled by auditor): The company has SOP & IK for Weed Control Work on Oil Palm Plants with document number SOC-KKS/IK/13 which is valid starting from February 1, 2016 and is approved by the Head of Plant Section of PT. Socfin Indonesian. The SOP document explains that the tools and materials used are one of them in the form of a warning sign. Based on the results of field visits in Block 1 Division 1, it is known that there are harvesting and spraying activities in 1 block. However, there is no warning sign related to the spray work.			
Non-Conformance Description (filled by auditor): Based on the explanation above, it is concluded that the implementation of spraying is not in accordance with the SOP that is owned.			
Root Cause Analysis (filled by organization audited): Lack of understanding of the implementation of Pesticide Spraying IK. So that the work arrangements have not been carried out according to the IK. At the time of spraying the warning sign was already there, but the spray foreman was late in installation.			
Correction (filled by organization audited): The foreman is responsible for installing a warning sign when the spraying activity takes place			
Corrective Action (filled by organization audited): Assistant conducts briefing/socialization related to IK that applies to spray foreman			
Assessor Evaluation and Conclusion (filled by auditor): Verify September 14, 2021 The company showed proof of improvement in the form of documentation of socialization of the installation of the spray area sign (Warning Sign) and photos of the installation of the sign (warning sign) on August 21, 2021 which was attended by the spray foreman and Division I spray workers. must install a warning sign for the spray area which is useful as a warning sign for employees or civilians who will cross the spray area in division 1 of the Tanah Gambus plantation. Based on the root cause analysis, corrective actions and evidence that has been shown by the company, this discrepancy can be declared Fulfilled .			
Verified by	: Rizliani A		

NCR No.	: 2021.02	Issued by	: Rizliani Aprianita Hsb
Date Issued	: 6 August 2021	Time Limit	: 4 November 2021
NC Grade	: Major	Date of Closing	: 24 October 2021
Standard Ref. & Requirement	: 3.4.3 The Social and Environmental Management and Monitoring Plan is implemented, monitored and updated periodically in a participatory manner.		
Evidence observed (filled by auditor): RKL-RPL <ul style="list-style-type: none"> - The revised RKL-RPL matrix for 2005. The parameters that are managed and monitored are based on the following matrix: <ul style="list-style-type: none"> o Outdoor air quality → every 6 months o Indoor air quality → once a year o Quality of immovable source emission → every 6 months o Noise → every 6 months o Liquid waste → once a month o Groundwater → once a year o Solid waste → every 6 months o Hazardous waste → every 6 months o Job Opportunities once → every 3 years o Community perception around → once every 3 years o Public health → once a year - Report on the Realization of RKL-RPL semester 2 of 2020 and semester 1 of 2021 Chapter II implementation and evaluation, it is known that : <ul style="list-style-type: none"> o Air emissions → emission quality tests have been carried out for stationary sources (boilers) o Indoor air quality → Indoor air quality testing has been carried out in RKL-RPL SM 2 in 2020. o Outdoor air quality → outdoor air quality testing has been carried out in RKL-RPL SM 2 in 2020, but there has been no outdoor air quality test in SM 1 in 2021. o Noise → it is explained that the magnitude of the impact of noise generating sources (15 areas) such as: generator set and turbine 90 dB and boiler 87 dB. In addition, there is no attachment of noise test results for semester 1 of 2021. Based on the explanation in the RKL-RPL it is known that the test results have not been issued by the testing laboratory and noise testing data will be attached to the next report. o Liquid waste testing → carried out at the outlet. The results of the wastewater quality test have been attached o Groundwater well water quality testing → has been carried out in 6 locations. o Hazardous waste management report and hazardous manifest → have been attached o Solid waste has → monitored the amount of solid waste o Public health disease trends → have been monitored o Job opportunities and public perception → conducted in July – December 2018 <p>Based on the explanation above, it is concluded that monitoring activities have not used updated data according to the RKL-RPL matrix.</p> SEIA Conversion <ul style="list-style-type: none"> - Report on the 2016 Social and Environmental Impacts of Conversion Activities of Bangun Bandar and Lima Puluh Estates, which was prepared by Aksenta. The document describes several social and environmental impacts on the physical environment component, the impact on the biological environmental component and the impact on the social component. - Social Impact Assessment document for 2020 which describes several plans for managing and monitoring social impacts and their realization. 			

There is no evidence of the realization of impact management on the physical and biological environmental components in accordance with the Study Report on the Social and Environmental Impacts of the Conversion Activities.

Non-Conformance Description (filled by auditor):

Based on the explanation above, it is concluded that there is insufficient evidence that the management and monitoring of impacts has been carried out in accordance with the environmental matrix document and the Environmental and Social Impact Assessment Report of Conversion Activities.

Root Cause Analysis (filled by organization audited):

Lack of updating of information presented in the report, with various causes for the following conditions:

- The implementation of the emission test tender which took a long time resulted in delays in the outdoor air quality and noise testing process so that the test results had not yet been published.
- There is no monitoring matrix monitoring table for each parameter that is managed and monitored, especially in conversion activities to facilitate the preparation of the RKL RPL report

Correction (filled by organization audited):

- Contacting the implementing party for the emission test (PT. Sucofindo) to immediately issue the results of the test analysis (coordinating with the sub-branch of Engineering)
- Prepare RKL RPL report for semester I/2021 (continued) which has been equipped with information on management and monitoring activities for conversion activities.

Corrective Action (filled by organization audited):

- Teknik department changed the emission test tender period which was previously conducted every 6 months to once every 2 years for time efficiency and the implementation of emission measurements was carried out 3-4 months before the end of semester period
- Sustainability staff set a monitoring matrix monitoring table for each parameter and distributed it to the plantation as a guide in preparing RKL-RPL report
- Plantation and sustainability staff verify the results of the RKL – RPL reports.

Assessor Evaluation and Conclusion (filled by auditor):

Verification on 24 October 2021

The company shows evidence of improvement, in the form of:

- Memo No. IA/TK/172/2020 dated November 28, 2020 regarding the implementation of the emission test tender for semesters 1 and 2 of 2021.
- Letter of agreement for environmental and OHS emission test work in the second semester of 2021 and 2022 PT Socfin Indonesia No. PD-GM/X/240/2021 April 28, 2021
- The 2021 RKL-RPL reporting monitoring matrix which consists of 18 parameters along with the management/monitoring frequency.
- Ambient air quality test analysis report with measurement date 4 – 8 June 2021 by the Testing Laboratory. Based on the test results, it is known that there are no test results that exceed the quality standard.
- Follow-up RKL-RPL reports that have informed several parameters related to environmental analysis based on the RKL RPL matrix and several parameters based on the impact of conversion activities.

Based on the explanation above, the non-conformance is declared Fulfilled.

Verified by : **Rizliani A**

1.1. Identification of Findings, Corrective Actions and Observations at ASA-2.1 Assessment

NCR No.	: 2022.01	Issued by	: Rindu Galih Rezza R.
Date Issued	: 26 August 2022	Time Limit	: Next Surveillance
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	6.7.5 Work accidents are recorded using Lost Time Accident (LTA)		
<p>Evidence observed (filled by auditor):</p> <ul style="list-style-type: none"> Based on the results of the LTA calculation for the period January – July 2022, there were four (4) workplace accidents (2 accidents at the estate and 2 at the mill) and one of these accidents was a serious accident that caused permanent disability (missing 1 index finger). However, in the calculation of the LTA there are several things to note, including: <ul style="list-style-type: none"> In January, February, March, and July 2022 there were no work accidents in the plantation unit, but there were lost working hours in those 4 months. In April and July 2022 there were no work accidents at the mill unit, but there were lost working hours in those 2 months. The company uses lost working hours in its LTA calculation and for work accidents that cause disability, the loss of working hours is only 68 hours. Calculations related to LTA (calculation of Severity Rate and Frequency Rate) have been regulated in the Decree of the Director General of Industrial Relations and Manpower Supervision of the Indonesian Ministry of Manpower No. KEP.84/BW/1998 on How to Fill in the Accident Statistics Report and Analysis Form. Where in it has been regulated regarding the calculation of the Severity Rate, Frequency Rate and provisions regarding loss of working days/loss of working days which are regulated for accidents that cause defects for the tip of the index finger is 100 days. The LTA calculation used by the company does not refer to the regulation, starting from the use of lost working days (not working hours) to the determination of lost working days for serious work accidents (disability, loss of organ function, etc.) as well as those that cause death (fatality) <p>Non-Conformance Description (filled by auditor): The company has not been able to show evidence that the implementation of the Lost Time Accident (LTA) calculation is in accordance with the Decree of the Director General of Industrial Relations and Labor Supervision of the Indonesian Ministry of Manpower No. KEP.84/BW/1998 on How to Fill in the Accident Statistics Report and Analysis Form</p> <p>Root Cause Analysis (filled by organization audited):</p> <p>Correction (filled by organization audited):</p> <p>Corrective Action (filled by organization audited):</p> <p>Assessor Evaluation and Conclusion (filled by auditor):</p>			
Verified by	:		

NCR No.	: 2022.02	Issued by	: Briyogi Shadiwa
Date Issued	: 26 August 2022	Time Limit	: Next Surveillance

NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	: 7.3.2 There is evidence of waste disposal according to procedures that are fully understood by workers and managers		
Evidence observed <i>(dilengkapi oleh auditor):</i>			
<p>1. During the field visit at the time the audit was conducted, toxic hazardous waste was still found in places that did not have a toxic hazardous waste storage permit, for example:</p> <ul style="list-style-type: none"> - There is a pile of inner fertilizers in the Division 3 Central Fertilizer Warehouse. - There are 2 used drums in the civil workshop. - There are several sacks of fertilizer and inner in the river border area of block 065. <p>2. The company has a procedure for the Guidelines for Handling Chemical Packaging Waste (Dok No.: SOC/DP/4.11-05, No. Rev: 08, effective August 1, 2020), which informs the types of toxic hazardous waste packaging waste generated within PT SOCFINDO, among others : waste bottles, sachets, jerry cans, burlap fertilizer, buckets, drums and other chemical packaging. The procedure also explains that:</p> <ul style="list-style-type: none"> - Delivery of Packaging Waste Hazardous Materials & Waste Toxic hazardous materials located in the producing area, such as: afdeling, chemical warehouse, water treatment, are not allowed to be stored in that area. Packaged waste Toxic hazardous materials must be handed over to the Toxic Hazardous Waste Warehouse each time a Toxic hazardous material waste is generated in the area. - Ex-chemical packaging waste from the afdeling sent to the Waste Toxic Materials warehouse must be accompanied by a record of the submission of the Toxic Hazardous Waste which is initialed by the officer who submits (afdeling) and the officer who receives the Toxic Hazardous Waste (Waste of Toxic Hazardous Materials Warehouse) 			
Non-Conformance Description <i>(dilengkapi oleh auditor):</i>			
The company has not been able to show sufficient evidence that the management/disposal of toxic hazardous waste in the field has been in accordance with the established procedures.			
Root Cause Analysis <i>(filled by organization audited):</i>			
Correction <i>(filled by organization audited):</i>			
Corrective Action <i>(filled by organization audited):</i>			
Assessor Evaluation and Conclusion <i>(filled by auditor):</i>			
Verified by	:		

3.4.2. Opportunity for Improvement

No	Ref. Std.	Description
1	3.4	The company has the opportunity for improvement in the SIA Monitoring Report, in the form of implementing SIA monitoring activities adjusted to the types of activities that have been set in the SIA management and monitoring plan (revision 2022) and completing the SIA Monitoring Report with an analysis of the results of questionnaires to correspondents, so as to produce information in the report in a measurable and informative achievement of correspondence results (in the form of tables, diagrams, percentages), as well as conclusions that can be used as the basis for determining CSR programs and increasing the scope of correspondence by involving NGO organizations.
2	3.6.2	Ensure that work accident follow-up is implemented in all company operational units/stations
3	7.3	<ul style="list-style-type: none"> The company has the opportunity to improve the stages of activities in the procedures for the Guidelines for Handling Chemical Packaging Waste (Dok No.: SOC/DP/4.11-05, No. Rev: 08, effective August 1, 2020), in terms of allowing the use of hazardous waste, in accordance with applicable regulations related to the use of hazardous waste. The company has the opportunity to immediately follow up the hazardous waste management cooperation process with a third party that has been determined as the winner in the tender
4	7.12.4	Increasing efforts to reforest/add stands in river border areas and efforts to restore the function of river borders on the right and left of the river (in block 46), where the border is only on one side
5	-	The company has the opportunity to tidy up the recording documentation.

3.4.3. Noteworthy Positive Components

No	Description
1	All employees have received booster vaccines
2	There are no fire issues in the company's operations
3	Have Health Facilities 1

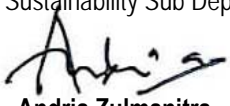

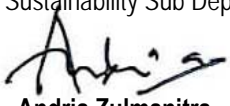

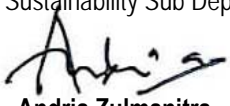

3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>SPSI PUK Mill and Estate</p> <ul style="list-style-type: none"> • The company has given workers rights and obligations in accordance with company regulations, for example related to wages, overtime and also work support facilities. • Currently, there are several housing conditions that are damaged, the employee has reported it to the company and is still in the repair stage (not entirely) • Regarding the demonstration that took place in June 2022, the SPSI factory branch did not interfere in the activity (only members from SPSI Estate), all factory workers union members continued to work as usual. • There is no issue of forced labor, and there is no coercion from union officials to be obliged to join a trade union. • Election of union leader based on the agreement of the members without any interference from the company. 	<p>Regarding the demonstration incident, based on the explanation of the SPSI PUK Estate management, it was indeed initiated by the plantation workers union. The union held a demonstration regarding the issue of reduced bonuses from previous years. Based on the explanation of the Department of Manpower Batubara Regency, related to bonuses, is the company's prerogative. From the results of the collective bargaining agreement review, it is also known that the bonus is based on a collective agreement between the Federation of Agricultural and Plantation Workers Unions of All Indonesia and the North Sumatran Plantation Company Cooperation Agency, not determined by PUK SP.PP-SPSI. Until the audit activity was carried out, currently all workers have returned to work.</p>
<p>Labor Agency of Batubara Regency</p> <ul style="list-style-type: none"> • There are no issues related to the fulfilment of workers' rights and obligations. • Regarding the workers' demonstration in June 2022, the agency stated that they are still waiting for a decision from the head office. According to the department's view, the bonus in question is the prerogative of the company, workers cannot claim the value of the bonus, unless it is related to mandatory matters such as minimum wages or overtime. 	<p>From the results of the document review and explanation from the company, negotiations have been carried out with the union and related agencies and are currently waiting for a decision from the central office. The workers in both the plantations and factories are working as usual.</p>
<p>Environmental Agency of Batubara Regency</p> <ul style="list-style-type: none"> • Complete environmental documents and complete environmental permits • There are no pollution issues due to company operation 	<p>There are no negative issues that need further clarification</p>
<p>Karya Mandiri Contractors</p> <ul style="list-style-type: none"> • There are no problems in the cooperation contract for land management activities, • Payment system is good and on time • There are requirements for cooperation in the form of minimum wages, application of OHS, environmental aspects and management of toxic hazardous waste 	<p>There are no negative issues that need further clarification</p>
<p>UD Bukit Mas</p> <ul style="list-style-type: none"> • As a supplier of building materials • Order based on need 	<p>There are no negative issues that need further clarification</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> One month payment system There are no problems with payment 	
<p>PT Mustika Karya Buana</p> <ul style="list-style-type: none"> As a labor provider for planting oil palm trees and caring for seedlings Workers' wages are paid according to the applicable district minimum wage Workers have been given government insurance schemes (BPJS Manpower and BPJS Health) Workers are given PPE in accordance with their work for free and replaced when it has expired and or is damaged There is a letter of cooperation agreement for each worker 	<p>There are no negative issues that need further clarification</p>
<p>PT Gunung Kawi</p> <ul style="list-style-type: none"> As a CPO Transporter There are requirements for cooperation in the form of receiving a minimum wage, implementing OHS and environmental policies, There are no problems in the implementation and payment of the cooperation contract 	<p>There are no negative issues that need further clarification</p>
<p>National Land Agency of Batubara Regency.</p> <p>The relationship between the agency and the company is quite good so far. Reports on Land Use Title (HGU) are always reported regularly every year. During the past year, there have never been any incidents/cases or issues related to land disputes/claims in the company's operational areas. Regarding the information on the granting of PT Socfin Indonesia's Land Use Title (HGU) area to the Batubara Regency Government as an office area, it is not clearly known by the agency. This is because all related matters are carried out by the Regional Office of the National Land Agency of Sumatra Utara Province. The progress of the extension of the Land Use Title (HGU) is also carried out by the Regional Office, not the Regency, so the extent of the progress of the extension is not known by the Agency.</p>	<p>Based on the results of the document review, it is known that all arrangements for the extension of the Land Use Title (HGU) are carried out by the Ministry of Agrarian Affairs and Spatial Planning/National Land Agency of the Republic of Indonesia and the Regional/Regency Office only as supporting parties in managing the extension.</p> <p>PT Socfin Indonesia has submitted an application for an extension of the Land Use Title (HGU) to the Ministry of Agrarian Affairs and Spatial Planning / National Land Agency of the Republic of Indonesia since January 2021 in accordance with Letter No. UM/X/Bi/236/21 dated January 19, 2021 for the Land Use Title (HGU) Area of 4,974.29 Ha in Batubara Regency whose HGU will expire on December 24 and 31, 2023. The progress of the extension until the audit activity takes place has reached the stage of re-measurement PT Socfin Indonesia land area of ± 1,418.65 Ha in Batubara Regency in accordance with Letter No. 91/S-300.16.1-UK.01.03/II/2022 dated February 21, 2022, where the ministry assigned 2 field implementers to carry out these measurements. For the measurement of other permits (covering an area of</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
	3,373.11 Ha and 182.53 Ha) has not been carried out by the ministry. Currently, the processing of permit extensions is still ongoing at the ministry and these permits are still valid until December 31, 2023.
<p>Tanah Itam Ulu Village</p> <p>Over the past year, the relationship and communication between the village community and the company has been quite good. The impact caused by the company's operational activities (plantation and mill) is felt by the community positively, such as the existence of routine CSR assistance every year, the absence of fire incidents, no environmental pollution, communication responses related to requests/proposals for assistance are always responded well, and others. So far, the community and the village government have never had any grievance or complaints submitted to the company.</p> <p>The company has routinely disseminated its policies, communication procedures to socialization of the PSR (Farmers Palm Oil Replanting) program to the community and farmer groups in the village. In addition, there have never been any incidents or issues related to existing land disputes/claims between the community and the company, the absence of child laborers employed in the company, nor any harassment or discrimination against workers or the community.</p>	There's no negative issues need to further verification.
<p>Lima Puluh Kota Urban Village</p> <p>Over the past year, the relationship and communication between the village community and the company has been quite good. The impact caused by the company's operational activities (plantation and mill) is felt by the community positively, such as the existence of routine CSR assistance every year, the absence of fire incidents, no environmental pollution, communication responses related to requests/proposals for assistance are always responded well, and others. So far, the community and the village government have never had any grievance or complaints submitted to the company. In addition, there have never been any incidents or issues related to existing land disputes/claims between the community and the company, the absence of child laborers employed in the company, nor any harassment or discrimination against workers or the community.</p>	There's no negative issues need to further verification.
<p>Simpang Gambus Village</p> <p>Over the past year, the relationship and communication between the village community and the company has been quite good. The impact caused by the company's operational activities (plantation and mill) is felt by the community not</p>	Based on the results of the study of CSR realization documents for the period of 2021 and 2022, it is known that the company has provided assistance several times in the form of infrastructure improvements and

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>positively/negatively. In addition, there have never been any incidents or issues related to existing land disputes/claims between the community and the company, the absence of child laborers employed in the company, nor any harassment or discrimination against workers or the community.</p> <p>The village said that since 2020 until now (July 2022) the company no longer provides assistance to the community such as heavy equipment assistance, infrastructure repairs and other CSR. The village has never provided a letter of request for information or a request for assistance to the company since 2020 until now.</p>	<p>borrowing heavy equipment for the needs of the Simpang Gambus Village community. For example, namely:</p> <ul style="list-style-type: none"> • Assistance for borrowing heavy equipment for leveling the ground and dismantling coconut stump at the mosque construction site in Simpang Gambus Village on December 17, 2021. • Assistance for normalization of drainage channels in Simpang Gambus Village on March 10, 2022.
<p>Issue from internet:</p> <p>https://fokustime.com/2022/01/05/pt-socfin-indonesia-socfindo-tanah-gambus-cabut-quगतannya/?amp</p> <p>and</p> <p>https://medanbisnisdaily.com/m/news/online/read/2022/01/05/148656/polemik_lahan_kantor_bupati_batubara_akhirn_ya_pt_socfindo_cabut_quगतan_di_pn_kisaran/</p> <p>(https://www.tuntasonline.com/bonus-tahunan_dikurangi_karyawan-pt-socfindo-unjuk-rasa)</p>	<p>Based on the results of interviews with the National Land Agency of Batubara Regency and the surrounding community, it is known that the area of PT Socfin Indonesia - Tanah Gambus which was previously requested by the Batubara Regency Government to be used as a 39.64 Ha government office area has been approved by the company. Therefore, the previous lawsuit from the company has been officially withdrawn and is no longer suing the local government. This is in accordance with the results of interviews with company management who stated that they have agreed to give the land to the local government and the area will be removed from the management area at the time of processing the extension of the new land permit (HGU) which is currently in the process of being processed. Further explanation of the management process has been explained in the results of the interview with the National Land Agency of Batubara Regency above.</p> <p>Regarding the demonstration incident, based on the explanation of the SPSI PUK Estate management, it was indeed initiated by the plantation workers union. The union held a demonstration regarding the issue of reduced bonuses from previous years. Based on the explanation of the Department of Manpower Batubara Regency, related to bonuses, is the company's prerogative. From the results of the collective bargaining agreement review, it is also known that the bonus is based on a collective agreement between the Federation of Agricultural and Plantation Workers Unions of All Indonesia and the North Sumatran Plantation Company Cooperation Agency, not determined by PUK SP.PP-SPSI. Until the audit activity was carried out, currently all workers have returned to work.</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY		
4.1	Formal Sign-off of Assessment Findings		
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <table border="0" data-bbox="422 798 1331 1008"><tr><td data-bbox="422 798 812 1008"><p>PT Socfin Indonesia Head of Sustainability Sub Department</p><p>Andria Zulmanitra Friday, 09 September 2022</p></td><td data-bbox="812 798 1331 1008"><p>Mutuagung Lestari Lead Auditor</p><p>Briyogi Shadiwa Friday, 09 September 2022</p></td></tr></table>	<p>PT Socfin Indonesia Head of Sustainability Sub Department</p>  <p>Andria Zulmanitra Friday, 09 September 2022</p>	<p>Mutuagung Lestari Lead Auditor</p>  <p>Briyogi Shadiwa Friday, 09 September 2022</p>
<p>PT Socfin Indonesia Head of Sustainability Sub Department</p>  <p>Andria Zulmanitra Friday, 09 September 2022</p>	<p>Mutuagung Lestari Lead Auditor</p>  <p>Briyogi Shadiwa Friday, 09 September 2022</p>		

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	National Land Agency	Batubara Regency	Phone	Interview	23-08-2022	√	-
2	Tanah Itam Ulu Village	Batubara Regency	Phone	Interview	23-08-2022	√	-
3	Lima Puluh Kota Urban Village	Batubara Regency	Phone	Interview	23-08-2022	√	-
4	Simpang Gambus Village	Batubara Regency	Phone	Interview	25-08-2022	√	-
5	SPSI PUK Mill and Estate	Batubara Regency	Phone	Interview	23-08-2022	√	-
6	Labor Agency of Batubara Regency	Batubara Regency	Phone	Interview	23-08-2022	√	-
7	Environmental Agency	Batubara Regency	Phone	Interview	23-08-2022	√	-
8	Karya Mandiri Contractor	Batubara Regency	Phone	Interview	23-08-2022	√	-
9	UD Bukit Mas	Batubara Regency	Phone	Interview	23-08-2022	√	-
10	PT Mustika Karya Buana	Batubara Regency	Phone	Interview	23-08-2022	√	-
11	PT Gunung Kawi	Batubara Regency	Phone	Interview	23-08-2022	√	-
12	Tanah Gambus POM: <ul style="list-style-type: none"> • 1 security • 1 weighbridge worker • 3 welders • 3 workshop officers • 3 workshop workers • 3 storage officers 	PT Socfin Indonesia	Direct	Interview	23-08-2022	√	-
13	Tanah Gambus Estate: <ul style="list-style-type: none"> • 1 storage officer • 2 paramedics • 3 daycare and kindergarten workers • 4 housing resident • 2 head foreman • 4 contractor workers 	PT Socfin Indonesia	Direct	Interview	24-08-2022	√	-
14	Sawit Watch	-	Email	Questionnaire	15-08-2022	-	√
15	WWF (World Wide Fund for Nature)	-	Email	Questionnaire	15-08-2022	-	√
16	WALHI (Wahana Lingkungan Hidup Indonesia)	-	Email	Questionnaire	15-08-2022	-	√
17	AMAN (Aliansi	-	Email	Questionnaire	15-08-2022	-	√

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
	Masyarakat Adat Nasional)						

Appendix 2. Assessment Program

DATE	22 – 26 August 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 22 August 2022		
07.05 – 09.30	JAKARTA (CGK) → MEDAN (KNO) GA-182	All Auditor
10.00 – 12.00	MEDAN → TANAH GAMBUS	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 16.00	Opening meeting : <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) 	All Auditor
Tuesday, 23 August 2022		
08.00 – 12.00	<ul style="list-style-type: none"> Public consultation with stakeholder to relevant agency in Batubara Regency by Phone / Directly Stakeholder consultation to affected communities surrounding the plantations and previous land owner. Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier. 	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	Field observation to Tanah Gambus POM: <ul style="list-style-type: none"> Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Dispatch CPO) Occupational Health & Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond) Implementation of Employment Procedure and Mechanism Aspect Presentation of Daily Progress	All Auditor
Wednesday, 24 August 2022		
08.00 – 12.00	Field Observation to Tanah Gambus Estate Aspect to be verified : <ul style="list-style-type: none"> 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

DATE	22 – 26 August 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	<ul style="list-style-type: none"> Interview with related personnel during field observation 	
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	<ul style="list-style-type: none"> Document review and completing audit checklist. Continue interview with Related Agencies, Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier. Presentation of Daily Progress. 	All Auditor
Thursday, 25 August 2022		
08.00 – 12.00	<ul style="list-style-type: none"> Document review and completing audit checklist. Document review and completing audit checklist. Continue interview with Related Agencies, Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier. 	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	<ul style="list-style-type: none"> Document review and completing audit checklist. Continue interview with Related Agencies, Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier. Presentation of Daily Progress. 	All Auditor
Friday, 26 August 2022		
08.30 – 10.00	Closing Meeting : <ul style="list-style-type: none"> Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timeline of CAR's, Conclusion) Comments, Responses and Questions 	All Auditor
10.00 – 15.00	TANAH GAMBUS → MEDAN	All Auditor
16.45 – 19.15	MEDAN → JAKARTA GA-121	All Auditor