

*Roundtable on Sustainable Palm Oil Certification
RSPO*

[✓] Surveillance

Name of Management : **Dolok Ilir Palm Oil Mill PT Perkebunan Nusantara IV subsidiary of PT Organisation Perkebunan Nusantara III**
 Plantation Name : Dolok Ilir Estate & Laras Estate
 Location : Village of Babolon, Sub District of Dolok Batunanggar, District of Simalungun, Province of Sumatera Utara, Indonesia
 Certificate Code : **MUTU-RSPO/075**
 Date of Initial Registration : 29 September 2015
 Date of Certificate Issue : 22 March 2021 Date of License Issue : 11 January 2023
 Date of Certificate Expiry : 28 September 2025 Date of License Expiry : 28 September 2023

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.2	03 to 07 October 2022	Haikal Ramadhan Kharismansyah (Lead Auditor), Benli Manurung, Rahmat Abdiansyah, Kiki Fadli	Hasiholan Sihombing	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.2	11 January 2023

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Figure 1. Location Map of Dolok Ilir and Laras Estate

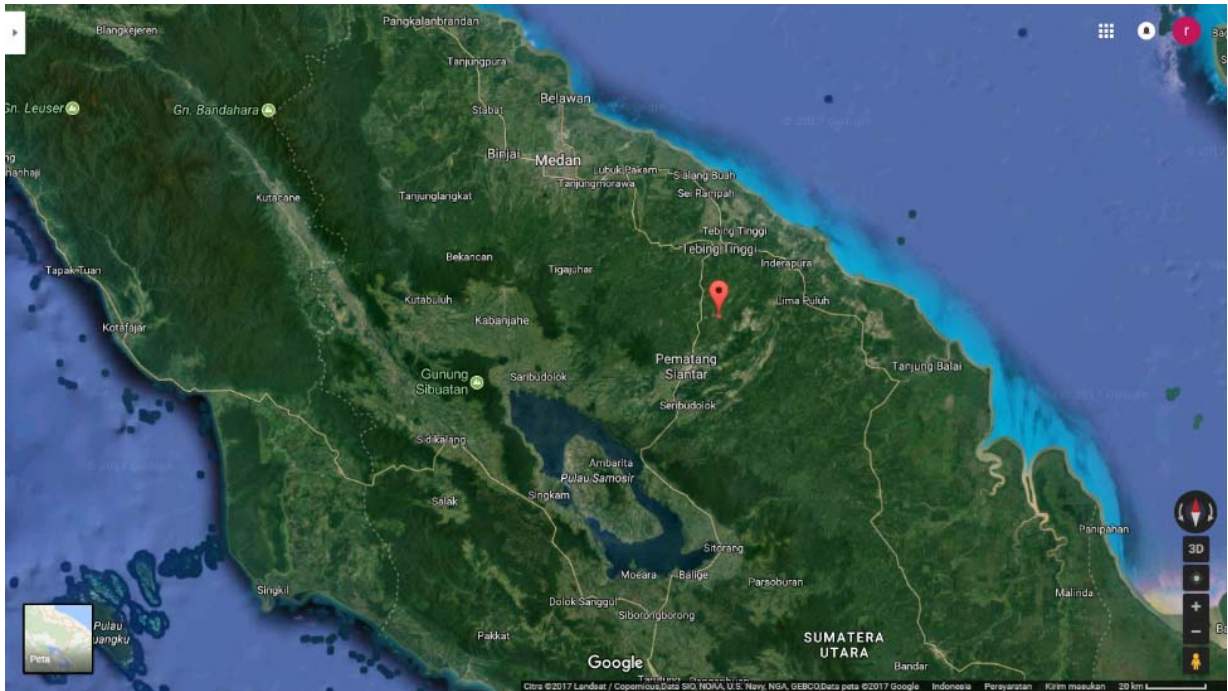


Figure 2. Operational Map of Dolok Ilir Estate

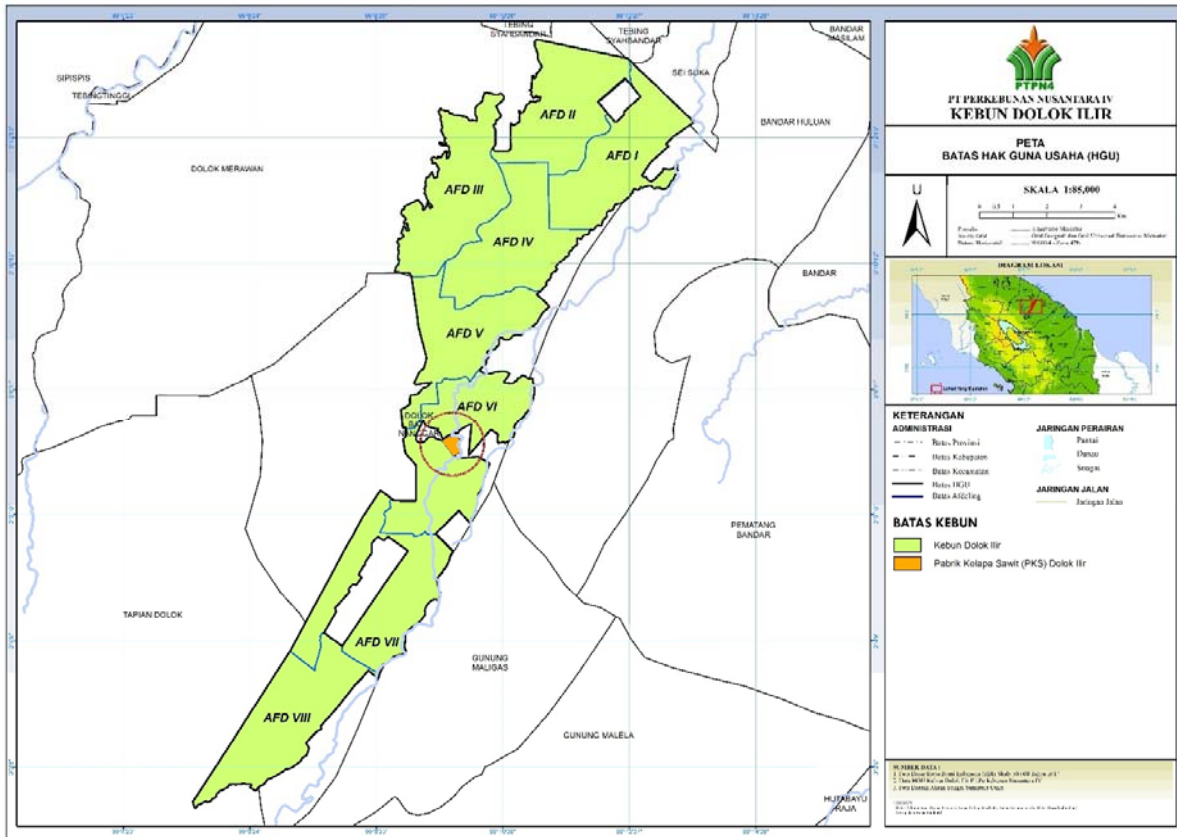
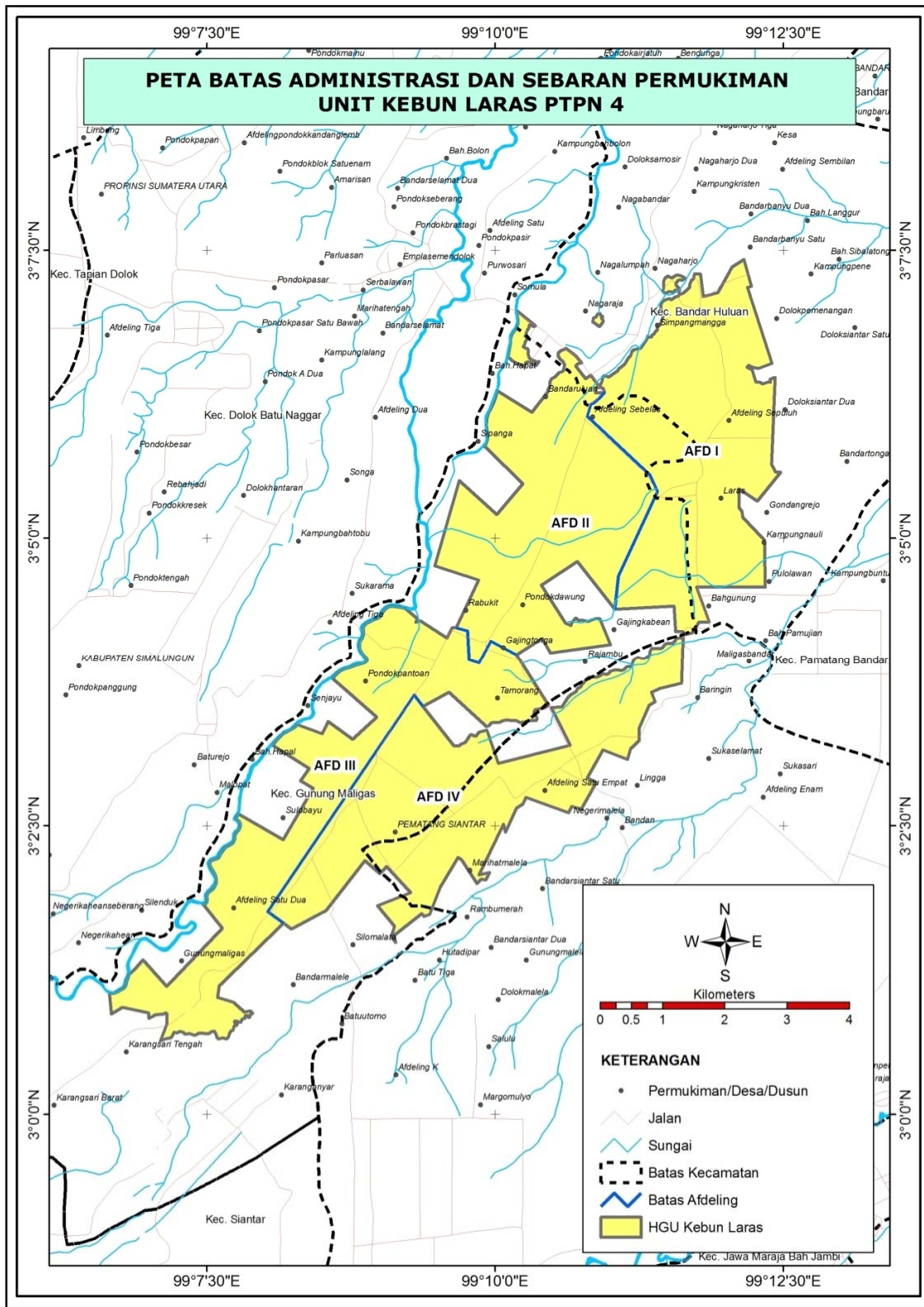


Figure 3. Operational Map of Laras Estate



Abbreviations Used

AMDAL	:	<i>Analisis Dampak Lingkungan</i> (Environmental Impact Analysis)
ASA	:	Annual Surveillance Assessment
BOD	:	Biological Oxygen Demand
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> / Social Security Administrator
BPN	:	<i>Badan Pertanahan Nasional</i> (National Land Agency)
BUMDES	:	Badan Usaha Milik Desa (Village Owned Enterprises)
CCTV	:	Closed Circuit Television
CEC	:	Capacity Exchange Cation
CLA	:	Collective Labor Agreement
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate Social Responsibility
DELH	:	<i>Dokumen Evaluasi Lingkungan Hidup</i> /Environmental Evaluation Document
EFB	:	Empty Fruit Bunch
EIA	:	Environment Impact Analysis
FFB	:	Fresh Fruit Bunch
GHG	:	Green House Gasses
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha</i> (Land Use Title)
IK	:	<i>Instruksi Kerja</i> /Work Instruction
ISPO	:	Indonesia Sustainable Palm Oil
IUP	:	<i>Izin Usaha Perkebunan</i> (Plantation Business Permit)
JWM	:	Jaya Wira Manggala
KAN	:	Komite Akreditasi Nasional (National Accreditation Committee)
LA	:	Land Application
MCU	:	Medical Check Up
NGO	:	Non Government Organization
OER	:	Oil Extraction Rate
OFI	:	Opportunity for Improvement
OHS	:	Occupational Health and Safety
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i> /OHS Committee
PK	:	Palm Kernel
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PP	:	Peraturan Pemerintah (Government Regulation)
PPD	:	<i>Personil Pengendali Dokumen</i> (Document Control Officer)
PPE	:	Personal Protective Equipment
PT	:	<i>Perseroan Terbatas</i>
PTPN IV	:	PT Perkebunan Nusantara IV
RKL-RPL	:	<i>Rencana Kelola Lingkungan-Rencana Pemantauan Lingkungan</i> (Environmental Management and Monitoring Plan)
RSPO	:	Roundtable on Sustainable Palm Oil
RTE	:	Rare, Threatened, Endangered
SCCS	:	<i>Supply Chain Certification System</i>
SEIA	:	Social Environmental Impact Assessment
SIA	:	Social Impact Assessment

SMES	:	Small & Medium-Sized Enterprises
SMK3	:	<i>Sistem Manajemen Kesehatan dan Keselamatan Kerja</i> (OHS System Management)
SOP	:	Standard Operational Procedure
SPI	:	Satuan Pengawas Internal (Internal Control Unit)
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant of Effluent Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none"> Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020. RSPO Certifications Systems for Principles & Criteria and RSPO Independent Smallholders Standard (Endorsed by RSPO Board of Governors on 12 November 2020) 	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	Dolok Ilir POM PT Perkebunan Nusantara IV	
1.2.2	Contact person	Pirgok Panggabean	
1.2.3	Organisation address and site address	Head Office: Jln. Letjen Suprpto No.2 Medan 20151, Sumatera Utara, Indonesia	
1.2.4	Telephone	(62-61) 415 4666	
1.2.5	Fax	(62-61) 457 3117	
1.2.6	E-mail	perencanaan@ptpn4.co.id	
1.2.7	Web page address	www.ptpn4.co.id	
1.2.8	Management Representative who completed the application for certification	Pirgok Panggabean	
1.2.9	Registered as RSPO member	1-0030-06-000-00 13 December 2006	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	One (1) unit of Palm Oil Mill (Dolok Ilir Mill), supplied by two (2) estates, i.e: Dolok Ilir Estate and Laras Estate	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude Longitude
	Dolok Ilir	Babolon Village, Dolok Batunanggar Sub District, Simalungun District, Sumatera Utara Province, Indonesia	N 03° 07' 20" E 99° 09' 42"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude Longitude
	Dolok Ilir Estate	Babolon Village, Dolok Batunanggar Sub District, Simalungun District, Sumatera Utara Province, Indonesia	N 03° 07' 9.8" E 99° 09' 38.7"
	Laras Estate	Laras Village, Bandar Hulan Sub District, Simalungun District, Sumatera Utara Province, Indonesia	N 03° 06' 02" E 99° 11' 56"

1.5	Description of Area Statement			
1.5.1	Tenure			
	• State (HGU)	11,411.47	Ha	
	• Community		Ha	
1.5.2	Area Statement			
	• Total area	11,411.47	Ha	
	• Mature area	7,789.00	Ha	
	• Immature area	2,703.00	Ha	
	• Hiaten Area	113.57	Ha	
	• Emplacement	129.88	Ha	
	• WWTP	4.71	Ha	
	• Golf Court	5.60	Ha	
	• Electrical Line	10.81	Ha	
	• Road outside planted	111.00	Ha	
	• Road and Bridge	258.87	Ha	
	• HCV	251.97	Ha	
	• Canal	19.16	Ha	
	• Unplanted area (Hill and lowland)	3.47	Ha	
	• Conservation area (Symbolic plant)	8.79	Ha	
	• Ex Mill area	1.64	Ha	
1.6	Planting Year and Cycles			
1.6.1	Age profile of planting year			
	Planting Year	Hectarage (Ha)		
		Dolok Ilir Estate	Laras Estate	
			Total	
	1997	509.00	-	509.00
	1998	405.00	-	405.00
	1999	573.00	216.00	789.00
	2000	90.00	-	90.00
	2004	8.00	-	8.00
	2005	-	14.00	14.00
	2008	14.00	-	14.00
	2010	19.00	7.00	26.00
	2011	263.00	174.00	437.00
	2012	106.00	440.00	546.00
	2013	451.00	-	451.00
	2014	-	398.00	398.00
	2016	2,898.00	616.00	3,514.00
	2017	274.00	-	274.00
	2018	314.00	-	314.00

	Sub Total Mature	5,924.00	1,865.00	7,789.00			
	2019	272.00	311.00	583.00			
	2020	348.00	195.00	543.00			
	2021	149.00	1,428.00	1,577.00			
	Sub Total Immature	769.00	1,934.00	2,703.00			
	TOTAL	6,693.00	3,799.00	10,492.00			
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 (%)
	Dolok Ilir	60	211,506.38	42,798.62	20.24	8,503.67	4.02
	*Production data source from 12 months before assessment (Oct 21 – Sept 22)						
	* There is a difference between FFB Processed and FFB received because there were backlog from the previous period						
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)	%
	Dolok Ilir	7,348.81	5,924.00	112,325.94	18,96	107,487.34	95.69
	Laras	4,062.66	1,865.00	55,729.92	29,88	51,397.86	92.22
	TOTAL	11,411.47	7,789.00	168,055.86	21,58	158,885.20	94.54
	*Production data source from 12 months before assessment (Oct 21 – Sept 22)						
	*Dolok Ilir and Laras in the same period sent FFB to Pabatu POM, Dolok Sinumbah POM, and Gunung Bayu POM with a total of 9,170.66 MT						
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)		
	RSPO Certified						
	Tanah Itam Ulu Estate	PTPN IV				12,927.28	
	Marihat Estate					1,070.41	
	Marjandi Estate			1,554.00		1,378.46	
	Balimbingan Estate					138.21	
	Gunung Bayu Estate			6,772.00		57.97	
	RSPO Non Certified						
	Bah Birong Ulu	PTPN IV				760.17	
	CV Riana Lim	Independent Supplier				36,194.57	
	TOTAL					52,527.07	
	*Source Production Data on 12 months before assessment (Oct 21 – Sept 22)						
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 (MT)				
	FFB Processed		176,000	174,564.89				
	CPO Production		42,240	36,717.32				
	Palm Kernel (PK) Production		7,040	6,943.36				
	*License period is from May 2022 to December 2022							
1.8.2	Product selling							
	Type of selling product		Actual selling product for last year					
	CSPO sold as RSPO certified product			8,000.00				
	CSPK sold as RSPO certified product			3,511.08				
	CSPO sold under other scheme			0				
	CSPK sold under other scheme			0				
	CSPO sold as conventional			23,148.78				
	CSPK sold as conventional			3,379.76				
1.8.3	Estimate of Certified FFB Claim							
	Name of Estate(s)	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)			
	Dolak Ilir	7,348.81	5,924.00	118,000	17.89			
	Laras	4,062.66	1,865.00	59,000	15.53			
	TOTAL	11,411.47	7,789.00	177,000	16.86			
	*Projected FFB production for 12 months of certificate							
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 (%)	
	Dolak Ilir	60	177,000	37,200	21.00	7,200	4.07	MB
	*Projected CSPO and CSPK production for 12 months of certificate							
1.9	Other Certifications							
	ISO 9001:2008		-					
	ISO 14001: 2004		-					
	OHSAS 18001:2007		-					
	ISCC		-					
	ISPO		Certificate Number : ISPO 00034 October 20 2021 – October 19 2026					
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						

Pulau Tiga (PTPN I)	2022	Pulau Tiga Estate	2022	Aceh Tamiang District, Aceh Province	Audited on 2022
Tanjung Seumantoh (PTPN I)	2022	Lama Estate	2022	Aceh Timur District, Aceh Province	
		Baru Estate	2022	Aceh Timur District, Aceh Province	
		Tualang Sawit Estate	2022	Aceh Timur District, Aceh Province	
		Julok Rayeuk Selatan Estate	2022	Aceh Timur District, Aceh Province	
Cot Girek (PTPN I)	2022	Julok Rayeuk Utara Estate	2022	Aceh Utara District, Aceh Province	
		Cot Girek Es-tate	2022	Aceh Utara District, Aceh Province	
Sawit Hulu (PTPN II)	2022	Sawit Hulu Estate	2022	Langkat District, Sumatera Utara Province	
Kwala Sawit (PTPN II)	2022	Kwala Sawit Estate	2022	Langkat District, Sumatera Utara Province	
		Air Tenang Estate	2022	Langkat District, Sumatera Utara Province	
Sawit Seberang (PTPN II)	2022	Batang Serangan Estate	2022	Langkat District, Sumatera Utara Province	
		Sawit Seberang Estate	2022	Langkat District, Sumatera Utara Province	
		Tanjung Jati (Rayon) Estate	2022	Langkat District, Sumatera Utara Province	
Pagar Merbau (PTPN II)	2022	Tanjung Garbus Estate	2022	Deli Serdang District, Sumatera Utara Province	Audited on 2022
		Melati Estate	2022	Deli Serdang District, Sumatera Utara Province	
		Patumbak Estate	2023	Deli Serdang District, Sumatera Utara Province	
		Limau Mukur Estate	2023	Deli Serdang District, Sumatera Utara Province	
		Tandem (Rayon) Estate	2023	Deli Serdang District, Sumatera Utara Province	
Sisumut (PTPN III)	2015	Sisumut Estate	2015	Labuhan Batu Selatan District, Sumatera Utara Province	October 15, 2015 (Certified)
		Aek Nabara Utara Estate	2015	Labuhan Batu Selatan District, Sumatera Utara Province	October 15, 2015 (Certified)
Rambutan (PTPN III)	2016	Tanah Raja Estate	2016	Serdang Bedagai District, Sumatera Utara Province	Sept 1, 2016 (Certified)
		Gunung Monaco Estate	2016	Serdang Bedagai District, Sumatera Utara Province	Sept 1, 2016 (Certified)
		Silau Dunia Estate	2016	Serdang Bedagai District, Sumatera Utara Province	Sept 1, 2016 (Certified)
		Sarang Ginting Estate	2016	Serdang Bedagai District, Sumatera Utara Province	Sept 1, 2016

					(Certified)
		Sei Putih Estate	2016	Serdang Bedagai District, Sumatera Utara Province	Sept 1, 2016 (Certified)
		Rambutan Estate	2016	Serdang Bedagai District, Sumatera Utara Province	Sept 1, 2016 (Certified)
		Bandar Betsy Estate	2022	Simalungun District, Sumatera Utara Province	
Sei Daun (PTPN III)	2015	Sei Daun Estate	2015	Labuhan Batu Selatan District, Sumatera Utara Province	Sept 8, 2016 (Certified)
		Bukit Tujuh Estate	2015	Labuhan Batu Selatan District, Sumatera Utara Province	Sept 8, 2016 (Certified)
Torgamba (PTPN III)	2015	Torgamba Estate	2015	Labuhan Batu Selatan District, Sumatera Utara Province	Sept 7, 2016 (Certified)
Sei Meranti (PTPN III)	2016	Sei Meranti Estate	2016	Labuhan Batu Selatan District, Sumatera Utara Province	Sept 14, 2016 (Certified)
Sei Silau (PTPN III)	2017	Sei Silau Estate	2017	Asahan District, Sumatera Utara Province	Apr 3, 2017 (Certified)
		Pulau Mandi Estate	2017	Asahan District, Sumatera Utara Province	Apr 3, 2017 (Certified)
		Ambalutu Estate	2017	Asahan District, Sumatera Utara Province	Apr 3, 2017 (Certified)
		Hutapadang Estate	2017	Asahan District, Sumatera Utara Province	Apr 3, 2017 (Certified)
Sei Mangkei (PTPN III)	2017	Dusun Hulu Estate	2017	Batubara District, Sumatera Utara Province	Oct 2017 (Certified)
		Bangun Estate	2017	Simalungun District, Sumatera Utara Province	Oct 2017 (Certified)
		Gunung Para Estate	2017	Serdang Bedagai District, Sumatera Utara Province	Oct 2017 (Certified)
		Gunung Pamela Estate	2017	Serdang Bedagai District, Sumatera Utara Province	Oct 2017 (Certified)
		Sei Dadap Estate	2017	Asahan District, Sumatera Utara Province	Oct 2017 (Certified)
Sei Baruhur (PTPN III)	2018	Sei Baruhur Estate	2018	Labuhan Batu Selatan District, Sumatera Utara Province	April 2018 (Certified)
		Sei Kabara Estate	2018	Labuhan Batu Selatan District, Sumatera Utara Province	April 2018 (Certified)
Hapesong (PTPN III)	2020	Hapesong Estate	2020	Tapanuli Selatan District, Sumatera Utara Province	October 2020 (certified)
		Batang Toru Estate	2020	Tapanuli Selatan District,	October

				Sumatera Utara Province	2020 (certified)
Aek Nabara Selatan (PTPN III)	2014	Aek Nabara Selatan Estate	2014	Labuhan Batu District, Sumatera Utara Province	May 23, 2014 (Certified)
		Rantau Prapat Estate	2014	Labuhan Batu District, Sumatera Utara Province	May 23, 2014 (Certified)
		Merbau Selatan Estate	2014	Labuhan Batu Utara District, Sumatera Utara Province	May 23, 2014 (Certified)
		Membang Muda Estate	2014	Labuhan Batu Utara District, Sumatera Utara Province	May 23, 2014 (Certified)
		Labuhan Haji Estate	2014	Labuhan Batu Utara District, Sumatera Utara Province	May 23, 2014 (Certified)
		Bandar Selamat Estate	2014	Asahan District, Sumatera Utara Province	May 23, 2014 (Certified)
Aek Torop (PTPN III)	2014	Aek Torop Estate	2014	Labuhan Batu Selatan District, Sumatera Utara Province	June 17, 2014 (Certified)
Aek Raso (PTPN III)	2014	Aek Raso Estate	2014	Labuhan Batu Selatan District, Sumatera Utara Province	June 30, 2014 (Certified)
Pabatu (PTPN IV)	2015	Pabatu	2015	Serdang Bedagai, Sumatera Utara	Certified on September 2015
Dolok Ilir (PTPN IV)	2015	Dolok Ilir	2015	Simalungun, Sumatera Utara	Certified on September 2015
		Laras	2018	Simalungun, Sumatera Utara	Certified on December 2018
Pulu Raja (PTPN IV)	2015	Pulu Raja	2015	Asahan, Sumatera Utara	Certified on August 2015
Adolina (PTPN IV)	2018	Adolina	2018	Serdang Bedagai dan Deli Serdang, Sumatera Utara	Certified on April 2018
Bah Jambi (PTPN IV)	2018	Bah Jambi	2018	Simalungun, Sumatera Utara	Certified February 2018
		Marihat	2018	Simalungun, Sumatera Utara	Certified February 2018
		Bah Birung Ulu	2022	Simalungun, Sumatera Utara	Stage-1 Audit
		Marjandi	2019	Simalungun, Sumatera	Certified

				Utara	on 20 may 2019 (1,802.0 Ha)
			2022	Simalungun, Sumatera Utara	Out of scope Certification 2nd Stage Audit (30.0 Ha)
Dolok Sinumbah (PTPN IV)	2018	Dolok Sinumbah	2018	Simalungun, Sumatera Utara	Certified on April 2018 (3,757.0 Ha)
			2022	Simalungun, Sumatera Utara	Out of scope Certification 2nd Stage Audit (35.94 Ha)
		Balimbingan	2018	Simalungun, Sumatera Utara	Certified on April 2018
Mayang (PTPN IV)	2021	Mayang	2019	Simalungun, Sumatera Utara	Certified on March 2019
		Bukit Lima	2022	Simalungun, Sumatera Utara	Preparation
Gunung Bayu (PTPN IV)	2019	Gunung Bayu	2019	Simalungun, Sumatera Utara	Certified on September 2019
		Tanah Itam Ulu	2019	Simalungun, Sumatera Utara	Certified on September 2019
Tinjawan (PTPN IV)	2019	Tinjawan	2019	Simalungun, Sumatera Utara	Certified on March 2019
		Aek Nauli	2019	Simalungun, Sumatera Utara	Certified on March 2019
		Padang Matinggi	2019	Simalungun, Sumatera Utara	Certified on March 2019
Air Batu (PTPN IV)	2018	Air Batu	2019	Asahan, Sumatera Utara	Certified on May 2019
		Air Batu	2022	Asahan, Sumatera Utara	Out of Scope

					certificatio n 2nd Stage Audit
Berangir (PTPN IV)	2018	Berangir	2018	Labuhan Batu Utara, Sumatera Utara	Certified on July 2018
		Berangir	2022	Labuhan Batu Utara, Sumatera Utara	Out of scope Certificatio n 2nd Stage Audit (10.0 Ha)
Sawit Langkat (PTPN IV)	2018	Sawit Langkat	2018	Langkat, Sumatera Utara	Certified on June 2018
		Sawit Langkat	2022	Langkat, Sumatera Utara	Out of scope Certificatio n 2nd Stage Audit (301.50 Ha)
Pasir Mandoge (PTPN IV)	2020	Pasir Mandoge	2020	Asahan, Sumatera Utara	Certified on October 2018
		Sei Kopas	2020	Asahan, Sumatera Utara	Certified on October 2018
		Tonduhan	2020	Simalungun, Sumatera Utara	Certified on October 2018
		Sei Kopas (HPK)	2022	Asahan, Sumatera Utara	
Timur (PTPN IV)	2022	Timur	2022	Mandailing Natal, Sumatera Utara	
		Balap	2022	Mandailing Natal, Sumatera Utara	
Ajamu (PTPN IV)	2021	Ajamu	2019	Labuhan Batu Utara, Sumatera Utara	Certified on September 2019
		Meranti Paham	2019	Labuhan Batu Utara, Sumatera Utara	Certified on September 2019
		Panai Jaya	2022	Labuhan Batu Utara, Sumatera Utara	Preparatio n
Sosa (PTPN IV)	2022	Sosa	2022	Padang Lawas, Sumatera Utara	Preparatio n
PT Agro Sinergi	2022	PT Agro Sinergi Nusantara	2022	Aceh Barat, Aceh	Preparatio

Nusantara (PTPN IV)					n
PT Sinergi Perkebunan Nusantara (PTPN IV)	2022	PT Sinergi Perkebunan Nusantara	2022	Morowali Utara, Sulawesi	Preparation
Tandun (PTPN V)	2016	Tandun Estate,	2016	Tapung Hulu District, Kampar District, Riau Province, Indonesia	Certified
		Sei Berlian Estate	2016	Tapung Hulu District, Kampar District, Riau Province, Indonesia	Certified
		Sei Lindai Estate	2016	Tapung Hulu District, Kampar District, Riau Province, Indonesia	Certified
		Sei Lindai 98 ha	2021	Tapung Hulu District, Kampar District, Riau Province, Indonesia	Certified
		Sei Berlian 866 ha	2023	Tapung Hulu District, Kampar District, Riau Province, Indonesia	
Sei Rokan (PTPN V)	2016	Sei Rokan Estate	2016	Rokan Hulu District, Riau Province, Indonesia.	Certified
Sei Tapung (PTPN V)	2019	Sei Tapung	2019	Rokan Hulu District, Riau Province, Indonesia.	Certified
		Sei Siasam	2019	Rokan Hulu District, Riau Province, Indonesia.	Certified
		KUD Makarti Jaya	2022	Rokan Hulu District, Riau Province, Indonesia.	
		KUD Karya Mukti	2022	Rokan Hulu District, Riau Province, Indonesia.	
		KUD Dayo Mukti	2023	Rokan Hulu District, Riau Province, Indonesia.	
		KUD Tani Sejahtera	2023	Rokan Hulu District, Riau Province, Indonesia.	
Sei Intan (PTPN V)	2019	Sei Intan	2019	Rokan Hulu District, Riau Province, Indonesia	Certified
Tanjung Medan (PTPN V)	2022	Tanjung Medan	2022	Rokan Hilir District, Riau Province, Indonesia	-
Tanah Putih (PTPN V)	2019	Tanah Putih	2019	Rokan Hilir District, Riau Province, Indonesia	Certified
		Tanah Putih Plasma	2023	Rokan Hilir District, Riau Province, Indonesia	-
Lubuk Dalam (PTPN V)	2019	Lubuk Dalam	2019	Siak District, Riau Province, Indonesia	Certified
		Lubuk Dalam Plasma	2022	Siak District, Riau Province, Indonesia	
Sei Buatan (PTPN V)	2022	Sei Buatan	2022	Siak District, Riau Province, Indonesia	
		Air Molek 1	2023	Siak District, Riau Province, Indonesia	
		Air Molek II	2023	Siak District, Riau Province, Indonesia	

		KUD Karya Dharma	2023	Siak District, Riau Province, Indonesia	
		KUD Tunas Karya	2023	Siak District, Riau Province, Indonesia	
Sei Galuh (PTPN V)	2023	Sei Galuh	2023	Kampar District, Riau Province, Indonesia	-
		Sei Galuh Plasma	2023	Kampar District, Riau Province, Indonesia	-
Sei Pagar (PTPN V)	2019	Sei Pagar	2019	Kampar District, Riau Province, Indonesia	-
		Sei Pagar Plasma	2023	Kampar District, Riau Province, Indonesia	-
Sei Garo (PTPN V)	2019	Sei Garo	2019	Kampar District, Riau Province, Indonesia	Certified
		Sei Garo Plasma	2023	Kampar District, Riau Province, Indonesia	-
Terantam (PTPN V)	2019	Terantam	2019	Kampar District, Riau Province, Indonesia	Certified
		Terantam 2 (725.44 ha)	2022	Kampar District, Riau Province, Indonesia	
		Tamora	2023	Kampar District, Riau Province, Indonesia	
		Sei Kencana	2023	Kampar District, Riau Province, Indonesia	
		Sei Batu Langka	2023	Kampar District, Riau Province, Indonesia	
Rimbo Dua (PTPN VI)	2018	Rimbo Satu	2018	Jambi Province	Certified
		Rimbo Dua	2018	Jambi Province	Certified
		Batang Hari	2022	Jambi Province	
Bunut (PTPN VI)	2022	Bunut	2022	Jambi Province	
Ophir (PTPN VI)	2022	Ophir	2022	Sumatra Barat Province	
		Pangkalan 50 Kota	2022	Sumatra Barat Province	
Aur Gading (PTPN VI)	2023	Durian Luncuk	2023	Jambi Province	
Solok Selatan (PTPN VI)	2023	Solok Selatan	2023	Sumatra Barat Province	
Tanjung Lebar (PTPN VI)	2022	Tanjung Lebar	2023	Jambi Province	
		Bukit Cermin	2023	Jambi Province	
Bekri (PTPN VII)	2022	Bekri	2022	Lampung Province	Audited on February 2022
		Rejosari	2022	Lampung Province	Audited on February 2022
		Padang Ratu	2022	Lampung Province	Audited on February 2022
Betung (PTPN VII)	2022	Betung	2022	Lampung Province	Certified
		Bentayan	2026	Lampung Province	
Talang Sawit (PTPN VII)	2023	Betung Krawo	2023	Musi Banyuasin District, Sumatera Selatan Province	

Sungai Lengi (PTPN VII)	2023	Sungai Lengi	2023	Muara Enim District, Sumatera Selatan Province	
Kertajaya (PTPN VIII)	2022	Kertajaya	2022	Lebak District, Banten Province	
		Cisalak Baru	2022	Lebak District, Banten Province	
		Bojongdatar	2022	Lebak District, Banten Province	
Cikasungka (PTPN VIII)	2022	Cikasungka	2022	Bogor District, Jawa barat Province	
		Sukamaju	2022	Sukabumi District, Jawa barat Province	
Gunung Meliau (PTPN XIII)	2022	Gunung Meliau	2022	Sanggau District, Kalimantan Barat Province	
Rimba Belian (PTPN XIII)	2023	Rimba Belian	2023	Sanggau District, Kalimantan Barat Province	
		Gunung Mas	2023	Sanggau District, Kalimantan Barat Province	
		Sungai Dekan	2023	Sanggau District, Kalimantan Barat Province	
Parindu (PTPN XIII)	2023	Parindu	2023	Sanggau District, Kalimantan Barat Province	
Luwu (PTPN XIV)	2022	Luwu	2022	Luwu Timur, District, Sulawesi Tengah	
		Keera-Maroon	2022	Luwu Timur, District, Sulawesi Tengah	
		Malili	2023	Luwu Timur, District, Sulawesi Tengah	
		Asera	2023	Luwu Timur, District, Sulawesi Tengah	
*Date Approval TBP on November 2021.					
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard				
	The company has no agreement with any associated smallholder				

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1.2	<ol style="list-style-type: none"> Haikal Ramadhan Kharismansyah (Lead Auditor). Indonesian citizen, Bachelor of Agriculture department of plant and pest disease (Agrotechnology). He has 3 years' experience as an Agronomy Staff in private oil palm plantation in Indonesia. Training which had attended including Basic Management Development Program Agronomy, Integrated Urban Pest Management, Integrated Pest Management, ISO 9001:2015, Auditor ISPO, RSPO Lead Auditor Training, ISO 22000 awareness, RSPO SCCS, and Social Auditing by WIRE. Did some audit SPO scheme with aspects best management practices, SCCS, Legal, Social, and worker welfare. During this assessment verified Legal, FPIC, SCCS, Social, Time Bound Plan & Partial Certification Benli Manurung (Auditor). Indonesian citizen, Bachelor of Agriculture Majoring in Soil Science. He has more than 4 years of experience as a plantation operations staff in a private oil palm plantation company in Indonesia. The trainings he has attended include: ISPO, RSPO, Lead auditor of ISO 9001: 2015; ISO 14001:20015, IHT Health & Safety Aspect and Best Management Practice. Has participated in several audit activities since 2016 in the field of Best Management Practice, Health & Safety Aspect and Worker Welfare. In this audit activity, he verified Best Management Practice, Health, and Safety aspect. Kiki Fadli (Auditor). Indonesian citizen, Bachelor of Agricultural Engineering, Agricultural Engineering Study Program. Has experience working in the sustainability department in private and state-owned oil palm plantations. Has attended training on New Refreshment Lead Auditor ISPO, Lead Auditor RSPO, General OHS Expert, ISO 9001:2008, ISO 14001:2015, ISO 17021, ISO 17065, HCV, SMK3 and ISH Lead auditor training conducted by RSPO. During this assessment he verified Worker Welfare and Transparency aspect Rahmat Abdiansyah (Auditor). Indonesian citizen, Bachelor of Forestry from the Department of Forest Resources Conservation and Ecotourism, Bogor Agricultural University. Has experience working in the Indonesian Palm Oil Farmers Organization and Indonesian private oil palm plantation companies. Participate in ISPO and RSPO Internal Auditor training in 2018, ISPO and P&C Certification Systems IHT in 2019, IHT ISO 19011, ISPO Auditor Training in 2020, RSPO Lead Auditor Training in 2020, ISO 14001 and ISO 9001 Lead Auditor Training in 2020, and awareness of the RSPO Certification System and the RSPO P&C in 2019 and 2020. During this assessment he verified Environmental, GHG, HCV, and smallholders' aspect.
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-1.2	<p>Number of auditors :4 auditor</p> <p>Number of days for ASA-1.2 at site: 5 days</p> <p>Number of working days for ASA-1.2 at site: 20 Working days</p>
2.2.2	Assessment Process
ASA-1.2	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Perkebunan Nusantara IV Dolok Ilir POM to the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certifications Systems for Principles & Criteria and RSPO Independent Smallholders Standard (Endorsed by RSPO Board of Governors on 12 November 2020)</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) <i>interview</i>, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to directly observe the sufficiency of implementation on site.</p> <p>Some opportunities for improvement of the results <i>ASA-1.2</i> delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase <i>ASA-1.3</i>. Improvement of findings from <i>ASA-1.1</i> were observed by auditors at this <i>ASA-1.2</i> assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of <i>ASA-1.2</i></p> <p>The opening meeting was held on 03 October 2022 while the Closing meeting was held on 07 October 2022. Both</p>

activities were carried out offline and attended by auditee representatives such as Estate and Mill Managers, Sustainability Staff, and Document Control Officers. In this assessment UoC immediately suspended due recurring major NC on 14 October 2022. The document study was carried out centrally at the Dolok Ilir Estate. At the closing meeting, the auditee receives the results of the audit conclusions.

The unit of certification can fulfill all major non-conformances on 28 December 2022. Based on this, certificates and licenses can be reactivated on 29 December 2022, but the license at palmtrace ends on 28 December 2022, so the license status is expired (as a note from 28 December 2022 to 09 January 2023 FFB, CPO and PK products produced during this period were declared RSPO uncertified).

The assessment program please find Appendix 2

<p>2.2.3</p>	<p>Locations of Assessment</p>
<p>ASA-1.2</p>	<p>Sampling of the location considering issue based on document review, interview, or stakeholder consultation. On this assessment sample locations that visited by the auditor are:</p> <p>Dolok Ilir POM</p> <ul style="list-style-type: none"> • CPO Storage Tank. Observation and interview related CPO storage tank capacity • Kernel Bin. Observation and interview related PK storage tank capacity • Weighbridge. Observation and interview related supply chain, FFB Source, OHS aspect and worker welfare. • WWTP. Field observations related to WWTP entry, runoff, effluent testing. Officers are equipped with PPE and effluent discharge records. • Empty bunch area. Field observations related to empty bunch management. • Employee Housing. Observation of the availability of infrastructure such as employee housing facilities, clean water facilities, educational facilities, religious facilities, health facilities and sports facilities. • Water Source Reservoir. Observations and interviews related to water management, recording of water use, health checks, PPE, and waste management. • Chemical warehouse. Observation about storage condition and material that kept in the storage • Hazardous Waste Temporary Warehouse. Observation the warehouse condition. • Fuel Warehouse. Observation the warehouse condition. • Workshop. Observations and interviews with officers related to material handling, work procedures, OHS, wages and environmental management. • Boiler Station. Observation of boiler work process according to SOP, implementation of OHS and environmental aspects • Sorting Station. Observation of FFB sorting work practices according to SOPs, implementation of OHS and environmental aspects • Sterilizer Station. Observation of the FFB boiling process according to SOPs, implementation of OHS and environmental aspects • Engine Room Station. Observation of work processes in the Engine Room according to SOPs, implementation of OHS and environmental aspects • Pressing Station. Observation of the Pressing process according to SOPs, implementation of OHS and environmental aspects • Kernel Station. Observations and interviews with workers related to the work system, employment aspects, health checks, and safe work practices. <p>Dolok Ilir Estate</p> <ul style="list-style-type: none"> • Block 2000 A Land Application. Field observations and interviews related to aspects of BMP, OHS, Environment and Employment. • Block 16 DH & 16 DG Division 6 (HGU Pole No. BPN 62 and BPN No. 64). Observation the conditions and position of legal boundary.

- **Block 99 Q Division 5 (HGU Pole No. BPN 350, BPN 352, BPN 353).** Observation the conditions and position of legal boundary.
- **Replanting Plan Area Division 5 Blok 97A.** Observation related replanting mechanism
- **Block 13 U Division 6.** Observation of HCV management.
- **Block 16 CM and 16 CJ Division 6 (Bah Bolon River).** Observation of HCV management.
- **Harvesting, Block 13Q, 13 R Division VI and Blok 16 DQ Division VII.** Field observations and interviews related to aspects of BMP, OHS, and Labour.
- **Transport FFB, Blok 16 DQ Division VII.** Field observations and interviews related to aspects of BMP, OHS, and Labour.
- **Landfill Division VI.** Observations related to domestic waste management.
- **Employee Housing Division VI.** Observation of the availability of infrastructure such as employee housing facilities, clean water facilities, educational facilities, religious facilities, health facilities and sports facilities.
- **Rinse House Division VII.** Observations related to the management of agrochemical materials and waste, MSDS, emergency response facilities and types of pesticides used.
- **Fertilizer warehouse Division VII.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Division Office VII.** Observations employment facilities.
- **Harvesting, Division I Block 18I.** Observations and interviews with workers related to the work system, employment aspects, health checks, and safe work practices.
- **Pest Census, Division I Block 18I.** Observation and interview with workers related to IPM.
- **Pesticide Worker, Division I Block H18.** Observations and interviews with workers related to the work system, employment aspects, health checks, and safe work practices.
- **Landfill, Division I Block 18E.** Observations related to domestic waste management.
- **Chemical mixing area and Rinse room, Division IV.** Observation and interview related pesticide mixing area, PPE storage, safety aspect.
- **Fertilizer warehouse, Division IV.** Observation related to management of fertilizer material, MSDS, emergency response facilities and the types of fertilizer used.
- **Housing Complex, Division IV.** Observation to housing complex facilities, such as house condition, clean (for drink) water refill, Genset House, assembly point, fire extinguisher, prayer building, and landfill for domestic waste.
- **Harvesting, Division II Block 16BT.** Observations and interviews with workers related to the work system, employment aspects, health checks, and safe work practices.
- **EFB Application, Division IV Block 19E.** Observations and interviews with foreman related to the work system, application dosages, employment aspects, and safe work practices.
- **Harvesting, Division V Block 97AC.** Observations and interviews with workers related to the work system, employment aspects, health checks, and safe work practices.

Laras Estate

- **Boundary Pole Number 64 & 65 Block 16 F. Division I.** Observation and interview related monitoring and maintenance its boundary
- **Boundary Pole Number 319 & 320 Block 19R & Block 14X.** Observation and interview related monitoring and maintenance its boundary
- **Boundary Pole Number 193 Block 21A.** Observation and interview related monitoring and maintenance its boundary
- **Block 97 AF Division 2 (Bah Longgur Spring).** Observation of HCV management.
- **Block 97 AK Division 2 (Bah Apal River).** Observation of HCV management.
- **Block 96 H Division 2 (Tumorang Spring).** Observation of HCV management.
- **Block 89 N Division 4 (Waringin River).** Observation of HCV management.
- **Agrochemicals Warehouse.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Fertilizer warehouse.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.

	<ul style="list-style-type: none"> • Fuel Warehouse. Observation the warehouse condition. • Rinse House Division I and II. Observations related to the management of agrochemical materials and waste, MSDS, emergency response facilities and types of pesticides used. • Transport FFB, Division II. Field observations and interviews related to aspects of BMP, OHS, and Labour. • Harvesting, Division II Block 16E. Observations and interviews with workers related to the work system, employment aspects, health checks, and safe work practices. • Replanting Area/Immature Area, Division III Block 98AS. Observations of soil and water conservations • Terrace, Division III Block 98AS. Observation of terrace conditions and soils conservation. • Selective Weeding, Division IV Block L19. Observations and interviews with workers related to the work system, employment aspects, health checks, and safe work practices. • Harvesting, Division II Block 99J. Observations and interviews with workers related to the work system, employment aspects, health checks, and safe work practices. • Pesticide Worker, Division II Block 99F. Observations and interviews with workers related to the work system, employment aspects, health checks, and safe work practices. •
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-1.2	<p>Consultation of stakeholders for PTPN IV – Dolok Ilir POM held by:</p> <ul style="list-style-type: none"> • Public announcement in Mutuagung website on 26 September 2022. • Public consultation with government agencies of Simalungun District (Agriculture Agency, Labor Agency, and Environmental Agency) on 4 October 2022. • Public consultation by interview with locals of the nearby village (Rabuhit, Serbalawan, Bah Gunung and Tumorang Village) and local contractor on 4 October 2022. • Consultation meeting and interview with Internal Stakeholder (labor union and gender committee) on 6 October 2022. • Consultation with NGO (WWF, Sawit Watch, Wahana Lingkungan Hidup Indonesia, dan AMAN) via email on 26 September 2022. <p>Numbers of input from stakeholders were clarified by PT Perkebunan Nusantara IV – Dolok Ilir POM</p>
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit (ASA-1.3) will be conducted eight (8) months to twelve (12) months after date of annual license

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Dolok Ilir POM – PT Perkebunan Nusantara IV subsidiary of PT Perkebunan Nusantara III operation consisting of one (1) mill and two (2) oil palm estates.

During the assessment, there were four (4) Nonconformities were assigned against Major Compliance Indicators; six (6) Nonconformities were assigned against Minor Compliance Indicators and three (3) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective actions that had been reviewed and accepted by Auditors in form of documentation evidence

MUTUAGUNG LESTARI found that Dolok Ilir POM – PT Perkebunan Nusantara IV subsidiary of PT Perkebunan Nusantara III complied with the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification System for Principles and Criteria and RSPO Independent Smallholder Standards, Endorsed by the RSPO Board of Governors on 12 November 2020.

Therefore, MUTUAGUNG LESTARI Recommends RSPO Certification of compliance continued.

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY		
1.1	The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
1.1.1 and 1.1.3	<p>The company shows the Decree of the Directors of PTPN IV No 04.03/Kpts/02/II/2018 dated February 5, 2018 regarding the publication of PTPN IV company documents which regulates the types of company documents and the authority to publish company documents, for example documents that can be published such as annual reports, company profiles , AMDAL, etc. as well as documents that cannot be published such as commodity selling price formula, list of selected partners, etc.</p> <p>The company also demonstrated procedures related to the transparency mechanism in providing information to stakeholders as contained in the SOP document. SOP 06 No. Revision 03 Effective Date 1 August 2017 which describes the mechanism for requesting information and responses, including the following:</p> <p>Headquarters</p> <ul style="list-style-type: none"> • The process of controlling requests for information and responses is managed by the corporate secretary. • All requests for information are forwarded to the Board of Directors for disposition. • In accordance with the disposition, forwarded to the relevant Section for implementation according to the disposition of the Board of Directors. • Implementation of requests for information and responses to stakeholders. • The period for responding to requests for information to stakeholders is a maximum of 30 working days. <p>Business unit</p> <ul style="list-style-type: none"> • The process of controlling requests for information and responses is managed by the HR Assistant and General. 	

- All requests for information are then submitted to the Unit Manager for processing and solutions for handling them.
- After the Unit Management examines the request for information, a decision is made and the response is then submitted to the requester for information.
- If the Unit Management feels that this requires a higher-level process, the request is submitted to the Manager and Head Office for a solution to the completion of the response request.
- If the process and solution for requesting information has been decided by the Manager and Head Office, the request for feedback is submitted to the Plantation Unit Manager to be forwarded to the requester for information.
- The period for responding to requests for information to stakeholders is a maximum of 30 working days.

Based on the results of verification of incoming and outgoing mail documents, it is known that all incoming letters including requests for information have been responded to by the company, for example a letter from the community of Aman Sari sub-district, Simalungun district with No 01/MAS/VII/2022 dated 21 July 2022 regarding the request for road opening new, which the company has responded to on July 23, 2022 with the letter number DOI/SEVP.OP1/09/VII/2022.

1.1.2

Types of information that can be accessed by stakeholders are listed in the Decree of the Directors of PTPN IV No. 04.03/Kpts/02/II/2018 regarding the publication of PTPN IV company documents. The information that can be accessed is environmental, social, legal, OHS documents, employment, etc. The company has also submitted the following mandatory reports:

- Report on Utilization of HGU for Dolok Ilir and Laras Estate dated July 2, 2022 to BPN Simalungun Regency sent via Pos Indonesia
- The report on the implementation of the RKL/RPL for semester 1 of 2022 has been reported to the Simalungun Regency Environmental Service on July 15, 2022. (Dolok Ilir POM and Estate Dolok Ilir)
- The report on the implementation of the management of hazardous and toxic waste in the 1st Quarter of 2022 has been reported to the Environment Agency of the Simalungun Regency on April 13, 2022. (Dolok Ilir POM and Dolok Ilir Estate)
- The report on the implementation of the POME Monitoring Quarter 1 2022 has been reported to the Environment Agency of the Simalungun Regency on April 13, 2022. (Dolok Ilir POM and Dolok Ilir Estate)
- The report on the implementation of the management of hazardous and toxic waste for the 2nd Quarter of 2022 has been reported to the Environmental Service of the Simalungun Regency on July 15, 2022. (Dolok Ilir POM and Dolok Ilir Estate)
- The report on the implementation of the monitoring of POME in Quarter 2 2022 has been reported to the Environmental Service of Simalungun Regency on July 15, 2022. (Dolok Ilir POM and Dolok Ilir Estate)
- The report on the implementation of the RKL/RPL for semester 1 of 2022 has been reported to the Simalungun Regency Environmental Service on August 22, 2022. (Estate Laras).
- The report on the implementation of the management of hazardous and toxic waste for the 2nd Quarter of 2022 has been reported to the Simalungun Regency Environmental Service on August 9, 2022. (Estate Laras).
- Mandatory Reporting Manpower (estate) with reporting number 21155.20220427.0003 reporting date 27 April 2022.
- Mandatory Reporting Manpower (mill) with reporting number 21155.20211021.0001 reporting date October 21, 2021.
- Proof of registration of Fixed Period Working Agreement Dolok Ilir Estate with No. 52/PKWT/2022 on 5 September 2022.
- Evidence of reporting on the activities of the Dolok Ilir POM Bipartite cooperation institution for the first quarter of 2022 was submitted to the Simalungun Regency Manpower Office on 9 May 2022.
- Evidence of reporting on the activities of the Dolok Ilir Estate Bipartite cooperation agency for the first quarter of 2022 was submitted to the Simalungun Regency Manpower Office on April 11, 2022.

1.1.4

The company shows the SOP for Communication and Consultation with the Community No. SPO 03, Revision 03, Effective Date January 2, 2017 which explains the company's communication procedures with the public, as follows:

- Communication and consultation with the community in the estate and mill Units is directly managed by the recording and process by the HR Assistant and the General Manager representing the Manager to communicate with the Muspida, Koramil, Polsek, religious leaders, traditional leaders, and the surrounding community. All results of communications that occur must be submitted to the Manager to be known and processed and will be informed to

the public what policies and follow-up actions will be taken by the company in handling the results of these communications and consultations no later than 3 months after the information is received by the Manager in order to maintain corporate image. Furthermore, if there is an important matter for the Board of Directors to know, the Manager can directly convey it to the District General Manager and jointly inform the Board of Directors.

- Communication and consultation with the community in the district is directly managed by the recording and process by the Assistant for Human Resources and the District General to communicate with the Muspida, Koramil, Polsek, religious leaders, traditional leaders, and the surrounding community. All communications that occur must be submitted to the District General Manager to be known and processed and will then be informed to the public what policies and follow-up actions will be taken by the company in handling the results of these communications and consultations no later than 3 months after the information is received by the General Manager. District in order to maintain the corporate image. Furthermore, if there is an important matter for the Board of Directors to know, the District General Manager can directly convey it to the Board of Directors.
- Communication and consultation with the public at the Head Office is managed directly by the recording and process by the Head Office Public Relations (public relations/corporate communication) in the Corporate Secretary Division. All results of communications that occur must be submitted to the Head of the Corporate Secretary Section to be known and processed and will then be informed to the public what policies and follow-up actions will be taken by the company in handling the results of these communications and consultations no later than 3 months after the information is received by the company. Head of Corporate Secretary Section in order to maintain the company's image. Furthermore, if there is an important matter for the Board of Directors to know, the Head of the Corporate Secretary Division will immediately submit it to the Board of Directors.

The company also showed the minutes of the company's socialization to stakeholders and community representatives which was held on February 10, 2022, which was attended by 10 participants. Based on the results of interviews with community representatives and government stakeholders, it is known that stakeholders already know the communication and consultation mechanism with the company.

1.1.5

The company has a list of stakeholders that was updated on August 18, 2022, which provides the name of the agency, contact name, field of cooperation, and contact number. The list of stakeholders consists of:

- Village head
- Simalungun Regency Government
- Subdistrict Head
- Police
- NGOs
- Public figure
- Contractor
- Suppliers
- Internal Stakeholders

Status: Comply

1.2

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

1.2.1

The company has a policy of ethical behaviour that is stated in the PTPN IV Code of Conduct document in accordance with the Decree of the Board of Commissioners and the Board of Directors of PTPN IV No. DK-08/KPTS/VII/2020 which was set on July 21, 2020. The Code of Conduct document explains the commitments and attitudes of business actors, obligations and rights of business actors, prohibitions for business actors, ethics with stakeholders, and compliance with violations.

Based on the results of the document review, it is known that the company has socialized the code of conduct which was carried out on Thursday 30 June 2022. In addition, based on the results of interviews with workers at Dolok Ilir Estate, Laras Estate, Dolok Ilir Mill and contractor representatives, it is known that workers already know the company's code of conduct and there were no reports of acts of corruption committed.

1.2.2

Based on interviews with management representatives, the method of monitoring compliance with the code of ethics is through the internal audit of PTPN IV. The Company shows the results of the Internal Control Unit internal audit conducted in September 2022. In addition, the Company also monitors through complaints submitted through the whistleblowing system, and it is known that there were no complaints received during 2022.

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

Unit certification show compliance with related regulation i.e :

• **Legal Aspect**

Land rights :

- Dolok Ilir : HGU Certificate No. 1 of 2006 for an area of 7,348.81 Ha valid until December 31, 2030
 - Laras : HGU Certificate No. 6 of 2008 for an area of 4,062.66 Ha valid until September 21, 2033
- Total HGU owned is 11,411.47 Ha

Plantation Business Permit:

- Dolok Ilir : Decision of the Head of the Integrated Licensing and Investment Services Agency of Simalungun Regency No.188.45/503/1113/BPPT-P4 12014 dated December 16, 2014 for a capacity of 60 tons of FFB/hour and an area of 7,348.81 Ha
- Laras : Simalungun Regent Decree No. 183.45/2767/K-PPT/2012 dated August 08, 2012 for an area of 4,062.66 Ha

Environmental Aspect:

- Revision of the Environmental Management Plan and Environmental Monitoring Plan based on the recommendation letter from the Environmental Agency of Simalungun Regency number 213/LINGHUP-2010 dated 27 October 2010 for an operational area of 7,348.81 ha and a mill with a capacity of 60 tons/hour. (Dolok Ilir POM and Dolok Ilir Estate).
- The company already has an Environmental Evaluation Document (DELH) which is stipulated through the Simalungun Regency BLH Decree No. 188.45/759/linghup/2011 for PT Perkebunan Nusantara IV (Persero) Estate Laras with oil palm plantation activities with an environmental impact analysis study covering an area of 4,062.66 ha which was approved by the BLH Simalungun Regency on December 14, 2011. (Estate Laras)
- The Company has obtained an Approval for Fulfillment of the Commitment of Wastewater Disposal Permit Application to PT Perkebunan Nusantara IV unit Dolok Ilir with Number 503/03/17.4/2021 from the Head of the One Stop Integrated Investment and Licensing Service on January 29, 2021 with a validity period of 5 years.
- The company has obtained an Approval for Fulfillment of Commitment to Commercial/Operational Permits (operational permits for the management of hazardous and toxic waste for producers) with the number 503.26/00499/17.4/2021 for the PTPN IV Dolok Ilir unit from the Head of the Investment and One-Stop Integrated Licensing Service Office on May 3, 2021 with a validity period of 5 years. (Dolok Ilir POM and Dolok Ilir Estate).
- The company already has an Approval for Fulfillment of Commitment to a Commercial/Operational Permit (Operational Permit for the Management of Hazardous and Toxic Waste for Producers) number 503/33/17.4/2020 from the Office of Investment and One Stop Integrated Services of Simalungun Regency on September 10, 2020 with hope valid for 5 years. (Laras Estate).

Employment Aspect:

- Proof of Recording of Fixed Period Working Agreement by the Manpower Office of Simalungun Regency with registration number 52/PKWT/2022 dated 5 September 2021 for 53 workers who have complied with government regulations No. 35 of 2021.
- Manpower Reporting Mandatory with reporting number 21155.20220427.0003 reporting date 27 April 2022 which is in accordance with Minister of Manpower Regulation No. 18 of 2017.

- The company has set a minimum wage with components of basic salary, special allowances, and rice supply so that a total of IDR 2,522,610 is obtained which is in accordance with the Decree of the Governor of North Sumatra No. 188.44/746/KPTS/2021.

2.1.2

The unit of certification has basic guidelines and work instructions for identification and evaluation of compliance with laws and regulations and other requirements. document 04.01/KOL/P/034 dated August 1, 2018. The guidelines include informing the person in charge of identifying and updating regulations as part of corporate legal and investor relations with a period of once a year.

List of regulation which applicable with unit of certification activity i.e :

- Government Regulations No. 35 of 2021 concerning Specific Time Work Agreements, outsourcing, working hours, rest periods, and layoffs
- Government Regulations No. 36 of 2021 concerning Wages
- Government Regulations No. 37 of 2021 concerning Job Loss Guarantee
- Minister of Environment regulations No. P.12 of 2020 concerning Storage of Hazardous and Toxic Waste
- Regulation of the Minister of Manpower number 4 Of 2022 concerning payment procedures and terms for “*Jaminan Hari Tua*”

The list of regulation last update in June 2022. Evaluation of law registers for contractors described in 2.2.2 and 2.2.3. In addition, once a year also conduct RSPO internal audit.

2.1.3

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

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

The company has also carried out routine monitoring related to the condition and presence of HGU stakes as seen in the monitoring of HGU boundary markers in the second semester of 2022, which among others informs:

- Dolok Ilir Estate :
 - Division V: Total core and auxiliary stakes 68 pieces, 3 missing, and 65 in good condition
 - Division VI: A total of 66 core and auxiliary stakes, 18 missing, and 48 in good condition
- Laras Estate :
 - Division III : Total core and auxiliary stakes 100 pieces, 25 missing, 9 damaged, and in good condition 66 pieces
 - Division IV : Total core stakes and auxiliary stakes 86 pieces, 20 damaged, 11 missing, and in good condition 55 pieces

In the previous assessment, there was OFI to ensure the maintenance and repair program of the boundary pole was carried out according to the set time. In the current assessment conditions, according to the monitoring results, there are still many missing/damaged for the boundary pole. The results of field verification, one of the causes is the area directly adjacent to the community housing area. However, the company is still trying to carry out repairs and maintenance such as in Division V Dolok Ilir Estate where in the previous assessment the number of missing stakes was 13 and 3 were damaged, while in this assessment, 3 stakes are still missing (not repaired).

Based on the field observation to boundary pole No. 64, 62, and 353 of Dolok Ilir Estate and boundary pole No. 319, 320, 65, and 66 of Laras Estate, it is known that the condition of the boundary pole is in good condition according to the results of monitoring. between the company and the village/community farm. Thus, it can be concluded that the company has implemented a monitoring and maintenance program for stakes and has clear legal boundaries.

	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 and 2.2.3

The company shows a list of contracted third parties listed in the list of contractors for the August 2022 period which also informs the company name, object of work, contract number, contact party and contact number, including 1 CPO transporter, 1 PK transporter, 1 Security Service and 1 FFB transporter and it can be shown that the cooperation contract has its own clause regarding the fulfillment of relevant legal obligations, for example in SPK No: 04.05/S.Perj/Pem/03/III/2022 dated March 1, 2022 with CV Pelita Jaya for CPO transport work.

In addition, the Employment Agreement Letter has also included a separate clause that prohibits practices involving child labor, forced labor, and workers from human trafficking, which states that as a form of compliance with applicable laws and regulations, the parties are required to comply with the following provisions: do not employ minors in accordance with labor regulations, do not practice forced labor, do not employ workers resulting from human trafficking and others.

2.2.2

The company shows a list of contracted third parties listed in the list of contractors for the period August 2022, such as 1 CPO transporter, 1 PK transporter, 1 Security Service and 1 FFB transporter and it can be shown that the cooperation contract has its own clause regarding the fulfillment of relevant legal obligations, for example in SPK No: 04.05/S.Perj/Pem/03/III/2022 dated March 1, 2022 with CV Pelita Jaya for the work of transporting CPO.

The results of interviews with 2 FFB transport workers and 1 FFB truck driver worker CV Karya Teknik in Division VII Dolok Ilir Plantation and 1 FFB truck driver at Division II Laras Estate CV EWS Nusantara III, it was stated that the workers did not have a good work agreement with the contractor and had not registered in Social Employment Insurance Administration Body.

Until the audit activity takes place, the company has not been able to show that the third party that has a cooperative bond with the company, has complied with the relevant legal compliance clauses as stated in the contract clauses including, but not limited to compliance with the minimum wage, Social Health/Employment Insurance Administration Body participation and relationship employee work. **(NCR No 2022.01 with category minor)**

2.2.2	Status: NCR No. 2022.01 with Minor Category	
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2.3

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

2.3.1

The other direct FFB sources is from PTPNIV group itself i.e :

- Tanah Itam Ulu Estate (RSPO certified)
- Marihat Estate (RSPO certified)
- Marjandi Estate (RSPO certified)
- Bah Birong Ulu (Non certified)
- Balimbingan Estate (RSPO certified)
- Gunung Bayu Estate (RSPO certified)

Based on this, it can be concluded that the source of the fruit is legal because it is still in one PTPN IV group entity

2.3.2

Based on the Dolok Ilir POM Processed FFB, it is known that there is an other parties FFB supplier by the name of CV Riana Lim. The results of the public consultation and management explanation revealed that CV Riana Lim, apart from selling FFB from her own land, also collects FFB from other parties (agents). The unit of certification shows the FFB supplier data for the CV namely:

Agent	Adress	Coordinate
Sarjono	Bandar Tengah	N.'03"06.33.2' E.'099"13.40.0'
Bambang	Gajing Kahean	N.'03"03.84.4' E.'099"10.71.3'

Mujiman	Gajing Tengah	N.'03°03.83.5' E.'099°10.72.1'
Iwan	Gajing Tengah	N.'03°03.82.8' E.'099°10.71.8'

As explained by Director of CV Riana Lim, agents take FFB from other farmers from various sources. However, until surveillance-1.2 has been completed, it has not been shown that:

1. Source of FFB for each agent along with FFB origin and geolocation information
2. Proof of ownership status or rights/claims to land by planters/farmers

As specific guidance for this indicator states that if the certification unit has indirect FFB supplying smallholders, then for RSPO certified mills, the time requirement to fulfill the indicator is three years from 15 November 2018, i.e. 15 November 2021. For uncertified mills/mills which is in the process of the first year of certification, the time requirement for supply farmers to meet the requirements according to indicator 2.3.1 is three years from the date the mill is certified.

These requirements include:

- Information on the geolocation of the FFB origin;
- Proof of ownership status or rights/claims to land by planters/farmers;
- If relevant, a valid planting/operational/trading permit, or as part of a cooperative so that the buying and selling of FFB can be carried out

Thus, it become non-conformity No.2022.02

2.3.2	Status: NCR No. 2022.02 with Minor Category	
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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 management plan at estate level was evidenced with a document of Economic Indicators for Estate (5 Years) from 2017 – 2023 which include projected OER and KER, FFB Production, Pesticide usage, production cost projection, and revenue projection.

An annual evaluation is available for each management unit in the Annual Report which contains information on production, improvement of results, date of expenditure, proportional estimates, original estimates and reasons for over / under spending. For example, the Latest evaluation Laras Estate has been done in September 2022.

3.1.2
There is replanting program for 5 years in each management unit, for example on the year of 2022 for Laras Estate is 2,468 Ha. This replanting program were evaluated every year by the estate managers.

3.1.3
The unit of certification was shown continuous improvement documents, for example, SPI internal audit reports, RSPO and ISPO internal audit reports and their follow-up, periodic waste test reports, surface water quality test reports etc.

An annual evaluation is available for each management unit in the Annual Report which contains information on production, improvement of results, date of expenditure, proportional estimates, original estimates and reasons for over / under spending. For example, the Latest evaluation Laras Estate has been done in September 2022.

	Status: Comply	
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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 has taken actions for continuous improvement in environmental aspects, for example:

- Waste management and monitoring through WWTP Management, effluent quality testing and reporting to the Simalungun Regency Environmental Service.
- Air quality management and monitoring through road maintenance, air quality testing and reporting to the Simalungun Regency Environmental Service.
- Groundwater management and monitoring through testing ground water quality and reporting it to the Simalungun Regency Environment.
- Hazardous waste management through Hazardous and Toxic Waste Storage and Hazardous and Toxic Waste management and monitoring.
- Greenhouse Gas (GHG) Management. Implement a zero-burning policy, utilization of EFB, shells and fibre as renewable energy, regular engine maintenance, and regular emission quality tests.

3.2.2

The unit of certification has not been able to show the annual report submitted to the RSPO secretariat through the certification body at the time of the annual audit, using the RSPO metric template format. This becomes non-conformity **No.2022.03**

3.2.2	Status: NCR No. 2022.03 with Minor Category	
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3.3
Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

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

3.3.2

The company has a routine inspection/monitoring mechanism for operational activities in the form of an internal audit which is conducted every semester (6 months). The internal audit activity is carried out by the Internal Audit Unit (SPI). To ensure that SOPs have been implemented, the company has routinely conducted SPI audits, ISPO and RSPO internal audits.

3.3.3

The unit of certification was shown continuous improvement documents, for example, SPI internal audit reports Semester I 2022, RSPO and ISPO internal audit reports and their follow-up in 2022, periodic waste test reports May 2022, surface water quality test reports Semester II 2022, etc.

	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 has conducted an independent and participatory environmental and social impact assessment by involving the stakeholders listed in several documents, namely:

Environmental Aspect

Dolok Ilir POM dan Dolok Ilir Estate

The Company has carried out an environmental impact assessment which is stated in the Revised AMDAL document of the Environmental Management Plan and Environmental Monitoring Plan of the Oil Palm Plantation, Palm Oil Mill and Organic Fertilizer Factory of PT. Perkebunan Nusantara IV which has been approved by the environmental agency based on the recommendation letter from the Environmental Agency of Simalungun Regency number 213/LINGHUP-2010 dated October 27, 2010 for an operational area of 7,348.81 ha and a POM with a capacity of 60 tons/hour as well as an organic fertilizer factory for the Dolok ilir Estate. In 2018 to 2022 the company has carried out replanting, so with this the company has identified the impact of replanting activities. The management and monitoring plan for the impact of replanting is as follows:

- Job opportunities for the community

- The impact of the mobilization of heavy equipment and material transport trucks that cause dust and noise.
- Changes in temperature due to uprooted oil palm stands
- Preventing landslides due to construction of isolation trenches
- The attack of the horn beetle pest on the plantations of residents adjacent to the replanting area.

Laras Estate

The company already has an Environmental Evaluation Document (DELH) which is stipulated through the Simalungun Regency BLH Decree No. 188.45/759/linghup/2011 for PT Perkebunan Nusantara IV (Persero), Laras Estate with oil palm plantation activities with an environmental impact analysis study covering an area of 4,062.66 ha which was approved by environmental agency Simalungun Regency on December 14, 2011. Environmental documents life was compiled by the North Sumatra Research Institute. In 2019 to 2022 the company has carried out replanting, so with this the company has identified the impact of replanting activities. The management and monitoring plan for the impact of replanting is as follows:

- Job opportunities for the community
- The impact of the mobilization of heavy equipment and material transport trucks that cause dust and noise.
- Changes in temperature due to uprooted oil palm stands
- Preventing landslides due to construction of isolation trenches
- The attack of the horn beetle pest on the plantations of residents adjacent to the replanting area.

Social Aspect

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

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

Based on document verification, it is known that the social and environmental impact assessment has been carried out independently and participatively by involving affected stakeholders, including impact assessments from smallholder schemes.

The results of field observations during the audit activity revealed that all of the company's operational activities have been included in the environmental documents owned by the company.

Based on the results of interviews with village representatives of Bandar Selamat, it is known that the social impacts of the company's existence include partnerships with business actors to provide business opportunities to the community, CSR, job opportunities, etc. These social impacts have also been identified in the SIA Document, Environmental Document, as well as the company's social impact management plan.

Based on document verification, it is known that the scope of the social impact assessment has covered the entire village and has involved internal workers.

3.4.2

The company has a plan for environmental and social management and monitoring, namely:

Environmental Aspect**Dolok Ilir POM dan Dolok Ilir Estate**

The environmental management and monitoring plan is in accordance with the AMDAL Document, such as:

- Impact of Decreasing Air Quality (Ambient)
- Odour Level Impact
- Noise Impact
- Emission Level Impact
- Surface Water Quality Impact
- Wastewater Quality Impact
- Impact of Soil Fertility
- Hazardous Waste Impact
- Impact of Job Opportunities
- People's Attitudes and Perceptions

Laras Estate

The environmental management and monitoring plan is in accordance with the DELH Document, such as:

- Ambient air quality
- Noise
- Ground water quality
- Surface water quality
- Hazardous Waste
- Employment Opportunity
- People's Attitudes and Perceptions

Social Aspect

The company already has an SIA management plan for the 2022-2023 period based on the results of a review conducted on March 3, 2022 which was carried out in a participatory manner through questionnaires to the surrounding community and employees. The SIA management plan includes:

- Improve communication with stakeholders with village communities.
- Opportunity to get a job.
- Opportunity to try and work.
- Scholarships for schoolchildren
- replanting activities
- Dissemination to the public regarding company policies.
- Conflict with farmers

The SIA management plan which was prepared based on the results of consultations with stakeholders such as the surrounding community and employees has covered all the company's operational activities. This is evidenced by the SIA management plan which contains the social impacts of the company's operations on the affected stakeholders.

Based on the results of interviews with village representatives of Bandar Selamat, it is known that the social impact of the existence of companies such as partnerships by trying to provide business opportunities and work opportunities to the community, as well as CSR. Both impacts have been covered in the SIA study document.

3.4.3

The Company has implemented environmental and social management and monitoring plans, namely:

Environmental Aspect

The company has implemented an environmental management and monitoring plan for the first semester of 2022. The environmental management and monitoring plan is in accordance with its environmental documents. The results of the verification of the implementation of the environmental management and monitoring plan for the first semester of 2022 are in accordance with the directions of the environmental documents owned. In general, the results of environmental

management and monitoring are in accordance with the provisions. The company has also conducted evaluations such as trend evaluation, critical level evaluation, and compliance evaluation. Based on the results of interviews with the surrounding community, information was also obtained that there was no environmental pollution by the company. In addition, the results of interviews with the Simalungun Regency Environmental Office also explained that the company had carried out environmental management and monitoring and reported the results of environmental management and monitoring implementation to the Environment Agency.

Social Aspect

Based on document verification and interviews, the following evidence were obtained:

- The company has conducted a social impact assessment which is stated in the social impact analysis report document which was prepared in collaboration with PT. Surveyor Indonesia, Indonesian Sustainable Palm Oil Foundation in 2009. The document describes the positive and negative impacts of plantation operations and recommendations for the management of social impacts that will be carried out by the company.
- The company has implemented social impact management for the period of 2021 in accordance with the SIA management plan for 2020-2021 such as:
 1. Improve communication with stakeholders in the village to discuss participatory village development programs based on priorities from the villagers' point of view.
 2. Conducting socialization if there is an acceptance of labour to the villages around the plantation.
 3. Directing vendors/contractors to prioritize local workforce absorption.
 4. Socialization to the community around the plantation regarding the law applicable in the company against the perpetrators of theft.
 5. Conduct noise testing in the factory area due to complaints from several people about the noise generated by the processing of Dolok Ilir POM.
- The company has reviewed the SIA management plan, which was carried out on March 3, 2022 which was carried out in a participatory manner through questionnaires to the surrounding community and employees. From the results of the review, there are recommendations for the SIA management plan, namely:
 1. Improve communication with stakeholders with village communities.
 2. Opportunity to get a job.
 3. Opportunity to try and work
 4. Scholarships for schoolchildren
 5. replanting activities
 6. Dissemination to the public regarding company policies.
 7. Conflict with farmers
- Based on the results of interviews with representatives of the surrounding community in the Serbelawan sub-district and the results of field observations, the following social issues were obtained:
 1. Information on job vacancies, people feel less informed if there are job vacancies in the company. This has been done by the company by conducting socialization, but this issue is still developing, and the company is still managing it and has been listed in the management plan as a result of the review conducted.
 2. The results of field observations in the Dolok Ilir POM area are known that the WWTP Pond Flow Meter is not available. The results of interviews with company representatives revealed that the WWTP Pool Flow Meter was lost because it was stolen. This has been done by the company by conducting socialization, but this issue is no longer listed in the management plan of the review results and this issue is still developing. In addition, the results of the monitoring of the theft issue have not been shown by the company.
 3. The results of field observations at the Dolok Ilir Estate and Laras Estate which are adjacent to the villages, it is known that many piles of domestic waste are dumped by the community in the company area. The issue related to domestic waste has not been included in the SIA management plan as a result of the review.
 4. The results of field observations at the Laras Estate show that there are rock excavation activities in the company area bordering the Bah Apal river carried out by the community which have the potential to cause harm and damage to the river border area. This issue has not been included in the company's AIS management plan

Based on this evidence, the Company has not been able to show evidence that the SIA management plan that has been implemented can mitigate developing social issues and the reviewed SIA management plan has not covered all developing social issues. **NCR No 2022.04 with Major Category**

3.4.3	Status: NCR No. 2022.04 with Major Category	
3.5 A system for managing human resources is in place.		
<p>3.5.1 – 3.5.2</p> <p>The company has a human resource management system, for example as follows:</p> <ul style="list-style-type: none"> • Basic guidelines and work instructions Recruitment and Appointment of Group IA-IID Employees No. 04.15.01A which was published in June 2013. • Basic guidelines and work instructions Employee Performance Assessment Group IA-IVD No 04.15.04 which was published in June 2013. • Basic guidelines and work instructions Issuance of Decree for Employee Pension Group IA-IVD No. 04.15.12 which was issued in June 2013. • Collective Labor Agreement for the period 2022 – 2023 in Chapter II in article 12 regarding admissions, in article 13 regarding appointments, in article 14 regarding groups and career paths, in article 15 regarding group promotions, in article 16 regarding promotions (promotions), in Article 17 regarding class/position demotion (demotion) and Article 18 regarding mutation. <p>The company also shows records of the implementation of employment procedures, for example:</p> <p>Employee Promotion and Assessment</p> <p>The company shows employee ratings for the 2022 period, for example for Laras Estate as stated in letter No LAR/GMD-III/R/02/I/2022 with the following assessment:</p> <ul style="list-style-type: none"> • Employees with the initials ASB, the position of harvester, were promoted from IA/9 to IB/0 with 5 points for attendance, 5 points for job knowledge, 5 points for productivity, 4 points for teamwork and 5 points for honesty. • An employee with the initial N, the position of Plant Foreman I, was promoted from group IIC/1 to IID/0 with an attendance rating of 5 points, job knowledge 5 points, productivity 5 points, teamwork 5 points and honesty 5 points. On a rating scale from 1 point is very bad to 5 points is very good. <p>Pension</p> <p>The company shows a pension determination document, for example the one shown for Dolok Ilir POM in the decision of the board of directors No. 04.07/Kpts/1499 – PKS-DOI/VII/2022 regarding dismissal with normal retirement rights for employees of PTPN IV on behalf of the initials BS which stipulates the honourable dismissal of employees on July 1, 2022 because it has reached the retirement age limit and provides old-age benefits in accordance with the provisions.</p>		
Status: Comply		
3.6 An Occupational Health and Safety (H&S) plan is documented, effectively communicated and implemented.		
<p>3.6.1</p> <p>The Company already has Risk Management documents prepared by the OHS Committee Secretary for Dolok Ilir Estate, Laras Estate and Dolok Ilir Mill. The document describes the risk assessment and its controls for all operational areas of the company which was revised as of January 23, 2022.</p> <p>Based on field observation, hazard identification risk assessment and control (HIRAC) documents has been implemented adequately and appropriate in Estate and Mill. For examples: operator uses earmuff, harvester uses helmet, etc</p> <p>3.6.2</p> <p>Based on document review as well as field observations in warehouses and harvesting activities, known that the company has completed OHS instructions such as banners for gathering points, evacuation routes, and OHS warnings in order to controlling risks and potential hazards for all employees, for example, warning about PPE mandatory areas at each station according to the identification of risks and potential hazards.</p> <p>In additions, the company carries out activities to monitor the effectiveness of the OSH plan such as:</p> <ul style="list-style-type: none"> - Regular monthly OHS meetings for each unit in the context of the effectiveness of the OSH plan that has been prepared in the beginning of the year. - MCU. 		

- Carry out fire simulations on a regular basis
- Fire extinguisher inspection
- First aid monitoring

Based on field observations in the engine room, it is known that the company has a power plant with a capacity of > 200 KVA and the company can show that it has personnel who have attended OHS Expert training from OHS Service Company but the certificate is still on process. Companies has shown the certificate from OHS Service Company (PT Safrindo Jaya) number 315/KET/SR-MDN/IX/2022 30 September 2022 explaining that SYafri Aldrian (Engine Room Worker) has passed the OHS Expert Certification which was held on 12 - 30 September 2022.

There are several results of Spirometry and Audiometry examinations, and the company has not followed up on this because the results of the examination have just been received from Laras Hospital on October 7, 2022. The company has the opportunity to follow up on the abnormal results of the Audiometry and Spirometry examinations **(OFI)**.

Status: Comply

3.7

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

3.7.1 – 3.7.2

The company demonstrated a training program for each unit in 2022 in which the training also covers parties who need training such as staff, workers, small farmers, and contractors. The training programs include the following:

- Refreshment of boiler operation planned for March 2022.
- Refreshment of SCCS planned for January 2022.
- Basic refreshment of OHS planned for July 2022.
- Refreshment of hazardous and toxic waste management planned for May 2022.

The company also shows the realization of training, for example:

- Refreshment of boiler operation, which was carried out on March 5, 2022, which was attended by 9 participants.
- SCCS refreshment, which was held on January 24, 2022, which was attended by 10 participants.
- Basic OHS refreshment, which was carried out on July 11, 2022, which was attended by 11 participants.
- Refreshment of hazardous and toxic waste management, which was carried out on May 9, 2022, which was attended by 9 participants.

The results of interviews with representatives of labor unions and workers such as warehouse officers, harvesters, fertilizer workers, grading officers, boiler officers stated that the company had provided training or socialization on working procedures to each worker verbally and understood by workers.

3.7.3

The recording of the training on the supply chain system for personnel was on July 09, 2022, in the Dolok Ilir POM meeting room and was attended by 9 participants such as processing assistants, Quality Assurance assistants, production crews, FFB clerk, weighing clerk and security. Based on the results of interviews with security officers and weigh-in officers at the mill, it is known that they have understood the acceptance of RSPO certified FFB which is marked by the presence of a CSPO stamp.

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1 & 3.8.2

Based on the FFB data received by the Dolok Ilir POM, it is known that the source of the FFB comes from their own estate (Dolok Ilir and Laras), In one group of PTPN IV which RSPO certified (Tanah Itam Ulu Estate, Marihat Estate, Marjandi Estate, Balimbingan Estate, dan Gunung Bayu Estate) and Bah Birong Ulu Estate which RSPO Non Certified also from third party suppliers who are not certified so that the module used is MB.

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. The estimates of certified production for the next

license period also have been set, in reasonable amount taking into account the last year production. The data are shown in the following table:

Product	Estimate Production period of May 29, 2022 – Dec 28, 2022	Actual Production (MT) of previous audit (May 2022 to September 2022)	Estimate Production for 12 months (MT)
FFB	176,000	88,615.28	177,000.00
CSPO	42,240	18,001.38	37,170.00
CSPK	7,040	3,509.75	7,169.00

*Estimated production is obtained from actual production one year prior to the assessment (Oct 21 – Sept 22)

3.8.4

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

License ID	CB133647
Member Name	Dolak Ilir POM PTPN IV
Member ID	RSPO_PO1000002539
RSPO Membership Number	1-0082-09-000-00 (PT Perkebunan Nusantara IV)
Issued On	06/06/2022
Issued By	PT Mutuagung Lestari
Start Date	29/05/2022
End Date	28/12/2022

3.8.5

The certification unit has Basic Guidelines and Work Instructions for Handling Certified Palm Oil Products Document Number: 04.03/P/003 dated 2018 Revision Number: 01 Revision Date : 01 November 2021 and approved by the Director. The procedures include explaining:

- Handling of Certified Fresh Fruit Bunches (FFB): Delivery of FFB from the Estate, Receiving certified FFB at the POM, Recording
- Handling of CSPO and CSPK: Monitoring of CSPO and CSPK stock, CSPO delivery, PK delivery, Recording, Reporting → If the realization of CSPO and CSPK production reaches 80%, it must be reported to the Sustainability planning department. POM records and balances all receipts of RSPO certified FFB and shipments of CSPO/CSPK every month (real time)
- CSPO Control, CSPK (Certified Products) Not RSPO IT Platform / Palm Trace compliant
- RSPO IT Platform/Palm Trace → Head engineer/appointed officer coordinates with PT. Kharisma Pemasaran Bersama Nusantara (KPBN) through the planning & Sustainability, marketing and then PT. Kharisma Pemasaran Bersama Nusantara (KPBN) will remove it in case of cancellation of shipments because the volume of CSPO/CSPK/CSPKO/CSPKE is sold under conventional schemes or in case of underproduction due to non-balance within 3 (three) months or loss or damage
- Announcement → Done a maximum of 3 months from delivery
- Traceability
- Market Communication and Claims
- Occupational Health and Safety

3.8.6

The Procedure to conduct annual internal audit including supply chain refers to Procedure No. 21 dated 2 January 2018. In the SOP mentioned that internal audit is done annually. Internal audit of SCCS describe the requirements in the RSPO SCCS and the RSPO market communications and claims documents and effectively implements and maintains the standard requirements. Unit of certification has conducted internal audit for RSPO standard, including supply chain conducted by Strategic Planning and Sustainability Division from Head Office Medan. Internal audit held on 29 August – 02 September 2022. Based on result of internal audit, known that there is no non-conformity related supply chain indicator.

3.8.7

Product	Estimate Production period of May 29, 2022 – Dec 28, 2022	Actual Production (MT) of previous audit (May 2022 to September 2022)
FFB	176,000	88,615.28
CSPO	42,240	18,001.38
CSPK	7,040	3,509.75

Based on the table above, it is known that there has been no overproduction between the license quota and the actual production. Related for handling non-conforming oil palm products, has been set in Basic Guidelines and Work Instructions for Handling Certified Palm Oil Products Document Number: 04.03/P/003 dated 2018 Revision Number: 01 Revision Date: 01 November 2021

3.8.8

Based on document verification obtained information in the license period it was known if the certified product sold under RSPO as described in the table below:

	Despatch period (MT) (May 2022 to September 2022)
CSPO sold under RSPO Scheme	4,000.00
CSPO sold under other scheme	-
CSPO sold as conventional	13,148.78
CSPK sold under RSPO Scheme	1,221.90
CSPK sold under other scheme	-
CSPK sold as conventional	964.21

Product	Actual Production (MT) of previous audit (May 2022 to September 2022)
FFB	88,615.28
CSPO	18,001.38
CSPK	3,509.75

Based on the data, there is no over sales of certified products or any non-certified products that are claimed to be certified products. Examples of sales documents shown include :

Seller Member Name : Dolok Ilir POM PTPN IV Member ID : RSPO_PO1000002539	Product Details Product Name : CSPO Supply Chain Model : Mass Balance Volume : 500 MT
Buyer Member Name : PT Musim Mas – Belawan Member ID : RSPO_PO1000000076	Transport Shipping/BL Date : 29/05/2022
Transaction Seller Contract Number : 0056/HOLDING/CPO-L/N-IV/III/2022 Seller reference Number : 149/HOLDING/CPO-MB/DOI/VI/2022 Buyer Reference Number : Actual DO Date 11 April 2022	Traceability Transaction ID : TR-0ab9fidc-3acc Creation date : 27/06/2022 Confirmation date : 01/07/2022

3.8.9

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

- Cooperation Agreement Letter of PT Perkebunan Nusantara IV with CV Pelita Jaya concerning Transportation of CPO Production in 2022 Number: 04.05/S.Perj/Pem/03/III/2022 dated 01 March 2022 valid until 31 December 2022.
- Cooperation Agreement Letter of PT Perkebunan Nusantara IV with CV Karya Mandiri regarding Transportation of Palm Kernel Number: 04.05-Peng/S.Perj/03/II/2022.

In the Work Agreement Article 5 letter P, it is stated that the Second Party runs an internal system in the Transportation of CPO Production and complies with all RSPO requirements related to the supply chain and is willing to be audited at any time by the appointed certification body. Based on the results of interviews with CV Pelita Jaya, it is known that the transporter representatives have received socialization about the RSPO and know the clause that they are willing to be audited at any time.

3.8.10

Dolak Ilir POM uses third party services to transport CPO and PK namely CV Pelita Jaya and CV Karya Mandiri. The company has shown the details of the contact number, PIC, contract number and address of the transporter.

3.8.11

Dolak Ilir POM informs CB of the names of contractors used for RSPO certified palm products along with their contact details. Meanwhile CV Pelita Jaya and CV Karya Mandiri is the new contractor to handle certified product (CPO and PK). Notification to CB about the new contractor is delivered before the opening meeting is held through the submission of the latest contractor list

3.8.12

Dolak Ilir POM has record of all Certified FFB, CSPO and CSPK as presented in the table below :

- **FFB**
May 2022 to September 2022: 88,615.28 MT (certified) and 19,818.66 MT (Non certified)

- **CSPO**

Period	CPO production (MT)		Total	Cert CPO Dispatch (MT)			Total	Stok CPO	
	Cert	Non Cert		RSPO	Other scheme	Non Cert		Certified	Non Certified
May 22 – September 22	18,001.38	3,092.80	21,094.19	4,000.00		16,241.59			

- **CSPK**

Period	CSPK production (MT)		Total	Cert PK Dispatch (MT)			Total	Stok PK	
	Cert	Non Cert		RSPO	Other scheme	Non Cert		Certified	Non Certified
May 22 – September 22	3,509.75	875.09	4,384.84	1,221.90		1,839.31			

Based on the mass balance calculation, it is known that:

- CSPO production is 18,001.38 MT and sold as RSPO certified amount 4,000 MT and conventional amount 13,148.78 so that CSPO stock is 852.60 Mt
- CSPK production is 3,509.75 MT and sold as RSPO product amounting to 1,221.90 MT and as conventional with amount 964.21 so that CSPK stock is 1,323.63 MT

As stated in SOP for Handling Certified Palm Oil Products Document No: 04.03/UNIT/SUS/P/001 August 2018 revision 3 dated 01 November 2021 states the validity period of all documents is five years

3.8.13 & 3.8.14

Dolak Ilir POM has determined the extraction rate for CPO and PK to be produced. Based on actual production of CPO and PK for 12-month certificate period, the average extraction rate for CPO is 20.24 % and PK is 4.02%. The Extraction rate for production projections will be update annually based on the actual production of CPO and PK.

3.8.15

Dolak Ilir POM apply Mass Balance Module

3.8.16

Dolak Ilir POM during the current license period (May 2022 – December 2022) performs the following transactions:

- CSPO production is 18,001.38 MT and sold as RSPO certified amount 4,000 MT and conventional amount 13,148.78 so that CSPO stock is 852.60 Mt
- CSPK production is 3,509.75 MT and sold as RSPO product amounting to 1,221.90 MT and as conventional with amount 964.21 so that CSPK stock is 1,323.63 MT

For products sold as conventional, remove stock or credit allocation has been carried out with the following evidence:

Stock Transactions

Stock Transaction ID	Date	Product	Supply Chain Model	Transaction Type	Volume
ST-TR-19e557e6-5e75	06-10-2022	CSPO	Mass Balance	Credit Allocation	20.706
ST-TR-2d9c529c-8fee	23-08-2022	CSPO	Mass Balance	Credit Allocation	5.000
ST-TR-d66214c4-a4e9	06-10-2022	CSPK	Mass Balance	Remove From Certified Stock	1.903,64

**Volume in MT*

From shipping announcement verification, known that shipping announcement carried out not more than 3 months after dispatch. For example Transaction ID : TR-0ab9fidc-3acc for CSPO with volume 500MT and the shipping date is 29 May 2022 while confirmation date on 01 July 2022

3.8.17

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

Status: Comply

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

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

4.1.1
Policies are in place to respect human rights. Based on the results of document review and interviews with management regarding human rights policies, it is known that there has been no change since the previous assessment, which is stated in the PT PN IV Dolok Ilir Business Unit Corporate Commitment document on Human Rights, set on March 14, 2018, which explains the following: as follows:

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

Based on the results of interviews with workers at the Mill, Estate, Worker union, Contractors, and the community around the company it is known that the company respects human rights throughout the company's operations.

4.1.2
The unit of certification does not carry out acts of violence or intimidation in any form in its operations. This can be seen, among others, based on the results of interviews with representatives of workers at Mill and Estate as well as the Manpower Office which stated that there were no acts of violence or intimidation in any form by the company.

Status: Comply

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

4.2.1
The company shows the joint regulation of the board of commissioners and directors of PTPN IV No DK-60/PER/XI/2013 and No 04.03/PER/13/XI/2013 regarding the whistleblowing system which explains the mechanism for submitting and

handling reports, for example as follows:

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

In addition, there is also an SOP for internal communication and handling of employee complaints with No SPO 19 revision 2 with an effective date of January 2, 2015. If the problem cannot be resolved at the unit level, it will be continued at the board of directors' level and subsequently in accordance with the agreement of the parties, including the legal or other settlements.

4.2.2

The company has SPO Communication and Consultation with the community Number 03 Dated January 2, 2017, Revision No. 4 In point 5.1 it is explained that Communication and consultation with people who cannot read and write is carried out by the PIC by conveying and introducing the problem to be resolved which can be in the form of pictures, stories, videos, dialogues and case examples.

Based on interviews with representatives of the Serbelawan and Bandar Selamat Village community, it was conveyed that they already knew the communication mechanism and that complaints could be submitted orally or in writing.

4.2.3

Based on interviews with management representatives, it was conveyed that if there are complaints, the company will inform the parties about the progress of handling complaints, including the agreed time frame, and the results are available and communicated to relevant stakeholders. From the recapitulation of Incoming & Outgoing Letters for Units such as Laras Estate, it is known that during the 2022 period (until the audit is carried out) there are no incoming letters in the form of complaints from stakeholders, but what is documented is related to invitations and requests from stakeholders.

4.2.4

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

In addition, several things to verify from complaints that enter the RSPO portal include the following:

- <https://askrspo.force.com/Complaint/s/case/5000o00002PZMO7AAP/detail>,
Regarding the complaint, it was found that there was no trade union, namely the Federasi Serikat Pekerja Metal Indonesia (FSPMI) in Dolok Ilir and Laras. In addition, the status of workers is permanent workers and Fixed Period Working Agreement so that daily workers are not found in the unit. As for the payment of wages, holiday allowances and bonuses, they have been paid according to the provisions
- <https://askrspo.force.com/Complaint/s/case/5000o00002PYscZAAT/detail>
Regarding the complaint, Fixed Period Working Agreement workers are still found to be doing their main job and this has also become a non-conformity in indicator 6.2.7. Furthermore, for worker contracts, wages and overtime, the company has provided a copy of the contract to workers and has paid wages and overtime according to the provisions.

Status: Comply	
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4.3

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

4.3.1

The certification unit already has Basic Guidelines and Work Instructions for the Distribution of Funds for the Partnership Program, Community Development and Corporate Social Responsibility Document Number: 04.PKBL/04.PKBL/SUB/P/002 June 2013 revision 1 dated 1 August 2018. These guidelines, among others, explain about Partnerships, CSR, and the Community Development Work Program

It has been shown that the CSR/Environmental Development work programs for 2022 are as follows:

- Free takjil distribution
- Cheap oil distribution
- MTQN implementation assistance
- Help for flood victims
- Good Friday distribution
- Rice distribution

Based on the compiled program, it is known that the activities are in the form of social assistance, while from the results of public consultations with representatives of Bandar Selamat, Dolok Tenera Village, and Serbelawan Village, information was obtained that apart from social assistance, empowerment programs are also needed, such as support for SMEs or BUMDES. The Village Party also feels that so far they have never been involved/asked for opinions related to the preparation of community development programs. In reality social responsibility was still given, for example through responding to proposals from the village or other stakeholders.

Thus, the company has the opportunity to:

1. Involve relevant stakeholders in the preparation of community development programs (CSR/PKBL/Partnerships).
2. Develop community development programs in accordance with existing guidelines. In addition to social assistance, you can also consider partnership and community empowerment programs. **OFI**

The realization of CSR includes the distribution of free takjil during the month of Ramadan at the mosques around the company, the distribution of cheap cooking oil, and the distribution of groceries

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

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

• **Location Permit**

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

• **Plantation Business Permit (IUP)**

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

• **Land Title (HGU)**

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

Head No. 48-HGU-BPN RI-2008 dated 7 August 2008. The HGU was located on Village of Nagori Gunung Malela, Sub District of Gunung Malela, District of Simalungun. HGU of Laras Estate is valid up to 21 September 2033.

4.4.2

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

4.4.3

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

4.4.4

The operational areas of PTPN IV Dolok Ilir were comes from concession rights that previously owned by Handless Vereeniging Amsterdam (HVA) which taken over and nationalized by the Indonesian Government in 1959. This matter is mentioned in Government Regulation No. 19 in 1959

4.4.5 & 4.4.6

There is no land acquisition process due the operational areas of PTPN IV Dolok Ilir were comes from concession rights that previously owned by Handless Vereeniging Amsterdam (HVA) which taken over and nationalized by the Indonesian Government in 1959. This matter is mentioned in Government Regulation No. 19 in 1959

Status: Comply

4.5

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

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

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

Based on legal document verification village representative of Dolok Tenera, Dolok Ilir Satu, and Serbelawan known that no new planting and area expansion by unit management. Furthermore, there is no customary right within estate operational areas.

Status: Comply

4.6

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

4.6.1; 4.6.2; 4.6.3; 4.6.4

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

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

<p>government institutions and community representatives through FPIC approach, as verified in Indicator 4.4.5.</p> <p>Based on legal document verification, interview with Village representative of Dolok Tenera, Dolok Ilir Satu, and Serbelawan known that no new planting and area expansion by unit management. Based on the results of the interview, it was also stated that the company's operational area is a Dutch plantation area that has been nationalized and there is no customary right within estate operational areas.</p>	
<p>Status: Comply</p>	
<p>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.</p>	
<p>4.7.1; 4.7.2; 4.7.3 Procedure of land compensation, identification of land owners and land conflict management is presented in document No. 04 (Rev. 02) dated 02 January 2015, which explaining that the settlement of land disputes is carried out through negotiation process involving deliberation of regional leaders, respective government agencies. Value of compensation should be agreed by both parties and recorded on the agreement. Calculations carried out with reasonable prices in accordance with the taxable value and state of the areas. Procedure do not distinguish the compensation calculation based on gender, local community or ethnic groups.</p> <p>The history of Laras Estate and Dolok Ilir Estate areas comes from concession rights owned by Handless Vereeniging Amsterdam (HVA) which managed Agave (or pineapple fibers) that was taken over and nationalized by the Indonesian Government in 1959. This matter is mentioned in Government Regulation No. 19 in 1959. So that compensation payment process is not applicable. Related to land disputes/occupation with several smallholder groups, it has involving government institutions and community representatives through FPIC approach, as verified in Indicator 4.4.5.</p>	
<p>Status: Comply</p>	
<p>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.</p>	
<p>4.8.1; 4.8.2; 4.8.3; 4.8.4 When ASA-1.2 was implemented, there were no issues of land disputes in the company's operational areas. The same thing was obtained from the results of public consultations with representatives of Dolok Tenera Village, Dolok Ilir Satu Village, and Serbelawan Village. Confirmation with BPN could not be done because the communication team of the auditors had not received a response when they were going to carry out the public consultation.</p>	
<p>Status: Comply</p>	
<p>PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION</p>	
<p>5.1 The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>	
<p>5.1.1 Based on interviews with management representatives and document review, it is known that PT Perkebunan Nusantara IV does not have a plasma plantation scheme. In addition to obtaining FFB from the nucleus estate, the company also receives FFB from other PTPN IV units and also receives FFB from a third party, namely the FFB Contractor CV Rianalim.</p> <p>In the case of FFB pricing for FFB contractors, it is the price set by the company. in determining the price of FFB, the company considers the market price, CPO price, transportation costs, and processing prices.</p> <p>Based on the results of the interview with CV Riana Lim, it is known that the FFB price is the price set by the company by considering the market price and CPO price. Information regarding the FFB price will be conveyed by the company via WhatsApp message.</p>	
<p>5.1.2 Based on interviews with management representatives and document review, it is known that PT Perkebunan Nusantara</p>	

IV does not have a plasma plantation scheme. In addition to obtaining FFB from the nucleus estate, the company also receives FFB from other PTPN IV units and also receives FFB from a third party, namely the FFB Contractor CV Riana Lim.

In the case of FFB pricing for FFB contractors, it is the price set by the company. In determining the price of FFB, the company considers the market price, CPO price, transportation costs, and processing prices. If there is a change in the FFB price, the company will inform the price change to the FFB contractor via telephone and WhatsApp message.

Based on the results of the interview with CV Riana Lim, it is known that the FFB price is the price set by the company by considering the market price and CPO price. Information regarding the FFB price will be conveyed by the company via WhatsApp message and telephone.

5.1.3

Based on interviews with management representatives and document review, it is known that PT Perkebunan Nusantara IV does not have a plasma plantation scheme. In addition to obtaining FFB from the nucleus estate, the company also receives FFB from other PTPN IV units and also receives FFB from a third party, namely the FFB Contractor CV Riana Lim.

In the case of FFB pricing for FFB contractors, it is the price set by the company. In determining the price of FFB, the company considers the market price, CPO price, transportation costs, and processing prices. If there is a change in the FFB price, the company will inform the price change to the FFB contractor via telephone and WhatsApp message. For the determination of the premium value, until now there has been no determination of the premium value by the company.

5.1.4

Based on interviews with management representatives and document review, it is known that PT Perkebunan Nusantara IV does not have a plasma plantation scheme. In addition to obtaining FFB from the nucleus estate, the company also receives FFB from other PTPN IV units and also receives FFB from a third party, namely the FFB Contractor CV Riana Lim.

5.1.5

The company can show a cooperation agreement with CV Riana Lim, namely the Agreement with POM Number DOI/CV.RIA/SP-TBS/03/VIII/2022 between PT Perkebunan Nusantara IV – PKS Dolok Ilir and CV Riana Lim on August 1, 2022 with a validity period of 3 months. The agreement has been agreed by each party and the FFB price is determined by the Company.

Based on the results of document verification, it is known that the cooperation agreement is carried out transparently, has a period of time, and has been agreed upon by both parties.

Based on the results of the interview with CV Riana Lim, it is known that the cooperation agreement has been agreed upon by each party and is still valid. In addition, there are no complaints from CV Riana Lim related to the cooperation agreement and the implementation of the cooperation so far.

5.1.6

The company can show proof of FFB payment to the FFB Supplier, namely CV Riana Lim for the period 12-18 September 2022. The results of document verification are known that the payment has been in accordance with the amount of FFB sent and the payment is made via Bank Mandiri transfer on 22 September 2022. On the payment shown also attached details of the amount of FFB shipped and the total price paid by the company.

Based on the results of interviews with CV Riana Lim, it is known that the FFB payments made by the company are carried out on time in accordance with the cooperation agreement. The payment has also been in accordance with the amount of FFB sent and so far, there have been no complaints related to FFB payments made by the company.

5.1.7

The company has tested the weighbridge conducted by the Office of Cooperatives, Small and Medium Enterprises and

Trade Pematang Siantar City Government UPTD Legal Metrology Pematang Siantar in accordance with the Testing Result Certificate Number 510.3/0933/ML.PS/IV/2022 on April 18, 2022 for Electronic weigh bridge with GSC brand, Type GST 9600, Serial Number 967456 with a capacity of 40,000 Kg/10 Kg with the results Legalized based on the Law of the Republic of Indonesia Number 2 of 1981 concerning Legal Metrology and the validity period is until April 2023.

5.1.8

Based on interviews with management representatives and document review, it is known that PT Perkebunan Nusantara IV does not have a plasma plantation scheme. In addition to obtaining FFB from the nucleus estate, the company also receives FFB from other PTPN IV units and also receives FFB from a third party, namely CV Riana Lim.

5.1.9

Based on interviews with management representatives and document review, it is known that PT Perkebunan Nusantara IV does not have a plasma plantation scheme. In addition to obtaining FFB from the nucleus estate, the company also receives FFB from other PTPN IV units and also receives FFB from a third party, namely CV Riana Lim.

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

Based on interviews with management representatives and document review, it is known that PT. Perkebunan Nusantara IV does not have a plasma plantation scheme. In addition to obtaining FFB from the nucleus estate, the company also receives FFB from other PTPN IV units and also receives FFB from a third party, namely CV Riana Lim.

5.2.2

The company has consulted with the above stakeholders to assess their need for support to improve their livelihoods with CSR/PKBL programs. The Company has participated in the development of communities around the plantations through education, health, infrastructure, productive businesses, sports, arts, culture and religious activities. The company has several records regarding the contribution of regional development, based on the results of the consultation.

5.2.3

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

5.2.4

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

5.2.5

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

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1

Any form of discrimination is prohibited.

6.1.1 – 6.1.2

The company demonstrated the PTPN IV plantation management system policy which was issued on January 25, 2022, by the Director, which among other things explained in point 13 which is to provide equal opportunities for everyone to get a job and position regardless of ethnicity, religion, race and gender.

The company also periodically disseminates the company's management system policies, for example, as shown in the

documentation of the company's management system policy socialization, which was conducted on February 14, 2022, which was attended by 11 participants.

Based on the results of field observations, it is known that the company has implemented policies related to non-discrimination and equality of opportunity, for example there are female workers who occupy strategic positions, namely as estate managers.

Based on interviews with trade unions and the gender committee, it was stated that there was no discrimination and that all workers had equal opportunities, for example in terms of promotion and that there were also no migrant workers.

6.1.3

The company shows records of the implementation of employment procedures, for example in the assessment of employees for the 2022 Laras Estate period listed in letter No. LAR/GMD-III/R/02/I/2022 with the following assessment:

- Employees with the initials ASB, harvester position, were promoted from IA/9 to IB/0 with 5 points for attendance, 5 points for job knowledge, 5 points for productivity, 4 points for teamwork and 5 points for honesty.
- An employee with the initial N, the position of Plant Foreman I, was promoted from group IIC/1 to IID/0 with an attendance rating of 5 points, job knowledge 5 points, productivity 5 points, teamwork 5 points and honesty 5 points.

On a rating scale from 1 point is very bad to 5 points is very good.

Based on this, the company has carried out promotions on the basis of skills, abilities and quality of workers.

6.1.4

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

6.1.5

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

- The Management Structure of the Laras Estate Gender Committee in 2022 which was ratified on 12 January 2022 consisting of the Trustees, Chairpersons, Deputy Chairs I, Deputy Chairs II, secretaries, Education, Socio-Cultural and Economic Sectors and members.
- The structure of the Dolok Ilir Gender Committee in 2022 which was ratified on January 7, 2022, consisting of the Trustees, Chairpersons, Deputy Chairs I, Deputy Chairs II, secretaries, Education Sector, Socio-Cultural Sector and Economic Sector and members.

Referring to OFI's previous assessment, based on the results of interviews with representatives of the Gender Committee, it is known that there were no incidents of sexual harassment or domestic violence. The gender committee also conducts socialization to workers on a regular basis, for example during morning briefings. The results of interviews with workers' representatives, it can be concluded that workers already know the mechanism for complaints or complaints related to domestic violence or harassment.

The gender committee also has a work program, for example:

- Improved cleanliness in the housing environment
- Increase employee faith and piety
- Socialization of the gender committee and grievance mechanism
- Socialization related to human rights
- Monitoring the number of pregnant women, giving birth and breastfeeding

The company also shows the realization of the program, for example, it is stated in the documents of female employees who are pregnant, giving birth and breastfeeding for the period of 2022. Based on this document, it was found that until August 2022 the gender committee has monitored 23 female workers with the result that there are no female workers who pregnancy, childbirth and breastfeeding.

6.1.6

The company shows proof of payment for workers with the same coverage, for example employees with NIK 4023593 (harvesting Division 5 Dolok Ilir Estate class IA/01) and employees NIK 4023567 (harvesting Division 3 Dolok Ilir Estate group IA/01), both of which are Employees in the harvest division who get the same wage value are:

- Basic salary of IDR 2,018,105
- Special allowance of IDR 328,527
- Rice supply for workers is IDR 176,000
- Electricity allowance of IDR 126,132

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 has a collective work agreement for the period 2022 – 2023 which has been ratified through the Decree of the Head of the Manpower and Transmigration Office of North Sumatra Province No. 568/20-6/DTK/II/2022 concerning the registration of a collective labor agreement dated January 19, 2022. The cooperation agreement describes employment relations, leave and absence from work, wages, employee welfare & social security, transfers, sanctions, termination of employment, complaints and others.

The company also shows a list of the number of workers for September 2022, namely Dolok Ilir POM with 123 workers, Dolok Ilir Estate with 368 workers and Laras Estate with 333 workers.

In addition, the company also shows a fixed period working agreement, for example agreement No. DOI/S.Perj/155/VIII/2022 dated August 1, 2022, for harvest work. The agreement has explained several terms of work, rights and obligations of workers and others. For example, workers' responsibilities, wages, leave, social security and others. The agreement has been signed by both parties.

Based on document verification, field observations and interviews with workers (harvest workers, fertilizing workers, factory workers, etc.), it is known that there is no indication of forced labor and that employees have received wages above the minimum wage.

6.2.2

Based on field visits during harvesting activities, it was found that 1 person in Division VII of Dolok Ilir Estate and 1 person in Division III of Laras estate was helping to pick loose fruit and FFB. The two people are not employees of the company and one of the work assistant personnel is not yet 18 years old.

The company shows a circular with No DOI/SE/06/III/2022 on March 23, 2022, regarding the prohibition on replacing work and bringing family, in point 4 explains that it is prohibited for all employees to replace/transfer/bring family to do work that is their responsibility. answer to others for any reason.

Based on references to Indonesian regulations, for example:

- Law of the Republic of Indonesia No. 13 of 2003 concerning Manpower in Article 50 states that the employment relationship occurs due to the existence of a work agreement between the entrepreneur and the worker/labourer.
- Indonesian Government Regulation No. 35 of 2021 concerning fixed period working agreement, outsourcing, working time and rest time, and termination of employment, states that:
 - Article 2 paragraph 1 states that the employment relationship occurs because of a work agreement between the entrepreneur and the worker/labourer.
 - Article 2 paragraph 4 states that the work agreement is made for a certain time or for an indefinite time.

Furthermore, the company also made improvements by showing the minutes of the socialization of the ban on family cups and a letter of reprimand to the harvester with the initials P. However, it is not certain, the error occurred only with the worker. In addition, a plan has not been shown to ensure that the same thing does not happen again in the future.

Based on the foregoing, the company has not been able to show sufficient evidence that the provisions regarding the prohibition on changing jobs and bringing families to help with work have been implemented consistently. **(NCR No 2022.05 with Major Category / Recurring)**

6.2.3

The company shows a collective work agreement for the period 2022 – 2023 which stipulates the details of wages (article 33), work requirements (article 12), regular working hours (article 20), deductions (article 41), overtime (article 21), sick leave (art. 29), right to vacation (articles 25-26), maternity rest (article 27), reasons for dismissal (article 70), notification period before work termination (article 74), etc.

There is evidence of legal compliance, for example overtime wages paid by the company to employees of Dolok Ilir POM, the company uses a processing premium system with calculation details, namely: (FFB processed - basis) x Premium Rate x (OER + KER) x (Loss Value Oil + Kernel) x Oil Quality Value x Kernel Quality Value, so that the basic premium is obtained. Furthermore, the basic premium will be multiplied by points from the employee's position. For example, on September 5, 2022, for employees with initial R with the position of processing member (1.5 points) with the calculation of the basic premium for the morning shift is IDR 116,157 so that the premium paid on that date is IDR 174,236. If it is simulated with the calculation of government regulations No. 35 of 2021, the amount of overtime pay that must be paid by the company is IDR 84,260 with details of overtime hours of 5 hours and an hour's overtime pay for group IC/5 is IDR 15,320. So that the determination of the company's premium to replace overtime pay has exceeded the overtime wage that should have been paid.

In addition, the company also shows a pension determination document, for example the one shown for Dolok Ilir POM in the decision of the board of directors No 04.07/Kpts/1499 – PKS-DOI/VII/2022 concerning dismissal with normal retirement rights for PTPN IV employees on behalf of the initials BS which stipulates honourable dismissal of employees on July 1, 2022 because they have reached the retirement age limit and provide old-age benefits in accordance with the provisions.

6.2.4

Based on the results of document review, interviews with workers, interviews with worker representatives (labor unions and gender committees) and field observations, it is known that the company provides decent housing, sanitation facilities, water supplies, medical needs, education, and public facilities, which in a nutshell described as follows:

- House building (residential): Staff house and employee house
- Educational Facilities: Kindergarten, Elementary School, and Junior High School
- Clean water facilities: water and bathroom
- Health facilities: Laras Hospital
- Facilities for worship: mosque and church
- Sports facilities: volleyball court, soccer field, badminton hall, table tennis court, mini golf course, tennis court
- Public facilities: baby/childcare

6.2.5

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

6.2.6

A decent living wage is given to all workers in accordance with applicable regulations, namely based on the Decree of the Governor of North Sumatra Province No. 188.44/746/KPTS/2021 dated November 19, 2021, which stipulates the North Sumatra provincial minimum wage in 2022 at IDR 2,522,609.94 / month. The company has implemented it with a wage component consisting of basic wages, special allowances, and rice supplies.

The company shows the Decree of the Board of Directors No. 04.07/Kpts/15/III/2022 on March 31, 2022, concerning Basic Salary and Special Benefits for Gol employees. IA – IVD 2022 which is effective from January 1, 2022, such as:

- In Group IA/0, basic salary is IDR 2,018,088, special allowance is IDR 328,522 and rice supply is IDR 176,000 so that a total of IDR 2,522,610 is obtained.
- In Group IB/0, basic salary is IDR 2,018,221, special allowance is IDR 328,674 and rice supply is IDR 176,000 so that a total of IDR 2,522,895 is obtained.

Based on the data above, the determination of wages is in accordance with the Decree of the Governor of North Sumatra Province.

Regarding the Living Wage, the company has assessed the wages paid in accordance with the minimum wage and has also assessed the in-kind benefits provided, which include school facilities, extra food and work clothes, with the following details:

Goal : IA/0

- Prevailing Wages
 - Salary : IDR 2,522,610
 - Other allowances : IDR 1,614,471
- In-Kind Benefit
 - School Facilities : IDR 317,827
 - Extrafooding : IDR 129.450
 - Work clothes : IDR 75,650
- Total : IDR 4.458.199,-

6.2.7

Based on the list of employees of the Dolok Ilir Estate for the period of September 2022, it is known that there are 176 harvest workers with permanent employee status and 53 others with fixed period working agreement status. The company shows the statement area of Dolok Ilir Estate with a mature area of 5,924 Ha. If it is simulated for the need for harvest labor with the provisions of a 6-day harvest plot and a permanent work target of 3 hectares, then the number of harvesters needed is 329 people, so that from the September 2022 period of harvesting workers as many as 229 people (permanent worker and fixed period working agreement) there is still a difference in the number harvest labor of 100 people.

Based on interviews with harvest workers, for example, 2 harvest workers (with the initials RK and N) in Division VI and 1 harvest worker (with initials RWN) in Division VII Dolok Ilir Estate, it was stated that the workers are employees with fixed period working agreement status with the longest tenure starting from 2019. The company also shows the results of employee assessments for the period July 1, 2021, to November 19, 2021 with a recommendation that the fixed period working agreement be extended.

Based on the reference rules in Indonesia, for example:

- Indonesian Government Regulation No. 35 of 2021 concerning fixed period working agreement, outsourcing, working time and rest time, and termination of employment in article 4 paragraph 2 states that fixed period working agreement cannot be held for permanent work.
- Decree of the Central Executive Board of GAPKI No. SK/002/PPG/III/2013 concerning the flow of work implementation processes in the oil palm plantation business sector states that harvesting and processing FFB into CPO is the main job.

Based on the above, the company has not been able to show sufficient evidence that all the main work has been carried out by permanent workers. **(NCR No 2022.06 with Minor Category)**

	Status:	
6.2.2		NCR No. 2022.05 with Major Category (Recurring)
6.2.7		NCR No. 2022.06 with Minor Category

6.3
The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.

6.3.1 – 6.3.3

The company demonstrated the PTPN IV plantation management system policy which was issued on January 25, 2022, by the Director, which among other things explained in point 18, namely encouraging and facilitating employees to form labor unions.

The company already has a labor union, for example, as shown in the letter of approval of the labor union management from the Manpower Office of Simalungun Regency No. 560/108/23.4/2020 regarding the management structure of the Dolok Ilir SPBUN for the period 2019-2024 which was issued on March 16, 2020, with details of the management, namely:

- Chair and Deputy Chair I – III
- Secretary and Deputy Secretary I – IV
- Treasurer and Deputy treasurer I – III
- Workers' welfare and protection department
- Education and training section
- Organization section
- Business development department
- Women's empowerment section
- Inter-institutional and public relations department

The company also demonstrated the realization of the union program, for example the socialization of the company's core values on June 30, 2022, which was attended by 20 participants. Based on the results of interviews with workers and representatives of trade unions, it is known that there are companies that have facilitated the formation of labor unions and have not interfered with the formation or activities of registered organizations/labor unions, or other representatives who are freely chosen for all workers, including migrant workers and contract workers.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1, 6.4.2 and 6.4.4

The company shows the PTPN IV plantation management system policy which was issued on January 25, 2022, by the Director, which among other things explains point 9, which is a commitment not to use child labor in accordance with laws and regulations as well as workers resulting from human trafficking. Based on the verification of the list of workers for the period September 2022, it was not found that there were workers under 18 years of age. In addition, the management system policy is periodically disseminated to employees and stakeholders, for example the socialization conducted on February 10, 2022, at Dolok Ilir Estate with 10 participants.

Based on the results of interviews with contractors, it was conveyed that there was a clause in the cooperation agreement that stated the prohibition on using child labor. The company also shows a contract with a third party, for example a cooperation contract with a CPO transporter with No. 04.05/S.Perj/Pem/03/III/2022 which states in article 11 point 3 that the contractor is obliged to comply with all provisions of laws and regulations. applicable laws, including not employing minors.

6.4.3

Based on the document review, it is known that there are students who practice field work, for example as indicated by the approval letter of apprentice students No DOI/X/88A/VIII/2022 dated August 29, 2022, who practice from September 5, 2022 – October 15, 2022. Based on interviews with management representatives, it was stated that students who did field work practices more often carried out administrative data collection activities. In addition, students are first informed about areas/activities that have the potential to be high risk and in the field review, students are accompanied by staff or company employees.

Status: Comply

6.5

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

6.5.1 – 6.5.2

The company shows the PTPN IV plantation management system policy issued on January 25, 2022, by the Director

which explains, among other things, point 11, namely preventing sexual harassment and various forms of violence against female workers and protecting the reproductive rights of female workers. In addition, the management system policy is periodically disseminated to employees and stakeholders, for example the socialization, which was carried out on February 10, 2022, at Dolok Ilir Estate with 10 participants and also communicated during the morning assembly. Based on interviews with representatives of the gender committee, it was stated that so far there have been no incidents of sexual harassment and violence.

6.5.3

The company also shows documents for female employees who are pregnant, giving birth and breastfeeding for the period of 2022. Based on these documents, it was found that until August 2022, the company has monitored 23 female workers with the result that there are no female workers who are pregnant, giving birth and breastfeeding.

Based on the results of interviews with representatives of the gender committee from estate and mill, it is known that the majority of female workers who work have entered old age, so that no one is pregnant or has just given birth. However, the representative of the gender committee explained that if there were new employees who gave birth or were about to give birth, they would be given permission for 45 days pre-delivery and 45 days post-delivery, giving permission to breastfeed according to the baby's needs by being allowed to leave the job known to the foreman and direct supervisor.

6.5.4

The company shows the joint regulation of the board of commissioners and directors of PTPN IV No DK-60/PER/XI/2013 and No 04.03/PER/13/XI/2013 regarding the whistleblowing system which explains the mechanism for submitting and handling reports, for example as follows:

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

The company has also socialized the whistleblowing system to all employees, for example what was done at Dolok Ilir Estate on 10 February 2022 which was attended by 10 participants.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1

Based on the results of the review of employee list documents, interviews with labor unions and gender committees, interviews with management and the results of field visits at the estate and mill, it was found that there were no migrant/foreign workers.

6.6.2

The company shows proof of registration of the Dolok Ilir Estate fixed period working agreement with No 52/PKWT/2022 on September 5, 2022, which reports 53 workers with fixed period working agreement status who are employed as harvesters.

The company also shows a fixed period working agreement, for example agreement No. DOI/S.Perj/155/VIII/2022 dated August 1, 2022, for harvest work. The agreement has been signed by both parties and explains, among others, the following:

- Describe the type and location of work

- Working time 1 week 6 days
- Wages given
- Participated in the Social Insurance Administration Body program

The proof of implementation of the work agreement is found on the workers' salary slips, for example fixed period working agreement workers on behalf of the initials RWH whose basic wage is IDR 2,614,165 or has exceeded the provincial minimum wage and Social Insurance Administration Body registration as evidenced by the details of benefits and deductions for Social Health Insurance Administration Body.

Status: Comply

6.7

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

6.7.1

The certification unit shows the document ratifying the OHS committee organizational structure through the Decree of the Head of the Manpower and Transmigration Office of North Sumatra Province for Dolok Ilir Estate, Laras Estate and Dolok Ilir Mill, for example Laras Estate with No. 566/144-7/DTK/SU/WIL.III/2022 dated March 14, 2022. The document explains that FDP Saragih is the secretary of OHS committee. The certification unit in this case shows the following documents:

- a. Decree of the Minister of Manpower of the Republic of Indonesia with No. No 5 /10174/S.02.04/IX/2021 dated September 10, 2021, regarding the Appointment of OHS Expert on behalf of FDP Saragih and valid for 3 years from the date of stipulation.
- b. OHS Expert Authority Card on behalf of Agustian with No. Reg. 43041/PK3/AJ/12/2021/P1 which is valid until September 10, 2024.

Based on verification auditor with the news on (<https://www.elaeis.co/berita/baca/pks-ptpn-iv-dolok-ilir-ludes-terbakar>) there was a fire in Dolok Ilir POM on January 6, 2022. The company can show Minutes No.PKSDOI/BA/01/II/2022 regarding the post-fire investigation report of Dolok Ilir POM on January 7 2022 which was carried out by the management representative. The fire case was discussed and evaluated at OHS Meeting on January 7, 2022 which was attended by 11 participants. The fire has also been reported to the Integrated Service Unit of Labor Inspection of North Sumatra Province on April 13, 2022 through the OHS Report for the first quarter of 2022.

In addition, based on interview result with Manpower Agency of Simalungun District, revealed that the management unit has submitted the manpower report and OHS report every 3 months. The guiding committee for occupational health and safety report covers the entire occupational health and safety activity within company's operation activity.

6.7.2

Accident and emergency response procedures are described in:

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

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

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

The company already has personnel who have received first aid training in the workplace from the Indonesian Ministry of Manpower, for example Muhammad Joni No. 17-7/P3K/DTK/2018 valid until August 25, 2024

In addition, the company also appointed a foreman in the field to be responsible for carrying the first aid kit in Estate and Mill.

6.7.3

The company can show the minutes of the handover of PPE where PPE is given one times per year. Based on the results of interviews with workers at Dolok Ilir Estate, Laras Estate and Dolok Ilir Mill, it is known that workers have been equipped with PPE which is provided free of charge.

Based on field observation in rinse area, it is known that company has provided sanitation facilities that can be used by workers to clean themselves, change clothes and store work tools.

6.7.4

The company has a policy to include employees in the Collective Labor Agreement Document for the period 2022 to 2023, especially in Chapter VIII on Social Security and Labor Welfare. The document describes some of the following information:

- For prospective employees, the Company registers the Social Employment Insurance Administration Body Program in accordance with applicable regulations, which consist of Work Accident Insurance, Death Security, Old Age Security and Pension Security.
- Companies through Social Employment Insurance Administration Body register social security programs for employees in accordance with applicable regulations, which consist of Work Accident Insurance, Death Security, Old Age Security and Pension Security.
- The settlement process for obtaining benefits/compensation from the social security administering agency is the responsibility of the company.

The company can show proof of payment for Social Health and Employment Insurance Administration Body, for example as follows:

Social Employment Insurance Administration Body

Dolok Ilir Estate and Mill:

The contribution for September 2022 on September 29, 2022 for 491 participants.

Laras Estate:

Contribution for September 2022 on September 29, 2022 for 333 participants.

In addition, the company makes Social Health Insurance Administration Body payments on September 27, 2022 for all PTPN IV employees in a group with the following details:

- September Contribution (Honorary).
- Employee September Contribution.
- September Contribution (Pension).

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

In addition, companies can show examples of reporting work accidents to Social Insurance Administration Body, for example, for harvest workers' work accidents on June 14, 2021, the minutes of chronology and proof of submission of compensation to heirs on January 26, 2022 can be shown.

6.7.5

The company has recorded the number of work accidents and the number of days lost in each unit, for example LTA for Dolok Ilir Estate period August 2022 with the number of work accidents as much as 0 times and the number of days lost as much as 0 days where the company has calculated the Fatality Rate and Severity Rate.

In addition, accordance to the Minutes No.PKSDOI/BA/01/II/2022 dated January 7, 2022 regarding the Dolok Ilir POM fire investigation report, it is known that there was no work accident which resulted in lost working days where according to the LTA document review for period January 2022 it is known that there were no cases work accident at Dolok Ilir POM.

	Status: Comply	
PRINCIPLE #7 PROTECT, CONSERVE AND ENHANCE ECOSYSTEMS AND THE ENVIRONMENT		
7.1 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.		
<p>7.1.1 The company already has the procedures contained in the Basic Guidelines and Work Instructions for Controlling Pests and Diseases of Oil Palm Plants with document number: 04.04/KS/TAN/P/005 revision 1 on 24 February 2020. Pest and disease censuses are carried out every week and if the results exceed the threshold, it will be continued with an effective census. If the result exceeds the threshold, chemical control will be carried out according to the recommended agronomic dose.</p> <p>In additions, based on the results of field visits and document reviews, it is known that the company has carried out Mechanical Pest and Disease Control (Collecting caterpillar cocoons, collecting Oryctes larvae, installing Pheromone traps and light traps at night) and Biologically (planting beneficial plant).</p>		
<p>7.1.2 Based on the results of the field visit, it was discovered that the company uses beneficial plants in the form of Turnera Subulata, Turnera Ulmifolia, and Antigonon planted on the roadside. Turnera Ulmifolia is an invasive species based on the LHK Ministerial Regulation No. 94 of 2016, but the company has taken care to control its spread.</p>		
<p>7.1.3 Based on interviews with management representatives, field workers and the surrounding community, there is no indication of the use of fire materials for pest control. From the results of field observations at Dolok Ilir Estate and Laras Estate there were no indications of burning. The company also does not use certain species to control pests and diseases.</p> <p>In additions, based on the results of field visits and document reviews, it is known that the company has carried out Mechanical Pest and Disease Control (Collecting caterpillar cocoons, collecting Oryctes larvae, installing Pheromone traps and light traps at night) and Biologically (planting beneficial plant).</p>		
	Status: Comply	
7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.		
<p>7.2.1 The certification unit already has a justification for pesticide application in the form List of Agrochemical Recommendation 2022 for controlling weeds, pests and diseases in palm oil plantations. Based on the review of the list of pesticides used and field visits to the pesticide storage warehouses at Dolok Ilir Estate and Laras Estate, known that the company uses selective pesticides according to the target pests/weeds to be controlled for example, using Fluroksipir Metil Heptil Ester to controlling weeds.</p>		
<p>7.2.2 The unit of certification shows records of the use of pesticides carried out in Dolok Ilir Estate and Laras Estate, for example the use of Metsulindo (active ingredient <i>Methyl Metsulfuron</i>) in Dolok Ilir Estate for the period January - July 2022, LD50 480 g/ha, active ingredient 0.22 l/ha and total used 237 liters.</p>		
<p>7.2.3 Based on the results of field visits and document reviews, it is known that the company has carried out Mechanical Pest and Disease Control (Collecting caterpillar cocoons, collecting Oryctes larvae, installing Pheromone traps and light traps at night) and Biologically (planting beneficial plant).</p>		
Chemical control is carried out as a final stage of pest and disease control where this is carried out in accordance with		

the recommendations from the census results.

7.2.4

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

7.2.5

Based on the results of field visits at the Pesticide Warehouse at the Dolok Ilir Central Warehouse and Laras Estate Sentra Warehouse, known that there were no pesticides with the active ingredient paraquat or pesticides with categories 1A and 1B by WHO.

In addition, the company shows a list of pesticides used by Dolok Ilir Estate and Laras Estate in 2022, such as a list of pesticides used by Dolok Ilir Estate in 2022 as many as 12 types, for example Metsulindo with the active ingredient Methyl Metsulfuron (category III).

7.2.6

The results of the field visit of the cycle path spraying activity in block 99F Division II Laras Estate and the circle path spraying worker in block H18 Division I Dolok Ilir Estate it was found that the workers had understood how to apply pesticides in accordance with the company's SOP. The results of the auditor's observations show that the workers have been equipped with PPE in accordance with the results of risk identification. Workers also explained that they had been given training in the application and handling of pesticides. In addition, the foreman circle path spraying has also been equipped with a first aid kit.

In addition, the company showed proof of training on "limited pesticide application" which was held on October 2-5, 2018, located at Dolok Ilir Estate which was attended by 47 employees (Available list of attendance and proof of certificate), for example a certificate in the name of Poniran (number 521.4/428.51/ UPTTPH/X/2018) on 17 October 2018.

In addition, the company can show evidence of training on the use of pesticides and calibration of spray equipment, which was carried out on June 4, 2022, at Division VII Dolok Ilir Estate which was attended by 6 participants.

7.2.7

Based on the results of field visits at the pesticide storage at the Central Warehouse of Dolok Ilir Estate and the Sentra Laras Estate Warehouse, known that the storage warehouse has been equipped with OHS warnings and symbols, MSDS, emergency response facilities and infrastructure, adequate ventilation, and lighting. In addition, the results of field visits to circle spraying activities at block 99F Division II Laras Estate known that pesticide mixing was carried out in each mixing area. Pesticides that have been mixed with water according to the dose are filled into jerry cans and brought to the field where they will be filled into each Knap Sack to be sprayed by workers into the application area.

7.2.8

Based on field observations at the Chemical Warehouse, as well as interviews with operators in each Plantation and Factory, it is known that used pesticide containers will be stored in temporary shelters for Hazardous and Toxic waste which were built with OHS and environmental aspects in mind. The water used for rinsing will be reused as mixing water for chemical activities.

Based on the results of field visits to employee housing areas, it was found that there were no traces of used pesticide packaging, for example as water reservoirs or flowerpots.

7.2.9

Based on that interview and field observation, its known that there's no pesticide with aerial spraying.

7.2.10

The certification unit has conducted a special medical examination (cholinesterase) for pesticide operators and is carried

out annually at Laras Hospital on August 11, 2022. The results of the health check are informed to workers and all pesticide operators are fit to work (normal results). In addition, based on interviews with pesticide workers, it is known that they have never had a work accident caused by chemicals such as irritants.

7.2.11

Based on interviews with female spraying worker at Block H18 Division I Dolok Ilir Estate, it was found that there were no pregnant or lactating female worker who worked with pesticides. The worker explained that if a worker becomes pregnant, it will be transferred to oil palm upkeep or work in a daycare centre. The female worker also explained that if she was menstruating, she would get 2 days of leave.

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 identification of waste sources for the 2021/2022 period with details: ex sacks of fertilizer, inner plastic of fertilizer sack, used oil from generator, used neon/lights, wastewater, EFB, Shell, fiber, dash of boiler, domestic waste, paper and others.

Sources of emissions include:

- CO2 Gas: Transportation of FFB, CPO Shipping, Operation of heavy equipment, operation of generator & electric pumps, management of WTP, boilers, laboratory activities, waste ponds and Mill processes.
- Gas NO2 & SO2: Activities in the laboratory.
- Gas CH4: Fertilizing activities and WWTP ponds.

Hazardous and Toxic waste

Hazardous Waste generated by the Estate and Factory will be stored in the Temporary Storage of Hazardous Waste owned, then it will be transported by a licensed third party which will then be handed over to the licensed Hazardous Waste manager. The company already has a permit for Temporary Storage of Hazardous Waste and is still valid, namely:

- The company already has an Approval for Fulfilment of Commitment to Commercial/Operational Permits (operational permits for the management of hazardous and toxic waste for producers) numbered 503.26/00499/17.4/2021 for the PTPN IV Dolok Ilir unit from the Head of the Office of Investment and One-stop Integrated Licensing Services in May 3, 2021 with a validity period of 5 years. (Dolok Ilir POM and Dolok Ilir Estate).
- The company already has an Approval for Fulfillment of Commitment to a Commercial/Operational Permit (Operational Permit for the Management of Hazardous and Toxic Waste for Producers) number 503/33/17.4/2020 from the Office of Investment and One Stop Service, Simalungun Regency on September 10, 2020, with hope valid for 5 years. (Laras Estate).

In terms of carrying out the transportation of hazardous waste, the company cooperates with a licensed hazardous waste carrier, namely PT Veronica Tannaga. The company can show a cooperation agreement with the carrier, namely the cooperation agreement between PT Perkebunan Nusantara IV and PT Veronica Tannaga with Number 04.03/-Perj/08.1/VI/2022 on June 8, 2022, with a validity period of up to December 7, 2022.

Solid Waste

The solid waste produced by the company is shell, fibre and EFB. The management plan is carried out by reusing solid waste such as shells and fibre to be reused as boiler fuel. Meanwhile, solid waste such as EFB is reused by applying it to plantation areas. This is evidenced by the results of field visits during audit activities that the company has utilized shells and fibre for boiler fuel, while EFB has been reused for plantation land.

POME

POME generated from the factory is reused for Land Applications. Before being channelled to LA, POME is first managed at the WWTP with the aim that the quality of POME that is flowed to LA is in accordance with the provisions. This is

evidenced by the results of field visits at the WWTPs, it is known that before being distributed to LA, POME is first in the WWTPs, besides that there are no indications of environmental pollution by the company.

Hazardous and Toxic waste

Based on document verification and the results of field observations, the following evidence were obtained:

- The SOP for the management of hazardous and toxic waste (B3) with SPO Number 02 revision 03 dated January 02, 2017, explains that all Hazardous waste and former Hazardous waste packaging produced must not be used for other purposes and must be directly submitted to the Temporary Storage of Hazardous Waste located permission.
- The results of field observations at the Division 7 Estate Dolok Ilir office revealed that there were 2 Pcs of hazardous waste type paint cans and 1 Pcs of used motor oil containers which were not placed in the Temporary Hazardous Waste Storage.
- Observations in the Dolok Ilir POM area revealed that there were 6 Pcs of hazardous waste type paint cans in a pile of scrap metal that was not placed in the Temporary Storage of Hazardous Waste.
- The results of observations in the POM Dolok Ilir Workshop area revealed that there were 2 Pcs of Hazardous Waste of the type of used lamps which were not placed in the Temporary Hazardous Waste Storage Area.
- Based on field observations at the Laras Central Estate Warehouse, it was found out that there were 12 drums of used fertilizer containers of Humega Liquid type which were not placed in the Temporary Storage of Hazardous Waste.
- The results of field observations in the Engineering Room of the Laras Estate revealed that there were 3 Pcs of used filter type hazardous waste which were not placed in the Temporary Hazardous Waste Storage Area.

Domestic Waste

Based on document verification and the results of field observations, the following evidence were obtained:

- SOP for the management of household domestic waste with SPO Number 20 Revision 03 On January 2, 2018, it is known that every employee collects his waste in the provided trash can and cleans the yard around the housing. Disposal of waste by sorting organic and inorganic waste. The cleaning staff periodically collects waste from the Temporary Place and takes it to the Final Disposal Site using the tools provided.
- The results of observations at the Dolok Ilir POM employee housing revealed that there were piles of household domestic waste at 2 points behind the housing.
- The results of field observations at the Division 1 Estate Laras housing estate revealed that there was a hole for domestic waste in the housing area in which there was domestic waste mixed with organic and inorganic waste.
- The results of field observations in the housing of Dolok Ilir POM employees revealed that there were 2 points of burning domestic waste in the housing area.
- The results of field observations at the employee housing Division 6 Estate Dolok Ilir revealed that there were traces of domestic waste burning in the housing area.

The company has not been able to show sufficient evidence that waste management is in accordance with its SOP. **NCR No 2022.07 with Minor Category.**

7.3.2

Based on the results of field observations in the Empty Bunch Area (EBA) of Dolok Ilir POM, it is known that there is still a puddle of leachate in the pile of EFB. In addition, piles of EFB have filled the ditch to drain leachate into the WWTP pond. Based on this evidence, the discrepancy in this indicator is declared Unmet and Raised to Major. **NCR 2021.05 Minor Raised to Major Category.**

7.3.3

Based on field visits to employee housing and warehouse areas, both estates and factories, it was found that there were no burning or open burning for waste destruction. Each housing has provided a trash can for domestic waste such as organic and inorganic. Hazardous and toxic waste will be collected in a temporary storage area for Hazardous and Toxic Waste.

Status:		
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7.3.1	NCR No. 2022.07 with Minor Category	
7.3.2	NCR Raised to Major	
7.4		
Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.		
7.4.1; 7.4.2		
<p>The company already has procedures and work instructions related to good cultivation practices to manage soil fertility, several SOPs and IK which include:</p> <ol style="list-style-type: none"> 1. Basic guidelines and work instructions for fertilization management with the number: Business unit A.10 which came into effect on February 24, 2020. In the IK it explains about maintaining soil fertility by providing fertilizer into the soil as a substitute for nutrients that have been taken by plants both with organic fertilizers as well as single and compound inorganic fertilizers. 2. SPO on Leaf and Soil Sample Analysis with number: 05.4. This procedure explains that soil analysis is carried out every 3-5 years or once a year if needed, while leaf analysis is carried out once a year and on young plants, if necessary, leaf samples can be taken twice a year with the consideration that changes in nutrients in young plant leaves are very important. change quickly. <p>The company has shown the fertilizer recommendation for 2022 which is based on the results of soil analysis (on February 13, 2018) and leaf analysis (on September 1, 2021) by PPKS with soil parameters %Fraction (Sand, Dust, Clay); pH (H₂O, KCl); C; N; C/N; P; K; Ca; Na; Mg; JKB; CEC; KB; Al-dd and the leaf parameter is N; P; K; Ca; Mg; B.</p>		
7.4.3		
<p>The company shows Production and Utilization Data for Liquid and Solid Waste in 2022. The document shows EFB applications until July 2022 for Dolok Ilir Estate for mature area as much as 4.325, 24 Tons. The results of the field visit at Division IV Block 19E Dolok Ilir Estate, it is known that the company has applied 40 tons/ha of EFB per year.</p>		
7.4.4		
<p>Companies can show the realization of fertilization in 2022 which is carried out in accordance with fertilizer recommendations, for example the realization of NPK fertilization for the period January - September 2022 Dolok Ilir Estate as much as 328.922 Ton and Laras Estate as much as 686.84 Ton.</p>		
	Status: Comply	
7.5		
Practices minimise and control erosion and degradation of soils.		
7.5.1		
<p>Based on the area statement verification, known that there are no new/extensive planting activities in the company but only replanting activities. According to the results of the field visit in the replanting area in block 98AS Division III Laras Estate and verification of the soil slope map, known that the company's undulating/sloped areas has made terracing to prevent erosion.</p>		
7.5.2; 7.5.3		
<p>Based on the area statement verification, known that there are no new/extensive planting activities in the company but only replanting activities. According to the results of the field visit in the replanting area in block 98AS Division III Laras Estate, known that the company's undulating/sloped areas has made terracing to prevent erosion.</p>		
	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		
<p>Dolok Ilir Estate</p> <p>Estate management has topography, slope, and soil map with scale 1:25,000. The map was prepared by IOPRI in 1999. The map informed that in general slope condition in Dolok Ilir Estate were dominantly flat to undulating and there was no</p>		

presence of hilly to steep area (>40%). Furthermore, soil type was fully mineral, consist of six types, e.g.: Typic Tropopsamment (brown alluvial), Typic Dystropept (yellowish brown podzolic), Typic Hapludult (yellowish red podzolic), Typic Hapludult (yellowish red podzolic), Typic Tropaquent (alluvial) and Typic Dystropept (yellowish brown podzolic) which covers about 1,132 ha; 2,135 ha; 407 ha; 2,080 ha; 673 ha; and 138 ha, respectively. Thus, main limitation of soil properties in Dolok Ilir was mainly due to low fertility soil.

Laras Estate

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

Based on the area statement verification, known that there are no new/extensive planting activities in the company but only replanting activities. In additions, based on the results of the field visit in the replanting area in block 98AS Division III Laras Estate, it is known that the company has made terracing on the sloped area to prevent erosion. In addition, the company has also planted *Leguminose cover crops* (LCC) and used exs chipping of palm oil plants as mulch to covering the soils.

7.6.2

Based on the area statement verification, known that there are no new/extensive planting activities in the company but only replanting activities. The results of the field visit in Block 98AS Division III revealed that there is only replanting area and no indication of new plantings where the area under the management of the company is the same as the area in the previous assessment according to the Land Use Titles owned by the company.

7.6.3

Based on the area statement verification, known that there are no new/extensive planting activities in the company but only replanting activities. The results of the field visit in Block 98AS Division III revealed that there is only replanting area and no indication of new plantings where the area under the management of the company is the same as the area in the previous assessment according to the Land Use Titles owned by the company.

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

According to the Dolok Ilir Estate and Laras Estate soil maps sourced from IOPRI 1999, there is no peat area in the company area. In addition, based on the results of field observations, known that there is no indication of peatland in the company's operational area.

Status: Comply

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

The company has implemented a water management plan consisting of:

- Do not apply chemicals in river border areas
- Not disposing of liquid waste into rivers but reusing it to plantation land. Before being used, the liquid waste must be managed at the WWTP so that the quality meets the standards set by the government.
- Utilizing water for factory processing in accordance with the standards set by the company.
- Conduct river water quality testing.

Based on field observations through the Bah Apal river border area in Block 87 B Estate Laras, it can be seen that the company has carried out management of the river border by installing signboards as HCV areas and painting on oil palm trees as spray boundaries. In addition, there are no traces of chemical applications.

The company has a surface water quality monitoring program that is conducted every semester by a KAN accredited laboratory (LP-1284-IDN) on 22 June 2022. The monitoring location is on a river for the scope of the company's operational area, namely the Bah Apal River, the Bah Bolon River and the Waringin River. Currently the company is testing surface water using quality standards that refer to PP 22 of 2021 Class III. The results of the test will then be reported to the relevant Office through the RKL-RPL Report every semester. Based on the results of the tests carried out, it is known that all test parameters are still in accordance with the established quality standards.

Based on the results of surface water quality testing, it is known that all test parameters are in accordance with the quality standards set out in PP No. 22 year 2021 (surface water). In addition, as a form of preventive action in environmental management and monitoring to prevent and reduce the concentration of parameters that are not in accordance with quality standards, the company has ensured best practices in waste management by ensuring that no waste flows directly to the environmental agency, ensure that domestic liquid waste is managed by providing a septic tank and several management activities in accordance with the company's management plan.

The results of observations and interviews with workers show that the company has also provided access to clean water for workers by providing hygienic water for drinking and water for daily needs.

7.8.2

Wet streams in the company area are protected by the company. This is evidenced by the results of field observations in the water flow canal area of Block 12 E Estate Dolok Ilir and on the Bah Apal River Border Block 87 B it is known that the river border is protected by the company. Some of the activities carried out by the company are placing red signs as limits for chemical application and planting mahogany and waru species. In addition, there are no traces of chemical application in the tributary border.

The Auditor Team has also verified related to NCR in the previous assessment. The results of the audit team's verification revealed that the company had rehabilitated watercourses and wet streams that had already been replanted by removing palm trees and planting plants with mahogany and hibiscus species. Based on the results of field observations to the river border area of the Bahapal River, Block 97 AK, it is known that the condition of the river border does not contain oil palm plantations and around the border, mahogany and waru have been planted.

7.8.3

The company can show a document of the results of measuring the quality of liquid waste that is applied to the land, namely the document of the results of testing liquid waste for the period January 2021 - August 2022. The test is carried out by a KAN accredited laboratory (LP-1284-IDN) using quality standards that refer to the Minister of Environment Decree No. 28 of 2003. Based on the results of the analysis of the test document, it shows that all the parameters tested are in accordance with the applicable quality standards. For example, the test results in the period February 2022 with the results of BOD 158 (BM: <5,000) and pH 7.62 (BM: 6-9). In addition, the test results in the April 2022 period with the results of BOD 482 (BM: <5,000) and pH 6.82 (BM: 6-9) and the period September 2022 with the results of BOD 654 (BM: <5,000) and pH 7.06 (BM: 6-9).

Based on the results of interviews with the Environmental Service regarding the management of liquid waste at WWTPs, there were no issues related to environmental pollution, the results of interviews with people from villages around the company also stated that there was no pollution from liquid waste produced by the company.

The Company has obtained an Approval for Fulfillment of the Commitment of Wastewater Disposal Permit Application to PT Perkebunan Nusantara IV unit Dolok Ilir with Number 503/03/17.4/2021 from the Head of the One Stop Integrated Investment and Licensing Service on January 29, 2021, with a validity period of 5 years.

Based on the results of field observations in the Land Application area of Block 2000 A Estate Dolok Ilir, it is known that the location of the liquid waste application on the land is in accordance with the location stated in the Land Application permit, other than that there is no indication of overflowing liquid waste that is flowed. The results of observations at WWTP also found that liquid waste has been managed at WWTP, there is a pond to manage liquid waste, there is no indication of leakage and overflow in the WWTP pond.

7.8.4

The company can show the results of the recapitulation of water use for the period January 2021 – September 2022, namely:

The use of water for FFB processing is 420.947 m³ with an average use of water for FFB processing every month is 21,407 m³. The data shows that the company uses surface water that is in accordance with the quota set by the company, which is 487,348 m³/year or 24,367 m³/month.

The company can also show proof of payment of surface water levies for the period August 2022 to the Regional Tax and Levy Management Agency of Pematang Siantar Regional Revenue Management Unit on September 8, 2022, via SUMUT Bank Transfer and the payment is in accordance with the surface water tax bill from the Regional Tax and Levy Management Agency North Sumatra Province Regional Revenue Management Unit.

Status: Comply

7.9

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

7.9.1

The plan to increase the efficiency of the use of fossil fuels and optimize the use of renewable energy by the company is to use shells and fibre as boiler fuel which is used to generate turbines to generate electricity. The use of energy generated from the turbine is monitored every day.

Dolok Ilir POM has an Energy efficiency document for the period September 2021 – August 2022 for the use of fossil fuels or the use of renewable fuels. The calculation of efficiency with the use of fossil fuels during September 2021 - August 2022 is as follows:

FFB Processed as much as 207,038.88 tons using renewable fuels such as shells of 14,492.72 tons and Fibre as much as 28,985.44 tons. The turbine produced from the use of Shell and Fibre is 4,002,363 Kwh or 19.33 Kwh/Ton FFB, while the generator used is 159,195 Kwh. The efficiency of renewable energy used by the company is 96.21%.

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 also has conducted GHG emission calculations period 2021 use of Calculator Palm GHG version 4.0. Accurate data has been put into the RSPO PalmGHG Calculator (Palm GHG version 4.0) and has been verified. Summary of net GHG emissions from PalmGHG calculator of the audit report which calculation option is applied "Apply full Version".

Summary of Net GHG Emissions

Emission per product	tCO ₂ e/tProduct
CPO	0.95
PK	0.95

Production	t/yr
FFB processed	188,090.56
CPO produced	41708.64
PK produced	7610.06

Extraction	%
OER	22.17
KER	4.05

Land use	Ha
Planted area on mineral	21033.70
Planted on peat	0.00

Total area planted	21033.70
Conservation Area (Forested)	0.00
Conservation Area (Non-Forested)	439.83
FFB Production per hectare	8.94

Summary of field emission and Sinks

Description Emissions Sources	Own crop		Group		3 rd Party	Total
	tCO2e	tCO2e/ tFFB	tCO2e	tCO2e/ tFFB	tCO2e	
Land conversion	103625.59	0.64	96089.72	19.66	0.00	199715.31
CO2 emissions from fertilizer	6400.41	0.04	11730.08	2.40	0.00	18130.49
NO2 emissions from peat	0.00	0.00	0.00	0.00	0.00	0.00
NO2 from Fertilizer	4360.66	0.03	9075.03	1.86	0.00	13435.69
Fuel consumption	99.70	0.00	1064.11	0.22	0.00	1163.80
Peat oxidation	0.00	0.00	0.00	0.00	0.00	0.00
Sinks						
Crop sequestration	-98223.26	-0.61	-89484.60	-18.31	0.00	-187707.86
Sequestration in Conservation area	0.00	0.00	0.00	0.00	0.00	0.00
Total	16263.10	0.10	137868.44	3.44	1739.20	46476.63

Summary Oil Mill Emissions and Credits

Remarks	tCO2e	tCO2e/t FFB
Emissions sources		
POME	0.00	0.00
Fuel consumption	419.52	0.00
Grid electricity	0.00	0.00
Credits		
Export of grid electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	419.52	0.00

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

The audit team has verified the GHG palm that has been carried out by the company. Based on the verification results, it is known that the GHG palm input data is in accordance with the actual conditions. This is evidenced by the results of verification of the amount of FFB production from Dolok Ilir Estate and Laras Estate, planted area of Dolok Ilir Estate and Laras Estate and the distribution of planting years, as well as the area HCV area. GHG emissions in 2021 will be higher than in 2020. This is due to the fact that in 2021 the company will carry out replanting activities, and FFB Processing is more than in 2020.

7.10.2

PTPN IV Dolok Ilir did not clear new land after January 1, 2015. Based on interviews with management and document

review, it is known that the operational area of the Dolok Ilir business unit is land that has been managed as plantation land (cocoa, rubber, and palm oil) since the Dutch colonial government and became National company since 1959.

7.10.3

Based on document review and interviews with company representatives, it was found that there were no new developments. The company has identified the source of pollution in the mill and estate, the document informs the source (station/activity), source of pollution and emission, impact (human, work equipment, environment) and impact control. For example, from the boiler it produces boiler ash, steam and chemical pollution, from the engine room it produces pollution in the form of noise.

Efforts to reduce pollutants carried out by the company include:

- Monitoring air quality and emissions from boilers and generators
- Carry out liquid waste management in WWTPs before being used in plantations
- Perform regular machine maintenance.
- Optimizing the use of fertilizers according to recommendations
- Use of fibre and shells in PKS to reduce diesel fuel.

The company has tested emissions from boilers and generators, as well as ambient air quality which was carried out in semester 1 of 2022 by a KAN accredited laboratory (LP-001-IDN). Based on the results of the document review, it is known that the results of the tests carried out are in accordance with the provisions stipulated by the Government.

Status: Comply

7.11

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

7.11.1

The company has a plantation management system policy issued in January 2022 which states in point 15 point e, namely implementing zero burning during plantation development and actively supporting initiatives to prevent and monitor forest fires and haze. The company has also disseminated information to employees, stakeholders and community representatives, for example on February 10, 2022, at the Dolok Ilir Office.

In line with this, field visits also found the implementation of replanting without burning, for example in Dolok Ilir Estate Division V Block 97A and 97 AD.

7.11.2

The company demonstrated the PTPN IV plantation management system policy issued on January 25, 2022, by the Director, which among other things explained in point 15 point e, namely implementing zero burning during plantation development and actively supporting initiatives to prevent and monitor forest fires and haze. The company also has an emergency response structure coordinated by a fire chief who oversees the core firefighting team, firefighters, and security teams.

The company shows a list of facilities and infrastructure for preventing and controlling land fires, for example at Dolok Ilir Estate Division 1, such as 1 axe, 2 shovels, etc. as well as plans for additional facilities and infrastructure, such as the construction of 4 fire towers until 2027. inventory and complete the facilities and infrastructure for the prevention and control of land fires in accordance with Ministry of Agriculture 5 of 2018. (OFI)

The company routinely reports the results of fire monitoring, for example the Land Fire Monitoring Report for the second quarter of 2022 Dolok Ilir POM to the Simalungun Regency Environmental Service on 15 July 2022

Based on the report in 2022, it is known that the POM Dolok Ilir fire occurred on January 6, 2022. Furthermore, the company has investigated this so that the cause of the fire does not recur.

7.11.3

The company periodically conducts emergency response simulations, especially fires, for example as shown in the emergency response simulation report on March 16, 2022, which was attended by 52 participants from employees and

stakeholder representatives.

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

PTPN IV oil palm plantation area is land that has been managed as plantation land (cocoa, rubber, and palm oil) since the Dutch colonial government and became a national company since 1959. is the replanting activity of the previous rotation of oil palm plantations. The youngest crop in the previous rotation was the 1990 crop.

In accordance with the RSPO Secretariat Email (Dillon Sarim) dated July 21, 2017, CH stated that PTPN IV (Unit Dolok Ilir and unit laras) had sent to continue the certification process "This unit has been disclosed as zero non-compliant land clearance. It may proceed with the RSPO Certification Process".

7.12.2

PTPN IV (Unit Dolok Ilir) oil palm plantation area is land that has been managed as plantation land (cocoa, rubber and oil palm) since the Dutch colonial government and became a national company since 1959. is the replanting activity of the previous rotation of oil palm plantations. The youngest crop in the previous rotation was the 1990 crop so the company's HCV assessment is still valid.

Dolok Ilir Estate

The company identified HCV in 2010 in collaboration with Indonesian Surveyors and the Indonesian Sustainable Palm Oil Foundation using the Guide to Identification of High Conservation Value Areas in Indonesia published by the Indonesian Consortium for the Revised HCV toolkit in June 2008. Based on the document, 16 species of protected animals were identified based on appendix II of CITES and no protected flora. The total area identified as HCV area is 51.45 ha (HCV 1, 4 and 6).

Laras Estate

An assessment of the identification of HCV areas for barrel plantations was carried out in 2011 by PT Surveyor Indonesia by an assessment team consisting of Kunkun jaya gurmaya (biodiversity expert), Ir Riswan (an expert on environmental services and landscape RSPO approved assessor), Henry Marpaung, Yusuf, Masrizal, Teguh Zaelani. The total area identified as HCV area is 200.52 ha (HCV 1, 4, 5 and 6).

Based on the document review, it is known that the company is not required to conduct an HCS study because there is no new land development after November 2018.

7.12.3

Based on the notice on the RSPO website it is known that the High Forest Cover Landscapes and High Forest Cover Countries have not been established by the RSPO. So that this standard has not yet been assessed.

7.12.4

The company has a HCV management and monitoring plan for the 2022 period which was prepared based on the results of consultations with the community and workers. The plans for the management and monitoring of HCVs for the 2022 period are:

- Conducting socialization related to the importance of forest areas to employees and the community
- Boundary marking of HCV area with plantation area
- Inventory of species and number of trees planted
- No hunting signs are posted
- Carry out monitoring and maintenance of HCV areas
- Monitoring the area of HCV 6 (Grave).

An integrated management plan has been developed in consultation with relevant stakeholders and includes directly managed areas and broader and relevant landscape level considerations. This is evidenced by the company's HCV

management plan which was developed by involving stakeholders such as the surrounding village community and employees. Management activities planned by the company also include areas that are managed directly and take into account the wider landscape such as maintaining the presence of HCVs (Sungai Bah Bolon and Bah Apal), anticipating land fires in the company area and in the area around the company, increasing employee and community knowledge by conducting socialization of HCV.

The Auditor Team has also verified related to NCR in the previous assessment. The results of the audit team's verification revealed that the company had rehabilitated watercourses and wet streams that had already been replanted by removing palm trees and planting plants with mahogany and hibiscus species. Based on the results of field observations to the river border area of the Bahapal River, Block 97 AK, it is known that the condition of the river border does not contain oil palm plantations and around the border, mahogany and waru have been planted.

7.12.5

Based on the results of public consultations with the surrounding community, there were no negative issues or complaints related to the management of HCVs in the company's operational areas. One of the HCVs is used and utilized by the community as a public bath, namely at Sweembad Naga Soppa Division II Estate Laras.

7.12.6

The company has a program to educate the workforce about RTE species status. The program is also included in the Company's HCV management plan. The program includes activities to increase knowledge and skills (for all staff and plantation employees, especially special officers in charge of managing HCV/HCV and monitoring important species, especially endangered species.

The company routinely conducts socialization to the community and workers in the company regarding the existence of endangered plants and animals, which is carried out in conjunction with the socialization of HCV areas, for example:

- Minutes of HCV socialization including the presence of important species were conducted on 22 January 2022 to 37 participants from Dolok Ilir Estate and Laras Estate.
- Minutes of socialization of HCV and important species, which was held on December 30, 2021, which was attended by 17 surrounding communities from Serbelawan Village and Dolok Ilir Village 1.

7.12.7

Based on document verification and the results of field observations, the following evidence were obtained:

- The results of the previous assessment revealed that there were discrepancies related to the replanting activities in the river border area (HCV) at the Laras Estate.
- The company has evaluated the implementation of the management plan based on the results of the 2021 HCV monitoring carried out on January 22, 2022 (Dolok Ilir Estate) and January 15, 2022 (Estate Laras). From the results of the evaluation conducted by the company, it is known that the function of the HCV area in the last 5 years is in good condition and there is no damage. This is contrary to the actual conditions in the field where in 2021 (ASA 1.1) there will be HCV areas replanted by the company. In addition, from the evaluation results it is known that there is no follow-up that will be carried out by the company.
- Based on the results of field observations at the Dolok Ilir Estate and Laras Estate during the audit activity, the company is currently carrying out replanting. In addition, the results of the verification of the long-term plan document revealed that in the next 5 years the company will also carry out replanting.
- The company already has an HCV management and monitoring plan for the period 2021-2022 where there are several activities to be carried out, for example, socialization of HCV to employees and the community, inventory of the types and number of trees that have been planted, making markers for HCV areas, and installing signs. hunting ban. However, there has been no activity to ensure that replanting activities are not carried out in HCV areas.

Based on this evidence, the company has not been able to show evidence that the results of the monitoring carried out are in accordance with actual conditions so that no follow-up has been taken to improve the management plan. **NCR No 2022.08 with Minor Category.**

7.12.8

The company did not clear land for new land clearing after November 2018. The area of the Dolok Ilir unit is land that has been managed as plantation land (cocoa, rubber and oil palm) since the Dutch colonial government and became a national company since 1959. Based on document verification of the year of coconut planting oil palm plantations indicate that planting after November 2005 is a replanting activity of previous rotational oil palm plantations. In addition, there was an email from the RSPO secretariat (Dilon Sarim) on 21 July 2017 stating that this unit has been disclosed as zero non-compliant clearance. It may proceed with RSPO Certification Process.

7.12.7	Status: NCR No. 2022.08 with Minor Category	
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3.2 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or √
ASA-1.2	The company didn't use trademark on the product.	√
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use	X or √
ASA-1.2	The company didn't use trademark on the product.	√
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or √
ASA-1.2	The company didn't use trademark on the product.	√
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or √
ASA-1.2	The company didn't use trademark on the product.	√
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

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

PT Perkebunan Nusantara III Time Bound Plan (TBP) is explained in point 1.10. PT Perkebunan Nusantara (PTPN) III has informed the TBP progress, MUTU has considered that PTPN IV is complied with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by PTPN IV on November 2021.

MUTU has verified partial certification for un-certified unit's subsidiary of PTPN IV based on their Time Bound Plan. There is one (14) uncertified mills and twenty six (26) uncertified estates of PTPN IV, MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

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

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?	PT Perkebunan Nusantara III has carried out self-assessment (i.e internal audit) against uncertified management units dated on 1 December 2020 by PT Perkebunan Nusantara III, PT Perkebunan Nusantara III has submitted some self-assessment reports year 2021 on behalf PTPN III, PTPN V, PTPN VI, and PTPN VIII. It has supported evidence of the self-assessment against each requirement such as self assessment reports
2.1.2	No replacement after dates defined in NIs Criterion 7.3 of: <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<p>PTPN III</p> <p>Based on document verification sighted that all uncertified unit has conducted LUCA and submitted to the RSPO:</p> <ul style="list-style-type: none"> - KRBTN dated 20 August 2021, there are raw non-compliant land clearance with area 489.83 Ha. - KBDY dated 20 August 2021, there are raw non-compliant land clearance with area 116.20 Ha. - KKINO dated 18 August 2021, there are raw non-compliant land clearance with area 477.85 Ha. - KJLRS dated 18 August 2021, there are raw non-compliant land clearance with area 3,823.91 Ha. <p>The KBDY and KRBTN has conducted HCV-HCS assessment by CV Greenera dated 19 to 23 October 2021. While the KNINO and KJLRS will be assessed on June 2022 by ALS- HCV. The company to be consider to realization this plan on June 2022.</p> <p>PTPN III's development of a new planting area (Muara Upu at South Tapanuli – Hapesong Estate) and there is a conversion</p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>area from crumb rubber to oil palm at Batang Toru Estate, Hapesong Estate, Rambutan Estate dan Bandar Betsy Estate.</p> <p>For the new planting at Muara Upu – Hapesong Estate, the company has carried out applying NPP in accordance with this clause and the progress under reviewing of Compensation Task Force. Based on communication with PT PN III. The company still waiting for Head of District decision response, for land exchanged process since the land was included on peat moratorium area according to President of Republic of Indonesia decree letter no. 6 year 2013.</p> <p>While for a conversion area, the company has arranged the plan for conducting the NPP. The objective evidenced as follow:</p> <ol style="list-style-type: none"> Internal Memo from Head of Management System for approval a purpose of NPP project for 4 (four) estates (Batang Toru Estate, Hapesong Estate, Rambutan Estate dan Bandar Betsy Estate) dated January 25, 2018. This internal memo issued based on the initial gap assessment has conducted in January 2018. Form of Request Budget (No. 3.16/PPAB/07/2018) dated January 29, 2018. <p>PTPN V Based on document review, there was no evidence that the company (PTPN V) has changed any primary forest and/or HCV area into palm oil plantation since November 2005 except Part of Sei Berlian estate (Sei Berlian-2) within forest areas based on Ministry of Forest decree No.SK.878/Menhut-II/2014 jo SK.903/MENLHK/SETJEN/PLA.2/12/2016). The organization has got Land Use Right (HGU) from government before the regulation above was issued so that the organization still coordinating with government about case it. Whereas, Sei Buatan estate, Tanjung Medan estate and Sei Galuh estate still in-process review of disclosure liability by RSPO secretari-at so they has not been ensured that no replacement to any identified as HCV areas or required to maintain or enhance HCVs. All planted areas after November 2005 are from re- planting process without NPP replacement. This company is considered old company under State Owned (Ministry of BUMN).</p> <p>PTPN VI Uncertified management units has conducted HCV assessment such as :</p> <ul style="list-style-type: none"> Unit of Batanghari Business (Batanghari Estate), Unit of Bunut business (Bunut Estate & POM), Unit of Tanjung Lebar business (Tanjung Lebar Estate & POM) & Unit of Durian Luncuk (Aur Gading POM &

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Durian Luncuk Estate) : Date on 1 January to 11 November 2018 by Samsul Ulum (license : ALS15013US) as lead assessor and some assessor members i.e R.Sukasmianto, Moh.Yasin, Bahrun, Pemi Aprilis, Devis Rachman, Ihwan Rafina, Roland Sinulingga and Endra Gunawan on behalf PT Fodec Khatulistiwa. It has carried out public consultation dated on 20 February 2018 (initial public consultation) & 4 June 2018 (public consultation for the result of HCV assessment). There are some evidences that public consultations has involved stakeholders. Current condition that HCV assessment report has been satisfactory category on 23 March 2021.</p> <ul style="list-style-type: none"> • During audit, other the uncertified management units has not been carried out HCV assessment such as Unit of Ophir business (Ophir POM & estate), Unit of Pangkalan 50 Kota business (Pangkalan 50 Kota estate), Unit of Solok Selatan business (Solok Selatan POM & estate), Bukit Cermin Estate, PT Bukit Kausar & PT MAJI but PTPN VI have budget & the allocation activity plan year 2020 for HCV assessment in Unit of Ophir business, Unit of Pangkalan 50 Kota business and Unit of Solok Selatan business. Allocation Activity Plan year 2020 is postpone because any reduction operational cost in pandemic covid-19. PTPN VI have action plan and estimating cost for HCV assessment include of the review by HCV RN, HCS, LUCA & SIA. Bunut estate & POM, Batang Hari estate and Tanjung Lebar estate have estimate for finalization of HCV RN and LUCA document in year 2021. Whereas, the remain of uncertified management unit is Triwulan I and IV year 2022. Before HCV assessment will doing by RSPO ALS assessor and has review by HCV-RN so uncertified management units has carried out assessment of protected areas refer to Indonesian regulation by internal assessor. <p>Batanghari Business Unit (Batanghari Estate) & Bunut Business Unit (Bunut Estate & POM) has submitted disclosure liability, LUCA & shp file to RSPO and RSPO has responded email from auditee on 29 January 2020 where RSPO is requesting some clarifications and auditee has not been submitted email to RSPO for some clarifications which needed. It is still waiting finalization of LUCA document.</p> <p>Auditee has been submitted reporting template for disclosure of areas cleared without prior HCV assessment since Nov 2005 file on behalf other uncertified management units i.e Unit of Tanjung Lebar Business (Tanjung Lebar estate & POM),</p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Unit of Durian Luncuk Business (Aur Gading POM & Durian Luncuk Estate), Unit of Ophir Business (Ophir Estate & POM), Unit of Pangkalan 50 Kota Business (Pangkalan 50 Kota estate), Bukit Cermin estate, PT Bukit Kautsar & PT MAJI.</p> <p>Some management units has carried out land clearing activities (replanting or conversion activities) since November 2005 without processed by HCV identification/assessment. Based on RaCP tracker (per November 2019) in RSPO website and the result of correspondence with RSPO compensation panel that the management units under PT Perkebunan Nusantara VI have 0 management unit with potential liability because information inside of disclosure liability form & LUCA still revised by auditee on behalf Unit of Batanghari Business and Unit of Bunut Business and other uncertified management units has not been submitted disclosure liability. LUCA and shp file.</p> <p>Following up one of resolution from 35th BHCVWG meeting year 2017 are pushing certified management unit to submit annex 7 & 8 (compensation concept note & compensation plan) to RSPO compensation panel in annual surveillance audit by each certification body according time frame which has decided in meeting. The progress of the concept note approval can be saw in indicator of 7.12</p> <p>There are some land clearing areas above year 2010 until 18 October 2016 (auditee join with RSPO) under PT Perkebunan Nusantara VI areas but New Planting Procedure (NPP) was not implemented. Based on information of NPP document that it will ensuring compliance with new planting requirement at the time of certification. After join to RSPO, there is conversion of plant type (from rubber to oil palm) year 2017 in Pangkalan 50 Kota estate and it have potential as sanction areas.</p> <p>2nd partial audit was conducted on 24-25 November 2021</p> <p>The Tanjung Lebar Business Unit postponed to February 2022, due to single membership consolidation and approval process by RSPO Secretariat and the Disclosure & Liability of Tanjung Lebar is still pending. While the Disclosure & Liability of Batang Hari Business Unit has approved by RSPO secretariat with Zero Liability dated 20 June 2020; the audit planned on 22 December 2021. Therefore the Disclosure & Liability of Bunut Business Unit is still on process, the latest email from Indrawan Suryadi (RSPO Secretariat) dated 23 November 2021. For the Bunut Business Unit certification plan is on schedule (December 2021).</p> <p>There are also letter for SEVP Operation from Head of Planning & Sustainability with number: ND-312/06.08/XI/2021 dated 25 November 2021 about RSPO certification preparation in Bunut & Batang Hari Business units and also</p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>awareness criteria 7.12 RSPO P&C and Risk Analysis for six business units (Ophir, PLK, Solsel, BKC, B. Kausar, and MAI) by Consultant Inovasi Sejahtera Berkelanjutan.</p> <p>PTPN VII Bentayan Estate, Sungai Lengi Estate, Sinabing Estate and Talopino Estate were not conducted new planting after November 2005. However the HCV identification document was not available. The HCV assessment will conducted by consultant (Bentayan Estate: 2026; Sungai Lengi Estate: 2022; Senabing Estate: 2025 and Talopino Estate: 2024).</p> <p>Senabing Estate was conducted Conversion from year of 2005 to 2010 with area 408 Ha. The LUCA assessment will be conducted by Consultant in the year of 2025.</p>
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>PTPN III PTPN III's development of a new planting area (Muara Upu at South Tapanuli – Hapesong Estate) and there is a conversion area from crumb rubber to oil palm at Batang Toru Estate, Hapesong Estate, Rambutan Estate dan Bandar Betsy Estate.</p> <p>For the new planting at Muara Upu – Hapesong Estate, the company has carried out applying NPP in accordance with this clause and the progress under reviewing of Compensation Task Force. Based on communication with PT PN III. The company still waiting for Head of District decision response, for land exchanged process since the land was included on peat moratorium area according to President of Republic of Indonesia decree letter no. 6 year 2013.</p> <p>While for a conversion area, the company has arranged the plan for conducting the NPP. The objective evidenced as follow:</p> <ul style="list-style-type: none"> c. Internal Memo from Head of Management System for approval a purpose of NPP project for 4 (four) estates (Batang Toru Estate, Hapesong Estate, Rambutan Estate dan Bandar Betsy Estate) dated January 25, 2018. This internal memo issued based on the initial gap assessment has conducted in January 2018. d. Form of Request Budget (No. 3.16/PPAB/07/2018) dated January 29, 2018. <p>PTPN V Auditee has been submitted reporting template for disclosure of areas cleared without prior HCV assessment since Nov 2005 file on behalf other uncertified management units i.e Unit of Tanjung Lebar Business (Tanjung Lebar estate & POM), Unit of Durian Luncuk Business (Aur Gading POM & Durian Luncuk Estate), Unit of Ophir Business (Ophir Estate & POM),</p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Unit of Pangkalan 50 Kota Business (Pangkalan 50 Kota estate), Bukit Cermin estate, PT Bukit Kautsar & PT MAJI.</p> <p>Some management units has carried out land clearing activities (replanting or conversion activities) since November 2005 without processed by HCV identification/assessment. Based on RaCP tracker (per November 2019) in RSPO website and the result of correspondence with RSPO compensation panel that the management units under PT Perkebunan Nusantara VI have 0 management unit with potential liability because information inside of disclosure liability form & LUCA still revised by auditee on behalf Unit of Batanghari Business and Unit of Bunut Business and other uncertified management units has not been submitted disclosure liability. LUCA and shp file.</p> <p>Following up one of resolution from 35th BHCVWG meeting year 2017 are pushing certified management unit to submit annex 7 & 8 (compensation concept note & compensation plan) to RSPO compensation panel in annual surveillance audit by each certification body according time frame which has decided in meeting. The progress of the concept note approval can be saw in indicator of 7.12</p> <p>There are some land clearing areas above year 2010 until 18 October 2016 (auditee join with RSPO) under PT Perkebunan Nusantara VI areas but New Planting Procedure (NPP) was not implemented. Based on information of NPP document that it will ensuring compliance with new planting requirement at the time of certification. After join to RSPO, there is conversion of plant type (from rubber to oil palm) year 2017 in Pangkalan 50 Kota estate and it have potential as sanction areas.</p> <p>PTPN VII Bentayan Estate, Sungai Lengi Estate, Sinabing Estate and Talopino Estate were not conducted new planting after November 2005. However the HCV identification document was not available. The HCV assessment will conducted by consultant (Bentayan Estate: 2026; Sungai Lengi Estate: 2022; Senabing Estate: 2025 and Talopino Estate: 2024). Senabing Estate was conducted Conversion from year of 2005 to 2010 with area 408 Ha. The LUCA assessment will be conducted by Consultant in the year of 2025.</p>
2.1.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>PTPN III KRBTN</p> <p>There are several area in Afdeling VII were occupied by communities and overlap with PT KAI. The unit management have made persuasive efforts to resolve it, however no agreement has been found. Currently was nothing significant land conflict.</p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>PTPN V There was land conflict between PT PN V with community in Senama Nenek village, located in Sei Kencana Estate and Terantam Estate for approximately ± 2,800 Ha (± 550 Ha under Terantam Estate and ± 2,250 Ha under Sei Kencana Estate). During this initial audit, this area has been released in accordance with a court decision.</p> <p>PTPN VI PT Perkebunan Nusantara VI have SOP of implementing FPIC, SOP of communication and consultation with community, SOP of handling land conflict including procedure of calculation and compensation.</p> <p>Land compensation process has done a few time ago for some areas in uncertified management units (Unit of Bunut Business, Unit of Tanjung Lebar Business, Unit of Batanghari Business, Unit of Durian Luncuk Business, Unit of Ophir Business). The record and document of land compensation on behalf PT Bukit Kautsar has provided by auditee as example photograph of hand over land compensation payment, land compensation letter date on 21 October 2009, letter date on 21 October 2009 from head of village, statement letter date on 21 October 2009 that land owners has agreed land to acquired, measure note date on 21 October 2009, receipt note of land compensation payment, ID card and land owner letter from head of village. Whereas, PT MAJI and Unit of Bukit Cermin Business has provided sample of land compensation i.e payment receipt, photograph of land compensation activity, copy ID card, agreement of payment, statement letter of hand over and legal land.</p> <p>Community who lose access and land right for plantation areas has given the opportunity to benefit (direct and indirect) from plantation development as sample in form of scheme smallholder areas, as employee, as contractor (transportation, supplier for daily food, etc), as FFB supplier, etc.</p> <p>Refer to case tracker or status of complaints under PT Perkebunan Nusantara VI period of February 2011 to during audit that any 1 cases and it has closed based complaint panel decision (since year 2019). Further details on this case are available here: http://www.rspo.org/members/complaints/status-of-complaints/view/26. Unit of Bukit Cermin Business has provided some evidences relate of land compensation record and document from dispute/conflict areas.</p> <p>2nd partial audit was conducted on 24-25 November 2021 Based on document log book of external letter verification on the uncertified units sighted that there were no land dispute</p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>claim from the communities during period January to October 2021.</p> <p>PTPN VII The Senabing Estate has not been able the land use historical for the area 2,355.72 Ha. Currently also the Senabing Estate not obtained HGU from the related Agency. There are land conflict resolution in Senabing Estate (Lahat District), the land dispute was started on 14 August 1986. It has resolved dated 9 June 2011 by Minute of Land Measurement number SENA/BA382/2001 in Tanjung Makmur Village for area 1.25 Ha.</p>
2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>PTPN III Based on self assessment in KRBTN, KBDSY, KKINO and KJLRS and desk study on internet sighted that there are no labour dispute issues, since last year period until the partial audit conducted on 8-9 November 2021.</p> <p>PTPN V There is no labour issue/dispute found during this initial certification audit.</p> <p>PTPN VI There is a mechanism of resolving grievance and compliant from employee and industrial action. It has covered in the collective labour agreement between PT Perkebunan Nusantara VI and SP- BUN PTPN VI (labour union) period of 2020 to 2021 (article 76 – sub section XIV) and SOP of internal communication and handling employee complaint. Scope of collective labour agreement is all company employees and as a normative reference for subsidiaries. Collective labour agreement has signed by both parties and any evidence of registration about collective labour agreement from Ministry of Man Power has been shown by auditee. Based on self-assessment against uncertified management units, there is no identified labor disputes ongoing at subsidiary companies of PT Perkebunan Nusantara VI. Based on website date on 3 October 2017 that any labour dispute between Mr M.Dasuky Hajar Nasution and PT MAJI. Based on communication with representative of PTPN VI that it has followed up both parties. SP-Bun (labour union) have vital position because based on SOP of internal communication and handling employee complaint that employee’s grievance & complaint can be informing to labour union (SP-BUN) and organization will try to resolve complaints at the labour union level and any mechanism solving grievance and compliance from employee on collective labor agreement (PKB)</p> <p>2nd partial audit was conducted on 24-25 November 2021 The renewable of collective labor agreement period of 2022-2023 is still on process, that the final meeting in Yellow Hotel will be conducted on 25 to 26 November 2021.</p> <p>PTPN VII</p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		There are no labour dispute during internal audit assessment, the company will be follow up the regulation of PP 50 of 2012, PP 38 of 2011, PP 101 of 2014, and Permenaker 19 of 2012.
2.1.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>PTPN III KRBTN Letter from Sumatera Utara Governor with number 520.33/145/DISPMPPTSP/5/1.5/1/2018 dated 25 January 2018 about Revision of commodity from rubber to oil palm plantation in Rambutan Estate. Revision from Rubber: 2,253.35 Ha & Oil Palm 546.41 Ha to Rubber: 1,156.95 Ha and Oil Pal 5,158.33 Ha.</p> <p>There are several HGU certificate with HGU number 1 year of 1996 in Sei Bamban Village (569.32 Ha), Sei Priok Village (780.45 Ha), Paya Bagas Village (4,373.78 Ha); and also Sei Simujur Village (1) number 18 year of 2009 with area 793.15 Ha.</p> <p>KBDBY <i>Surat Pendaftaran Usaha Perkebunan</i> with number HK.350/530/Dj.Bun.5/VII/2001 Bandar Betsy Estate with area 5,348.90 Ha with commodity rubber. Therefore conversion license from rubber to oil palm with number 503.35/271/17.42018 dated 12 February 2018 with area 116.2 Ha.</p> <p>HGU on process, the latest process are Nota Dinas number 419/ND-300.HP.03.01/VII/2021 from KANWIL BPN Sumatera Utara Province dated 1 July 2021 about Renewal of HGU Bandar Betsy with area 5,348.90 Ha dated 2 July 2021.</p> <p>KJLRS IUP on process due to revision of AMDAL document. However there are HGU number 03 year of 1994 with area 2,318.87 Ha.</p> <p>KKINO IUP on process due to revision of AMDAL document. However there are HGU number 122 year of 1999 with area 4,632.60 Ha. Based on Self-assessment there are some conditions not yet compliance with RSPO criteria 2.1 such as:</p> <ol style="list-style-type: none"> 1. HGU on process (Sei Simujur-2, KRBTN): There are letter from Senior Executive Vice President PTPN III dated 22 September 2020 with number BUMU/X/44/2020 to the BPN of Asahan District for Cadastral process. During the audit, the progress of this matter still opened. 2. There is a land conflict (Batang Toru Estate) not yet resolved.

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>PTPN V There has been no significant legal non-compliance in PTPN V and its subsidiary. The company is not in the process of any litigation. PT PN V has acquired HGU (land title) for all of its subsidiaries except the part of Sei Berlian estate (Sei Berlian-2) because the organization still in-process to get Land Use Right (HGU).</p> <p>PTPN VI Uncertified management units has complied with applicable legal requirement which supported by some evidences such as :</p> <ol style="list-style-type: none"> 1. Some uncertified management units (Ophir Estate & POM, Solok Selatan Estate & POM, Pangkalan 50 Kota Estate, Batanghari Estate, Bunut Estate & POM, Tanjung Lebar Estate & POM, Bukit Cermin Estate, Pinang Tinggi POM, Aur Gading POM, Durian Luncuk Estate & PT Bukit Kautsar) have Plantation Business Permit (Izin Usaha Perkebunan) so they has complied with Minister of Agriculture Regulation no.98/permentan/OT.140/9/2013 article 8 or 10 or 13. 2. Some uncertified management units (Ophir Estate & POM, Solok Selatan Estate & POM, Pangkalan 50 Kota Estate, Batanghari Estate, Bunut Estate & POM, Tanjung Lebar Estate & POM, Bukit Cermin Estate, Aur Gading POM, Durian Luncuk Estate, PT MAJI & PT Bukit Kautsar) have land use right (Hak Guna Usaha) so they has complied with law no.5 year 1960 article 28. One of land use right owned by Durian Luncuk estate still renewal process and one of Bukit Kautsar areas still in-process to get land use right. 3. Some uncertified management unit (Sei Bahar II Bunut POM, Solok Selatan POM, Tanjung Lebar Estate & POM, Pinang Tinggi Estate & POM, Bunut Estate, Batanghari Estate, Durian Luncuk Estate & PT Bukit Kautsar) have environment document so they has complied with Minister of Environment Regulation no.05 Year 2012 jo Minister of Environment & Forestry Regulation no.P.38/MENLHK/SETJEN/KUM.1/7/2019 or Minister of Environment Regulation no.13 Year 2010 or Minister of Environment Regulation no.14 Year 2010. 4. Bunut POM and Tanjung Lebar Estate & POM have storage temporary for hazardous & toxic materials waste and their permit so they has complied with Minister of Environment Regulation no.30 year 2009 article 5. 5. Bunut POM and Solok Selatan POM have land application permit so they has complied Minister of Environment Decree no.29 year 2003. 6. Unit of Tanjung Lebar Business, Unit of Bunut Business, Unit of Batanghari Business and Unit of Durian Luncuk Business have permit of release for forest areas from

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>government (Minister of Forestry Decree no.260/KPTS-VII/1988 and no.418/KPTS-II/1990). Whereas, PT Bukit Kautsar have permit of release for forest areas from government too (Minister of Forestry Decree no.69/Kpts-II/1997 & no.443/Kpts-II/1999 and letter from Head of Forestry Agency in Jambi Province no. S.6.802/Dishut/BIPH.1.2/XII/2015). PT Mendahara Agro Jaya Industri have permit of release for forest areas from government too (Minister of Forestry Decree no.954/Kpts- II/1999).</p> <p>7. Plantation Business Permit (Izin Usaha Perkebunan) on behalf PT MAJI (Head of Tanjung Jabung Timur decree No.30 year 2005) and PT Bukit Kautsar - Pengabuan POM (Governor of Jambi decree No.564/KEP.Gub/Disbun/2011).</p> <p>8. Environment Document on behalf Ophir Estate & POM (letter no.213/II/DAR-3/1999), Solok Selatan Estate (head of Solok Selatan District decree No.660/152/KLH-2011), Pangkalan 50 Kota Estate (head of capital investment and integration service decree no.007/IL/DPMPSTSP-LK/I/2020), Aur Gading POM & Durian Luncuk estate (Governor of Jambi Province decree No.171/Kep.Gub/BLHD/2009), Bukit Cermin Estate (approved by No.100.A year 2011 on 3 October 2011) and PT MAJI (approved by No.76 year 2007 on 23 March 2007) was available.</p> <p>A documented system relate of law requirements and mechanism to ensuring compliance with legal compliance and a system to tracking changes to the law and regulation has covered in procedure of updating law and regulation and evaluation of compliance. All uncertified management units has provided the list of relevant law and regulation and the status of compliance because the mechanism to ensuring compliance with legal compliance has been implemented.</p> <p>Auditee has provided a legal land, map of legal land and a procedure of boundary monitoring where boundary monitoring shall be conducting every month and reporting in report of boundary monitoring result. Uncertified management units has provided the report of boundary monitoring result such as Unit of Tanjung Lebar business, Unit of Batanghari business, Unit of Solok Selatan business, Unit of Pangkalan 50 Kota business, Unit of Ophir business, PT MAJI, Unit of Durian Luncuk business, Unit of Bunut business, Unit of Bukit Cermin business and PT Bukit Kautsar.</p> <p>PTPN VII The company will be follow up the regulation of PP 50 of 2012, PP 38 of 2011, PP 101 of 2014, and Permenaker 19 of 2012. The Senabing Estate has not been able the land use historical</p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		for the area 2,355.72 Ha. Currently also the Senabing Estate not obtained HGU from the related Agency. There are land conflict resolution in Senabing Estate (Lahat District), the land dispute was started on 14 August 1986. It has resolved dated 9 June 2011 by Minute of Land Measurement number SENA/BA382/2001 in Tanjung Makmur Village for area 1.25 Ha.

3.4 Identification of Findings, Corrective Action, Observations, Opportunity for Improvement and Noteworthy Positive Components.

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

NCR No.	: 2021.01	Issued by	: Rizliani Aprianita Hasibuan
Date Issued	: 24 September 2021	Time Limit	: 23 December 2021
NC Grade	: Major	Date of Closing	: 29 November 2021
Standard Ref. & Requirement	: 3.6.1 All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented		
Evidence observed (filled by auditor):			
<ul style="list-style-type: none"> Based on the results of interviews and field visits at the Laras Estate, Dolok Ilir Estate and Dolok Ilir Mill, it is known that there are activities such as HGU Mark Monitoring Activities, HCV Area Monitoring Activities, Pesticide Mixing Activities, and WTP Water Intake Activities. The results of field visits and interviews at the Spray Division I Block 11B Estate Laras activity, it was found that the spraying activity was around the causeway that was passed by people. Meanwhile, during the activity, there were no warning signs that spraying was being carried out, this is in line with the study of the spraying work instruction document and the review of the risk management document for the spraying activity that has not identified the potential danger to other people entering the area being sprayed. The results of field visits and interviews of workers in the water intake area of the WTP, it is known that the area has been flooded, but based on the results of the study of risk management documents in the WTP area, there has not been any information regarding the potential hazards of OHS due to flooding. In addition, it is known that these activities have not been listed in the Estate and Factory risk management documents. 			
Non-Conformance Description (filled by auditor):			
The company has not been able to show evidence that all operating activities have been assessed for risk to identify OHS problems, and mitigation plans and procedures are documented			
Root Cause Analysis (filled by organization audited):			
There has been no socialization of HIRAC to PICs due to the negligence of the PIC who is responsible for risk management documents for Monitoring HGU Pole, HCV Areas, While pesticide mixing has been included in risk management in Chemical work.			
Correction (filled by organization audited):			
<ul style="list-style-type: none"> - Making HIRAC outreach - Creating a Risk Management PIC - Create risk management for monitoring HGU stakes, HCV areas, pesticide activities and water intake activities of WTP - A review has been carried out regarding the Risk Management document and it is available in each Unit - PIC Risk Management also covers all Work Units 			
Corrective Action (filled by organization audited):			
HIRADC monitoring for all work in the Unit every year			
Assessor Evaluation and Conclusion (filled by auditor):			
Verification November 4, 2021:			
The company can show evidence of improvements including the following:			
<ul style="list-style-type: none"> - Record of Risk Management socialization on October 9, 2021 to the relevant PIC - Decree of the Manager of the Laras Plantation Unit No. MU/Kpts/.../X/2021 dated 4 October 2021 regarding the appointment of a PIC who is responsible for reviewing the Laras Estate risk identification document 			
Based on the results of verification of the adequacy of the Root Problem Analysis, Corrective Actions and Preventive			

Actions that have been made by the Auditee, the non-conformance is declared **Unfulfilled**.

Verification November 29, 2021

The company can show evidence of improvements including the following:

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

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

Verified by : **Rizliani Aprianita Hasibuan**

NCR No.	: 2021.02	Issued by	: Rizliani Aprianita Hasibuan
Date Issued	: 24 September 2021	Time Limit	: 23 December 2021
NC Grade	: Major	Date of Closing	: 29 November 2021
Standard Ref. & Requirement	: 3.6.2 The effectiveness of the H&S plan to address health and safety risks to people is monitored		
Evidence observed (filled by auditor):			
<ul style="list-style-type: none"> • Based on the results of field visits to the CPO despatch location, it was found that the CPO despatch floor was in a porous condition. • Based on the results of a field visit at Dolok Ilir Mill, it was found that people who were not workers entered the WWTP pool area. Meanwhile, based on the results of the interview, it is known that other unauthorized persons are prohibited from entering the WWTP pool area. • Based on the results of field visits and interviews in St. In the engine room, the contractor's oxygen cylinder was found without a safety chain. • Based on the results of the field visit at the workshop of Dolok Ilir Mill, it was found that the access to the workshop was covered in mud and flooding. In addition, the conditions in the workshop area were found to be placed not paying attention to the OHS aspect. • Based on observations of refueling activities at St. The boiler is known that there is 1 worker not wearing heat-resistant gloves. The PPE has been provided by the company and is available at the location. • Results of interviews with 2 workers at St. Kernel, it is known that 1 worker does not use PPE in the form of glasses and ear plugs. The PPE has been provided by the company and is available at the location. • The results of field observations revealed that employees have been equipped with face shields but face shields are not used because they interfere with vision while working. 			
Non-Conformance Description (filled by auditor):			
The Company has not been able to demonstrate that the effectiveness of the OHS plan to deal with OHS risks in people has been monitored.			
Root Cause Analysis (filled by organization audited):			
<ul style="list-style-type: none"> - Monitoring of the HIRAC implementation has not been carried out to minimize OHS risks in the work area - There is no PIC that monitors the implementation of the effectiveness of HIRAC to minimize OHS risks in the work area 			
Correction (filled by organization audited):			
<ul style="list-style-type: none"> - Make a proposal letter for improvement related to the CPO despatch floor - Make signs regarding limited access in the WWTP pool area and provide socialization to all workers - Make a warning letter to a third party related to the work tools placed at the Mill location that are not in accordance with the SOPs in PTPN IV 			

- Make a plan for cleaning activities at the workshop location in connection with the location being covered in mud and flooding as well as tidying and labeling items at the workshop location
- Provide socialization to workers to always use PPE when doing work
- Hirac documents related to damaged CPO despatch floors, unauthorized parties entering the WWTP, Contractor's Oxygen Cylinders placed without safety chains, workshops covered in mud and flooding, and Hirac not wearing PPE at the work site

Corrective Action (filled by organization audited):

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

Assessor Evaluation and Conclusion (filled by auditor):

Verification November 4, 2021:

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

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

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

Verification November 29, 2021

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

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

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

Verified by : **Rizliani Aprianita Hasibuan**

NCR No.	: 2021.03	Issued by	: Afiffuddin
Date Issued	: 24 September 2021	Time Limit	: 23 December 2021
NC Grade	: Major	Date of Closing	: 22 November 2021
Standard Ref. & Requirement	: 6.2.2 Employment contracts and related documents detailing payments and conditions		

	<p>of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.</p>
<p>Evidence observed (filled by auditor): Based on the results of field observations on maintenance activities at Dolok Ilir Division 3 Block 16 BI, it was found that three people were carrying out plant maintenance activities. From the results of the interview, it was known that there was 1 worker who was not an employee of the company and stated that he was replacing his mother who did not come to work because of illness. In addition, the person concerned also uses PPE and uniforms like other employees.</p> <p>Non-Conformance Description (filled by auditor): Based on the explanation above, it can be concluded that there are still people who carry out the company's operational activities without having a work agreement.</p>	
<p>Root Cause Analysis (filled by organization audited):</p> <ol style="list-style-type: none"> 1. Workers without asking permission from the local leadership make job changes to other people 2. When doing work activities in the morning, the employee suddenly gets sick. It was suggested by the supervisor to seek treatment or leave but the employee refused. So that when the field supervisor is not there because the supervisor is called, without asking the local supervisor/leader for permission, the employee orders his child to come to replace his parents' work. 3. The supervisor communicates with the workers to be able to attend to do the work, but the workers have not arrived until the audit activity takes place 	
<p>Correction (filled by organization audited):</p> <ol style="list-style-type: none"> 1. Make a guilty plea regarding employees who give permission to other parties to work within the Company 2. The local leadership gives a letter of warning to the employee concerned 3. Make a circular regarding the prohibition of absorbing jobs 4. Making facts of integrity to all employees regarding the prohibition of giving work to others 	
<p>Corrective Action (filled by organization audited):</p> <ol style="list-style-type: none"> 1. Giving sanctions according to company regulations to workers if it is found that workers give their work to other people 2. Supervise/ check all workers in the field by supervisors in the field according to their respective duties. 3. To ensure that there will be no more job replacement treatment to other people who are not related by the Company, the Field Supervisor and Foreman I 	
<p>Assessor Evaluation and Conclusion (filled by auditor): Verification on October 22, 2021 The company shows evidence of improvement as follows:</p> <ol style="list-style-type: none"> 1. Letter of Error Statement, dated 22 September 2021, which among other things explains that the worker (initials NRI) admits his guilt for hiring a member of his family to replace him on 22 September 2021. 2. Warning letter number: AfdIII/ST/01/IX/2021 from Division Plantation Assistant III Dolok Ilir to workers (initials NRI), dated September 23, 2021, for employing family members without permission from the local leadership. 3. Letter from the Dolok Ilir Plantation Unit Manager number: DOI/SE/26/XI/2021, dated September 23, 2021, regarding the Prohibition of transferring responsibility for Work, which among other things states that: <ul style="list-style-type: none"> • All employees are prohibited from replacing / transferring / transferring responsibility their work to other people for any reason. • If an employee is found who replaces / transfers his work to someone else without the knowledge of the company, all risks that arise are the responsibility of the employee concerned. • All Assistants, Foreman I and Foreman Division / Section to supervise the implementation of work in the field as well as possible while still guided by the SOP. 	

4. Letter from the Unit Manager number DOI/SE/29/X/2021, dated October 1, 2021, regarding the Signing of the Employee Statement, which among other things explains the signing of the statement as a form of worker commitment regarding the Letter from the Dolok Ilir Plantation Unit Manager number: DOI/ SE/26/XI/2021, dated September 23, 2021, regarding the Prohibition of transferring responsibility for Work.
5. Proof of signing the statement by 288 workers.

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

Verification on November 22, 2021

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

Verified by : Afiffuddin

NCR No.	: 2021.04	Issued by	: Riziani Aprianita Hasibuan
Date Issued	: 24 September 2021	Time Limit	: 23 December 2021
NC Grade	: Major	Date of Closing	: 29 November 2021
Standard Ref. & Requirement	<p>6.7.3 Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing</p>		
<p>Evidence observed (filled by auditor): <u>Dolok Ilir Mill:</u></p> <ul style="list-style-type: none"> - Results of interviews with 2 workers at St. Sterilizer, it is known that 1 worker bought his own PPE in the form of boots. The PPE provided by the company is in the form of safety shoes but is currently in a damaged condition. - Results of interviews with 1 St. Clarification, it is known that the worker bought his own PPE in the form of boots. The PPE provided by the company is in the form of yellow safety shoes but is currently in a damaged condition. <p><u>Dolok Ilir and Laras Estate:</u></p> <ul style="list-style-type: none"> - The results of an interview with 1 TPH scratching worker in Division III Blok 17C Estate Dolok Ilir, it was found that the workers bought their own PPE in the form of short rubber boots. The PPE provided by the company is in the form of boots, but currently it is wet and damaged. - The results of an interview with 1 harvest worker in Division I Blok 97X Estate Laras, it was found that the workers bought their own PPE in the form of boots. The shoe PPE provided by the company is currently wet and damaged. - The company shows evidence of improvement on the results of field observations, including the following: - Evidence of submission of PPE in the form of safety shoes to 1 worker at St. Clarification on September 23, 2021 - Proof of providing PPE in the form of heat-resistant gloves to 1 St. Boiler dated September 23, 2021 <p>In addition, the results of interviews and document review, it is known that the company conducts inspections every month, one of which is monitoring the completeness of PPE. However, it has not been informed regarding the condition / feasibility of PPE.</p> <p>Non-Conformance Description (filled by auditor): The Company has not been able to ensure that PPE is available to all workers.</p> <p>Root Cause Analysis (filled by organization audited): Lack of understanding of workers regarding damaged PPE mechanisms</p>			

Correction <i>(filled by organization audited):</i> Provide understanding to workers related to PPE	
Corrective Action <i>(filled by organization audited):</i> <ul style="list-style-type: none"> - Replace workers' PPE if something is damaged - Make a Decree for PIC to monitor the PPE of each worker 	
Assessor Evaluation and Conclusion <i>(filled by auditor):</i> <p>The company has shown evidence of improvements including the following:</p> <ul style="list-style-type: none"> - Decree Dolok Ilir Mill Manager No. PKS DOI/SK/02/X/2021 dated October 14, 2021 regarding the appointment of a Special Officer for Monitoring PPE for Every Worker of the PKS Dolok Ilir Unit. - Decree of the Dolok Ilir Plantation Manager No. DOI/SK/03/X/2021; No. DOI/SK/04/X/2021; No. DOI/SK/05/X/2021; No. DOI/SK/06/X/2021; No. DOI/SK/07/X/2021; No. DOI/SK/08/X/2021; No. DOI/SK/09/X/2021; No. DOI/SK/10/X/2021; October 14, 2021 regarding the appointment of a Special Officer for Monitoring PPE for Every Worker of the Dolok Ilir PKS Unit. - Decree Manager of the Laras Plantation Unit No. MU/Kpts/.../X/2021 dated October 4, 2021 regarding the appointment of a PIC who is responsible for monitoring the condition of PPE for employees at the Laras Plantation Unit - Monitoring document on the use and condition of PPE in Dolok Ilir and Laras plantations that informs the availability of PPE and its condition - Proof of handover of PPE boots to harvesters <p>Based on the results of verification of the adequacy of the Root Problem Analysis, Corrective Actions and Preventive Actions that have been made by the Auditee, the non-conformance is declared Unfulfilled.</p> <p>Verification November 29, 2021 Based on the results of the root cause analysis submitted, the preventive measures taken and additional evidence of improvement in the form of recordings of socialization of the use and mechanism for replacing PPE to workers, this discrepancy is declared to be fulfilled by observations in the next assessment.</p>	
Verified by	: Rizliani Aprianita Hasibuan

NCR No.	: 2021.05	Issued by	: Briyogi Shadiwa
Date Issued	: 24 September 2021	Time Limit	: Surveillance-1.2
NC Grade	: Minor	Date of Closing	: 28 December 2022
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 (filled by auditor): <p>The Dolok Ilir POM has not been able to show if the liquid (solid) and solid waste (empty bunch) of palm oil has been handled properly, based on field observations, information is obtained if:</p> <ul style="list-style-type: none"> • There is liquid waste (liquid from the empty bunch) from the empty bunch area which flows into the rain ditch around the factory (office) environment. • There is solid waste that fills the rain ditch around the workshop area. 			
Non-Conformance Description (filled by auditor):			

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

Root Cause Analysis (filled by organization audited):

- Lack of transport fleet, such as Wheel loaders (Secopel) and trucks transporting solid waste and tanks
- Storage capacity that is not proportional to the volume of empty bunches

Correction (filled by organization audited):

- Make an application letter to the PTPN IV Medan Head Office for additional transportation fleets
- Accelerate the process of transporting EFB, chopped and solid to reduce the volume that accumulates in the POM in coordination with the Plant Section

Corrective Action (filled by organization audited):

- Coordinate with Estate Unit for waste management in the POM.
- Adding yards for EFB and chopped piles including building leachate drainage ditches.
- Hopper Solid repositioning plan

Assessor Evaluation and Conclusion (filled by auditor):

Verification November 29, 2021

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

The non-conformities still open.

Verification on ASA 1.2

Based on the results of field observations in the Empty Bunch Area (EBA) of Dolok Ilir POM, it is known that there is still a puddle of leachate in the pile of EFB. In addition, piles of EFB have filled the ditch to drain leachate into the WWTP pond. Based on this evidence, the discrepancy in this indicator is declared Unmet and Raised to Major.

Major Verification December 20, 2022:

- The company already has documents proof of liquid waste recording from the flowmeter at the WWTP in October 2022 and November 2022, for example on October 29, 2022 the wastewater discharge was 585 (M3/Ton) and November 30, 2022 the wastewater debit was 675 M3/Ton.
- The company already has an Action Plan document for separating leachate from rain gutters and solids which is described as follows:
 1. Transportation of EFB/Chinese with PIC MU POM/MU Estate/Maskep/Asst QA in October 2022 – December 2022
 2. Making trenches I and II in the period October 2022 – January 2023.
 3. Additional floor area for EFB January 2023 – April 2023.
 4. Additional volume of solid transport contracts in October 2022 – December 2022.
 5. Etc.
- The company already has documents showing plans for repositioning the solid hopper which will be implemented in January 2023 – June 2023.
- The company shows solid data and EFB for the period October to December 20 2022 with the following description:

1. October 2022 as much as 1,008,090 kg and EFB/choice 3,057,180 kg.
 2. November 2022 as much as 340,570 kg and EFB/choice 1,090,020 kg.
 3. December 2022 as much as 712,780 kg and EFB/choice 1,360,490 kg
- Companies can show documents on the realization of empty bunches/chopped waste management applied to land for the December 2022 period of 712,780 kg

Based on the results of interviews with the company's PIC as well as evidence of management documents shown, the discrepancies were declared fulfilled.

Verify December 28, 2022 (After Panel)

The company has added a root cause analysis, namely because the EFB's tamping capacity is not proportional to the volume of empty bunches. In this regard, the company has created a program for additional EFB areas planned for January 2023 – April 2023 as well as ditches for leachate flow and additional EFB and solid transport contract volumes.

Verified by : **Briyogi Shadiwa/ Rahmat Abdiansyah/Ririn Sipayung**

NCR No.	: 2021.06	Issued by	: Briyogi Shadiwa										
Date Issued	: 24 September 2021	Time Limit	: 23 December 2021										
NC Grade	: Major	Date of Closing	: 23 December 2021										
Standard Ref. & Requirement	7.8.2 Water flows and wetlands are protected, including maintenance and restoration of riparian zones and other buffer zones at or before replanting, in accordance with the 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or the Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).												
<p>Evidence observed (filled by auditor):</p> <p>The plan for the protection of watersheds and wetlands in the form of river borders is described in SOP No. SPO 05 revision 03 effective August 27, 2018 regarding river border management mechanisms. The river border management plan includes:</p> <ul style="list-style-type: none"> • Identification of river type classification consisting of: runnel (< 1 m), small river (1-10 m), medium river (10-20 m), river (40-80 m), large river (80-220 m) and rivers (> 220 m). • Determine minimum boundaries: 100 m large river border, 50 m small river/tributary border, 100 m area around lake/reservoir, 200 m radius area around springs. • Re-allocation of river borders, swamps, springs into protected areas with the following procedures: conduct an inventory of the location, area and then mapped. • Restore the boundaries according to their designation. • On riverbanks where oil palm has been planted, the vegetation should be maintained by promoting vegetation growth in the riverbank areas by prohibiting chemical spraying. <p>The company has identified the wet stream as described in the 2011 Indonesian Sustainable Palm Oil High Conservation Value Identification Report Document, Laras Estate. Based on the results of the identification of the HCV area, information is obtained which are water flow areas and wetlands including:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Division</th> <th style="text-align: center;">Name</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">III</td> <td>Karang Anyar Springs</td> </tr> <tr> <td style="text-align: center;">II</td> <td>Bah Longgur Springs</td> </tr> <tr> <td style="text-align: center;">II</td> <td>Sweembad Nagasoppa Springs</td> </tr> <tr> <td style="text-align: center;">III</td> <td>Tumorang / Mentaling Springs</td> </tr> </tbody> </table>				Division	Name	III	Karang Anyar Springs	II	Bah Longgur Springs	II	Sweembad Nagasoppa Springs	III	Tumorang / Mentaling Springs
Division	Name												
III	Karang Anyar Springs												
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III	Tumorang / Mentaling Springs												

IV	Lingga Springs
III	Tumorang Riparian
II	Longgur Riparian
IV	Waringin Riparian
II & III	Bah Hapal Riparian

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

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

Non-Conformance Description (filled by auditor):

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

Root Cause Analysis (filled by organization audited):

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

Correction (filled by organization audited):

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

Corrective Action (filled by organization audited):

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

carried out by the plantation management and reports The results of the internal audit are reported to the company's Board of Directors.

Assessor Evaluation and Conclusion (filled by auditor):

Verification Nov 29th, 2021

The company shows evidence of improvement in the form of:

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

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

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

Verification on Dec 20th, 2021

The company shows evidence of improvement in the form of:

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

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

Verification on Dec 23th, 2021

The company shows evidence of improvement in the form of:

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

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

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

Verified by : **Briyogi Shadiwa**

NCR No.	: 2021.07	Issued by	: Briyogi Shadiwa																				
Date Issued	: 24 September 2021	Time Limit	: 23 December 2021																				
NC Grade	: Major	Date of Closing	: 23 December 2021																				
Standard Ref. & Requirement	<p>7.12.4 HCV and HCS forest after 15 November 2018, peatlands and other conservation areas that have been identified, protected and/or enhanced. Integrated management plans to protect and/or enhance HCV and HCS forests, peatlands and other conservation areas are developed, implemented, and adapted where necessary, and supplemented with monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and covers the areas directly managed and takes into account the relevant broader landscape level (if such landscapes have been identified).</p>																						
<p>Evidence observed (filled by auditor): The company has identified the conservation area (HCV) which is described in the 2011 Indonesian Sustainable Palm Oil High Conservation Value Identification Document Report, Laras Estate. Based on the identification of the HCV area, information on the location of HCV 4 in Laras Estate was obtained, including:</p> <table border="1"> <thead> <tr> <th>Division</th> <th>Name</th> </tr> </thead> <tbody> <tr> <td>III</td> <td>Karang Anyar Springs</td> </tr> <tr> <td>II</td> <td>Bah Longgur Springs</td> </tr> <tr> <td>II</td> <td>Sweembad Nagasoppa Springs</td> </tr> <tr> <td>III</td> <td>Tumorang / Mentaling Springs</td> </tr> <tr> <td>IV</td> <td>Lingga Springs</td> </tr> <tr> <td>III</td> <td>Tumorang Riparian</td> </tr> <tr> <td>II</td> <td>Longgur Riparian</td> </tr> <tr> <td>IV</td> <td>Waringin Riparian</td> </tr> <tr> <td>II & III</td> <td>Bah Hapal Riparian</td> </tr> </tbody> </table>				Division	Name	III	Karang Anyar Springs	II	Bah Longgur Springs	II	Sweembad Nagasoppa Springs	III	Tumorang / Mentaling Springs	IV	Lingga Springs	III	Tumorang Riparian	II	Longgur Riparian	IV	Waringin Riparian	II & III	Bah Hapal Riparian
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<p>As a follow-up effort to identify the HCV area in 2011 Laras Estate, the company has developed a management plan and monitor the HCV area for Semester 2021, while the management and monitoring plan includes:</p> <ol style="list-style-type: none"> Management Plan <ul style="list-style-type: none"> • Rehabilitation and Enrichment in river and spring border areas. • Boundary marking maintenance • Create an HCV Plank • Planting "Mindi trees" around the pennant to keep the water clean. Monitoring Plan <ul style="list-style-type: none"> • Monitoring the intensity of disturbances. • Monitoring the success rate of river border rehabilitation. • Monitoring of springs used by the public. 																							
<p>The company also has procedures related to HCV management in the SOP for Management and Monitoring of High Conservation Value Areas (No. SPO 08 Rev. 04, January 2, 2018). The document informs the determination of the buffer zone width for all protected areas, such as:</p> <table border="1"> <thead> <tr> <th>TYPES OF PROTECTED AREAS</th> <th>MANAGEMENT AREA</th> </tr> </thead> <tbody> <tr> <td>Protected Forest Area</td> <td>Maximum 500 meters from forest area</td> </tr> <tr> <td>Coastal Border Area</td> <td>100 meters from the highest tide point towards the land</td> </tr> <tr> <td>Great River Riparian</td> <td>100 meters from the left and right of the river</td> </tr> <tr> <td>Small River Riparian</td> <td>50 meters from the left and right of the river</td> </tr> <tr> <td>Area Around the lake/reservoir</td> <td>50 – 100 meters from the highest tide point</td> </tr> </tbody> </table>				TYPES OF PROTECTED AREAS	MANAGEMENT AREA	Protected Forest Area	Maximum 500 meters from forest area	Coastal Border Area	100 meters from the highest tide point towards the land	Great River Riparian	100 meters from the left and right of the river	Small River Riparian	50 meters from the left and right of the river	Area Around the lake/reservoir	50 – 100 meters from the highest tide point								
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	towards the land
Area Around the spring	At least with a radius of 200 meters around the spring
Mangrove Coastal Area	Minimum 130 times the average value of the difference between the highest and lowest annual tides measured from the lowest low tide line towards the land

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

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

Non-Conformance Description (filled by auditor):

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

Root Cause Analysis (filled by organization audited):

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

Correction (filled by organization audited):

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

Corrective Action (filled by organization audited):

- Establish a PIC who is responsible for identifying HCV areas and monitoring the management of HCV areas in accordance with the program plan that has been made/compiled.
- Provide socialization to the PIC on the procedure for identifying HCV areas in accordance with the identification documents owned by the plantation
- Provide socialization on the procedures for managing the HCV area to workers in Division, especially activities that have the potential to pollute/damage the HCV area such as chemical and fertilizing workers
- Evaluating training participants to socialize HCV area management procedures to workers in division, especially activities that have the potential to pollute/damage HCV areas, such as chemical and fertilizing workers.

- The planning and sustainability department conducts an internal audit of the plantation management system as a form of periodic monitoring to see the realization of the implementation of the HCV area management program that has been carried out by the plantation management and reports. The results of the internal audit are reported to the company's Board of Directors.

Assessor Evaluation and Conclusion (filled by auditor):

Verification Nov 29th, 2021

The company shows evidence of improvement in the form of:

- Commitment to the Mutual Agreement on September 24, 2021 which was agreed by all employees of the management of Laras Estate. The document describes a commitment not to plant oil palm in areas with potential HCV in riverbank areas.
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- Documentation of HCV rehabilitation activities in Block 97 AK of the Laras Estate Unit by planting perennials (mahogany).

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

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

Verification on Dec 20th, 2021

The company shows evidence of improvement in the form of:

- Inventory data on HCV area in the Laras Estate unit.
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The current non-conformance has not been met. Please make sure the company re-analyzes the root of the problem and corrective action.

Verification on Dec 23th, 2021

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- Memo No.: 04.04/KOL/eM-651/XII/2021 concerning Monitoring and Management of HCV Areas for River Border Water Flows, Springs and Wetlands made on 20 December 2021. The memo informs technical directions for managing HCV areas and river/wetland boundaries to all units of the company PT Perkebunan Nusantara IV.
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In addition, the company has established a root cause analysis and future corrective actions.

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

Verified by : **Broyogi Shadiwa**

Identification of Findings, Corrective Actions and Observations at ASA-1.2

NCR No.	: 2022.01	Issued by	: Kiki Fadli
Date Issued	: 7 October 2022	Time Limit	: Next Surveillance
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	2.2.2 All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.		
Evidence observed <i>(filled by auditor)</i> : <ul style="list-style-type: none"> The company shows a list of contracted third parties listed in the contractor list for the period August 2022, such as 1 CPO transporter, 1 PK transporter, 1 Security Service and 1 FFB transporter and it can be shown that the cooperation contract has its own clause regarding the fulfillment of relevant legal obligations. The results of interviews with 2 FFB transport workers and 1 TBS truck driver worker CV Karya Teknik at Division VII Dolok Ilir Plantation and 1 FFB truck driver worker at Division II Laras Estate CV EWS Nusantara III, it was conveyed that the workers did not have a work agreement either with the contractor and not registered with Social Insurance Administration Body Employment. It has not been shown that a third party who has a cooperative relationship with the company can prove the fulfillment of this clause 			
Non-Conformance Description <i>(filled by auditor)</i> : The company has not been able to show sufficient evidence that the third party that has a cooperative bond has fulfilled the relevant legal obligations as stated in the contract clauses including but not limited to the fulfillment of the minimum wage, Social Health/Employment Insurance Administration Body participation and employee employment relations.			
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			

NCR No.	: 2022.02	Issued by	: Haikal Ramadhan Kharismansyah
Date Issued	: 7 October 2022	Time Limit	: Next Surveillance
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	2.3.2 For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1.		
Evidence observed <i>(filled by auditor)</i> : Based on the FFB data from Dolok Ilir Mill, it is known that there is an independent FFB supplier with the name CV Riana Lim. The results of public consultations and management explanations revealed that CV Riana Lim, in addition to selling FFB from his own land, also collects FFB from other parties (agents). The certification unit shows the FFB supplier data for the CV, namely:			

AGENT NAME	ADDRESS	COORDINATE POINT
Sarjono	Bandar Tongah	N.'03°06.33.2' E.'099°13.40.0'
Bambang	Gajing Kahean	N.'03°03.84.4' E.'099°10.71.3'
Mujiman	Gajing Tongah	N.'03°03.83.5' E.'099°10.72.1'
Iwan	Gajing Tongaj	N.'03°03.82.8' E.'099°10.71.8'

As explained by the Director of CV Riana Lim, agents take FFB from other farmers from various sources. However, until Surveillance 1.2 has been completed, it cannot be shown:

1. Source of FFB for each agent along with location of origin of FFB and geolocation information.
2. Evidence of status of ownership or rights/claims to land by the planters/farmers.

As specific guidelines for this indicator state that if the unit of certification has indirect FFB supplying smallholders, then for RSPO-certified PKS, the time requirement to fulfill the indicator is three years from 15 November 2018, which is 15 November 2021. For PKS that have not been certified/Mill who are in the process of their first year of certification, the time requirement for supplying smallholders to fulfill the requirements according to indicator 2.3.1 is three years since the PKS is certified. The requirements in question include:

1. Information regarding the geolocation of the origin of FFB;
2. Evidence of status of ownership or rights/claims to land by the planters/farmers;
3. Where relevant, a valid planting/operational/trade license, or as part of a cooperative so that buying and selling of FFB can be carried out

Non-Conformance Description *(filled by auditor):*
The company has not been able to show sufficient evidence that all FFB obtained indirectly from collection centers (collectors), agents or other intermediaries have the information according to the requirements

Root Cause Analysis *(filled by organization audited):*

Correction *(filled by organization audited):*

Corrective Action *(filled by organization audited):*

Assessor Evaluation and Conclusion *(filled by auditor):*

Verified by

NCR No.	: 2022.03	Issued by	: Haikal Ramadhan Kharismansyah
Date Issued	: 7 October 2022	Time Limit	: Next Surveillance
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	: 3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.		
Evidence observed <i>(filled by auditor):</i>	-		
Non-Conformance Description <i>(filled by auditor):</i>	The unit of certification has not been able to show the annual report submitted to the RSPO secretariat through the certification body during the annual audit, using the RSPO metric template format.		
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	

NCR No.	: 2022.04	Issued by	: Rahmat Abdiansyah
Date Issued	: 7 October 2022	Time Limit	: 05 January 2023
NC Grade	: Major	Date of Closing	: 20 December 2022
Standard Ref. & Requirement	3.4.3 The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.		
Evidence observed <i>(filled by auditor):</i>			
<ul style="list-style-type: none"> • The company has conducted a social impact assessment which is stated in the social impact analysis report document which was prepared in collaboration with PT. Surveyor Indonesia, Indonesian Sustainable Palm Oil Foundation in 2009. The document describes the positive and negative impacts of plantation operations and recommendations for the management of social impacts that will be carried out by the company. • The company has implemented social impact management for the period of 2021 in accordance with the SIA management plan for 2020-2021 such as: <ol style="list-style-type: none"> 1. Improve communication with stakeholders in the village to discuss participatory village development programs based on priorities from the villagers' point of view. 2. Conducting socialization if there is an acceptance of labor to the villages around the plantation. 3. Directing vendors/contractors to prioritize local workforce absorption. 4. Socialization to the community around the plantation regarding the law applicable in the company against the perpetrators of theft. 5. Conduct noise testing in the factory area due to complaints from several people about the noise generated by the processing of Dolok Ilir POM. • The company has reviewed the SIA management plan which was carried out on March 3, 2022 which was carried out in a participatory manner through questionnaires to the surrounding community and employees. From the results of the review, there are recommendations for the SIA management plan, namely: <ol style="list-style-type: none"> 1. Improve communication with stakeholders with village communities. 2. Opportunity to get a job. 3. Opportunity to try and work 4. Scholarships for schoolchildren 5. replanting activities 6. Dissemination to the public regarding company policies. 7. Conflict with farmers • Based on the results of interviews with representatives of the surrounding community in the Serbelawan sub-district and the results of field observations, the following social issues were obtained: <ol style="list-style-type: none"> 1. Information on job vacancies, people feel less informed if there are job vacancies in the company. This has been done by the company by conducting socialization, but this issue is still developing and the company is still managing it and has been listed in the management plan as a result of the review conducted. 2. The results of field observations in the Dolok Ilir PKS area are known that the WWTP Pond Flow Meter is not available. The results of interviews with company representatives revealed that the WWTP Pool Flow Meter 			

<p>was lost because it was stolen. This has been done by the company by conducting socialization, but this issue is no longer listed in the management plan of the review results and this issue is still developing. In addition, the results of the monitoring of the theft issue have not been shown by the company.</p> <p>3. The results of field observations at the Dolok Ilir Estate and Laras Estate which are adjacent to the villages, it is known that many piles of domestic waste are dumped by the community in the company area. The issue related to domestic waste has not been included in the SIA management plan as a result of the review.</p> <p>4. The results of field observations at the Laras Estate show that there are rock excavation activities in the company area bordering the Bah Apal river carried out by the community which have the potential to cause harm and damage to the river border area. This issue has not been included in the company's AIS management plan.</p>
<p>Non-Conformance Description <i>(filled by auditor):</i> Based on this evidence, the Company has not been able to show evidence that the SIA management plan that has been implemented can mitigate developing social issues and the reviewed SIA management plan has not covered all developing social issues.</p>
<p>Root Cause Analysis <i>(filled by organization audited):</i> Lack of understanding of officers who manage SIA in a comprehensive manner which covers all aspects of the social impact analysis report document and issues that are actually developing around the plantation.</p>
<p>Correction <i>(filled by organization audited):</i></p> <ul style="list-style-type: none"> • Demonstrate that the SIA program has been implemented, monitored and updated • Conducting dialogue directly with the community and/or community representatives regarding company policies and accommodating the results of discussions into the SIA report and managing it so that it is well managed and documented and measurable.
<p>Corrective Action <i>(filled by organization audited):</i> Menetapkan PIC khusus yang mengelola laporan SIA sehingga isu-isu yang berkembang di masyarakat dapat terakomodir dengan baik dan monitoring serta evaluasi terhadap tindak lanjut SIA yang dikelola mampu terukur dan tertelusur dengan baik.</p>
<p>Assessor Evaluation and Conclusion <i>(filled by auditor):</i></p> <p>Auditor Verification November 10, 2022 The company has sent proof of improvement in the form of:</p> <ul style="list-style-type: none"> • SIA outreach activities to the public on 25 October 2022. • Dissemination of waste disposal to village communities directly adjacent to the company on 19 October 2022. • Root cause analysis, correction, and corrective action. However, there are still notes and auditor questions. <p>Based on this evidence, the discrepancies in this indicator unfulfilled.</p> <p>Auditor Verification December 6, 2022 The company has sent proof of improvement in the form of:</p> <ul style="list-style-type: none"> • SIA socialization document which was conducted on 25 October 2022. This document contains discussion regarding developing social issues such as theft, garbage disposal, recruitment of workers, etc. However, there are still questions/auditor notes related to this matter as explained in the correction column. • Root cause, Correction, and Corrective action. However, there are still questions/auditor notes related to corrective actions and corrections carried out by the company. <p>Based on this evidence, the discrepancies in this indicator unfulfilled.</p> <p>Major verification on December 20, 2022</p> <ul style="list-style-type: none"> • The company has shown the management and monitoring plan documents carried out by the company to follow up on the results of discussions related to waste disposal by the community in the 2022 period.

- The company already has a management plan related to theft which has been included in the SIA monitoring with a management plan providing socialization related to securing PTPN IV assets and activities, collecting data on areas prone to theft in the plantation company area and so on.
- The company already has a discussion document regarding rock excavation in the company area which is determined to be in the management of the SIA with a management plan to give a warning to quarrying parties whose work is illegal and provide socialization of the impact if the excavation activity widens.
- Based on a field visit to the company's area which is directly adjacent to the surrounding village, it is known that there is still scattered garbage. Based on interviews with the company, socialization will be conveyed to the village in accordance with the management plan and monitoring of social impacts on an ongoing basis. Socialization has been carried out, for example, on October 19, 2022.

Based on the results of interviews with the PIC assigned to monitor the management of social impacts and verified documentary evidence, the discrepancies have been declared **fulfilled** and will be observed in the next assessment.

Verified by : **Rahmat Abdiansyah/ Ririn Sipayung**

NCR No.	: 2022.05	Issued by	: Kiki Fadli
Date Issued	: 7 October 2022	Time Limit	: 05 January 2023
NC Grade	: Major (Recurring)	Date of Closing	: 20 Desember 2022
Standard Ref. & Requirement	6.2.2 Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.		
Evidence observed <i>(filled by auditor):</i> <ul style="list-style-type: none"> • Based on field visits during harvesting activities, it was found that 1 person in Division VII of Dolok Ilir Estate and 1 person in Division III of Laras Estate was helping to collect loose fruit and FFB from harvesters. From the results of interviews with these people, it is known that they get wages from the job of picking loose fruit and FFB, but it is also conveyed that the personnel are not employees of the company and do not have a cooperation agreement with the company and one of the personnel is not yet 18 years old. • The company shows a circular letter with No DOI/SE/06/III/2022 on March 23, 2022 regarding the prohibition on replacing work and bringing family, in point 4 explains that it is prohibited for all employees to replace/transfer/bring family to do work that is part of their job. responsibility to others for any reason. • Law of the Republic of Indonesia No. 13 of 2003 concerning Manpower in Article 50 states that the employment relationship occurs due to the existence of a work agreement between the entrepreneur and the worker/labourer. • Indonesian Government Regulation No. 35 of 2021 concerning fixed period working agreement, outsourcing, working time and rest time, and termination of employment, states that: <ul style="list-style-type: none"> - Article 2 paragraph 1 states that the employment relationship occurs because of a work agreement between the entrepreneur and the worker/labourer. - Article 2 paragraph 4 states that the work agreement is made for a certain time or for an indefinite time. • Corrections were made by showing the minutes of the socialization of the ban on family cup and a letter of reprimand to the harvester with the initials P. However, it is not yet certain, this error did occur only to the worker. Besides that, no plans have been shown to ensure that something similar doesn't happen again in the future 			
Non-Conformance Description <i>(filled by auditor):</i> The company has not been able to show enough evidence that the provisions regarding the prohibition of changing jobs and bringing families to help with work have been consistently implemented			
Root Cause Analysis <i>(filled by organization audited):</i>			

1. Lack of supervision in the field related to workers who are not employees carrying out work activities in the plantation environment.
2. Lack of understanding to all workers including worker supervisors (harvest foreman, 1st foreman and assistant) regarding the prohibition of workers bringing their families to help with work is prohibited both according to company regulations and legal provisions in force in the Republic of Indonesia.
3. There is no clear mechanism for supervising work activities in the field
4. Oversight of the foreman who is less effective and lack of understanding and supervision from the Assistant Head Leadership Employee regarding the prohibition of workers bringing their families

Correction (filled by organization audited):

1. Appoint a PIC to carry out field monitoring related to workers who give their work to other people and carry a family cup at work.
2. Carry out outreach to all workers regarding the prohibition of using illegal labor
3. All harvest workers at harvest time, who are monitored by the harvest foreman every working day do not bring their families.
4. Conduct socialization on the prohibition of workers bringing their families to the Assistant Head so that they can carry out supervision and supervision regarding harvest workers.

Corrective Action (filled by organization audited):

1. Monitor and evaluate every day to ensure harvest workers comply with regulations
2. Supervision of harvest workers
3. Sanctions for violations according to the CLA and the Civil Service Regulations
4. 4. Plan for monitoring harvest workers in 2023 with direct supervision from the Assistant Head

Assessor Evaluation and Conclusion (filled by auditor):

Verification November 9, 2022

The company provided evidence in the form of a decision letter from the manager of Laras Estate and Dolok Ilir Estate to appoint a PIC (assistant and foreman) in monitoring non-employee people participating in work activities.

However, the company still needs to provide an explanation of the auditor team's response, including:

- At the root of the problem, why is there a lack of oversight of non-employees who carry out work activities, while there is supervisory departments such as the harvest foreman, foreman 1 and assistants? (can be reviewed again related to the root of the problem in question)
- Regarding corrective action, from the proof of improvement that was sent, the designated PIC was the previous field supervisor, how can you ensure that the family cup issue will not happen again? (can be reviewed regarding the intended corrective action)
- Regarding preventive measures, was there a previous evaluation, why did the employee not heed the Unit Manager's Circular regarding the prohibition on changing jobs and bringing a family cup? (can be reviewed again related to the intended preventive measures)

Based on this, the discrepancy in this indicator is declared not fulfilled

Verification date December 5, 2022

The company has reviewed the root of the problem, corrective actions and corrective actions and has input from the previous NCR, but there are still a number of auditor questions and evidence that has not been sent, including the following:

- In the root of the problem column □ Apart from the circular letter, is there a mechanism in place to monitor employees so they don't bring in people who are not working status (family cup)?
- In the column for corrective actions in number 2, please correct the narration and request for corrections to be added referring to the root of problem number 2.

- In the corrective action column, please show evidence of the implementation of the monitoring and evaluation

Based on this, the discrepancy in this indicator is declared not fulfilled Verifikasi Major 20 Desember 2022

- Based on field visits to harvesting activities and interviews with 4 harvesters in Block 16K Division 2 Laras Estate, it is known that harvesters work alone without the help of others. The harvesters are also aware of the prohibition against bringing family members/support workers to help with work in the field.
- Based on field visits to harvesting activities and interviews with 4 harvesters in Block 16BR Division 4 and 3 harvesters in Block 16BG Division 3 Dolok Ilir Estate, it is known that harvesters work alone without the help of others. The harvesters are also aware of the prohibition against bringing family members/support workers to help with work in the field.
- The company shows circular no. DOI/SE/49/XII/2022 dated 15 December 2022 regarding the Prohibition of Hiring Workers Who Do Not Have Work Ties/Harvest Assistance (Family Cup). The circular contains a prohibition against not carrying out family cups, imposing sanctions on employees who do family cups, and monitoring and evaluating compliance with vendor/service provider regulations.
- Socialization of the Prohibition of Hiring Workers who do not have work ties which was carried out on December 15, 2022 was conveyed to the Foreman I Division, Harvest Foreman, Maintenance Foreman, Assistant for Plantation Personnel, Plant Clerk and attended by 29 participants at the Dolok Ilir Estate.
- Socialization of the Prohibition of Hiring Workers who do not have work ties which was carried out on December 15, 2022 was conveyed to the Foreman I Division, Harvest Foreman, Maintenance Foreman, Assistant for Plantation Personnel, Plant Clerk and attended by 31 participants at Laras Estate.
- The company shows the plan for the Illegal Labor monitoring program at Laras Estate unit made by the Plantation Personnel Assistant. The programs that have been made include making an integrity pact related to the policy on the prohibition of illegal workers, outreach to employees, determining the PIC to monitor illegal workers, and monitoring the status of workers in the field.
- The company shows documents monitoring the use of auxiliary labor at the Dolok Ilir Plantation for all Division. For example the Prohibition on the Use of Illegal Working Division VIII for the November 2022 period. Based on this monitoring, it is known that there is no use of illegal labor in the plantations.
- Circular No. DOI/SE/Intern/47/XI/2022 dated 26 November 2022 concerning the Prohibition of the Use of Illegal Labor and the Obligation of PPE.
- The company shows documents monitoring the use of auxiliary labor in Laras Estate for all departments. For example the Prohibition on the Use of Illegal Working Division I for the November 2022 period. Based on this monitoring, it is known that there is no use of illegal labor in the plantations.
- Circular No. LAR/SE/Intern/.../XI/2022 dated 26 November 2022 concerning the Prohibition of the Use of Illegal Labor and the Obligation of PPE.
- The company shows the CLA which contains sanctions if employees violate their duties and work which results in losses to the company.

Verification Date Desember 28, 2022

- The company provides additional root cause analysis and corrective action.
- The company showed a plan for the monitoring program for harvest workers for the Dolok Ilir and Laras units for 2023 which was made by the plantation personnel assistant. This monitoring will be carried out by the Assistant Head of the Dolok Ilir and Laras Plantation Services.
- - Re-socialization of the ban on the use of auxiliary labor which was carried out on 27 December 2022 at the Dolok Ilir and Laras Units which was also attended by the assistant head of the crop service.

In this regard, nonconformity have been met and will be observed again in the next assessment.

Verified by	Asystasya Aishah Silalahi
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NCR No.	: 2022.06	Issued by	: Kiki Fadli
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Date Issued	: 7 October 2022	Time Limit	: Next Surveillance
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	6.2.7 Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.		
Evidence observed <i>(filled by auditor):</i> <ul style="list-style-type: none"> Based on the list of employees for the period of September 2022, it is known that there are 176 harvest workers with permanent employee status and 53 others with fixed period working agreement status. The company shows the statement area of Dolok Ilir Estate with a mature area of 5,924 Ha. If it is simulated for the need for harvest labor with the provisions of a 6-day harvest plot and a permanent work target of 3 hectares, then the number of harvesters needed is 329 people, so that from the September 2022 period of harvesting workers as many as 229 people (permanent worker and fixed period working agreement) there is still a difference in the number harvest labor of 100 people. Based on interviews with harvest workers, for example, 2 harvest workers (with the initials RK and N) in Division VI and 1 harvest worker (with initials RWN) in Division VII Dolok Ilir Estate, it was stated that the workers are employees with fixed period working agreement status with the longest working period. starting from 2019. The company also shows the results of employee assessments for the period July 1, 2021 to November 19, 2021 with a recommendation for an extended fixed period working agreement. Indonesian Government Regulation No. 35 of 2021 concerning fixed period working agreement, outsourcing, working time and rest time, and termination of employment in article 4 paragraph 2 states that fixed period working agreement cannot be held for permanent work. Decree of the Central Executive Board of GAPKI No. SK/002/PPG/II/2013 concerning the flow of work implementation processes in the oil palm plantation business sector states that harvesting and processing FFB into CPO is the main job. 			
Non-Conformance Description <i>(filled by auditor):</i> The company has not been able to show sufficient evidence that all the main work has been carried out by permanent workers.			
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			

NCR No.	: 2022.07	Issued by	: Rahmat Abdiansyah
Date Issued	: 7 October 2022	Time Limit	: Next Surveillance
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.		

Evidence observed *(filled by auditor):*

Hazardous and Toxic waste

Based on document verification and the results of field observations, the following evidences were obtained:

- The SOP for the management of hazardous and toxic waste (B3) with SPO Number 02 revision 03 dated January 02, 2017 explains that all Hazardous waste and former Hazardous waste packaging produced must not be used for other purposes and must be directly submitted to the Temporary Storage of Hazardous Waste located permission.
- The results of field observations at the Division 7 Estate Dolok Ilir office revealed that there were 2 Pcs of hazardous waste type paint cans and 1 Pcs of used motor oil containers which were not placed in the Temporary Hazardous Waste Storage.
- Observations in the Dolok Ilir POM area revealed that there were 6 Pcs of hazardous waste type paint cans in a pile of scrap metal that was not placed in the Temporary Storage of Hazardous Waste.
- The results of observations in the POM Dolok Ilir Workshop area revealed that there were 2 Pcs of Hazardous Waste of the type of used lamps which were not placed in the Temporary Hazardous Waste Storage Area.
- Based on field observations at the Laras Central Estate Warehouse, it was found out that there were 12 drums of used fertilizer containers of Humega Liquid type which were not placed in the Temporary Storage of Hazardous Waste.
- The results of field observations in the Engineering Room of the Laras Estate revealed that there were 3 Pcs of used filter type hazardous waste which were not placed in the Temporary Hazardous Waste Storage Area.

Domestic Waste

Based on document verification and the results of field observations, the following evidences were obtained:

- SOP for the management of household domestic waste with SPO Number 20 Revision 03 On January 2, 2018 it is known that every employee collects his waste in the provided trash can and cleans the yard around the housing. Disposal of waste by sorting organic and inorganic waste. The cleaning staff periodically collects waste from the Temporary Place and takes it to the Final Disposal Site using the tools provided.
- The results of observations at the Dolok Ilir POM employee housing revealed that there were piles of household domestic waste at 2 points behind the housing.
- The results of field observations at the Division 1 Estate Laras housing estate revealed that there was a hole for domestic waste in the housing area in which there was domestic waste mixed with organic and inorganic waste.
- The results of field observations in the housing of Dolok Ilir POM employees revealed that there were 2 points of burning domestic waste in the housing area.
- The results of field observations at the employee housing Division 6 Estate Dolok Ilir revealed that there were traces of domestic waste burning in the housing area.

Non-Conformance Description *(filled by auditor):*

The company has not been able to show sufficient evidence that waste management is in accordance with its SOP.

Root Cause Analysis *(filled by organization audited):*

Correction *(filled by organization audited):*

Corrective Action *(filled by organization audited):*

Assessor Evaluation and Conclusion *(filled by auditor):*

Verified by

NCR No.	:	2022.08	Issued by	:	Rahmat Abdiansyah
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Date Issued	: 7 October 2022	Time Limit	: Next Surveillance
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	7.12.7 The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.		
Evidence observed <i>(filled by auditor):</i> Based on document verification and the results of field observations, the following evidences were obtained: <ul style="list-style-type: none"> • The results of the previous assessment revealed that there were discrepancies related to the replanting activities in the river border area (HCV) at the Laras Estate. • The company has evaluated the implementation of the management plan based on the results of the 2021 HCV monitoring carried out on January 22, 2022 (Dolok Ilir Estate) and January 15, 2022 (Estate Laras). From the results of the evaluation conducted by the company, it is known that the function of the HCV area in the last 5 years is in good condition and there is no damage. This is contrary to the actual conditions in the field where in 2021 (ASA 1.1) there will be HCV areas replanted by the company. In addition, from the evaluation results it is known that there is no follow-up that will be carried out by the company. • Based on the results of field observations at the Dolok Ilir Estate and Laras Estate during the audit activity, the company is currently carrying out replanting. In addition, the results of the verification of the long-term plan document revealed that in the next 5 years the company will also carry out replanting. • The company already has a HCV management and monitoring plan for the period 2021-2022 where there are several activities to be carried out, for example, socialization of HCV to employees and the community, inventory of the types and number of trees that have been planted, making markers for HCV areas, and installing signs. hunting ban. However, there has been no activity to ensure that replanting activities are not carried out in HCV areas. 			
Non-Conformance Description <i>(filled by auditor):</i> Based on this evidence, the company has not been able to show evidence that the results of the monitoring carried out are in accordance with actual conditions so that no follow-up has been taken to improve the management plan.			
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			

NCR No.	: 2022.09	Issued by	: Haikal Ramadhan Kharismansyah
Date Issued	: 7 October 2022	Time Limit	: 05 Januari 2023
NC Grade	: Major	Date of Closing	: 21 Desember 2022
Standard Ref. & Requirement	Certification System 5.5.3		

	<p>Requirements for uncertified management units:</p> <ol style="list-style-type: none"> No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12. Any new plantings since 1 January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB. 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 P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8. Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2. Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1.
<p>Evidence observed <i>(filled by auditor):</i> The company has shown documents related to the Time Bound Plan for all units that have not been RSPO certified on November 22, 2021. The document informs the condition of the units that have not been certified, such as:</p> <ul style="list-style-type: none"> HCV assessment process and progress. Information on new land clearing. <p>However, the document has not been accompanied by supporting documents or evidence related to legal compliance (criterion 2.1), labor issues (criterion 4.2), issues of land conflict (criteria 4.4, 4.5, 4.6, 4.7 and 4.8), and also the development of land remediation & compensation (criterion 7.12).</p>	
<p>Non-Conformance Description <i>(filled by auditor):</i> The company has not been able to show sufficient evidence that all units that have not been certified have met the requirements accompanied by supporting documents.</p>	
<p>Root Cause Analysis <i>(filled by organization audited):</i> The revision of the timebound plan is coordinated directly by Holding Perkebunan Nusantara. So that the time bound plan used is based on what has been approved by the RSPO. During the audit, the Partial Audit document was not shown.</p>	
<p>Correction <i>(filled by organization audited):</i></p> <ul style="list-style-type: none"> Submitting the results of the Partial Audit Revising the updated time bound plan and sending it to Holding Perkebunan Nusantara 	
<p>Corrective Action <i>(filled by organization audited):</i></p> <ul style="list-style-type: none"> Coordinate with the Planning and Sustainability Section regarding the provision of Partial Audit documents. Coordinate with the Nusantara Plantation Holding for revisions to the time bound plan. 	
<p>Assessor Evaluation and Conclusion <i>(filled by auditor):</i> Verifikasi Major 21 Desember 2022</p> <p>Based on PTPN Holding's time bound plan, it is known that there are 74 units that are not yet RSPO certified. Then the company has shown a self-assessment carried out by the internal auditor team from PTPN Holding. Until the major verification was carried out, there were around 35 units that had carried out self-assessments. Related to this, this discrepancy has been fulfilled and for self-assessment other PTPN units will be observed again in the next assessment.</p>	
<p>Verified by</p>	<p>Asystasya Aishah Silalahi</p>

3.4.2. Opportunity for Improvement

No	Ref. Std.	Description
1	3.6.2	<p>The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>The company has the opportunity to follow up on the results of audiometric and spirometry examinations</p>
2	4.3.1	<p>Contributions to community development that are based on the results of consultation with local community are demonstrated.</p> <p>The certification unit already has Basic Guidelines and Work Instructions for the Distribution of Partnership Program Funds, Community Development and Corporate Social Responsibility Document Number: 04.PKBL/04.PKBL/SUB/P/002 June 2013 revision 1 dated 1 August 2018. These guidelines, among others, explain about Partnerships, CSR, and the Community Development Work Program.</p> <p>It has been shown that the CSR/Environmental Development work programs for 2022 are as follows:</p> <ul style="list-style-type: none"> • Free takjil distribution • Cheap oil distribution • MTQN implementation assistance • Help for flood victims • Good Friday distribution • Rice distribution <p>Based on the compiled program, it is known that the activities are in the form of social assistance, while from the results of public consultations with representatives of Dolok Ilir Satu Village, Dolok Tenera Village, and Lutah Serbelawan, information was obtained that apart from social assistance, empowerment programs are also needed, such as support for SMEs or BUMDES. The Village Party also feels that so far they have never been involved/asked for opinions related to the preparation of community development programs.</p> <p>Thus, the company has the opportunity to:</p> <ol style="list-style-type: none"> 1. Involve relevant stakeholders in the preparation of community development programs (CSR/PKBL/Partnerships). 2. Develop community development programs in accordance with existing guidelines. In addition to social assistance, you can also consider partnership and community empowerment programs
2	7.11.2	<p>The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.</p> <p>The company shows a list of facilities and infrastructure for preventing and controlling land fires and plans to add these facilities and infrastructure. Furthermore, the company has the opportunity to take an inventory and complete the facilities and infrastructure for the prevention and control of land fires in accordance with the Ministry of Agriculture 5 of 2018.</p>

3.4.3. Noteworthy Positive Components

No.	Description
1	Consistency in following the RSPO assessment process
2	Good cooperation with the companion team

3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Agriculture Agency of Simalungun District Plantation Section</p> <p>The company has complied in reporting the development of its plantation business every four months even though it is an obligation that it should be reported every 6 months.</p> <p>So far, I have never heard of issues regarding environmental pollution, pest outbreaks due to replanting or land fires. The company also has fire control facilities and infrastructure for emergency response situations.</p>	<p>In general there are no negative issues that require further verification. Completion of land fire control facilities and infrastructure in accordance with applicable regulations has been used as an opportunity for improvement</p>
<p>Environmental Agency of Simalungun District section Control of Pollution and Environmental Damage</p> <p>In 2022, there were visits and evaluations related to the company's Land Application capacity. The written permit is 30 tons, but the facts on the ground and the realization of production show a higher capacity so that the permit must be added to and issued a new Operational Eligibility Letter. This is currently in the process of being managed</p>	<p>In accordance with the permit granted, the milling capacity of the POM is 60 tons of FFB/hour. Meanwhile, the actual language in the environmental document is that when the LA study was conducted, the factory capacity was 30 Tons of FFB/hour. Related to this, the company has conducted consultations and follow-up with the relevant agencies. Until now the process is still ongoing</p>
<p>Bandar Selamat Village Religious Leader</p> <p>The company pays attention to religious developments in the surrounding area, such as mosque assistance and Ramadan safari activities. In addition, in annual events such as Eid al-Fitr and Eid al-Adha, they usually provide assistance regularly.</p> <p>One of the empowerments for religious leaders (Muslims in particular) is by providing opportunities for religious leaders to give da'wah in Division especially during Ramadan activities.</p>	<p>In general there are no negative issues that require further verification</p>
<p>Manpower Office of Simalungun District</p> <p>The relationship and coordination between the company and the agency is going quite well. So far, there have been no issues regarding industrial relations issues. Based on data owned by the Department of Manpower, it is known that there are still harvest employees with PKWT status. In addition, there are employees with outsourcing status from other companies.</p> <p>At the end of 2021, there was a work accident that resulted in death (the harvester of PKWT Dolok Ilir Estate). To the knowledge of the service, all workers' rights have been completed by the company in accordance with applicable regulations</p>	<p>In general there are no negative issues that require further verification</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
National Land Agency	Until the assessment is completed, there has been no confirmation from the resource person. Whatsapp from the auditor has not been responded to regarding willingness/unwilling to be a resource person
Representative of Tumorang Village	Until the assessment is completed, there has been no confirmation from the resource person. Whatsapp from the auditor has not been responded to regarding the willingness/unwillingness to be a resource person. The resource person replied to whatsapp two days after the activity was completed
Representative of Bah Gunung Village	Until the assessment is completed, there has been no confirmation from the resource person.
Labor union (Estate & Mill) <ul style="list-style-type: none"> • The company has provided PPE and wages in accordance with applicable regulations • There are cases of work accidents in the Dolok Ilir estate in 2021. The rights for the Dolok Ilir estate including Social Insurance Administration Body claims have been paid in 2022. • The company routinely conducts high-risk health checks as well as periodic health checks. • There are temporary workers but for harvest. • The company has provided socialization related to CLA, company policies, work procedures and others. • Issues from the RSPO complaint portal : <ul style="list-style-type: none"> - https://askrspo.force.com/Complaint/s/case/5000o00002PZMO7AAP/detail - https://askrspo.force.com/Complaint/s/case/5000o00002PYscZAAT/detail 	Related to the issue from the RSPO complaint portal, has been discussed in indicator 4.2.4
Gender Committee <ul style="list-style-type: none"> • No cases of sexual harassment in the last 1 year • Menstrual leave is available with a mechanism to report to the foreman and will be examined at the clinic. • Maternity leave is given 1.5 months before and 1.5 months after giving birth by showing the results of a doctor's examination. • There is no difference between male workers and female workers. Every worker has equal rights in terms of employment opportunities and also anonymity protection. 	There are no negative issues that need further verification
CV Riana Lim <ul style="list-style-type: none"> • There is a collaboration between CV Riana Lim and the company. • FFB comes from own land, from farmers, and from agents around. 	There are no negative issues that need further verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none">• There are no complaints regarding the payment of FFB and the price of FFB.• So far the cooperation has been going well.	

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 style="text-align: center;">Signed on behalf of:</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p>PT Perkebunan Nusantara IV Management Representative</p>  <p><u>Pirogok Panggabean</u> Wednesday, 28 December 2022</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Haikal Ramadhan Kharismansyah</u> Wednesday, 28 December 2022</p> </div> </div>

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Environment Agency of Simalungun Regency	Simalungun Regency	-	Via Telephone	4 October 2022	√	-
2	FFB Supplier (CV Rianalim)	Simalungun Regency	-	Via Telephone	6 October 2022	√	-
3	Head of Rabuhit Village	Simalungun Regency	-	Via Telephone	4 October 2022	√	-
4	Head of Serbalawan Village	Simalungun Regency	-	Via Telephone	4 October 2022	√	-
5	National Land Agency	Simalungun Regency	-	Via Telephone	4 October 2022		√
6	Labor Union	Simalungun Regency	-	Via Telephone	6 October 2022	√	-
7	Community leader of Bandar Selamat Village & Nagari Dolok Tenera	Simalungun Regency	-	Interview (direct and via Phone)	4 October 2022	√	-
8	Greenpeace	-	info.id@greenpeace.or.id	Email	26 September 2022	-	√
9	Sawit watch	Bogor, Indonesia	info@sawitwatch.or.id	Email	26 September 2022		√
10	WWF	Jakarta, Indonesia	wwf-indonesia@wwf.or.id	Email	26 September 2022		√
11	WALHI	Jakarta, Indonesia	informasi@walhi.or.id	Email	26 September 2022		√
12	AMAN	Jakarta, Indonesia	rumahaman@cbn.net.id	Email	26 September 2022		√

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
13	Plantation Office of Simalungun Regency	Simalungun Regency	-	Via Telephone	4 October 2022	√	-
14	PT Jaya Wira Manggala (Contractor Security Service)	Medan City, Sumatera Utara Province	-	Via Telephone	4 October 2022	√	-
15	Gender Committee	Dolok Ilir POM & Dolok Ilir Estate	-	Direct Interview	6 October 2022	√	-
16	Tumorang Village	Simalungun Regency	-	Via Telephone	4 October 2022	-	√
17	Bah Gunung Village	Simalungun Regency	-	Via Telephone	4 October 2022	-	√
18	CV Riana Lim	Simalungun Regency	-	Via Telephone	4 October 2022	√	

Appendix 2. Assessment Program

DATE	03 – 07 October 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 03 October 2022		
07.05 – 09.30	Jakarta (CGK) → Kualanamu (KNO)	All Auditor
10.00 – 12.00	KNO – Site (Dolok Ilir)	
12.00 – 14.00	Lunch break and preparing for opening meeting	
14.00 – 15.00	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
15.00 – 17.00	Document Review <ul style="list-style-type: none"> • Basic Info, Metric Template, Stakeholder list, Supporting Map, RKH, etc 	All Auditor
Tuesday, 04 October 2022		
08.00 – 12.00	Public Consultation and Document Review <ul style="list-style-type: none"> • Public consultation with stakeholder to relevant agency in Simalungun Regency (by Phone) • Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier • Stakeholder consultation to affected communities surrounding the plantations and previous land owner • Document Review • Verification of Basic Information Mill and Estate 	HRK
08.00 – 12.00	Field observation to Dolok Ilir Estate <ul style="list-style-type: none"> • Implementation of legal aspect (Land Ownership, Legal Boundaries) and HCV Management • Implementation of Agronomy Aspect (Harvesting & transport, Manuring, Pesticide Application, IPM, EFB Application, etc) • Implementation of environment and waste management aspect (inspection to chemical storage, fertilizer storage, Hazardous Waste Storage, clinic, etc) • Observation of worker facilities (housing, school, worship, clean water, etc) 	RAB BMG KKF
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	Field observation to Dolok Ilir POM : <ul style="list-style-type: none"> • Supply chain verification (FFB receiving, weighbridge, FFB Sorting, Despatch CPO) • Observation to chemical storage, hazardous waste storage, POME Pond, Emergency simulation, WWTP, etc • Observation to processing activity 	All Auditor
16.00 – 17.00	Presentation of Daily Progress.	All Auditor
Wednesday, 05 October 2022		
08.00 – 12.00	Field observation to Laras Estate <ul style="list-style-type: none"> • Implementation of legal aspect (Land Ownership, Legal Boundaries) and HCV Management • Implementation of Agronomy Aspect (Harvesting & transport, Manuring, Pesticide Application, IPM, EFB Application, etc) 	HRK BMG

DATE	03 – 07 October 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	<ul style="list-style-type: none"> Implementation of environment and waste management aspect (inspection to chemical storage, fertilizer storage, Hazardous Waste Storage, clinic, etc) Observation of worker facilities (housing, school, worship, clean water, etc) 	RAB KKF
12.00 – 14.00	Break	All Auditor
14.0 – 17.00	<ul style="list-style-type: none"> Document review and completing audit checklist. Continuing public consultation (If needed) 	All Auditor
16.30 – 17.00	Presentation of Daily Progress.	All Auditor
Thursday, 06 October 2022		
08.00 – 12.00	Document review and completing audit checklist.	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 16.00	Document review and completing audit checklist. Interview with related personnel's during field observation (by phone).	All Auditor
16.00 – 17.00	Presentation of Daily Progress.	All Auditor
Friday, 07 October 2022		
08.00 – 09.00	Internal Meeting Auditor Team	All Auditor
09.00 – 11.30	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
11.30 – 13.00	Break/Friday Prayer	All Auditor
13.00 – 15.00	Site → KNO	All Auditor
16.45 – 19.15	KNO → CGK	All Auditor