

***Roundtable on Sustainable Palm Oil Certification
R S P O*****[✓] Surveillance**

Name of Management Organisation : ANJA Siais Palm Oil Mill – PT Austindo Nusantara Jaya Agri Siais
Subsidiary of PT Austindo Nusantara Jaya Agri
Plantation Name : PT Austindo Nusantara Jaya Agri Siais (Lembah Subur Utara Estate and
Lembah Subur Selatan Estate) and Koperasi Tani Binasari
Location : Village of Pardomuan, Sub District of Angkola Selatan, District of Tapanuli
Selatan, Province of Sumatera Utara, Indonesia
Certificate Code : MUTU-RSPO/046
Date of Initial Registration : 25 September 2014
Date of Certificate Issue : 25 September 2019 Date of License Issue : 25 September 2023
Date of Certificate Expiry : 24 September 2024 Date of License Expiry : 24 September 2024

Assessment	Assessment Date	PT Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.4	5 – 9 June 2023	Hasiholan Sihombing (Lead Auditor), Septian Maulana, Rizki Tanaya, Iwan Perala	Moh Arif Yusni	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.4	03 August 2023

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

TABLE OF CONTENT

FIGURE

Figure 1. Location Map of PT. Austindo Nusantara Jaya Agri Siais	1
Figure 2. Operational Map of PT. Austindo Nusantara Jaya Agri Siais	2

Abbreviations Used	3
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1.0 SCOPE of the CERTIFICATION ASSESSMENT

1.1 Assessment Standard Used	5
1.2 Organisation Information	5
1.3 Type of Assessment	5
1.4 Location of Mill and Plantations	5
1.5 Description of Area Statement	6
1.6 Planting Year and Cycle	6
1.7 Description of Mill and Supply Base	6
1.8 Estimate Tonnage of Certified Product	7
1.9 Other Certifications	8
1.10 Time-Bound Plan	8

2.0 ASSESSMENT PROCESS

2.1 Assessment Team	10
2.2 Assessment Methodology, Assessment Process and Locations of Assessment	10
2.3 Stakeholder Consultation and Stakeholders Contacted	13
2.4 Determining Next Assessment	13

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification	14
3.2 Conformity Checklist of Certificate and Logo Use	65
3.3 Summary of RSPO Partial Certification	66
3.4 Identification of Findings, Corrective Actions, Observations, Opportunity for Improvement and Noteworthy Positive Components	68
3.5 Summary of Arising Issues from Public and Auditor Verification	77

4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY

4.1 Formal Signing of Assessment Findings	81
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APPENDICES

1. List of Stakeholders Contacted in the RSPO Certification Process	82
2. Assessment Program	84

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

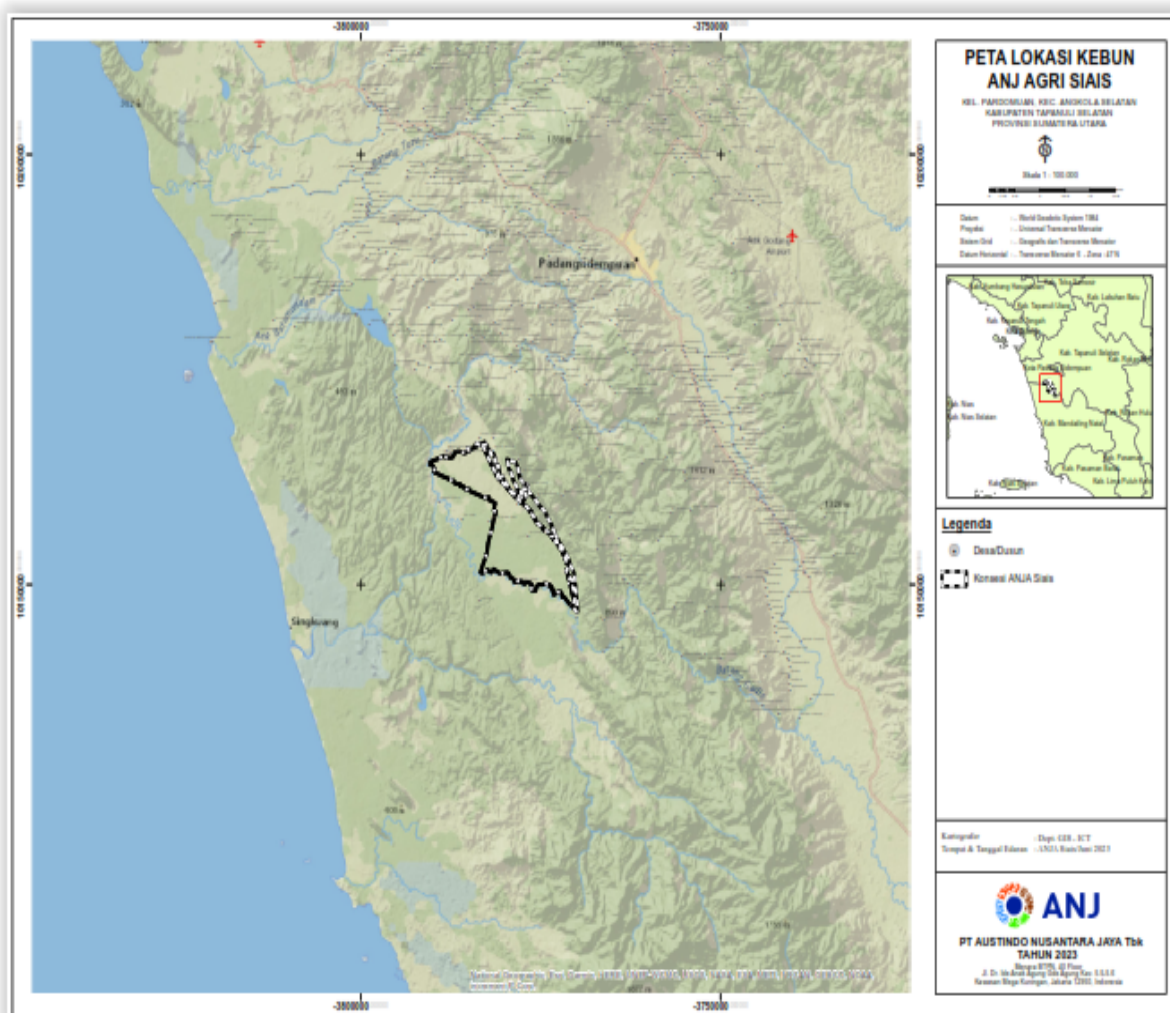
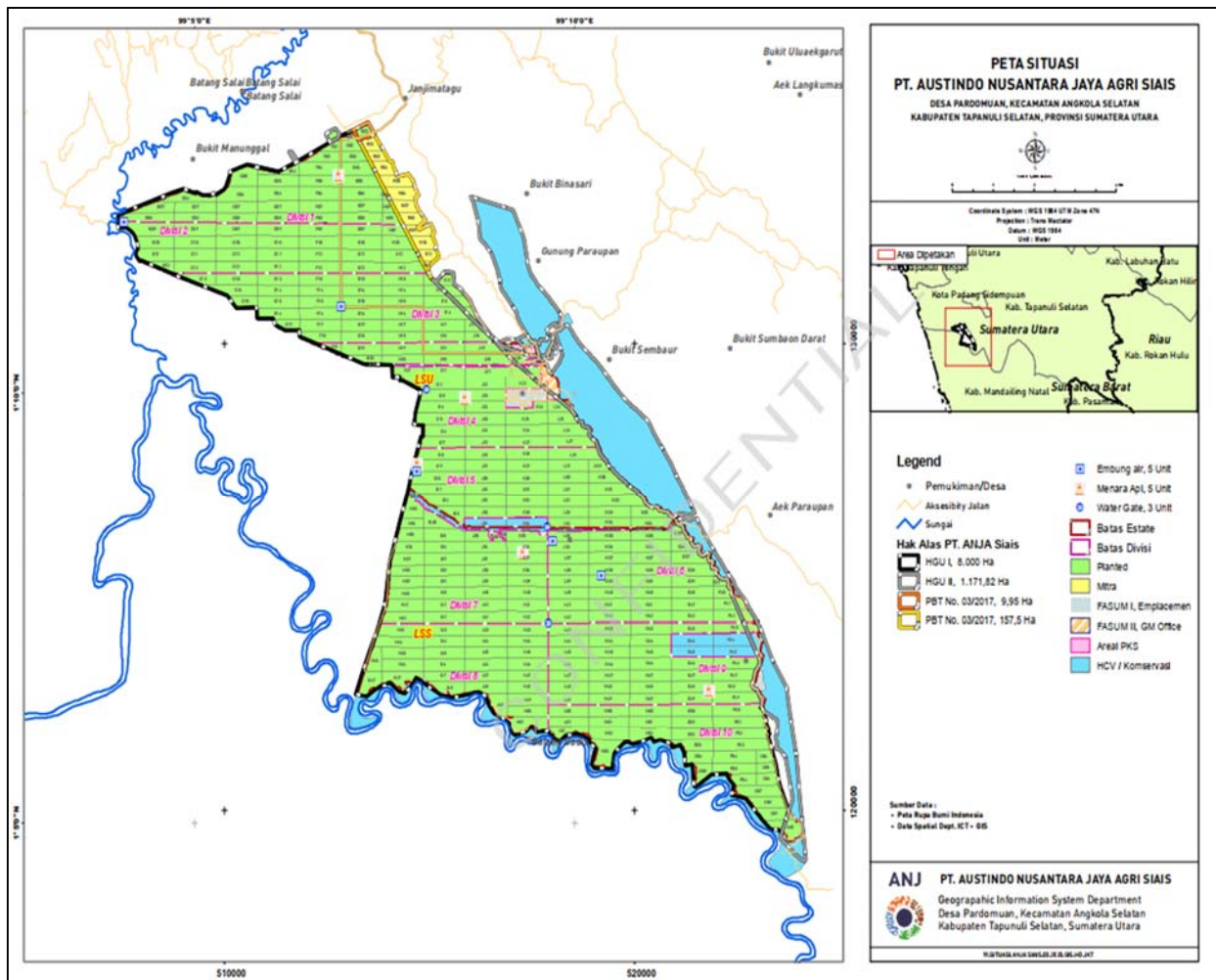


Figure 2. Operational Map of PT Austindo Nusantara Jaya Agri Siais



Abbreviations Used

ANDAL	:	Environmental Impact Assessment
ANJA	:	Austindo Nusantara Jaya Agri
ASA	:	Annual Surveillance Assessment
BOD	:	Biological Oxygen Demand
BNN	:	<i>Badan Narkotika Nasional</i> (National Narcotics Board)
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> / Social Security Administrator
BPJN	:	<i>Badan Pertanahan Nasional</i> (National Land Agency)
CB	:	Certification Body
CD	:	Corporate Development
CH	:	Certificate Holder
COVID-19	:	Coronavirus Disease 2019
CPT	:	<i>Circle, path dan TPH</i> / Circle, path and FFB collecting place
CSR	:	Corporate Social Responsibility
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CPO	:	Crude Palm Oil
DPRD	:	<i>Dewan Perwakilan Rakyat Daerah</i> (Regional House of Representatives)
EFB	:	Empty Fruit Bunch
EHS	:	Environmental Health and Safety
EIA	:	Environment Impact Assessment
FFB	:	Fresh Fruit Bunches
FPIC	:	Free, Prior, Informed, Consent
GHG	:	Green House Gases
GM	:	General Manager
GMO	:	General Manager Office
GPS	:	Global Positioning System
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha</i> (Land Use Permit)
HIRA	:	Hazard Identification Risk Assessment
HIRAC	:	Hazard Identification Risk Assessment Control
HIRADC	:	Hazard Identification Risk Assessment Determining Control
HR	:	Human Resource
HRD	:	Human Resource Development
HRO	:	Human Resources Officer
IPAL	:	<i>Instalasi Pengelolaan Air Limbah</i> (Effluent Plant)
IPM	:	Integrated Pest Management
IUCN	:	International Union for Conservation of Nature
JKK	:	<i>Jaminan Kecelakaan Kerja</i> / Work Accident Insurance
JKM	:	<i>Jaminan Kematian</i> / Insurance Death
JHT	:	<i>Jaminan Hari Tua</i> / Old Age Security
KER	:	Kernel Extraction Rate
KTPA	:	<i>Kelompok Tani Peduli Api</i> (Community Fire Care)
LSS	:	Lembah Subur Selatan Estate
LSU	:	Lembah Subur Utara Estate

LUCA	:	Land Use Change Analysis
MB	:	Mass Balance
MCU	:	Medical Check Up
MDA	:	<i>Madrasah Diniyah Awaliyah</i> (Islamic Elementary School)
MSDS	:	Material Safety Data Sheets
NGO	:	Non-Government Organizations
OER	:	Oil Extraction Rate
OHS	:	Occupational Health and Safety
OSS	:	Online Single Submission
P&C	:	Principles and Criteria
PHL	:	<i>Pekerja Harian Lepas</i> / Daily Worker
PIC	:	Person In Charge
PK	:	Palm Kernel
PKWT	:	<i>Perjanjian Kerja Waktu Tertentu</i> / Contract Worker
PKWTT	:	<i>Perjanjian Kerja Waktu Tidak Tertentu</i> / Permanent Worker
POM	:	Palm Oil Mill
POLRI	:	<i>Polisi Republik Indonesia</i> (Indonesian Police)
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
PPLH	:	<i>Pusat Penelitian Lingkungan Hidup</i> (Environmental Research Center)
PT ANJA Siais	:	PT Austindo Nusantara Jaya Agri Siais
RaCP	:	Remediation and Compensation Plan
RKL	:	<i>Rencana kelola lingkungan</i> (Environment Management Plan)
RPL	:	<i>Rencana pemantauan lingkungan</i> (Environment Monitoring Plan)
RSPO	:	Roundtable on Sustainable Palm Oil
RTE	:	Rare, Threatened and Endangered
SEIA	:	Social and Environmental Impact Assessment
SERBUNDO	:	<i>Serikat Buruh Perkebunan Indonesia</i>
SIA	:	Social Impact Assessment
SCCS	:	Supply Chain Certification System
SOP	:	Standard Operating Procedure
TNI	:	<i>Tentara Republik Indonesia</i> (Indonesian Army)
TPA	:	<i>Tempat Pembuangan Akhir</i> (Landfill)
TPS 3R	:	<i>Tempat Pembuangan Sampah dengan Reduce, Reuse, Recycle</i> (Waste Disposal Place by Reduce, Reuse, Recycle Method)
TPST	:	<i>Tempat Pembuangan Sampah Terpadu</i> (Integrated landfill)
UKL-UPL	:	<i>Upaya Pengelolaan Lingkungan dan Upaya Pemantauan Lingkungan</i> (Environment management and Monitoring Plan)
WI	:	Work Instruction
WLTK	:	<i>Wajib Laporkan Tenaga Kerja</i> / Employment Report
WTP	:	Water Treatment Plant
WWTP	:	Wastewater Treatment Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT								
1.1	Assessment Standard Used	<ul style="list-style-type: none"> 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 Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020. 							
1.2	Organisation Information								
1.2.1	Organisation name listed in the certificate	PT Austindo Nusantara Jaya Agri Siais							
1.2.2	Contact person	Antoperis Tarigan							
1.2.3	Organisation address and site address	<p>RSPO registered company: Sinar Mas Land Plaza 7th Floor. Jl. Pangeran Diponegoro, No. 18. Medan, Sumatera Utara, Indonesia, 20152</p> <p><u>Liaison Office:</u> Menara BTPN Lantai 40 Jalan Dr. Ide Anak Agung Gde Agung Kav 5.5 – 5.6 Kawasan Mega Kuningan, Jakarta 12950</p>							
1.2.4	Telephone	(62 61) 453 7480							
1.2.5	Fax	(62 61) 453 8366							
1.2.6	E-mail	antoperis.tarigan@anj-group.com							
1.2.7	Web page address	www.anj-group.com							
1.2.8	Management Representative who completed the application for certification	Jekson Simaremare (Pjs General Manager)							
1.2.9	Registered as RSPO member	1-0032-07-000-00 on 27 February 2007							
1.3	Type of Assessment								
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base: ANJA Siais POM, Lembah Subur Utara Estate, Lembah Subur Selatan Estate, and Koperasi Tani Binasari							
1.3.2	Type of certificate	Single							
1.4	Locations of Mill and Plantation								
1.4.1	Location of Mill								
	Name of Mill	Location	<table border="1"> <thead> <tr> <th colspan="2">Coordinate</th> </tr> <tr> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>N 01° 10' 31"</td> <td>E 99° 09' 21"</td> </tr> </tbody> </table>	Coordinate		Latitude	Longitude	N 01° 10' 31"	E 99° 09' 21"
Coordinate									
Latitude	Longitude								
N 01° 10' 31"	E 99° 09' 21"								
	ANJA Siais POM	Village of Pardomuan, Sub District of Angkola Selatan, District of Tapanuli Selatan, Province of Sumatera Utara, Indonesia							
1.4.2	Location of Certification Scope of Supply Base								
	Name of Supply Base	Location	<table border="1"> <thead> <tr> <th colspan="2">Coordinate</th> </tr> <tr> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>N 01° 10' 03"</td> <td>E 99° 09' 42"</td> </tr> </tbody> </table>	Coordinate		Latitude	Longitude	N 01° 10' 03"	E 99° 09' 42"
Coordinate									
Latitude	Longitude								
N 01° 10' 03"	E 99° 09' 42"								
	Lembah Subur Utara Estate	Village of Pardomuan, Sub District of Angkola Selatan, District of Tapanuli							

		Selatan, Province of Sumatera Utara, Indonesia			
	Lembah Subur Selatan Estate	Village of Pardomuan, Sub District of Angkola Selatan, District of Tapanuli Selatan, Province of Sumatera Utara, Indonesia	N 01° 10' 03"	E 99° 09' 42"	
	Koperasi Tani Binasari (81 Smallholder)	Village of Pardomuan, Sub District of Angkola Selatan, District of Tapanuli Selatan, Province of Sumatera Utara, Indonesia	N 01° 10' 03"	E 99° 09' 42"	
1.5	Description of Area Statement				
1.5.1	Tenure				
	• State		9,171.82 Ha		
	• Community		157.50 Ha		
1.5.2	Area Statement				
		Lembah Subur Utara Estate (Ha)	Lembah Subur Selatan Estate (Ha)	Koperasi Tani Binasari (Ha)	Total
	• Total area	4,851.98	4,319.84	157.50	9,329.32 ha
	• Mature area	3,938.75	3,803.19	157.50	7,899.44 ha
	• Emplacement, infrastructure, etc	56.27	8.5	-	64.77 ha
	• POM	14.87	-	-	14.87 ha
	• HCV	842.09	508.15	-	1,350.24 ha
1.6	Planting Year and Cycles				
1.6.1	Age profile of planting year				
	Planting Year	Hectarage (ha)			
		Lembah Subur Utara Estate	Lembah Subur Selatan Estate	Koperasi Tani Binasari	Total
	2005	515.42		-	515.42
	2006	3,132.91		157.50	3,290.41
	2007	290.42	1,074.54	-	1,364.96
	2008	-	1,574.82	-	1,574.82
	2009	-	1,153.83	-	1,153.83
	TOTAL	3,938.75	3,803.19	157.50	7,899.44
1.6.2	New Planting area after January 2010		- Ha		
1.6.3	Planting Cycle		1 st Cycle		
1.7	Description of Mill and Supply Base				
1.7.1	Description of Mill				

	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Output (tonnes)	Extraction (%)	Output (tonnes)	Extraction (%)
		ANJA Siais	60	264,395.12	52,526.62	19.87	12,963.32
	<i>*Production Data Source from June 2022 – May 2023</i>						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (ha)	Production Area (ha)	FFB (tonnes/year)	Yield (tonnes/ha/ year)	Supplied to Mill	
						FFB (tonnes/year)	%
	Lembah Subur Utara	4,851.98	3,938.75	85,149.26	21.62	85,149.26	100
	Lembah Subur Selatan	4,319.84	3,803.19	79,682.43	20.95	79,682.43	100
	Koperasi Tani Binasari	157.50	157.50	2,377.09	15.09	2,377.09	100
	TOTAL	9,329.32	7,899.44	167,208.78	21.17	167,208.78	100
	<i>*Production Data Source from June 2022 – May 2023</i>						
1.7.3	FFB description from other source						
	Name of sources/Organisation	Type of Organisation	number of smallholders	Production Area (ha)	Supplied to Mill		
					FFB (tonnes/year)		
	PT ANJ (uncertified)	PT ANJ	-	9.74	309.06		
	Koperasi Tani Binasari (Plasma) – Non-Certified	Smallholder scheme	81	157.50	1,153.78		
	UD Boru Namora	Independent smallholders	-	-	52,667.72		
	UD Riri	Independent smallholders	-	-	1,654.27		
	Kelompok Tani Janjimatogu	Independent smallholders	-	-	41,347.94		
	TOTAL					97,132.77	
	<i>*Production Data Source from June 2022 – May 2023</i> <i>**Koperasi Tani Binasari has been certified since 25 September 2022 (Production data from June 2022 – 24 September 2022)</i>						
1.7.4	Product categories			FFB, CPO, PK			
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product			Last Year Projected Certified Volume (25 Sept 2022 – 24 Sept 2023) (MT)		Last Year Actual Certified Volume (June 2022 - May 2023) (MT)	
	FFB Processed			199,000		166,228.45	
	CPO Production			42,155		33,788.96	
	Palm Kernel (PK) Production			9,801		8,531.71	
1.8.2	Product selling						
	Type of selling product			Actual selling product for last year (June 2022 - May 2023) (MT)			
	CSPO sold as RSPO certified product			30,303.65			
	CSPK sold as RSPO certified product			6,344.48			

	CSPO sold under another scheme	0						
	CSPK sold under another scheme	0						
	CSPO sold as conventional	330.00						
	CSPK sold as conventional	0						
1.8.3	Estimate of Certified FFB Claim							
	Name of Estates	Total Area (ha)	Production Area (ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)			
	Lembah Subur Utara	4,851.98	3,938.75	92,000	23.36			
	Lembah Subur Selatan	4,319.84	3,803.19	85,500	22.48			
	Koperasi Tani Binasari (81 Smallholders)	157.50	157.50	2,500	15.87			
	TOTAL	9,329.32	7,899.44	180,000	22.79			
	*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 (%)	
	ANJA Siais	60	180,000	36,000	20.00	9,000	5.00	MB
	*Projected CSPO and CSPK production for 12 months of certificate							
1.9	Other Certifications							
	ISO 9001:2015			-				
	ISO 14001: 2015			Certificate Registration No. 08 04 K 14070 valid until 11 November 2023 issued by TUV Nord				
	ISO 45001: 2018			Certificate Registration No. 03 14 K 17056 valid until 11 November 2023 issued by TUV Nord				
	SMK3			REG.SMK.2021.SUC.SK-1052 valid until 21 April 2024 issued by Sucofindo				
	ISPO			Certificate MUTU-ISPO/037 valid 4 September 2025 issued by Mutuagung Lestari				
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
	MILL	Time Bound Plan						
	ANJA Siais (PT ANJA Siais)	2014	Lembah Subur Utara	2014	Tapanuli Selatan District, Sumatera Utara Province, Indonesia	Certified		
			Lembah Subur Tengah	2014				
			Lembah Subur Selatan	2014				
			Lembah Subur Utara	2023 (9.74 Ha)		Uncertified		
			Koperasi Tani Binasari	2022				
	Jangkang	2009	Jangkang	2009		Certified		

(PT Sahabat Mewah Makmur)		Balok	2009	Belitung Timur District, Bangka Belitung Province, Indonesia		
		Ladang Jaya	2009			
		Sari Bunga	2009			
		Air Ruak	2009			
		Mitra Lestari Cooperative	2019		Certified	
		Mitra Anugerah Cooperative	2019		Certified	
		Sambar Jaya Makmur Cooperative	2019		Certified	
		Lindong Raya Cooperative	2022		Certified	
		Berhimpun Sejahtera Cooperative	2025		Uncertified	
		Tiong Sejahtera Cooperative	2023		Certified	
		Gunung Nyerudong Cooperative	2023		Certified	
		Bumdes Balok	2023		Certified	
		Binanga (PT ANJ Agri)	2012		Estate Wilayah Timur	2012
	Estate Wilayah Tengah			2012		
	Estate Wilayah Barat			2012		
	ANJA estate			2023	Uncertified	
KAL POM (PT. Kayung Agro Lestari)	2019	Sungai Gemilang Teduh 1 (SGT-1)	2019	Ketapang District, Kalimantan Barat Province, Indonesia	Certified	
		Sungai Gemilang Teduh 2 (SGT-2)	2019			
		Gunung Sejahtera Tumbuh 2 (GST-2)	2019			
		Gunung Sejahtera Tumbuh 1 (GST-1)	2019			
		Koperasi Laman Mayang Sejahtera	2019		Certified	
		Koperasi Bina Satong Lestari	2021		Certified	
		Koperasi Lestari Abadi Bersama	2022		Certified	
		PT Galempa Sejahtera Bersama	2027	Empat Lawang District, Sumatera Selatan Province, Indonesia	Uncertified	
PMP POM (PT PPM)	2021	PT Putera Manunggal Perkasa	2021	Sorong Selatan District, Papua Barat Province, Indonesia	Certified	
		Koperasi Sukka Mandiri Bersama	2021		Certified	
		PT. Permata Putera Mandiri	2021		Certified	
		Koperasi Maju Bersama Sejahtera	2025		Uncertified	
*TBP is updated September 2022 and has been approved by RSPO.						
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard					
	Associated smallholder has been included in certification scope.					

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1.4	<p>1. Hasiholan Sihombing (Lead Auditor). Indonesian citizen. Bachelor of Agriculture Majoring in Agronomy, Agriculture Faculty. He has working experience for 7 (seven) years since 2009 as an Operational Staff in an Oil Palm Plantation Company in Indonesia. The training he has followed namely: Lead Auditor ISPO in 2016, RSPO P&C Lead Auditor Course in 2018, RSPO Supply Chain Certification Lead Auditor Course in 2020, SA 8000 Awareness in 2018, Quality Management Systems (ISO 9001:2015) in 2016, Environmental Management Systems (ISO 14001:2015) in 2017, OHS General Expert in 2013, OHSAS 18001:2007 in 2017, ISO 19011:2018 in 2019, ISO 17021:2011 and ISO 17065:2012 in 2016. During this audit, he was assigned to verify legal aspects, land dispute, SCCS, BMP and OHS aspects.</p> <p>2. Septian Maulana (Auditor). Indonesian Citizen, Bachelor of Economic, Pamulang University. Have experience as sustainability staff on oil palm plantation. Training have been followed including Occupational Health and Safety Expert Candidate certification by Ministry of Manpower and Transmigration of Indonesia; Basic Fire Fighting and Basic First Aid; Awareness Integrated Management Systems (ISO 14001, and ISO 45001 in 2020); Awareness (ISO 19011, ISO 17065; and ISO 17021) in 2020; ISO 9001:2015 Lead Auditor in 2021, ISPO Lead Auditor in 2021, RSPO Lead Auditor in 2021, Awareness Social Audit SMETA in 2022 and RSPO ISH Standards Training in 2022. In this audit activity was verified Worker Welfare and Transparency Aspects.</p> <p>3. Rizki Tanaya (Auditor). Indonesian citizen, Bachelor of Agriculture, Majoring Socio-Economic Agriculture, Padjadjaran University. Training that has been attended include ISPO Auditor Training and Refreshment New ISPO Ministry of Agriculture 38 of 2020, RSPO SCCS Auditor Training, RSPO P&C Lead Auditor Training, ISO 9001:2015 Lead Auditor Training, General OHS Expert Training, ISO 19011:2018, ISO 17021:2015, ISO 17065:2012, ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, ISO 50001:2018, FSC CoC, BAP, SEDEX/SMETA, and Global GAP. Has carried out several audit activities on environmental, conservation, Best Management Practices, OHS, Labor and Social aspects. In this audit activity was verified on aspects of Environment, GHG and Conservation.</p> <p>4. Iwan Perala (Auditor Trainee). Indonesian Citizen, Bachelor of Forestry, Department of Silviculture and Master of Science, Soil and Environment Biotechnology Study Program. He has experience as an environmental research assistant at a Southeast Asian regional research institute. The trainings that have been attended are Lead Auditor ISO 9001:2015 QMS certified by IRCA, IHT ISO 9001:2015 QMS, ISO 14001:2015 EMS, ISO 17021:2015, ISO 19011:2018, ISO 45001:2018 awareness, HSE Plan awareness, CSMS awareness, ISO 50001:2018 EnMS awareness, ISCC awareness. In this assessment, an assessment is made of aspects of Best Management Practices and OHS under the supervision of the Lead Auditor.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-1.4	<p>Number of auditors: 3 auditor and 1 auditor trainee</p> <p>Number of days for ASA-1.4 at site: 5 days</p> <p>Number of working days for ASA-1.4 at site: 15 Working days</p>
2.2.2	Assessment Process
ASA-1.4	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Austindo Nusantara Jaya Agri Sia's to the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard Endorsed by the 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) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p>

Bina Sari Cooperative has been certified under management of Lembah Subur Utara Estate.

Some opportunities for improvement of the results ASA-1.4 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase RC.

Improvement of findings from ASA-1.2 and 1.3 were observed by auditors at this ASA-1.4 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-1.4

The opening meeting was held on 5 June 2023. As for the participants who attended the opening meeting included the General Manager, Estate and Mill Managers, Support Team from Jakarta and other staff. Closing meeting was held on 17 June 2022 attended by the same participants as the opening meeting. The management of PT ANJ Agri Siais accept all the onsite ASA-1.4 audit results.

The assessment program please find Appendix 2

2.2.3	Locations of Assessment
ASA-1.4	<p>The sampling location consider the issue arise from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:</p> <p>ANJA Siais POM</p> <ul style="list-style-type: none"> ● Security Post. Field observations and interviews related to employment aspects. ● Weighbridge. Field observations and interviews regarding the mechanism for separating certified and non-certified fruit. ● WTP. Observation of technical activities, employment aspects, and OHS implementation related to aspects of water use for processes and housing. ● Workshops. Observation of technical activities, employment aspects, and OSH implementation. ● Central Warehouse. Field observations related to the management of chemicals, environmental aspects and OHS. ● Chemical Warehouse. Field observations related to the management of chemicals, environmental aspects and OHS. ● Hazardous Waste Storage. Online field observations related to hazardous and toxic waste management, completeness of supporting infrastructure and emergency response in accordance with permits, OHS and environmental aspects. ● Solar Tank. Observations related to fuel tank conditions, OHS aspects, availability and condition of emergency response equipment and environmental management. ● Sorting Station. Observations related to work procedures, anti-bribery practices, employment, complaint mechanisms and OHS aspects. ● Press Station. Observations related to work procedures, housekeeping, employment, complaint mechanisms and OHS aspects. ● Engine Room Station. Observations related to work procedures, environmental management, employment, complaint mechanisms and OHS aspects. ● Boiler Stations. Observations related to work procedures, environmental management, employment, complaint mechanisms and OHS aspects. ● Hydrant Simulation. Field observations regarding the preparedness of emergency response equipment. ● WWTP. Field observations and interviews related to liquid waste management, work procedures, housekeeping, employment, complaint mechanisms and OHS aspects. ● Water Intake (Paraupan River) Block K20. Field observations related to taking water sources for processing. ● EFB Area. Field observations related to solid waste management and sanitation in the EFB area. ● Composting Area. Field observations and interviews related to liquid and solid waste management, work procedures, housekeeping, employment, complaint mechanisms and OHS aspects.

Transit Storage in Padang Sidempuan.

- Transit Storage. Observation related CPO and PK Storage at Transit Storage in Padang Sidempuan.

Lembah Subur Utara Estate (LSU)

- HGU Stakes No. OPM029 block M30 Division 5. Field observations related to land boundaries.
- HGU Stakes No. 039 block G20 Division 4. Field observations related to land boundaries.
- HGU Stakes No. 020 block B10 Division 2. Field observations related to land boundaries.
- Conservation area (Forested Mountain Area) Block M30 Division 5. Field observation related to conservation area management.
- Block GH 11/12 Division 2 harvesting activities. Field observations and interviews related to aspects of employment, OHS and BMP.
- Manual maintenance activities for Block G3 Division 1. Field observations and interviews related to aspects of employment, OHS and BMP.
- Manual Spraying Activities Block L27 Division 4. Field observations and interviews related to aspects of Manpower, OHS and BMP.
- Clinic. Field observations and interviews related to aspects of employment, OHS, management of hazardous and toxic waste and health facilities.
- Central Child Care Center. Field observations and interviews related to aspects of Employment, OHS and Work Procedures.
- Central housing. Field observations related to aspects of Housing Facilities and Infrastructure.
- Block L25 Garbage Disposal Site. Field observation related to OHS and Domestic Waste Management.
- Domestic landfill. Field observations and interviews related to domestic solid waste management, work procedures, housekeeping, employment, complaint mechanisms and OHS aspects.
- Block G01 and G02 (Boundary of Certified and Non-Certified Area). Field observations and interviews related to FFB separation mechanism from non-certified area.
- Chemical Storage. Field observations and interviews related to management of hazardous chemicals, work procedures, housekeeping, employment, complaint mechanisms and OHS aspects
- Fertilizing Storages. Field observations and interviews related to management of hazardous materials, work procedures, housekeeping, employment, complaint mechanisms and OHS aspects
- Rinse House. Field observations and interviews related to management of rinse houses spraying and fertilizing activities, work procedures, housekeeping, and OHS aspects
- Fire Simulation. Field observations and simulation of firefighting facilities and infrastructure

Koperasi Tani Binasari

- HGU Stakes No. 106 Koperasi Tani Binasari. Field observations related to land boundaries.
- HGU Stakes No. 149 Koperasi Tani Binasari. Field observations related to land boundaries.

Lembah Subur Selatan Estate (LSS)

- HGU Stakes No. 110 and 111 block O55 Division 10. Field observations related to land boundaries.
- HGU Stakes No. 102 block N52 Division 10. Field observations related to land boundaries.
- Conservation area (Forested area) Block OP44/45 Division 9. Field observation related to conservation area management.
- Conservation area (Batang Gadis River Border) Block O55 Division 10. Field observation related to conservation area management.
- Harvest Block M43 Division 9. Field observations and interviews related to aspects of BMP, OHS, Labor and Environment.
- Weeding Manual Block P48 Division 9. Field observations and interviews regarding aspects of BMP, OHS, Labor and Environment.
- Daycare on Sentosa Baru Housing Complex. Field observations and interviews related to aspects of BMP, OHS, Labor and the Environment.
- Generator House. Field observations and interviews related to aspects of BMP, OHS, Labor and the Environment.
- Sentosa Baru Housing Complex. Field observations and interviews related to aspects of BMP, OHS, Labor and the Environment.

	<ul style="list-style-type: none"> • Owl House Block K46 Division 9. Field observation related to integrated pest control. • Piezometer Block K46 Division 9. Field observation related to peatland management. • Subsidence Stake Block L44 Division 9. Field observation related to peatland management. • Water Level Block L44 Division 9. Field observations related to peatland management.
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-1.4	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT ANJ Agri Siais was held by:</p> <ul style="list-style-type: none"> • Public notification on website Mutuagung Lestari on 22 May 2023. • Public consultation by email with NGOs such as WALHI, WWF, AMAN, and Sawit Watch on May 30, 2023. • Public consultation by phone with government institution on 06 – 08 June 2023 • Public consultation by phone with communities including previous land owner on 06 – 08 June 2023 • Public consultation by direct interview with internal stakeholders and contractor on 06 – 08 June 2023 <p>Numbers of input from stakeholders were clarified by PT ANJ Agri Siais.</p>
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
	The next visit RC will be conducted eight (8) months to twelve (12) months.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of ANJA Siais POM – PT Austindo Nusantara Jaya Agri operation consisting of one (1) mill and three (3) oil palm estates.

During the assessment, there were two (2) non-conformities were assigned against Minor Compliance Indicators; and one (1) opportunity 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 action(s) that had been reviewed and accepted by Auditor(s) in form of documentation evidence(s) e.g. (document record/photographic/etc). Those corrective action(s) taken that consist of two (2) Minor non-conformity(s) had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that Siais POM – PT Austindo Nusantara Jaya Agri complied with the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard Endorsed by the RSPO Board of Governors on 12 November 2020.

Therefore, MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is *Continued*

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
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	Unit of Certification has a SOP for communicating and providing information that is approved and signed by the External Affairs Director, with document no. SOP-Leg-02 revision 01 and has been in effect since April 1, 2013. Based on the SOP, it has been explained that communication and information sharing is divided into 2: <ul style="list-style-type: none"> • Internal communication and information sharing • External communication and information sharing The SOP explains the types of information that may be accessed/provided in general and information that is confidential and requires approval from company management. The SOP also explains the person responsible for providing information both internally and externally, namely the Human Resources Officer or External Affairs Officer. The documents that can be accessed by the public are documents with general categories and with approval from management such as AMDAL, Employee data, accidents, Social Security, Land Application permits, Policies, HCV Documents, Land Title Documents, Procedures, CSR, HIRAC, etc.	
1.1.2	The unit of certification can show evidence that information has been received in an appropriate form and language related to stakeholder involvement, unit of certification rights and obligations that are conveyed to all relevant stakeholders, including: <ul style="list-style-type: none"> • Plantation progress report (LPUP) of PT ANJA Siais period of Semester II 2022 has been sent to Plantation Agency of Tapanuli Selatan District on 6 April 2023. 	

- Land Title utilization report of PT ANJA Siais for the period of 2022 has been sent to Land Agency of Tapanuli Selatan District on 13 March 2023.
- OHS reports that are carried out quarterly to the relevant agencies, for example the Quarter IV OHS Report 2022 have been submitted to the Sumatera Utara Provincial Manpower Agency on 26 April 2022.
- Compulsory Employment Report Documents in the Company No. 20152.20221031.0001 dated October 31, 2022 with the obligation to report back on October 31, 2023.
- Reporting of the Environmental Management Plan and Environmental Monitoring Plan of the Palm Oil Plantation and Processing Factory of PT Austindo Nusantara Jaya Agri Siais semester II, 2022 Number 012/GMO/ANJA Siais/External/II/2023 which was reported to the Tapanuli Selatan Regency Environmental Service on February 14, 2023.
- Environmental Management Plan and Environmental Monitoring Plan report for semester II, 2022 which was reported to the Sumatera Utara Province Environmental Service through SIMPEL was printed on May 29, 2023, with number 1685324920-11667.
- RKL-RPL report for semester II, 2022 which was reported to the Ministry of Environment and Forestry via SIMPEL when TTE was printed on June 8, 2023, with TTE ID number 1686185130-11667.
- Report on Liquid Waste Quality Analysis for the first quarter of 2023 with proof of receipt number 070/GMO/ANJASiais/External/IV/2023 which was reported to the Tapanuli Selatan Regency Environmental Service on April 14, 2023.
- Report on Hazardous Waste Management for the first quarter of 2023 which was reported to the Regional Government of Sumatera Utara Province with proof of Number 1686185886-17446 dated June 8, 2023.
- Evidence of Hazardous Waste Management reporting quarter I of 2023 which was reported to the Ministry of Environment and Forestry with proof of Number 1686185886-17446 dated June 8, 2023.
- Evidence of Environmental Management Plan and Environmental Monitoring Plan reporting for semester II of 2022 which was reported to Ministry of Environment with proof of Number 1686185130-11667 dated June 8, 2023.
- Report on Management of High Conservation Value Areas (HCV) for Semester II 2022 and has been reported to the Conservation and Natural Resources Centre of Tapanuli Selatan Regency on January 16, 2023.

1.1.3

Companies can show documentation of responses and information services to requests for information from stakeholders, for example:

- The request for the printing of the *BPJS* Health Card and the addition of the 4th, 5th and 6th child *BPJS* on 5 April 2023 has been responded to and completed on the same date.
- Complaints regarding children from workers have been registered but have not received a *BPJS* card on January 1, 2023, and have been responded to and resolved on the same day.
- Incoming letter from F. Serbundo dated 23 May 2023 regarding follow-up to the Negotiations for Making a Collective Labor Agreement (CLA) and has been responded to by the company via letter dated 25 May 2023.

Based on the results of interviews with representatives of the community around PT ANJ Agri Siais and government agencies in the Tapanuli Selatan Regency, it is known that the company's management is considered cooperative in providing the requested data and/or the data presented in the periodic mandatory reports.

1.1.4

Unit of Certification has a SOP for communicating and providing information that is approved and signed by the External Affairs Director, with document no. SOP-Leg-02 revision 01 and has been in effect since April 1, 2013. The SOP also explains the following:

- If there is a proposal / request for information on company participation obtained from external parties, the external relations officer within 3 days of receiving the proposal must be followed up by submitting the information to the general manager and external relations manager in charge of each region.
- Within no later than 3 months after submitting information from external parties to management and have not received a response, external relations will directly state that the company's proposal/application for participation is rejected by the company.

- External relations officer is responsible for communicating to external parties regarding the acceptance and/or rejection of the company's participation both verbally and in writing, as well as updating the status in the communication logbook and providing external information.

Based on the results of interviews with labor unions and the gender committee, it is known that the company has conducted socialization related to SOPs for communication and providing information. This is evidenced by the representatives of the trade unions and the gender committee understanding and explaining the procedure.

1.1.5

The company shows a list of stakeholders for 2023 which includes the name of the agency, name of the PIC/stakeholder, address and telephone number. The list of stakeholders consists of the names of contractors, internal stakeholders, suppliers, agencies, surrounding villages, non-governmental organizations/NGOs and others.

Based on the stakeholder list document, it is known that these contacts can be contacted through interviews with representatives of internal and external stakeholders, for example, interviews with the Environmental Agency of Tapanuli Selatan Regency.

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 policies related to the code of conduct of business, prevention and eradication of money laundering, eradication of criminal acts of corruption and prevention and eradication of corruption contained in the "ANJ Group Code of Business Conduct" issued on January 1, 2014.

Based on the results of interviews with representatives of contractors who work with companies, government agencies in Tapanuli Selatan Regency, information is obtained that stakeholders have an understanding regarding the business code of ethics declared by the company.

Thus, it is concluded that the company has owned and declared an honest and corruption-free business code of ethics that has been disseminated to the public.

1.2.2

Unit of Certification has several systems in place to monitor compliance and the implementation of ethical business policies and practices, namely:

- Through the mechanism of the Whistle Blowing System (WBS). In the system it is stated "if you see, know or experience a violation of business ethics, immediately report it to us". This system guarantees that the identity of the giver of information will be kept confidential. Reports of violations of the code of ethics can be made via email and telephone.
- Through internal audits which are conducted regularly every year.

Based on the results of interviews with representatives of labor unions as well as contractors and suppliers, it was conveyed that so far there has been no indication of any violation of the company's business code of ethics policy.

Status: Comply

PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS

2.1

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

2.1.1

The unit of certification has list of regulations of 2023 that includes local regulations and national regulation updated annually. List of laws/regulations listed has covers several aspects such as land permit and legality, manpower, occupational health and safety, best management practices and environment. Some examples of regulations compliance that have been done such as:

Land Legality

In legal aspect, the company has complied to plantation business permit, such as:

- Cultivation Plantation Business Permit (*IUP-B*) based on Decree of Tapanuli Selatan Regent Number: 525.26/1527/K/2003 concerning Plantation Cultivation Business Permit dated 8 September 2003 with a permit area of 8,000 Ha.
- Production Processing Plantation Business Permit (*IUP-P*) based on the Tapanuli Selatan Regent's Permit Number: 14/IZIN/2010 concerning Processing Plantation Business Permit (*IUP-P*) with a capacity of ± 60 tons of FFB/hour.
- Cultivation Plantation Business Permit (*IUP-B*) based on the Tapanuli Selatan Regent's Permit Number: 15.A/IZIN/2010 dated 28 July 2010 for a permit area of $\pm 1,639.06$ Ha.

Best Management Practice Aspect

In terms of best management practices, it was known that estate and mill management has implementing several compliances with Indonesian laws and regulations, such as implementing zero burning method during land preparation, to plant DxP palm from recognized seed producers in Indonesia, adopting integrated pest management as well as biological control, using of pesticides listed on pesticide commission, has conduct monitoring on fire hot spot, etc.

OHS Aspect

- Provide personal protective equipment for employees.
- Conduct health checks for all employees.
- Lifting equipment operator license/certificate, welder, boiler, electric K3 technician, production power aircraft, *hiperkes* paramedic, etc.

Worker Welfare Aspects

- The company has implemented partial minimum wages, pay scale structures, wages and overtime hours, provision of rest periods and annual and maternity leave entitlements.
- All workers have a work agreement.
- Workers have been enrolled in social security programs (*BPJS* Health and *BPJS* Employment).

Environment Aspect

- Decree No. 660.1 / 1670 / K / 2003 concerning the Environmental Feasibility of PT Ondop Perkasa Makmur on October 14, 2003. These documents are environmental documents for the HGU area of 8,000 hectares and a PKS development plan with a capacity of 45 — 60 tons of FFB / hour.
- Recommendation No. 660 // 432 / KPDL-TS / 2009 concerning Environmental Management Efforts (UKL) and Environmental Monitoring Efforts (UPL) plantation activities and conservation of the PT Ondop Perkasa Makmur area on August 7, 2009.
- Permit for hazardous waste storage issued by OSS Management and Organization Institution No. 60.1/09/DPHPTSP/2020 in 25 August 2020 and will be expired in 5 years.
- Permit document for waste disposal issued by the OSS agency for PT Austindo Nusantara Jaya Agri Siais which has fulfilled the commitments and is effective based on the approval of the Tapanuli Selatan Regency issued on Januari 25, 2021.

2.1.2

Based on the Regulatory Compliance Evaluation Procedure (Doc No: SOP Leg-01, Edition 01, Rev. 03) effective March 30, 2015, it is known that the person responsible for conducting inspections and evaluations of regulatory compliance is the External Relations Officer in each unit which is carried out every once a year through several methods including:

- Identify/request information directly to regulatory issuing agencies
- Identify through the official website of the regulatory issuing agency and/or the official website for updating laws and

regulations.

- Through seminars/socialization/workshops conducted by regulatory issuing agencies and/or other private agencies

The company has a list of regulations for compliance with the law in each Estate and Mill unit consisting of regulations on a regional, national and international scale which will be updated in 2023 where the list of regulations contains aspects related to company operations such as:

- Aspects of Occupational Safety and Health (OHS)
- Plantation Aspect (Related to Plantation Business)
- Employment Aspect
- Environmental Aspects
- and others

Some of the updated regulations identified and complied with by the company, for example:

- Government Regulation Number 22 of 2021 concerning Implementation and Management of the Environment
- Government Regulation Number 35 of 2021 concerning PKWT, Outsourcing, Working Time, Work Relations and Rest Time, and Termination of Employment
- Decree of the Governor of North Sumatra Number 188.44/949/KPTS/2022 of 2022 concerning Determination of the Minimum Wage for North Sumatra Province for 2023

2.1.3

Procedure of legal boundary stakes monitoring, and maintenance is presented in document No. IK-SOP Leg001-001 dated 1 April 2016. Procedure mentioned that maintenance was carried out by foreman with supervision of Assistant Manager. Monitoring the boundaries of the Land Title is done every 6 months.

The company shows the Land Title stake monitoring document which is carried out every 6 months. The last Land Title stake monitoring was carried out for example in December 2022 in all Estate. The report on the inspection and maintenance of the boundary stakes has provided complete information regarding the number of stakes, the state of the stakes, the location of the stakes, the coordinates of the stakes and corrective actions as well as the target time for repairs if there are damaged or missing stakes. In the monitoring report, it is known that all HGU stakes are available.

Based on field observations to several samples of Land Title stakes determined by the auditors, namely Lembah Subur Selatan Estate (Stakes No. 111, 110 and 102), Lembah Subur Utara Estate (Stakes No.020, 039 and OPM029), and Koperasi Binasari (Stake No. 149 and 106), it is concluded that all HGU stakes are in place according to their coordinates and are in good condition. Land boundaries with outsiders are clear, such as a large boundary road and trench that borders the Land Title area. There is no indication of land use outside the Land Title.

Status: Comply

2.2

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

2.2.1

The unit of certification already has a List of Contractors as stated in the Contractor List document of PT ANJ Agri Siais Year 2023 which is engaged in the provision of maid services for unloading, manual weeding, maintenance of trenches, maintenance of bridges, transporters hazardous waste transporter, etc. The following are for example some contractors whose cooperation contracts are still valid until the audit is carried out, namely:

Contractor	Activity
PT Alam Lestari Angkola Selatan	Transportation and Maintenance
PT G4S	Security Guard
PT Ondop Perkasa Siais	Transportation and Maintenance

PT Sinisura Rayana Bangun Ersada Transportation and Maintenance
PT Makmurindo Bintang Sentani Infrastructure

2.2.2

Companies can show evidence that all contracts, including those with FFB suppliers, have separate clauses regarding fulfillment of relevant legal obligations, for example in the Employment Agreement Letter between PT ANJ Agri Siais and PT Sinisura Rayana Bangun Ersada No. 292/SPK/GM/EST-LSS/04/2023 dated 1 April 2023 concerning Contract work with a period of 26 March – 25 May 2023. The clauses include:

- The second party declares and binds itself to the first party to always fulfill all permits needed in carrying out the work, based on all applicable legal provisions and/or regulations, including but not limited to the provisions of the Central Government and Regional Governments concerning manpower, labor and forestry .
- The second party is obliged to provide accident insurance, medical care and provision of PPE for its workers, as well as follow and implement the provisions and policies of the First Party regarding K3 in accordance with the laws and regulations in force in Indonesia.
- The integrity pact is listed in Article 11

Companies can also show proof of fulfillment of relevant legal obligations by contractors and FFB suppliers through documents of work agreements between contractors and workers that are in accordance with the labor list, proof of *BPJS* Health and Employment payments for contractor workers and contractor worker salary slips that are not lower than minimum wage.

2.2.3

Companies can show evidence that all contracts including those with FFB suppliers have separate clauses that prohibit practices involving child labour, forced labor and workers from human trafficking. For example in the Employment Agreement Letter between PT ANJ Agri Siais and PT Sinisura Rayana Bangun Ersada No. 292/SPK/GM/EST-LSS/04/2023 dated 1 April 2023 concerning Contract work with a period of 26 March – 25 May 2023.

Status: Comply

2.3

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

2.3.1 and 2.3.2

The company has a list of FFB suppliers contained in the external FFB Supplier Data document that informs the farmer code, area code, farmer's name, land area, year of planting, supplier, coordinate point, type of land ownership certificate, land area and others. Types of land ownership certificates for farmers such as Statement Letter of Land and deed of sale and purchase. As an example: for Indirect Suppliers

No.	Name of Farmer	Type of land legality	Name of FFB supplier	Village	Location
1.	Tanjung Polisi	deed of sale & purchase	Koperasi Tani Janji Matogu	Batang Selai	X:507751; Y:131730
2.	Gom Gom Hutabarat	Statement Letter of Land	Boru Namora	Malombu	X:505590; Y:142291
3.	Ishak Siregar	Statement Letter of Land	Koperasi Tani Janji Matogu	Malombu	X:507376; Y:141068

Direct Suppliers

No.	Name of Farmer	Type of land legality	Name of FFB supplier	Village	Location
1.	Andriansyah	Land Title	Koperasi Tani Desa Binasari	Pardomuan	X: 01°12'55.031"; Y: 99° 07'10.668"

The company has provided geolocation information and land tenure information to supply farmers at ANJ POM. Based on information from management, it is known that there are still many farmers who are not willing to provide information related to land legality evidence because they do not want / are afraid to provide land legality information to the company. The company held a stakeholder meeting on December 22, 2022 which involved stakeholders including government agencies to provide socialization regarding the importance of proof of land ownership for the certification process (especially the mandatory certification).

Status: Comply

PRINCIPLE #3 OPTIMISE PRODUCTIVITY, EFFICIENCY, POSITIVE IMPACTS AND RESILIENCE
3.1

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

3.1.1

The company shows the 5-Years Financial Projection 2023 – 2027 document that informs the company's financial plans for the next 5 years. The document informs production projections (FFB, CPO and PK), price projections as well as costs and revenues, briefly presented as follows:

Description	2023	2024	2025	2026	2027
<i>FFB Production (Ton)</i>					
<i>FFB Ex Estate</i>	168.520	186.043	197.251	202.483	209.335
<i>FFB External</i>	110.052	104.186	122.749	117.517	114.939
<i>FFB Processing</i>	278.572	290.229	320.000	320.000	320.000
<i>OER Own Estate (%)</i>	20,0	22,0	22,0	22,0	22,0
<i>OER External (%)</i>	19,5	19,1	19,1	19,1	19,1
<i>KER (%)</i>	5,1	4,80	4,80	4,80	4,80
<i>KER External (%)</i>	4,5	4,5	4,5	4,5	4,5

The management plan for smallholders is fully managed by the company and has been included in the management plan at LSU. Based on the results of interviews with the management of the Binasari farmer cooperative, it is known that the company has provided sufficient information regarding business plans and land management and their developments.

3.1.2

The results of the study of the area statement document informed the distribution of planting years between 2005 – 2009. In addition, the results of interviews with management and the review of the 5-Years Financial Projection 2023 – 2027 document informed that there is no replanting plan for the next 5 years.

3.1.3

The company showed Management Review Report Period 2022 24 May 2023, which attended by 16 top management. The minutes informs that there were 6 topics being discussed, i.e.: internal audit review RSPO and ISPO, management system performance, production achievement targets, compliance towards laws and regulations, operational change and development and recommendation for future.

Status: Comply

3.2

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

3.2.1

The management unit has developed and implemented an action plan for continuous improvement, and it is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification, such as:

- The company no longer uses pesticides with the active ingredient paraquat.
- The company has implemented biological pest control in this case by using host plants and barn owls to reduce the use of pesticides, especially insecticides and rodenticides.
- The company utilizes EFB as biobags for organic fertilizer.

Social and Environmental Aspect

- The use of renewable energy accordance to reduce the use of fossil fuels.
- Air quality management and monitoring through several action like road maintenance, air quality testing, routine maintenance of vehicles and machines and vehicle upgrades.
- Management and monitoring of surface and groundwater through testing the quality standard.
- Green House Gas Management and using land clearing with mechanical and zero-burning policy.

The company showed Management Review Report Period 2022 24 May 2023, which attended by 16 top management. The minutes informs that there were 6 topics being discussed, i.e.: internal audit review RSPO and ISPO, management system performance, production achievement targets, compliance towards laws and regulations, operational change and development and recommendation for future.

3.2.2

The company has shown the auditor regarding the RSPO metric template Version 2.1 that has been filled in according to the facts and data in the company's record documents, such as the number of workers, the area of production to the record of work accidents. Based on team auditor's review, the information has been matched with others document, such as supply chain record, demographic workers, etc.

Based on document verification, for The RSPO metric template known annual data 12-month period use (January to December 2022) for schedule reporting annual data social and environmental, included monitoring data of water consumption.

	Status: Comply	
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3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

The company has procedures for all activities in Mill and Estate, such as:

- Procedure No. SOP-AGR-03 issue 01 dated August 1, 2013, regarding Land Clearing with Zero Burning.
- Procedure No. SOP-AGR-05 edition 01 dated August 1, 2013 regarding soil and water conservation.
- Procedure No. SOP-AGR-07 dated 01 August 2013 regarding oil palm nurseries
- Procedure No. SOP-AGR-09 (Rev. 04) dated 01 April 2016 regarding planting on mineral lands.
- Procedure No. SOP-AGR-04 dated 01 August 2013 regarding planting on peatlands.
- Procedure No. SOP-AGR-06 dated 01 August 2013 regarding marginal land management.
- Procedure no. SOP-AGR-08 dated August 1, 2013 regarding planting nuts.
- Procedure No. SOP-AGR-11 dated August 1, 2013 regarding fertilizers and fertilization.
- Procedure No. SOP-AGR-12 dated August 1, 2013 regarding TBM and LCC fertilization.
- Procedure No. SOP-AGR-13 dated August 1, 2013 regarding principal payments.
- Procedure No. SOP-AGR-14 dated August 1, 2013 regarding the census and identification of principals.
- Procedure No. SOP-AGR-17 dated 01 August 2013 regarding weed control.
- Procedure No. SOP-AGR-20 dated 01 April 2016 regarding integrated pest control.
- Procedure No. SOP-AGR-21 dated August 1, 2013 regarding controlling mice with owls.
- Procedure No. SOP-AGR-24 dated 01 August 2013 regarding controlling rats with Rat Bait.
- Procedure No. SOP-AGR-26 dated August 1, 2013 regarding soil analysis.
- Procedure No. SOP-AGR-27 dated August 1, 2013 regarding termite control.
- Work Instruction No. IK-SOP-AGR-011-01 dated March 1, 2016 regarding compost.
- Work Instruction No. IK-SOP-AGR-011-07 dated 01 March 2016 regarding the application of compost.

- SOP for Pesticides and their Management No. SOP-AGR-18 (1st Edition Revision 0) effective August 1, 2013.
- Document No. ST 01/ ENG-STR June 2011 regarding FFB Reception Station.
- Document No. ST 02/ ENG-STR June 2011 regarding Sterilizer Station.
- Document No. ST 03/ ENG-STR June 2011 regarding Threshing Station.
- Document No. ST 04/ ENG-STR June 2011 regarding Pressing Stations.
- Document No. ST 05/ ENG-STR June 2011 regarding Depericarper Station.
- Document No. ST 06/ ENG-STR June 2011 regarding Kernel Station.
- Document No. ST 07/ ENG-STR June 2011 regarding Clarification Station Part 1.
- Document No. ST 08/ ENG-STR June 2011 regarding Boiler Station.
- Document No. ST 09/ ENG-STR June 2011 regarding Power Stations.
- Document No. ST 10/ ENG-STR June 2011 regarding Water Treatment.
- Document No. ST 11/ ENG-STR June 2011 regarding Boiler Water Management.
- Document No. ST 12/ ENG-STR June 2011 regarding Waste Treatment.
- Document No. ST 13/ ENG-STR June 2011 regarding Grading.
- Document No. ST 14/ ENG-STR June 2011 regarding Palm Oil Shipments.
- Document No. ST 15/ ENG-STR June 2011 regarding Factory Inventory System.
- Document No. ST 16/ ENG-STR June 2011 regarding CPO Stock Sounding Procedure.
- Document No. ST 17/ ENG-STR June 2011 regarding Palm Kernel Stock Procedure.
- Document No. ST 18/ ENG-STR June 2011 regarding Factory Security System.
- Document No. ST 19/ ENG-STR June 2011 concerning Washing of Oil Storage Tanks.

SOPs are available in offices accessible to workers. Based on the auditor's observations, the SOP that has been made has been implemented, for example the application of SOP No. ST 13/ ENG-STR June 2011 concerning Grading. The results of interviews with Mill workers, for example, St. grading, boiler and Engine Room as well as Estate workers for example harvesting activities, it is known that workers already have an understanding and can briefly explain work procedures in their respective work areas.

3.3.2

The certification unit has a procedure for management review that ensures the consistency of procedures implementation, the companies routinely conduct internal audit activities both agronomic and processing. One of them is contained in the document Standard Operating Procedure Internal Audit System Management No. SOP-SCD-03 dated 27 November 2017.

The company has an internal memorandum no. 015/ANJT/HRCM/IM/IX/2022 concerning Outsourcing Provisions. The document explains that the outsourcing company and its workers/laborers must comply with the terms of work, work rules, and collective work agreements/company regulations of ANJ and the Group. If a violation occurs, the company has the right to impose sanctions in accordance with the Collective Labor Agreement/company regulations that apply in each company.

Based on the results of public consultations with contractors, for example PT Sinisura Rayana Bangun Ersada, information was obtained that contractors had been given socialization regarding company policies and contractor workers within the scope of PT ANJ Siais were required to follow these policies. For example, PPE is under the supervision of the ANJ Siais HES team. Based on the management review document on May 24, 2023, it also shows that the contractor's compliance with company policies has been discussed, including the fulfillment of the contractor's work agreement.

3.3.3

The company showed Management Review Report Period 2022 24 May 2023, which attended by 16 top management. The minutes informs that there were 6 topics being discussed, i.e.: internal audit review RSPO and ISPO, management system performance, production achievement targets, compliance towards laws and regulations, operational change and development and recommendation for future.

The company also showed documents on the results of the RSPO and ISPO ANJ Siais remote internal audits for the 2023 period which were carried out on 20-24 February 2023 (document review) and 27 February - 3 March 2023 (field visit). The document includes compliance with RSPO and ISPO indicators, non-compliance, corrective and preventive action plans. For example: non-compliance with indicator 2.2.2 RSPO, has been fulfilled on 31 May 2023 which reads:

- Management has not been consistent in implementing the integrity pact
- Management has not been consistent in monitoring BPJS contractor employees

The corrective actions formulated are:

- Completed integrity pact k. to all contractors
- Complete the BPJS employee satisfaction of contractors

	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
 Based on the results of document review and field observations, it is known that there is no new area development within the scope of PT Austindo Nusantara Jaya Agri Siais certification, either new plantings or new mill operations. All activities are still the same as the previous audit activities.

3.4.2
Environmental Impact Analysis (EIA)
 The certificate holder has three Environmental Impact Assessment (AMDAL) documents covering different areas, consisting of the AMDAL in 2003 (covering a plantation area of 8000 ha and mill capacity of 45–60 mt FFB per hour), the UKL-UPL (covering an area of 1,639.05 ha) in 2009 and Environmental Impact Assessment (AMDAL) documents covering 9,639.06 ha and mill capacity of 60 mt FFB per hour. The three environmental documents describe all activities for pre-construction, construction, operation, and post-operation, including the palm oil mill, Lembah Subur Utara Estate, and Lembah Subur Selatan Estate.

PT Austindo Nusantara Jaya Agri Siais already has an environmental management plan as outlined in the RKL/RPL document. Based on the document review, it was found that the application of environmental management was carried out based on the current management plan, for example, regarding the quality of surface water, ambient air, biogas plant activities, and others. In 2015, the company developed a new composting plant; in relation to this, PT Austindo Nusantara Jaya Agri Siais has another AMDAL (UKL-UPL for composting plant in 2015). The last update in 2021 found that the company had developed a new AMDAL document (covering 9,639.06 ha and mill capacity of 60 mt FFB per hour).

Social Impact Assessment (SIA)

There has been no change in the SIA since the last assessment. PT Austindo Nusantara Jaya Agri Siais implemented a social impact assessment in 2013 with the participation of local communities and stakeholders. Records of meetings in the preparation of SIA documents are well documented. SIA has covered all the potential social impacts caused by the company's operations. Aspects of the study described in the document include infrastructure, socio-economic, socio-cultural, local wisdom, worker facilities, community environmental health, and company operations. In the SIA assessment, it also includes the activities of scheme farmers (the majority of the Binasari community). Evidence of local community participation in the social impact assessment is available, namely focus group discussions on December 16, 2012, for the local communities of Paraupan Napa, Binasari, Janji Matogu, Pardomuan, etc. external, which involves the participation of local communities in discussing the impacts that arise and how to solve them. The last public discussion was held on May 23, 2023, involving internal and external stakeholders such as Binasari Elementary School Teachers, Janjimatogu Oyster Mushroom Group, Koptasari Secretary, Paraupan KTPA, Janjimaogu KTPA, and others.

3.4.3

Company have plan which includes monitoring protocol outlined in the RKL-RPL document and implemented to monitor the effectiveness of the management activities to mitigate negative impacts and enhance positive impacts. Results of monitoring are listed on regular environmental monitoring and management report, and monitoring results for examples second semester of 2022 report shown environmental management related to waste water, surface water quality, land fires, peat subsidence still comply with regulation and monitoring plan.

The company has held public discussions with internal and external parties from the company which are published in Internal and External Corporate Social Impact Review Public Discussion 2023 document. In this event, the company held a focus group discussion related to the SIA Review conducted with internal and external parties of the company at the GMO Meeting Room of PT. ANJ Siais on May 23, 2023. The public discussion discussed many aspects such as infrastructure, human resource training and education, community environmental health, social assistance, religious activities, land issues, community institutions, job opportunities, business opportunities, and increased income, OHS system, industrial relations, career paths, salaries and welfare benefits, etc.

Status: Comply

3.5

A system for managing human resources is in place.

3.5.1

The unit of certification indicates the procedures for recruitment, promotion, retirement and termination of workers, as follows:

- Recruitment SOP No. SOP-HRCM-002 which was approved on November 1, 2019.
- SOP Guidelines for Recruitment/Appointment and Transfer/Promotion/Demotion of Employees No. 013/HR&GA/CP/07-2007 which was approved by the President Director on 31 July 2007.

In addition, the procedures for recruitment, selection, acceptance, promotion, retirement and termination of employment in accordance with applicable regulations have been contained in the Collective Labor Agreement between PT Austindo Nusantara Jaya Agri Siais and the Basis Serbundo Management for the period 2022 – 2024 which has been registered through a Head Decree Manpower Office of Sumatera Utara Province Number 560/441-6/DTR/XII/2022 December 2022.

3.5.2

The company shows records of the implementation of employment procedures, for example as follows:

Recruitment and Selection

- Electrical Employee Vacancies – Non-Staff Level in 2023, one of which contains information that the recruitment process is free of charge.
- Employee job application letter with the initial "S" along with the supporting documents including the results of a medical examination.
- Permanent Employee Work Agreement Document No. 045/ANJA/HR&GA/PKWTT/IV/2023 dated 17 April 2023 along with minutes of receipt of SPK documents by workers on the same date.

Promotion

- Employee Performance Evaluation Document - Non-Staff with the initials "YP" for the position of Helper Load FFB with the result that the employee did not pass the training period according to the letter dated March 28, 2023
- Documents for the End of Probationary Period of workers with the initials "SYW", with the conclusion being promoted according to the Promotion Letter dated March 1, 2023.

Pension/ Termination

- Minutes of Serh receiving a letter of suspension for the worker with the initials "RS" on March 20, 2023.
- Decision Letter No. 013/HR&GA/ANJAS/PHK/III-2023 dated 25 March 2023 concerning Termination of Employment for an employee with the initial "RS".
- Letter of Collective Agreement concerning termination of employment for the worker with the initials "RS" dated 13 April 2023 which informs the calculation of compensation.

Based on the results of interviews with representatives of the Manpower Office of Tapanuli Selatan Regency and representatives of neighbouring villages (Pardomuan Village, Pintu Padang Village, Napa Village Head and Simarpinggan Village Head), information was obtained that the company had provided information on vacancies or opportunities to work at the company openly to the surrounding community. In addition, so far there have been no complaints regarding recruiting fees charged to workers, withholding of documents and discriminatory treatment during the recruitment process.

Status: Comply

3.6

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

3.6.1

The company shows the Hazard Identification, Assessment and Risk Control documents for all Mill and Estate activities that have been reviewed by EHS, the document explains including: Name of Job, Type of Activity (Routine, Non-Routine and Emergency), Hazard Identification, Hazard Category, Risk, Analysis Initial Risk, Evaluation, Risk Control, Risk To The Company, Risk Level, Opportunity, Opportunity Level, Final Risk Assessment.

The results of interviews with workers such as harvest workers and boiler operators, it was found that the workers had an understanding and could briefly explain the potential hazards in their respective work areas.

In addition:

- The results of a review of the document SOP-EHS-001 Safety Procedures for Spraying Officers found that workers who do the dosing, diluting/mixing pesticides use PPE in the form of rubber boots, aprons, masks, safety goggles or face shields, rubber gloves, and other forms of clean water and soap
- Based on field observations at the mill, there are warnings indicating that PPE is appropriate for the work area
- Based on interviews with sprayers, it is known that the required PPE includes helmets, boots, masks, goggles, and gloves.
- Interviews with workers in the sorting area found that the required PPE is safety shoes, cloth gloves, masks, and safety shoes
- The results of the review of the PPE Needs Matrix document made by the EHS Coordinator found that the PPE used by workers in that section is appropriate

There is a 2023 EHS Department management plan that contains a plan for monitoring OHS for the work environment (noise, vibration, air microbiology, etc.), OHS management system, ISO 45001, emergency preparedness, work site inspections, OHS reporting, EHS induction monitoring, and training on OHS. The document also contains plans to hold management review meetings for SMK3, OHSAS, and ISO 45001. As well as coordinating the preparation of HIRA, including a review in the event of an accident.

Based on field observations, for example at grading stations, boilers and harvesters, it shows workers using PPE in accordance with HIRAC

3.6.2

There is a 2023 EHS Department management plan that contains a plan for monitoring OHS for the work environment (noise, vibration, air microbiology, etc.), OHS management system, ISO 45001, emergency preparedness, work site inspections, OHS reporting, EHS induction monitoring, and training on OHS. The document also contains plans to hold management review meetings for Occupational health and safety management system, OHSAS, and ISO 45001. As well as coordinating the preparation of HIRAC, including a review in the event of an accident.

Based on field observations, for example at grading stations, boilers, sprayers, and harvesters, it shows workers using PPE in accordance with HIRAC

The company shows a training needs analysis program for 2023 which includes, among others:

- OHS Training for Fertilizer Employees
- Chemical Warehouse Solar Emergency Response and Spill Training
- HIRAC Training
- Class I Steam Aircraft Operators

- Class 1 Machine Tool Operators

The company also shows the 2023 EHS Department management plan document which contains:

- Monitoring of noise analysis test 1 time in September
- Regular Occupational Safety and Health Advisory Committee (*P2K3*) meetings every month
- Conduct management review meetings for SMK3, OHSAS, and ISO 45001
- Checking and testing firefighting infrastructure
- Monitoring of light fire extinguisher checks in the company environment
- Inspection of completeness of PPE in the field
- Create and send Occupational Safety and Health Advisory Committee (*P2K3*) quarterly reports
- OHS training for fertilizer, harvester and sprayer employees
- The company provides PPE to workers free of charge and employees have an obligation to use and maintain it
- The company shows records of general health checks for all employees and special checks for 189 workers (Staff and field) conducted in December 2022

Status: Comply

3.7

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

3.7.1; 3.7.2

The company already has a Training System contained in the Collective Labor Agreement document between PT Austindo Nusantara Jaya Agri Siais and the Serbundo Base Management for the period 2022 – 2024 which has been registered through the Decree of the Head of the Sumatera Utara Province Manpower Office Number 560/441-6/DTR/ XII/2022 in December 2022. The document regulates the training system, briefly including:

- The company will provide and support employee training and development programs to improve the competence, knowledge, skills and abilities of workers both through training programs inside and outside the company.
- Permanent workers can be considered to be able to take part in training at their own request in relation to self-development outside of Working Hours but must submit a written request and obtain approval from their superiors.

Companies can show training programs, for example in 2023 which will inform the type of training, training frequency, target participants including internal workers and contractor workers.

Companies can show records of training realization, for example:

- Integrated pest control refresh training on May 26, 2023 for maintenance employees which was attended by 4 participants.
- Integrated pest control training on 24 May 2023 for foremen and maintenance employees attended by 4 participants.
- Harvest training refresh on May 4, 2023 which was attended by 40 participants.
- PPE refresh training on May 9, 2023 which was attended by 30 participants.
- Dissemination of Emergency Response SOP, HSE Policy and Implementation of compliance with the use of PPE at work sites and working area to contractor workers which was attended by 25 workers.

3.7.3

The unit of certification showed socialization about the supply chain to employees which was last conduct on 13 May 2023. The minutes explained the procedures for managing certified and non-certified products including the responsibilities for each of the personnel who handle products.

The results of interviews with Head of Administration, weighbridge operator in POM and FFB administration in Estate showed that workers have already known the duties and responsibilities of each in the implementation of SCCS in accordance with the procedure and have been able to explain well about the management of certified and uncertified products, especially regarding the origin of the FFB source.

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1 and 3.8.2

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

3.8.3

Estimated certified product recorded in the last assessment report. The estimates of certified production for the next license period are described in the ASA-1.4 report (basic info 1.8.3), in reasonable amount taking into account the last year's production. The data are shown in the following table:

Products	Last Year Projected Certified Volume (25 September 2022 – 24 September 2023) (MT)	Actual (June 2022 - May 2023) (MT)
FFB Processed Certified (MT)	199,000	166,228.45
CSPO (MT)	42,155	33,788.96
CSPK (MT)	9,801	8,531.71

3.8.4

The Mill has registered as RSPO member under PT. Austindo Nusantara Jaya Agri (No. 1-0032-07-000-00) and also has been registered in IT platform palm trace RSPO <https://palmtrace.rspo.org/web/rspo/member-directory> which information as follows:

- Member Name: PT Austindo Nusantara Jaya Agri Siais
- License ID: CB138505
- Core Product: Palm Oil
- Member ID: RSPO_PO1000001992
- Type of Business: Oil Mill

3.8.5

The Mill has had procedures related to the supply chain, such as SOP of RSPO Supply Chain (No. SOP-SCD-01 dated 1 July 2021). These procedures have been referred to the latest RSPO Supply Chain System. The procedure has covered all aspects in SCCS MB model, such as receiving and recording that identify the traceability of RSPO certified and uncertified source and products, FFB processing, the announcement in RSPO Palmtrace, key persons such as security, weight bridge clerk, dispatch/kernel officer, production clerk, Administration Head, as well as the training.

Based on the interviews with weighbridge officers and security, the two personnel have been able to explain well about the management of certified and uncertified products, especially regarding the origin of the FFB source. Regarding OFI in previous assessment, based on visits to areas bordering non-certified areas, the officers interviewed understood and were able to explain the mechanism for separating the recording of FFB from certified areas and FFB originating from non-certified areas.

3.8.6

The procedure for internal audit for SCCS mentioned in the procedure of Internal Audit (No. SOP-SCD-03 revision 04, dated 1 October 2018). Based on that procedure internal audit is carried out minimum one times a year. Based on document review, the company show the record evidence regarding internal audit of RSPO SCCS that conducted on 27 February – 2 March 2023. Based on result of internal audit, there is no non conformity SCCS indicators and complied with RSPO Supply Chain requirements for mills and the RSPO Rules on Market Communications and Claims.

Management Review of RSPO SCCS implementation conducted on 24 May 2023. The management review discussion has covered the input from internal audit result, correction and corrective action, process Performa and product compliance, follow up of previous management review, and recommendation for improvement.

3.8.7

The mill has verified and documented the volumes of certified and non-certified FFBs received. Certified and non-certified FFB received period of 12 months before audit which is June 2022 – May 2023:

Month	FFB (ton)		Total
	Certified	Non-Certified	
June 2022 - May 2023	167.208,78	97.132,77	264.341,55

Estimated certified product recorded in the last assessment report (ASA-1.3). Actual certified produced has been verified during this assessment. The data are shown in the following table:

Products	Last Year Projected Certified Volume (25 September 2022 – 24 September 2023) (MT)	Actual (June 2022 - May 2023) MT
FFB Processed Certified (MT)	199,000	166,228.45
CSPO (MT)	42,155	33,788.96
CSPK (MT)	9,801	8,531.71

According to the data during the license period, there still has not been any overproduction yet.

Mechanism to handle non-conforming palm oil products is contained in SOP of RSPO Supply Chain No. SOP-SCD-01 dated 1 July 2021. This procedure is generally applied to all complaint's aspects, including complaints and non-conforming products from customers/buyers. During the audit, there is no written complaint from stakeholders related to nonconforming products.

3.8.8

The mill has product information provided in such as document of weighbridge ticket, delivery order and other invoices, as example at invoices of PK certified delivery on 8 June 2023. The information provided on invoices are:

- The name and address of the buyer (PT Ivo Mas Tunggal);
- The name and address of the seller (PT ANJA Siais – ANJA Siais POM in Tapanuli Selatan District)
- The loading or shipment / delivery date (8 June 2023);
- A description of the product supply chain model (Mass Balance)
- The date on which the documents were issued (8 June 2023);
- The quantity of the products delivered (30.34 ton);
- Any related transport documentation (transport by CV Mujur Trans);
- A unique identification number (1232000400);
- RSPO certificate number (Mutu-RSPO/046);
- etc.

3.8.9

The unit of certification has legal ownership of CPO and PK and did not outsource its milling activities. Only transportation of CPO and PK are outsourced to third parties. The company has a list of contractors for transporting oil palm products from the mill which informs the name of the contractor, owner, address, work agreement number, signatures of both parties and validity period. Examples of these contracts are as follows:

1. CV Mujur Trans (CPO and PK transporter), transport CPO and PK agreement valid thru 31 December 2023.

2. UD Maju Bersama (CPO and PK transporter), transport CPO and PK agreement valid thru 31 December 2023.
3. CV Usaha Bersama (PK transporter), transport PK agreement valid thru 31 December 2023.

To ensure the contractors complies with the RSPO Supply Chain, in the agreement, there is a letter of commitment from each contractor stating that they are committed to supporting the implementation of the RSPO SCCS system including the willingness to provide proper access to accredited CBs in order to be able to access their operations and systems along with any information in their possession, if the audit is notified in advance.

Based on an interview with contractor (CV Usaha Bersama) regarding the clausal in the contract that allow CB to access the contractor, they acknowledge and understand about the provisions.

3.8.10 and 3.8.11

The Mill has the record of details of the contractor, covers the contractor company profile, address, contact person, email and phone number, contract agreement and period. There was no new contractor from the previous assessment. The list of contractors of CPO and PK transporter are:

1. CV Mujur Trans (CPO and PK transporter)
2. UD Maju Bersama (CPO and PK transporter)
3. CV Usaha Bersama (PK transporter).

3.8.12

The company has had up-to-date records and report that are kept in mill office, complete, accurate and up-to date. All the records can be accessed by the auditor, such as record of certified product shipping, sales contract, delivery order/invoice, production report and product sales. Based on document verification on procedure of document control and monitoring (No. SOP-SCD-01 dated 1 July 2021), retention time for all records and report, including regarding to supply chain are kept for 2 years.

For instance, record of all certified palm oil/palm kernel oil volumes purchased (input) and claimed (output) for period of 12-months before audit (June 2022 – May 2023):

CSPO

Month	CPO (ton)		Total
	Certified	Non-Certified	
June 2022 - May 2023	33,788.96	18,740.30	52,529.26

Month	CSPO Despatch (ton)			Total
	RSPO	Other Scheme	Non-Certified	
June 2022 - May 2023	30,303.65	-	330.00	30,633.65

CSPK

Month	PK (ton)		Total
	Certified	Non-Certified	
June 2022 - May 2023	8,531.71	4,431.22	12,962.93

Month	CSPK Despatch (ton)			Total
	RSPO	Other Scheme	Non-Certified	
June 2022 - May 2023	6,344.48	-	-	6,344.48

3.8.13 and 3.8.14

The conversion rate of production of CPO (OER) and PK (KER) were based on actual daily, monthly and yearly production. The extraction rate follows the actual data for a 12-month period for June 2022 until May 2023 i.e OER 19.87% and KER 4.90%. Periodically update of extraction is actual extraction.

3.8.15

SCSS module used in ANJA Siais POM is Mass Balance (MB), because the mill receives FFB from the estate RSPO certified and from third party that non-certified RSPO.

3.8.16

RSPO IT Platform member registration number for ANJA Siais Palm Oil Mill is RSPO_PO1000001992. The Mill carry out shipping announcement in the RSPO IT platform when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three (3) months after dispatch. For example:

- Certified PK sold to PT Ivo Mas Tunggal – Lubuk Gaung Refinery dated 16 February 2023 for 150.15 MT and transaction creates in IT Palm Trace dated 10 March 2023 (transaction ID: TR-4bb164e2-4d42)
- Certified CPO sold to PT Ivo Mas Tunggal – Lubuk Gaung Refinery dated 10 March 2023 for 1,000 MT and transaction creates in IT Palm Trace dated 21 March 2023 (transaction ID: TR-268ef2ec-167d)

Unit of certification sold all CSPK as RSPO product. For the CSPO that sold as conventional, the company has been sold as credits in the palm trace, as example stock transaction sold as credits dated 31 March 2023 for 330 MT (transaction ID: ST-TR-23121c98-9dfa).

3.8.17

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

Status: Comply	
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PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

4.1

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

4.1.1

The company has a Policy of Respect for Human Rights which has been effective since August 4, 2016, and has been approved by the President Director. The two policies state that the unit of certification is committed to respecting and protecting human rights within the area of the unit of certification. The human rights policy also explains that the unit of certification does not tolerate acts of retaliation against someone who discloses violations or allegations with good intentions.

Based on the interview with workers in estates (harvesters, pesticide sprayers, and maintenance workers), workers in mill (mill operators and warehouse workers), contractors, and village community leaders, they stated that there were no incidents or issues of human rights violations occurring in the operational area of the certification unit. The company also had respected the rights of human right defenders and prohibiting the retaliation towards human right defenders.

4.1.2

The results of interviews with the surrounding community (Pardomuan Village, Pintu Padang Village, Napa Village Head and Simarpinggian Village Head) and company workers revealed that if there was a conflict/problem with the company,

the resolution action taken was deliberation without resorting to violence. As an example of an external complaint related to *HGU*, it can be shown that the latest information on the complaint shows that the resolution process was carried out by deliberation and there was no act of violence or intimidation.

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

Complaints and grievance mechanisms have been included in the Complaint Mechanism SOP No. SOP-HRCM-08 Edition 01 dated 01 January 2023. In brief, the document explains, among others:

- Employees can submit complaints through their direct supervisor and/or through the HR&CM Department.
- Completion of the first stage no later than 3 working days and if it has not been resolved, the completion of the second stage no later than 3 working days.
- Complaints can be submitted through the complaint and suggestion box which is managed by the Head of the Environment for each housing, Field Assistant, Head of Wholesale, HRO and Resident Doctor for the complaints and suggestions box in their respective work areas.
- In addition, complaints can also be conveyed through Value Champion, Gender Committee, Whistle Blowing System and Bipartite Cooperation.

Based on the interviews with the surrounding communities, and workers (harvesters and mill operators), the workers had a good understanding of the communication procedures and personnel who served as communicators between the company and the community so that illiterate people can be informed by the related communicators.

4.2.2

Based on the results of interviews with representatives of Serbundo and Bipartite Cooperations, information was obtained that parties routinely hold meetings with workers, one of the agendas of which is to accommodate issues and complaints which will later be addressed to the unit of certification. Workers who cannot read/write can submit complaints through the labor union or superiors orally. Then, from the results of interviews with local stakeholders, information was obtained that the certification unit had appointed staff to serve as companions & communicators for stakeholders, so that people who could not read/write could submit information or complaints to the communicator.

4.2.3

Companies can show documentation of the realization of handling complaints from stakeholders, for example:

- The request for the printing of the BPJS Health Card and the addition of the 4th, 5th and 6th child BPJS on 5 April 2023 has been responded to and completed on the same date.
- Complaints regarding children from workers have been registered but have not received a BPJS card on January 1, 2023 and have been responded to and resolved on the same day.
- Incoming letter from F. Serbundo dated 23 May 2023 regarding follow-up to the Negotiations for Making a Collective Labor Agreement (CLA) and has been responded to by the company via letter dated 25 May 2023.

4.2.4

The company has SOP for Management of Complaints from External Stakeholders No. SOP-CID-03 November 1, 2020. The SOP explains that the process for responding to complaints is carried out a maximum of 14 working days from the time the complaint is received and recorded in the Complaint Form. The document also explains that the company will inform the response to the complainant through a meeting represented by CID/Government Relations and the complainant can appoint a party to be the mediator in the meeting.

Status: Comply

4.3

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

4.3.1

The company has carried out the identification of local development needs and priorities for the affected communities around the company through Stakeholder Meeting activities. The stakeholder meeting was held on December 22, 2022,

which aims to find out the aspirations of stakeholders, determine the CID/CSR program, and others. Stakeholders who attended this meeting included the surrounding community, village heads, community leaders, the Plantation Agency, and others.

The company has contributed to community development through the Management Plan Community Involvement and Development program. The implementation of the CID Management Plan program in 2022 includes the following activities:

- Vaccination Assistance for elementary school level on January 14, 2022
- Free medical assistance at ANJ clinic in 2022
- Booster vaccination in collaboration with the local government and the Tapanuli Selatan resort police on February 8, 2022, and March 12, 2022
- Introduction of Oyster Mushroom Cultivation at Binasari Village on January 20, 2022, and KTPA and Janjimatogu Village on January 24, 2022
- Communication with the community in Binasari Village on January 18, 2022
- Public consultation with KPH X Padang Sidempuan on March 23, 2022
- Child-friendly District program on March 31, 2022.
- And others.

The results of interviews with representatives of Napa Village and Pintu Padang Villages, obtained information that the company has realized a development program for the community and has been based on the results of consultations with the surrounding community.

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

The total scope area of certification is 9,329.32 Ha, with the details of legal document as follow:

HGU PT ANJA Siais

The company has had land title (HGU) as follows:

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

Total of land titled area: 9,171.82 Ha

Koperasi Tani Binasari Legality

The legality of the Koperasi Tani Binasari in the form of a Sporadic document in the form of a Statement of Physical Control of Land by the Chairperson of the Koperasi Tani Binasari dated February 14, 2022, which states that:

- In the framework of the application for the issuance of a HGU certificate on behalf of the cooperative, the Cooperative states that the area for which the HGU is being applied for is 157.50 Ha which is being applied for physically and is fully controlled, managed and owned by the cooperative.
- As long as it is controlled/managed by the cooperative, there are no problems and disputes from other parties and there is no change/reduction in the area, both regarding the control of the land and the boundary markings of the land parcels and are properly and correctly maintained in accordance with the Land Field Map No. 03/2017 March 10, 2017
- The statement letter was signed by Head of Pardomuan Village

Deed of establishment No. 46 dated November 14, 2011, and Deed of amendment No. 15 dated December 10, 2019. The basis for managing the Partnership Plantation is based on the Cooperation Agreement No. 0707/PLS/ANJAS/2018 and No. 07/KTBS/07/2018 dated 12 July 2018 between PT ANJ Agri Siais and the Koperasi Tani Binasari which is valid until 30 June 2036.

4.4.2, 4.4.3, 4.4.4, 4.4.5 and 4.4.6

PT ANJ Agri Siais was originally named PT Ondop Perkasa Makmur and has undergone a name change (become PT ANJ Agri Siais) in accordance with notarial deed no. 04 of 2010 dated March 2, 2010, with the approval of Law Ministry of Indonesia no. AHU-15127.AH.01.02.Year 2010 dated March 24, 2010.

The company has carried out land acquisition for the entire permit area it has. The last compensation process was carried out in 2006. Until the ASA-1.4 audit activity, it was found that there was no new land acquisition/expansion. Based on interviews with representatives of the Plantation Agency of Tapanuli Selatan Regency, it was also known that there was no new land acquisition in the HGU area.

The company shows the document recapitulation of land acquisition carried out up to 2006 in the document "Recapitulation of Land Compensation Application for HGU Certificate in the Expansion Area of PT Ondop Perkasa Makmur". Based on this document, it is known that compensation has been made to 37 owners of a land area of 163.68 hectares.

Based on the results of the Minutes of the Land Examination Committee B, Sumatera Utara Province dated January 7, 2009, No. 01/PPT/B/2009 Jo Minutes of Field Inspection Results dated January 28, 2016, No. 02/BA/PHTBH/HGU/II/2016 it is stated that the land requested is State land which has community cultivation which has been compensated by PT Ondop Perkasa Makmur (now PT Austindo Nusantara Jaya Agri Siais). The land requested is entirely located in an area of other use and is not in the area of the Indicative Map of Postponing the Granting of a new Permit.

Based on public consultation with village representatives (Village Head of Pardomuan, Village Head of Simarpinggan, Headman of Pintu Padang) and Plantation Agency known that there was no customary right in or near the concession area of PT ANJA Siais. All land acquisition between local people and company representatives conducted as mutual agreement and with Bahasa that understood by all parties involved. From the results of interviews with representatives of Plantation Agency of Tapanuli Selatan Regency, it is known that there is no expansion area of PT ANJ.

	Status: Comply	
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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

There is no new planting activity during this audit. Based on document Identification of HCV and stakeholder consultation, there was not found customary/indigenous rights in operational area. There were the records of the process of collecting

information on the preparation of the High Conservation Values Identification Report and the Social Impact Assessment Report. The recording evidence comprises of participants' list and photographs.

Status: Comply

4.6
Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.

4.6.1
The company has a procedure of Land Compensation, document No. SOP-Leg-03 dated 1 June 2013, related to identifying legal, customary or user rights, and for identifying people entitled to compensation. Based on public consultation with village representatives from Pardomuan Village, Pintu Padang Village and Simarpinggann Village known that they know about the procedure through the socialization given and they agree with the procedure.

4.6.2
The company has procedure of Land Compensation, document No. SOP-Leg-03 dated 1 June 2013. The procedure is described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. Based on public consultation with village representatives from Pardomuan Village, Pintu Padang Village and Simarpinggann Village known that they know about the procedure through the socialization given and they agree with the procedure and compensation process was done directed to the land owner and landowners are given the freedom to release their land without coercion.

4.6.3
PT ANJA Siais already has cooperation in the development of plasma plantations namely Koperasi Tani Binasari. Based on the data from the farmers in the Cooperative, it is known that there are farmers with gender and women. This indicates that there are equal opportunities for men and women to have land rights in the plasma.

4.6.4
PT ANJ Agri Siais was originally named PT Ondop Perkasa Makmur and has undergone a name change (become PT ANJ Agri Siais) in accordance with notarial deed no. 04 of 2010 dated March 2, 2010 with the approval of Law Ministry of Indonesia no. AHU-15127.AH.01.02.Year 2010 dated March 24, 2010.

The company has carried out land acquisition for the entire permit area it has. The last compensation process was carried out in 2006. Until the ASA-1.4 audit activity, it was found that there was no new land acquisition/expansion. Based on interviews with representatives of the Plantation Agency of Tapanuli Selatan Regency, it was also known that there was no new land acquisition in the HGU area.

The company shows the document recapitulation of land acquisition carried out up to 2006 in the document "Recapitulation of Land Compensation Application for HGU Certificate in the Expansion Area of PT Ondop Perkasa Makmur". Based on this document, it is known that compensation has been made to 37 owners of a land area of 163.68 hectares.

Based on the results of the Minutes of the Land Examination Committee B, Sumatera Utara Province dated January 7, 2009, No. 01/PPT/B/2009 Jo Minutes of Field Inspection Results dated January 28, 2016, No. 02/BA/PHTBH/HGU/II/2016 it is stated that the land requested is State land which has community cultivation which has been compensated by PT Ondop Perkasa Makmur (now PT Austindo Nusantara Jaya Agri Siais). The land requested is entirely located in an area of other use and is not in the area of the Indicative Map of Postponing the Granting of a new Permit.

Based on public consultation with village representatives (Headman of Pardomuan, headman of Simarpinggann, Headman of Pintu Padang) and Plantation Agency known that there was no customary right in or near the concession area of PT ANJA Siais. All land acquisition between local people and company representatives conducted as mutual agreement and

with Bahasa that understood by all parties involved. From the results of interviews with representatives of Plantation Agency of Tapanuli Selatan Regency, it is known that there is no expansion area of PT ANJ.

	Status: Comply	
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4.7
Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.

4.7.1
The company has a procedure in place to identify people and/or community groups entitled to compensation presented in document No. SOP-Leg-03 dated 1 June 2013. The procedure describes how to identify people and/or community groups entitled to compensation. Based on public consultation with village representatives from Pardomuan Village, Pintu Padang Village and Simarpinggan Village known that they know about the procedure through the socialization given and they agree with the procedure and compensation process was done directed to the land owner and landowners are given the freedom to release their land without coercion.

4.7.2
The company has procedure of Land Compensation, document No. SOP-Leg-03 dated 1 June 2013. The procedure is described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. Based on public consultation with village representatives from Pardomuan Village, Pintu Padang Village and Simarpinggan Village known that they know about the procedure through the socialization given and they agree with the procedure, and they can access the procedure through management representative of the company if they need it.

4.7.3
The company can show recapitulation of previous landowners who have been compensated. Compensation is only made for the area within HGU areas owned by the company. Based on interview with management of UoC and related government agencies of Tapanuli Selatan District, known that the certificate holder has no expansion area for new planting area.

Based on public consultation with village representatives from Pardomuan Village, Pintu Padang Village and Simarpinggan Village, the communities that have lost access and rights to land also provided opportunities to benefit from plantation development such as benefit in the form of CSR program, become employee and become a contractor in the company.

	Status: Comply	
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4.8
The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.

4.8.1, 4.8.2, 4.8.3 and 4.8.4
Based on the results of interviews with management, interviews with representatives of surrounding villages (Pardomuan Village, Pintu Padang Village and Simarpinggan Village) and the Plantation Agency of Tapanuli Selatan Regency, as well as field observations to the operational area, it was found that there were no land disputes in the certification unit.

	Status: Comply	
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PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION

5.1
The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.

5.1.1, 5.1.2, 5.1.3 and 5.1.6
The certification unit receives FFB supplies from the own estate, scheme smallholders and also from outside FFB. The following describes an example of pricing FFB owned by a company with plasma and outside FFB suppliers:

- The price of FFB from own estate is determined based on the FFB price determined by the Plantation Office of Sumatera Utara Province and every week the results of the FFB price determination are announced.

- The price of FFB to outside parties is based on an agreement between the two parties which may change from time to time, according to the market price level, the quality of FFB and the influence of other factors and the agreed price can be made verbally or in writing which is agreed by both parties.

FFB from Scheme Smallholders

There is an example of proof of payment for the FFB yield from the Binasari Farmer Cooperative for the April 2023 payment period, where based on the verification of documents that the auditor conducted, the price paid to the scheme smallholders is in accordance with the FFB purchase price stipulation issued by the Plantation Office of Sumatera Utara Province for the month of April 2023, for example, the price for FFB aged 10-20 years is IDR 2,767.59/kg and paid by the company IDR 2,767.59/kg.

Based on interviews with the management of the *Koperasi Tani Binasari*, it is known that the management of the cooperative and each plot owner know about the latest FFB prices every month.

FFB from Outsiders

Based on interviews with external FFB suppliers (*Koperasi Janji Matogu*) it is known that the determination and price changes of FFB are determined by various factors such as FFB quality, CPO prices and others and any price changes will be notified by the company via *whatsapp* or email directly to the FFB suppliers. While working with the company, the FFB supplier has never had any problems with payments. The results of verification of the FFB payment documents carried out by the auditors for the Cooperative Thanks to Joint Ventures, it is known that the FFB price paid to these suppliers for the period May 29, 2023 was IDR 1,850/kg and this is in line with the results of interviews with representatives of the Matogu Cooperative.

Based on the explanation above, it is concluded that the company periodically provides updated information on FFB prices to FFB suppliers.

5.1.4 and 5.1.5

The company has an agreement/contract with the FFB supplier. The agreement/contract with the FFB supplier is indicated in the Agreement between PT. Austindo Nusantara Jaya Agri Siais with the FFB Suppliers with a contract validity period of 2 years since the agreement was made. The company has shown cooperation agreements with FFB suppliers with the following information.

- Cooperation Agreement Letter No. 1104/COM/ANJAS/2021 on November 24, 2021 with UD Boru Namora.
- Cooperation Agreement Letter No. 1105/COM/ANJAS/2021 on November 24, 2021 with UD Riri
- Cooperation Agreement Letter No. 1103/COM/ANJAS/2021 on November 24, 2021 with KT Janji Matogu.
- Cooperation Agreement for the Development and Management of Oil Palm Estates with a Partnership Pattern between PT Austindo Nusantara Jaya Agri Siais and the *Koperasi Tani Binasari* Number 0707/PLS/ANJAS/2018 dated July 12, 2018. From the results of the interview, it is known that women are included in the decision making, one of the administrators of the *Koperasi Tani Binasari* is a woman.

5.1.7

The company performs calibration for weighing equipment carried out by third parties in the following documents:

- Certificate of Test Results No. 510.3/160-TU/THE/MET-TS/2022 from the Legal Metrology technical service unit of the "*Dinas Perdagangan dan Koperasi UKM Daerah*" of Tapanuli Selatan Regency for testing Electronic Bridge Scales with a capacity of 50 Tons on 12 December 2022. Testing was carried out on 06 December 2022 and is valid until December 06, 2023.
- Certificate of Test Results No. 510.3/160-TU/THE/MET-TS/2022 from the Legal Metrology technical service unit of the "*Dinas Perdagangan dan Koperasi UKM Daerah*" of Tapanuli Selatan Regency for testing Electronic Bridge Scales with a capacity of 50 Tons on 12 December 2022. Testing was carried out on 06 December 2022 and is valid until December 06, 2023.

5.1.8

Until now, there have been no independent smallholders specifically assisted by PT Austindo Nusantara Jaya Agri Siais to take part in certification, however, every 3rd party FFB supplier who sends FFB to the company gets an explanation and

understanding to make it better. Specifically for independent farmers who are trying to take part in certification are in other PT ANJ units. In addition, the company also includes the *Koperasi Tani Binasari* in the scope of certification.

5.1.9

The procedure for submitting external complaints and complaints is contained in the SOP document for External Stakeholder Complaints Management dated November 1, 2020. Complaints received and recorded in the complaint form will be followed up to the next process a maximum of 3 working days from the time the complaint is received. The response process to complaints is carried out a maximum of 14 working days from the time the complaint is received and recorded in the Complaint Form. In the complaint resolution mediation process, the company welcomes the relevant stakeholders as mediators if necessary.

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 and 5.2.2

The company has carried out the identification of local development needs and priorities for the affected communities around the company through stakeholder meetings. The 2022 stakeholder meeting was held on December 22, 2022, and aimed to find out the aspirations of stakeholders, determine the CID/CSR program, and others. Stakeholders who attended this meeting included the surrounding community, village heads, community leaders, cooperatives, farmer groups, suppliers, contractors, educational institutions, academics, the press, mass organizations, NGOs, labor organizations, TNI, Polri, the government of Angkola Selatan District and Tapanuli Selatan Regency, and other parties.

Until now, there have been no independent smallholders specifically assisted by PT Austindo Nusantara Jaya Agri Siais to take part in certification; however, every third-party FFB supplier who sends FFB to the company gets an explanation and understanding to make it better, especially for independent farmers who are trying to follow the certification in other PT Austindo Nusantara Jaya Agri Siais units. In addition, the company also includes Koperasi Tani Binasari in the scope of certification.

From the results of stakeholder consultations conducted by the management unit and the results of auditor interviews with third-party FFB suppliers, it is known that third-party FFB suppliers are not yet interested in participating in RSPO Certification.

5.2.3

The company has identified local development needs and priorities for the affected communities around the company through stakeholder meetings. The 2022 stakeholder meeting was held on December 22, 2022, and aimed to find out the aspirations of stakeholders, determine the CID/CSR program, and other things. Stakeholders who attended this meeting included the surrounding community, village heads, community leaders, cooperatives, farmer groups, suppliers, contractors, educational institutions, academics, the press, mass organizations, NGOs, labor organizations, TNI, Polri, the government of Angkola Selatan District and Tapanuli Selatan Regency, and other parties.

Especially for third-party FFB suppliers, the company has explained and conducted training ranging from agronomic assistance to fertilization and other business development. The increase in assistance on the legality of FFB production has only been carried out until the stage of mapping, pinpointing, and gathering information on the location of community land.

Especially for third-party FFB suppliers, the company has explained and conducted training ranging from agronomic assistance to fertilization, including an understanding of pesticide handling. Especially for plasma farmers, the model is fully managed, so pesticide handling training is not carried out for the Koperasi Tani Binasari.

5.2.4

Especially for third party FFB suppliers, the company has explained and conducted training ranging from agronomic assistance, fertilization, including understanding of pesticide handling to FFB suppliers. Especially for plasma farmers, the model is fully managed, so that pesticide handling training is not carried out to the Koperasi Tani Binasari.

5.2.5

The unit of certification can show evidence that it has publicly reported the support program for smallholders, especially plasma farmers regarding its development which is carried out regularly. The evidence shown is based on the receipt of the plantation business progress report 2nd Semester 2022 submission document to the Tapanuli Selatan District Agriculture Service, as well as the 2022 CID Management Plan Report which is publicly accessible.

In addition, information on support for farmers and the community is periodically published in PT ANJ's bulletin or magazine, which is published regularly, and in the 2022 Sustainability Report.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS
6.1

Any form of discrimination is prohibited.

6.1.1

The company has a policy of respecting Human Rights which was stipulated by the director on 04 August 2016. This policy, among other things, states that the unit of certification opens equal opportunities for prospective workers, does not discriminate against either workers or prospective employees, respects the uniqueness and richness of talents and views of employee.

Based on interview with stakeholders for example contractors and workers in Mill and Estate (Harvester, upkeep and Process), obtain information that stakeholders already have an understanding of the non-discrimination and equal opportunity policy.

6.1.2

Based on the results of interviews with representatives of the Serbundo, Employment Ministry of Tapanuli Selatan Regency and workers at both the Estate and Mill, it was stated that so far there have been no incidents of discrimination in the company's work environment. In addition, based on a review of the labor list documents as of April 2023, it is known that workers come from various genders, ethnicities and religions, so it can be concluded that there is no discriminatory treatment in the company's operational activities.

6.1.3

Based on the results of interviews with management, information was obtained that the recruitment process for all employees was carried out through the same process where prospective employees must meet the requirements in the form of administrative selection (application letter, graduation letter, photocopy of personal and family identity), psychological test (for certain positions), interview and health check results. To increase the career path, responsibility, authority and scope of an employee, the company provides promotions based on skills, abilities, leadership, honesty, discipline, loyalty, attendance, etc.

Based on the results of a study of labor recruitment documents, for example the acceptance of the Electrical Worker initial "S" at ANJA Siais Mill in 2023, information was obtained that during recruitment process, the company had set the standard of competence that required based on the offered position. Selection had included evaluation of skills, performance and medical test result. Furthermore, promotion is conducted based on work period, annual evaluation result and availability of position. All workers are treated equally in accordance with company regulation including rights of the worker as well. This is in line with the results of interviews with workers both at Mill and Estate which convey that the process of hiring based on work has been carried out on the basis of skills, abilities, quality and medical eligibility as required for the available jobs.

6.1.4

Based on field observation, interviews with the management and workers, it is known that there were no discriminatory in pregnancy testing given by the company. The pregnancy test conducted only to ensure that no pregnant workers in any agrochemical works such as pesticide application and fertilizing activities proven by there was no requirement regarding pregnancy test in recruitment SOP, job hiring announcement, and medical test during recruitment.

Based on the interview with women workers on spraying activity in Lembah Subur Selatan Estate, there was no pregnancy test during recruitment process. The pregnancy test only carried out for female workers to make sure that they not do any agrochemical works when pregnant.

6.1.5

The company has a gender policy listed in the Internal Memo Number 056/GMO/Siais/IM/II/2020 dated 24 February 2020 which was ratified by the General Manager. The document explains that in an effort to provide protection for all workers and their families, the certification unit determines that it will form a Committee for the Protection of Women and Children (P2A) which will be responsible for issues of gender, sexual harassment and the needs of pregnant/breastfeeding mothers.

The company already has a Gender Committee organization with the Gender Committee structure of PT ANJ Agri Siais which was updated on March 16, 2023. The Gender Committee structure consists of representatives of the genders of women and men with the composition of the management including: Protector and Advisor, Advisor, Chair, Deputy Chair, Secretary and Sub Field.

The programs of the Gender Committee include:

- Dissemination of Gender Committee functions
- Empowerment of women (*Posyandu* and creativity of mothers at ANJ Agri Siais)
- Protection of women and children
- Prevention and management of sexual harassment
- Etc

Based on the results of interviews with workers at both the Mill and Estate, information was obtained that workers had an understanding regarding the existence of the Gender Committee and so far there have been no incidents or issues related to gender.

6.1.6

Based on the interviews with workers (harvesters, maintenance workers, and mill operators), the workers already know that there was a wage scale structure for each level of workers and this has been proven by the difference in the monthly wage income presented on the pay slip.

Based on the results of a study of workers' salary slip documents for April 2023, for example, manual upkeep workers in Lembah Subur Utara Estate with the initials "NP" and "RG", obtained information that the company has paid wages no lower than the minimum wage and has implemented allowances according to the employee's length of service.

Status: Comply	
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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 Minimum Wage for Tapanuli Selatan Regency based on the Decree of the Governor of Sumatera Utara Number 188.44/1000/KPTS/2022 dated 7 December 2022 is set at IDR 3,090,695,-

Companies can show policies regarding remuneration, one of which is contained in the document Internal Memorandum Number 001/ANJT/HRCM/IM/II/2023 from the HR Director dated January 3, 2023 regarding the enforcement of the

minimum wage for non-staff/ NS-A employees, in which it informs that wages workers with less than 1 year of service in the amount of Rp. 3,090,695.-. In addition, NS-A employees with more than 1 year of service receive long service benefits.

Based on the results of a study of the April 2023 employee salary slip documents contained in Indonesian, for example the manual care workers in the Lembah Subur Utara Estate with the initials "NP" and "RG", information was obtained that the company had provided wages not lower than the minimum wage and had implemented the provision of benefits according to the employee's tenure.

6.2.2

The company already has a Collective Labor Agreement document between PT Austindo Nusantara Jaya Agri Siais and the Basis Serbundo Management for the period 2022 – 2024 which has been registered through the Decree of the Head of the Sumatera Utara Provincial Manpower Office Number 560/441-6/DTR/XII/2022 in December 2022 which explains work requirements such as: regular working hours, deductions, overtime, sick leave, right to leave, maternity leave, reasons for termination, notification period before termination of work, etc.

Based on the results of interviews with workers, both at the Mill and Estate (Harvesting, Upkeep and Processing at the Mill), information was obtained that workers received monthly wage information from the Salary Slip received in Indonesian and understood the information contained therein. In addition, based on the results of a study of the April 2023 employee salary slip documents contained in Indonesian, for example manual care workers in the Lembah Subur Utara Estate with the initials "NP" and "RG", information was obtained that the company had paid wages not lower than the minimum wage and had implementing the provision of benefits according to the length of service of employees.

Based on the results of interviews with Serbundo representatives, and workers both at Mill and Estate (Harvesting, Spraying and Processing), information was obtained that workers had received copies of employment relations documents, and workers had an understanding regarding the contents of employment relations documents.

Companies can show evidence of providing work relationship documents, for example Minutes of Handover of Documents Work Agreement Letter No. 052/ANJA/HR&GA/PKWTT/V/2023 dated 16 May 2023 to the workers of the Harvest Division 2 Lembah Subur Utara Estate with the initials "MR" and signed by both parties with a 3 month trial period. In addition, the work agreement also informs the amount of wages and other work conditions.

6.2.3

Companies can show proof of legal compliance for regular working hours, deductions, overtime, sick leave, vacation entitlements, maternity leave, reasons for termination, notice period before termination, and other employment conditions. For example:

Overtime

Based on the results of interviews with processing workers at the Mill (Engine Room, Press, Boiler, Loading Ramp and Grading), information was obtained that workers already have an understanding regarding the basis for calculating overtime pay and overtime is carried out by agreement between the company and employees.

Based on the results of a review of the Salary Slip, Absence and Overtime Calculation documents for boiler workers with the initial "N", boiler workers initial "MAFM" and engine room workers with the initial "MH", information was obtained that the calculation and payment of overtime wages was in accordance with regulations and did not exceed the deadline which is determined. In addition, proof of workers' willingness to work overtime can be shown through an Overtime Work Order (SPKL) dated May 22, 2023 for workers with the initial "MH" for 1 hour for turbine operations for FFB processing signed by superiors and approved by workers.

Rest Entitlements, Annual Leave and Maternity Leave

Company policy in guaranteeing the right to time off for workers is contained in the document Internal Memo No. 092/GMO/Siais/EM/IV/2020 on April 8 2020. The document explains the determination of annual leave, maternity leave, menstruation leave, and others. Where these provisions refer to the applicable regulations. In addition, the right to rest and leave is also contained in the Collective Labor Agreement document between PT Austindo Nusantara Jaya Agri Siais

and the Basis Serbundo Management for the period 2022 – 2024 which has been registered through the Decree of the Head of the Sumatera Utara Provincial Manpower Office Number 560/441-6 /DTR/XII/2022 in December 2022. The document briefly explains, among others:

- Every employee is entitled to annual leave (12-14 working days following the length of service and position).
- Labor break for 3 months.
- Miscarriage break for 1.5 months.
- Holidays that are legally recognized by the Company are official holidays determined by the Government every year or days determined by the Company as holidays/off for workers/labourers.

Based on the results of interviews with workers at both the Mill and Estate (Harvesting, Spraying and Processing), information was obtained that workers are entitled to 1 day of rest each week.

In addition, the company can show records of granting leave entitlements, for example:

- Certificate of Examination H2 (Maternity Leave) No. 01/CP/Anja Siais/V/2023 dated 26 May 2023.
- Annual leave application letter from employee with initial "S", in the document informs the number of leave entitlements, the number of leaves requested, and the remaining leave entitlements.

Pension/ Termination

- Minutes of Serh receiving a letter of suspension for the worker with the initials "RS" on March 20, 2023.
- Decision Letter No. 013/HR&GA/ANJAS/PHK/III-2023 dated 25 March 2023 concerning Termination of Employment for an employee with the initial "RS".
- Letter of Collective Agreement concerning termination of employment for the worker with the initials "RS" dated 13 April 2023 which informs the calculation of compensation.

6.2.4

The Company has provided facilities and infrastructure for the welfare of workers such as Housing, Mess, Clinics, Schools, Worship Facilities, Employee Centres, Sports Facilities, Daycare Centres, Multipurpose Buildings, Cooperatives, Water Treatment, etc. with adequate numbers for all employees.

The company can show the program and realization of the maintenance of assets including housing, electricity and water resources.

Based on the results of field observations in residential areas in the Lembah Subur Utara Estate and Lembah Subur Selatan Estate, it was found that housing facilities and infrastructure, including sanitation facilities, were in a well-maintained and adequate condition.

6.2.5

Based on the results of interviews with representatives of employee cooperatives, it is known that access to food or daily necessities is very easy to reach because there are cooperatives engaged in the procurement of staple foods. In addition, in the unit of certification there is also a weekly market every 3 times a week, where workers can shop for food or daily necessities.

6.2.6

The certification unit has calculated the prevailing wages and in-kind benefits based on the guidelines issued by the RSPO. Prevailing wages are taken from prevailing wages such as basic wages/minimum wages. Meanwhile, in-kind benefits are taken from all costs incurred by the certification unit for the provision and maintenance of facilities provided by the certification unit to employees, such as electricity, housing, water, schools, health facilities, and baby care that has been calculated based on actual and rational price at certification unit location. For example, to calculate the in-kind benefit of housing, the costs considered in the calculation include building material costs, construction costs, and including maintenance costs. Prevailing Wage and in-kind benefits provided to workers range from 33% - 87% of the applicable minimum wage.

6.2.7

Based on the results of a review of the labor list documents and interviews with Serbundo representatives, it was stated that currently there are no workers with temporary status who are directly employed by the company and there are no workers with casual daily worker status anymore.

So it can be concluded that the company has shown evidence that all work that is permanent in nature may not be carried out by Certain Time Workers (*PKWT*) or Casual Daily Workers.

Status: Comply

6.3

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

6.3.1; 6.3.2; 6.3.3

The company has a policy regarding the formation of a workers' union which is listed in the Internal Memo document No. 72/GM/srs/09-2012 which was ratified by the General Manager on September 24, 2012. The policy explains the company's commitment to giving workers the freedom to form and become union members.

As a forum for communication and conveying the aspirations of workers, the Company already has an Bipartite Cooperative organization PT ANJ Agri Siais and a Workers' Union which are members of F. Serbundo. The formation documents are as follows:

Bipartite Cooperation

- Minutes of Bipartite Cooperation Formation No. 023/GMO/Siais/IM/III/2023 dated 10 May 2023.
- Bipartite Cooperation Management Appointment Letter dated March 3, 2023.
- Ratification of the Changes in the Composition of the PT ANJ Agri Siais Bipartite Cooperation Management from the Manpower Office of the Tapanuli Selatan Regency on March 29, 2023.
- Minutes of Bipartite Cooperation Formation No. 038/GMO/Siais/IM/V/2023 dated 10 May 2023.
- Bipartite Cooperation Management Appointment Letter dated 12 May 2023.
- Request for Approval of Changes to the Composition of Management and Membership of Bipartite Cooperation PT ANJAS which was received by the Manpower Office of Tapanuli Selatan Regency on 12 May 2023.

F. Serbundo (Federation of Indonesian Plantation Trade Unions)

Proof of registration of trade unions at the Manpower, Transmigration and Social Services Office complex of the Tapanuli Selatan Regency government office with Registration Number BP.03/PB-SERBUNDO/VIII/TS/2016 on August 29, 2016.

In addition, the company can also show documents of meetings between the union and the company, for example the one held on 31 March 2022 regarding the CBA negotiations for the 2022 – 2024 period which was attended by 21 participants.

Based on the results of interviews with representatives of F. Serbundo, Bipartite Cooperation and workers both at the Mill and Estate (Harvesting, Manual Care and Processing at the Mill), information was obtained that the company has facilitated workers in forming trade unions by providing facilities in the form of borrowing rooms for meetings, membership Trade unions are voluntary; there is no intervention by the company in union activities.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1

The company already has a policy prohibiting the employment of minors contained in the Internal Memo Number 016/ANJT/HRCM/IM/IX/2021 issued on September 21, 2021 and signed by the HR Director. As the Internal Memo noted, the minimum age for workers is 18 years.

As a form of outreach, the Company has posted a warning regarding the prohibition of employing minors in areas that are easily visible, including housing areas and included as one of the clauses in agreements with contractors and suppliers who work with the company.

6.4.2; 6.4.3; 6.4.4

Based on the results of a review of the April 2023 Labor List document and interviews with the Tapanuli Selatan Regency Manpower Office, information was obtained that there were no workers under the age of 18 when they first joined the company.

Status: Comply

6.5

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

6.5.1

The company already has a policy regarding employee guarantees that they are free from all forms of harassment contained in the Internal Memo No 43/GMO/Siais/IM/V/2013 issued on 30 May 2013 by the General Manager. The certification unit also has a policy on threats and criminal acts as stated in Internal Memo No. 165/GMO/Siais/IM/VII/2020 which was issued on 10 July 2020 by the General Manager. To ensure that this policy is implemented, the certification unit has a reporting mechanism in case of harassment and violence in the workplace.

During the field visit, warnings regarding the prohibition of acts of sexual harassment and violence can be seen, especially in the employee housing area. In addition, based on the results of interviews with workers, it was stated that so far there had never been a case related to incidents of sexual harassment and violence as well as other forms of violence and harassment.

6.5.2

The unit of certification has a policy related to the protection of reproductive rights, especially for women, which is stated in the document Internal Memo Number 63/GM/srs/09-2012 dated 6 September 2012 which was approved by the General Manager. In providing protection for reproductive rights for women workers, the unit of certification is committed not to employ pregnant women and nursing mothers for spray work or other work related to chemical contamination. The memo document also applies to contractor workers and is included in the Work Agreement.

Based on the results of interviews with workers, it was stated that the company had provided protection for women's reproductive rights including the provision of menstruation leave, maternity leave and provided other alternative jobs for workers who handle chemicals if they were pregnant or breastfeeding.

6.5.3

The company has conducted an assessment of the needs of mothers who have just given birth, including breastfeeding mothers, which was discussed, one of which was at a meeting held on February 14, 2023. The meeting was also attended by representatives of the gender committee and workers who are pregnant so they can express opinions regarding their postnatal needs.

Based on the results of interviews and field visits at Child Care Centres, it is known that the company has provided facilities for young mothers such as routine health checks during Integrated Healthcare Center activities, day care centres and places for breastfeeding.

6.5.4

The company has an Internal Memo regarding procedures and monitoring of handling employee complaints with Number 77/GM/rs/10-2012 dated 11 October 2012 which was approved by the General Manager. The document describes the procedure for submitting and responding to complaints from workers to the Company and the party in charge. In addition, it was also explained that the person in charge would accommodate complaints by observing the norms of decency and decency. Then, the certification unit also has a gender policy listed in the Internal Memo Number

056/GMO/Siais/IM/II/2020 dated 24 February 2020 which was ratified by the General Manager. It is known that the policy explains that the Company's management guarantees the confidentiality of information and provides protection to victims and witnesses if there are cases of gender issues and sexual harassment.

Based on interviews with women workers, gender committees and labor union, it is known that they understand the related policies. It was further explained that so far there have been no problems or complaints related to reproduction in the workplace and they all know the mechanism to file a complaint.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1

Based on the results of interviews with workers, labor union representatives and representatives of the Employment Agency of Tapanuli Selatan Regency, it was stated that so far there have been no complaints or issues related to the implementation of forced labor by the company.

6.6.2

Based on the results of the interviews and review of the labor list documents on January 2023, information was obtained that there were no foreign workers working at PT ANJ Agri Siais. The status of workers working at PT ANJ Agri Siais include permanent workers and contract workers, all of whom have been equipped with work agreements that regulate work mechanisms starting from the job desk, workers' rights and obligations to the wage system.

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 company shows the Decree of the Head of the Labor Inspection Unit for Region V of the Sumatera Utara Province Manpower Office Number 1035-7/DTK-SU/WIL.V/2022 concerning Ratification of the Occupational Safety and Health Advisory Committee of PT Austindo Nusantara Jaya Agri Siais dated 30 November 2022 valid 2 year as long as there are no changes, with the P2K3 secretary. Indra Putra Harahap and has Certificate of Appointment of Occupational Safety and Health Expert Number 5/11252/AS.02.04/IX/2021 dated 30 September 2021 valid for 3 years.

Occupational Safety and Health Advisory Committee (P2K3) meeting

The company shows minutes of P2K3 meetings for 2022 and January – April 2023, as an example of P2K3 meeting minutes on August 22, 2022, which discusses, among other things:

- Work accident reporting on behalf of Martua Harahap and its investigation
- Improved EHS index
- Preparation of the mangala agni forest and land fires training
- RTM of internal audit results

The company also shows proof of submission of Occupational Safety and Health Advisory Committee (P2K3) reports which are carried out every quarter to the relevant agencies, for example the P2K3 Report for Quarters III and 4 of 2022. The last Occupational Safety and Health Advisory Committee (P2K3) report in the first quarter of 2023 was submitted to the Sumatera Utara Provincial Manpower Office on April 26, 2023.

6.7.2

The company shows the emergency response procedures contained in the Emergency Preparedness and Response Procedure document Number: SOP-EHS-015 Revision 02 effective August 10, 2018, which briefly explains, among others:

- Identification of hazards and emergency needs
- Emergencies in the Mill and Building Areas and their handling

The results of field observations have provided emergency response equipment such as fire extinguishers, hydrants, first aid kits for buildings and first aid bags for field workers brought by the foreman. The results of the interview concluded that the foreman personnel had an understanding regarding the handling of first aid kits and briefly explained the functions of the existing first aid equipment.

The company shows the EHS index document which contains a recapitulation of work accidents that occurred in 2022 and 2023. For 2023, for example, until April there had been 58 work accidents that occurred in 57 cases in estates, and 1 case in mills. These accidents are classified as minor accidents such as being stabbed by thorns, slipping, and being hit by work tools. The work accident has been reported to management, and has been discussed in the of Occupational Safety and Health Advisory Committee (*P2K3*) meeting. There is a of Occupational Safety and Health Advisory Committee (*P2K3*) report for the first quarter of 2023 which was reported to the Head of UPT Labor Inspector Region V of Sumatera Utara Province on April 26, 2023.

Based on the results of interviews and field observations, it was shown that First Aid was available in the places visited, for example in mills and spray workers in block 27 division 4 LSU and workers understood how to use it. In addition, there are 12 workers who have first aid licenses consisting of logistics clerks, CPO analysts, kernel analysts, LSU and LSS harvest foremen, harvest clerks, shipping clerks, CWT officers and firefighters. The last first aid training was held in January 2023 for firefighters. At the Mill and Estate locations, there are warnings of evacuation routes and gathering points that can be seen clearly and are known by workers.

6.7.3

SOP for PPE Management effective November 15, 2021, Number SOP-EHS-07, among other things, explains:

- The company provides PPE to workers free of charge and employees have an obligation to use and maintain it.
- Replacement of PPE can be done if its age or effective period has expired, the replacement program is according to the recommendation of the supplier or manufacturer, and it is damaged or of poor quality so that it does not provide proper protection.
- Procedures for replacing PPE and charging replacement costs (if needed) can be regulated separately based on the provisions of each company.
- The company also shows proof of providing PPE to workers employed on the plantation.

Based on the results of field observations, review of HIRAC documents and interviews with workers, it is known that workers receive PPE in accordance with HIRAC owned by the company at all locations in the company, for example HIRAC for LSU and LSS have identified pesticide application and harvesting. The Mill has also identified machine operations, for example boilers and loading ramps. All PPE is provided free of charge with a usage period of 1 year or following the manufacturer's recommendations. If it is damaged, the worker may replace the PPE by bringing evidence and after an assessment has been made of the cause of the damage to the PPE. The company shows proof of providing PPE, for example helmets to workers at LSU on January 31, 2023. Workers also understand the importance of using PPE and use PPE while working. The company also has a K3 training schedule including PPE for example on February 1, 2023, for division 4 harvesters.

MSDS is also available in the fertilizer and chemical storage warehouse. There are also sanitation facilities for workers who handle pesticides in the form of changing rooms and private lockers. Water used for washing pesticides is reused for pesticide application.

6.7.4

Companies can show proof of payment for BPJS Health and BPJS Employment along with a list of workers who are participants for January - April 2023. For example, for April 2023 the details of participants are as follows:

Descriptions	Number of Worker
Number of Workers on April 2023	1,201
Participants of BPJS Employment on April 2023	1,204

Participants of BPJS Health on April 2023 1,203

Companies can show recordings of Occupational Accident Case Reports to BPJS including Phase 1 and Phase 2 Reports which are complemented by chronology reports and accident investigations, for example a worker's work accident with the initials "MS" which occurred on April 4, 2023, and all cost incurred are covered.

Thus, it was concluded that the company already has a list of employees participating in the Employment and Health Social Security Administration Agency (BPJS) program.

6.7.5

The company shows the work accident report (LTA) contained in the EHS Index document, for example for all PT ANJ Agri Siais during 2021 as follows:

Description	Total
LTA	16
FR	20,036
SR	101,113

The company shows an investigation report and analysis of work accident incidents, for example on an accident on September 30, 2021, for workers with the initials MH at estate. The report explains the chronology of the accident, analysis of the causative factors and recommendations for improvement. The accident was also discussed at the P2K3 meeting on 22 August 2022.

Status: Comply

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

7.1

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

7.1.1

The unit of certification has committed to implement integrated pest management (IPM) which presented in several document for example as follows:

- Document No. SOP-AGR-20 dated 01 April 2016 about integrated pest management.
- Document No. SOP-AGR-21 dated 01 August 2013 about rat control by barn owl.
- Document No. SOP-AGR-24 dated 01 August 2013 about rat control through chemical baiting.
- Document No. SOP-AGR-27 dated 01 August 2013 about termite control.
- Work Instruction No. IK-SOP AGR-02 dated 01 September 2015 about Oryctes control, etc.

Based on field observations, there have been implementations of biological pest control such as the use of beneficial plants and the installation of owl cages as a place for tyto alba. In addition, there was also no sign of a massive pest attack.

Document No. SOP-AGR-20 dated 01 April 2016 concerning integrated pest management. It explains the plan and implementation of integrated pest control starting from identifying potential pests such as rats, tirathaba and termites. The document also describes the pest threshold and how to control it. For example, poison bait can be given to rats if they have exceeded the economic threshold (> 5% for immature plants, and ≥ 10% for mature plants), while monitoring can be done at any time. The document also explains that the main control principle is using natural enemies, for example Turnera sp., Cassia, sp., and Antigonon sp. There is also an owl's nest placed in the field.

The company shows a pest census, for example a termite census for January - December 2022. The total number of trees attacked was 12,738, and the use of pesticides was 228,973 L. Based on the plan and actual use of pesticides, it is known that the use of pesticides is still below the planned usage, for example for pesticides with the Agent brand at LSU, the program is 0.05 L/ha while the realization is 0.01 L/ha. There are no signs of using fire in pest control at the company.

7.1.2

Based on the results of field observations, it is known that there are no species that are classified as invasive species according to the Minister of Forestry and Environment Regulation No. 94 in 2016. The species used for biological pest control include *Turnera subulata*, *Antigonon* and *Tyto alba*.

7.1.3

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

Status: Comply

7.2

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

7.2.1

The company shows records of observing and controlling pests and the use of registered types of pesticides, for example:

- Termite Pest Control Recap Documents LSU and LSS December 2022, as follows:
 - Ha Census: 817.05 Ha
 - Ha Controlled: 584.02 Ha
 - Census Items: 40,142 Items
 - Healthy Trees: 39,780 Trees
 - Amount of Chemicals: 6,154 Liters
- The results of the Tyto Alba checking census in April 2023 found 301 gupons with 2.99% inhabited.
- The company grows host plants in the form of *Turnera subulata* and *Antigonon*
- The company shows a list of pesticides used, for example:

Merk	Active ingredient	Target	LD50	WHO
Trendy	Metil Metsulfuron 20 %	Broad and narrow leaf weeds and ferns	>2000 mg/kg	U
Agent 50 SC	Fipronyl	Termites	> 2000 mg/kg	II
Metaribb	Metarhizium	Beetle	-	-

The results of field observations in pesticide storage warehouses and a study of the list of pesticide use documents obtained information that there was no use of pesticides listed on the World Health Organization (WHO) Class 1A or 1B or included in the Stockholm or Rotterdam Conventions, as well as paraquat.

7.2.2

The company shows records of pesticides used, for example for the use of Trendy brand pesticides for LSS during 2021 as follows:

- Active Ingredients: Metil Metsulfuron 20 %
- LD50: >2,000 mg/kg
- Application Area: 13.578,05 Ha
- Active Ingredients/ Ha: 0,004 gr/Ha
- Total Applications: 282.898 gr

7.2.3

As part of reducing the use of pesticides, the company has integrated biological control in pest control, for example by using beneficial plants aimed at controlling Palm leaf eating caterpillar pests and *Tyto alba* for controlling rat pests. Based on the results of field observations on LSS, LSU and Koperasi Tani Binasari, it is known that the beneficial plant in a well-maintained condition and planted on the edge Street.

The company has Document No. SOP-AGR-20 dated 01 April 2016 concerning integrated pest management. It explains the plan and implementation of integrated pest control starting from identifying potential pests such as rats, tirathaba and termites. The document also describes the pest threshold and how to control it. For example, poison bait can be given to rats if they have exceeded the economic threshold ($> 5\%$ for immature plants, and $\geq 10\%$ for mature plants), while monitoring can be done at any time. The document also explains that the main control principle is using natural enemies, for example *Turnera sp.*, *Cassia sp.*, and *Antigonon sp.* There is also an owl's nest placed in the field.

The company shows a pest census, for example a termite census for January - December 2022. The total number of trees attacked was 12,738, and the use of pesticides was 228,973 L. Based on the plan and actual use of pesticides, it is known that the use of pesticides is still below the planned usage, for example for pesticides with the Agent brand at LSU, the program is 0.05 L/ha while the realization is 0.01 L/ha. There are no signs of using fire in pest control at the company.

7.2.4

Based on the results of the study of the list of pesticide use documents, there is the use of reagent brand pesticides for termite pest control. In the recording of pest observation and control, information is obtained, for example:

Recap Document of LSU and LSS Termite Pest Control Division December 2022, as follows:

- Ha Census: 817,05 Ha
- Controlled Ha: 584,02 Ha
- Palm Tree census: 40.142 Trees
- Healthy Palm Tree: 39.780 Trees
- Amount of Chemicals: 6.254 Liters

Based on pesticide use data there is no use of pesticides as a prophylactic, for example for termite control based on pest census data which is carried out every month.

7.2.5

The results of field observations in pesticide storage warehouses and a study of the list of pesticide use documents obtained information that there was no use of pesticides listed on the World Health Organization (WHO) Class 1A or 1B or included in the Stockholm or Rotterdam Conventions, as well as paraquat.

7.2.6

There is no revision about the procedure since last audit, procedure No. SOP-AGR-20 dated 01 April 2016 has mentioned that the use of agrochemical should be based on census analysis evaluation when the level of incidence is more than economic threshold. Furthermore, procedure of agrochemical uses and safety is presented in document No. SOP-AGR-19 dated 01 August 2013. In order to avoid P&D (include weeds) resistance and prophylactic uses of pesticide, estate management had substitute and/or rotate the use of pesticides for the same target.

When field visits to chemical warehouses, in the pesticide application block, and interview results show workers who handle pesticides have a good understanding. Based on field observations it also shows that workers who come into contact with pesticides use the appropriate PPE.

In the agrochemical warehouse there is also an MSDS for all existing chemicals

To ensure that pesticides are used or applied by people who have completed training and maintain competence of personnel, the company conducts regular training on, for example:

- Record of LSS integrated pest control training which was held on 12 – 20 March 2022 which was attended by 24 Participants.
- Record of LSU integrated pest control training held on February 9, 2021, which was attended by 46 Participants.

Based on interviews with spray workers, information was obtained that each sprayer had been given training related to spraying techniques and the use of pesticides

7.2.7

The results of field observations of chemical storage warehouses, it is known that chemical storage warehouses are in accordance with Government Regulation number 74 of 2001 concerning the Management of Hazardous and Toxic Materials. Among them are equipped with hazard symbols, ventilation, adequate lighting, emergency response facilities

and infrastructure, process flow for receiving and releasing chemicals, MSDS, storage of pesticides are grouped by type and available secondary containment which is clean.

7.2.8

The company has managed pesticide containers which refer to the SOP for Pesticide Waste Management and Management No. SOP-AGR-18 which took effect on August 1, 2013, and was approved by the Estate Director. The SOP describes the classification of pesticides, the correct use of pesticides, storage of pesticides, pesticide poisoning and its symptoms, and first aid for pesticide poisoning. In addition, in the B3 Waste Management SOP No. SOP-EHS-009 Edition 02 Revision 01 which takes effect on August 10, 2016, and is approved by the Estate Director, pesticide used packaging cannot be used for water containers, trash cans, and flower pots. Based on the results of field observations to the Employee Housing Estate in the Lembah Subur Utara Estate and the Lembah Subur Selatan Estate, it was not found that any used pesticide containers were used as trash bins, clean water reservoirs, and flower pots. In addition, the used pesticide packaging has been stored at the hazardous waste storage that has a permit and then sent to a third party. The results of the field visit did not find any use of used pesticides for other activities. In more detail, the management of used pesticide packaging activities is explained in indicator 7.3.1.

7.2.9

Based on the results of interviews with management representatives, it is known that the company does not apply pesticides by air.

7.2.10

The company shows records of general health checks for all employees and special checks for 189 workers (staff and field) conducted in December 2022 by the company's clinic staff and the Pramita clinical laboratory. The health check includes Hematology, urine, liver function, fat profile, kidney function, audiometry, HBsAg, and PA thorax. Based on the results of the document review, it was found that the results of the examination were all negative for occupational diseases. There are employees who have conclusions from the results of medical examinations that are recommended to be followed up, for example the presence of urine blood.

The company shows medical records for spraying workers which will be implemented in 2022. Based on interviews with workers and Occupational Safety and Health Advisory Committee (*P2K3*) it is also known that all workers are required to carry out MCU. Based on the data, it is known that spraying workers, for example NSS, Ma, EG, Er, have received medical tests.

Based on the results of interviews with the company, it was explained that health monitoring was carried out on these employees.

7.2.11

The company has a policy that prohibits pregnant and breast-feeding personnel working with chemical material. Based on interview with spraying personnel transferred to manual upkeep, it is known that there was neither pregnant nor breast-feeding female personnel who work with pesticide. Audit team also got information that the personnel have understood that female personnel cannot work with chemical material if they are pregnant or breast-feeding.

	Status: Comply	
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7.3

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

7.3.1

The company shown evidence that the waste has been identified based on toxicity and hazardous characteristics, and then managed in accordance with waste management procedure and government regulation.

There are no waste management plan changes since last audits. All waste has identified and managed in accordance with management plan. The mill effluent was processed on effluent pond until it complies with standard before being discharge to water bodies; empty fruit bunch are collected in the empty bunch areas and then reused again as nutrient

cycle on composting plan, shell and fiber are utilized as a renewable fuel for boiler, chemical containers including pesticide containers have been stored at licensed scheduled waste storage.

Some examples of waste management. Hazardous waste is handed over to a licensed manager. The last shipment was made on March 20, 2023, to licensed transporter PT Amindy Barokah, with a BK 9777MP transport vehicle.

Hazardous waste type	No Manifest	Amount
Used Battery	KLHK-1684520747	0.05 ton
Contaminated Packaging	KLHK-1684522394	0.172 ton
Medical waste	KLHK-1685578443	0.0955 ton
Contaminated Goods	KLHK-1684524483	0.7035 ton
Used Majun	KLHK-1684521521	0.015 ton
Used Lubricants	KLHK-1684519690	0.937 ton
Electronic waste	KLHK-1684525541	0.008 ton

Use of Mill Waste as renewable fuel during the 2022 period

Waste Type	Amount
Shell	16,464 ton
Fiber	34,822 ton

Waste from housing is managed by composting, where the compost results are applied either in employee housing or in the future to be traded. Especially for empty fruit bunch, it is managed by composting, where the results are applied using the Biobag method.

The management plan has included the strategy for reduced, reuse, recycled, and disposed of the waste. Each waste management strategy has been documented, the regular mandatory report related waste management has been submitted to Environmental Agency, such as Report of POME liquid waste disposal and Report of Hazardous Waste Management.

7.3.2

The company has SOP for Hazardous Waste Management with SOP Number-EHS-13 dated 15 November 2021 which explains that the management of hazardous waste is handed over to the Hazardous waste temporary storage and also has been showed Socialization document regarding SOP for Hazardous Management and SOP for Chemical Storage and Environmental OHS Policy to Mill employees on June 7, 2023.

However, based on the results of field observations several facts are as follows:

- In Landfill Block L25 Lembah Subur Utara Estate there are ex-motor vehicle lubricant packaging, used filter packaging, and ex-insect poison packaging in the Landfill mixed with Domestic Waste.
- In the ANJA Siais Mill Scrap Metal Piling Area, there is B3 waste such as ex-motor vehicle lubricant packaging, used filter packaging, ex-paint cans, ex-Grease Drums and ex-Thinner Cans.
- In Central Lembah Subur Utara Estate Housing, it was found that hazardous waste packaging was used in the form of ex paint buckets as water reservoirs and plant pots as well as ex motor vehicle lubricant packages which were not handed over to a licensed hazardous waste storage.

Based on this explanation, the company has not been able to show evidence that waste disposal is in accordance with the procedures it has. This is becoming non-conformity No. 2023.01 with minor category.

7.3.3

Based on a visit to Central Employee Housing, there was a Warning Against Burning Trash in Housing Areas then the management said that previously socialization had been carried out regarding the Prohibition of Burning Garbage to Employees and Housing Occupants.

However, based on the results of field observations at the Central Employees' Housing in Lembah Subur Utara, 4 points of burning domestic waste were found. Based on this evidence, there is still open burning for the destruction of domestic waste found at the location of the certification unit. This is becoming non-conformity No. 2023.02 with minor category.

7.3.2 7.3.3	Status: Non-conformity No. 2023.01 with minor category. Non-conformity No. 2023.02 with minor category.	
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7.4 Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.

7.4.1
Procedure related to soil fertility management is presented in several procedure, as follows:

- No. SOP-AGR-08 about planting of cover crop (legumes).
- No. SOP-AGR-11 about fertilizer and manuring.
- No. SOP-AGR-12 about manuring in immature area and cover crop.
- No. SOP-AGR-23 about leaf sampling unit.
- No. SOP-AGR-26 about soil analysis.
- No. IK-SOP-AGR-011-01 about compost fertilizer.
- No. IK-SOP-AGR-011-007 about compost application.

Procedure of Leaf and Soil sampling for manuring recommendation are presented in document No. SOP-AGR-23 and No. SOP-AGR-26. The procedure mentioned that leaf and soil analysis shall be conducted annually and every seven years, respectively. Fertilizer use in 2022 is explained in indicator 7.4.4.

The results of field observations revealed that the company had implemented measures to ensure soil fertility such as the application of biobags as an alternative nutrient source as seen in Division 6 Block L36/L37. Based on data from the 2022 management review, the use of biobags in 2022 is 7,751.72 tons or 100% of the total EFB produced at PT ANJ Siais. Based on pesticide use data there is no use of pesticides as a preventive measure, as explained in 7.1.1, for example for termite control based on pest census data which is carried out every month.

7.4.2
Leaf and Soil Analysis

- Company shows Leaf Analysis Report No. 1.057.4.1/04/22 dated 14 April 2022 for 44 samples. The parameters analyzed include: N, P, K, Mg, Ca, B and Cl.
- The company shows Land Analysis Report No. 008/RD/SIAIS/External/XI/2019 dated 2 January 2020 for 57 samples. The parameters analyzed include: Texture, N, OC, CEC, Exch (Ca, Mg, K, Na) Al-H, In 25% HCl (K, Mn), pH (HO), P (Total, Brar II).

Procedure of Leaf and Soil sampling for manuring recommendation are presented in document No. SOP-AGR-23 and No. SOP-AGR-26. The procedure mentioned that leaf and soil analysis shall be conducted annually and every seven years, respectively. The last leaf analysis was carried out in April 2022 while the last soil analysis was carried out in November 2019.

Results of leaf and soil sampling was used as reference for annual manuring recommendation. Leaf and soil laboratory testing works is conducted by PT Nusa Pusaka Kencana Analytical & QC Laboratory (Asian Agri Group). Analysis of leaf and soil sampling results for annual manuring recommendation is conducted by Agronomist team from Research and Development Department. Management of land belonging to smallholders is included in LSU, so that the soil analysis is carried out simultaneously with LSU.

7.4.3
The results of field observations and interviews show that companies use empty fruit bunches as biobags to optimize the use of inorganic fertilizers. Based on data from the 2022 management review, the use of biobags in 2022 is 7,751.72 tons or 100% of the total EFB produced at PT ANJ Siais.

7.4.4
Fertilization Program and Realization

The company shows documentation of fertilization that informs the type of fertilizer used as well as the program and the realization of its application. For example, during 2022 the types of fertilizers used include Urea, MOP, RP, Dolomite, and Borate with the following achievements:

Unit	Recommendation (Kg)	Realization (Kg)	%
LSU	1.717.902	1.650.636	96,08 %
LSS	1.943.499	1.755.576	90,33 %
Smallholders	1.717.902	1.650.636	74,74 %
Total Application		3.454.822	

Achievement of fertilization program by 92%. Based on the results of interviews with management, this was caused by rainfall during 2022 so that fertilization was not optimal. This statement is supported by management review data for 2022 which shows rainfall throughout the year. This failure will be carried out in 2023.

There are records of the use of fertilizers used in 2022 and production in 2022. Based on the study of these records, it was found that 3,454,822 kg of fertilizer was used with a total production of 172,070,210 kg. So that the use of fertilizer is 49.8 kg/ton. There is data for each fertilizer used during 2022.

Status: Comply

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

Based on the Peat Area Map of PT ANJA Siais Scale 1: 70,000 made by the Department of GIS & Surveys, it is known that there are types of peat soil covering an area of 4,502.73 Ha.

Based on the Semi-Detailed Soil Map of PT ANJA Siais contained in the Soils of PT ANJA Siais Estate document from the Param Agricultural Soil Surveys in January 2015 it is known that the distribution of slope classes is between 0 – 4% (level) and 12 – 24% (Rolling). The results of field observations show that there are types of peat soil with most of the company's area level 0 – 4%.

Thus, it can be concluded that the company already has a map that identifies marginal soils with high slopes including peat soil types.

7.5.2

The results of the study of the area statement document informed the distribution of planting years between 2005 – 2009. In addition, the results of interviews with management and the review of the 5-Years Financial Projection 2023 – 2027 document informed that there is no replanting plan for the next 5 years.

7.5.3

The results of the study of the area statement document informed the distribution of planting years between 2005 – 2009. In addition, the results of interviews with management and field observations did not reveal any new land clearing in the company's areas.

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

Based on the Peat Area Map of PT ANJA Siais Scale 1: 70,000 made by the Department of GIS & Surveys, it is known that there are types of peat soil covering an area of 4,502.73 Ha.

Based on the Semi-Detailed Soil Map of PT ANJA Sia's contained in the Soils of PT ANJA Sia's Estate document from the Param Agricultural Soil Surveys in January 2015 it is known that the distribution of slope classes is between 0 – 4% (level) and 12 – 24% (Rolling). The results of field observations show that there are types of peat soil with most of the company's area level 0 – 4%.

Thus, it can be concluded that the company already has a map that identifies marginal soils with high slopes including peat soil types.

7.6.2

The results of field observations and review of area statement documents, the company does not carry out new plantation development activities.

7.6.3

The results of field observations and review of area statement documents, the company does not carry out new plantation development activities.

Status: Comply

7.7

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

7.7.1

According to hectare statement review and information from estate management, it was known that there is no new planting and/or expansion on estate operational areas after 15 November 2018. Thus, this indicator is not applicable.

7.7.2

- Based on the results of the study of the Soil document of PT ANJ Agri Sia's Estate in January 2015 conducted by Param Agricultural Soil Surveys (M) Sdn. Bhd with a study area of 8,443 Ha, it is known that the area of peat (soil series: Erong, Liku, Karap) is 4,583,7 Ha with the distribution of depths including:

Soil Series	Depth	Depth (cm)	Ha
Erong	Shallow	50 - 100	204.9
Erong	Moderately Deep	100 - 150	199.3
Liku	Deep	150 - 300	626.6
Liku	Very Deep	>300	3,098.0
Liku Sandy Clay	Deep	150 - 300	105.8
Liku Sandy Clay	Very Deep	>300	41.4
Karap	Very Deep	>300	307.7
Total			4,583.7

- The company also shows the 2022 soil type map done by the GIS department informing that the peat area is 4,543.26 ha. This area is the same as the peat area that was reported to the RSPO in 2019.
- Based on interviews with management, information was obtained that the difference in data between the results of the land survey conducted by the Param Agricultural Soil Surveys and the 2022 soil map was due to the presence of peat areas outside the land title (HGU) which were also recorded by the Param Agricultural Soil Surveys.
- The company showed the Peat Inventory document and recorded communication regarding its submission to the RSPO via email on 15 November 2019 and has been responded to on 27 November 2019 "which informed that RSPO is acknowledge the submission and noted that ANJ Group will update us should there be more accurate data available as well as the submission for uncertified area can be anticipated by 31 March 2020". Based on the peat inventory document review, the following details are known:

Planted Area (Ha)	7,973.80
Planted on Peat (Ha)	4,461.42
Unplanted Other (Ha)	2.83
Unplanted Conservation (Ha)	79.01
Average Depth (M)	1.5
Total Peat (Ha)	4,543.26

Based on the explanation above, the OFI in the previous audit has been verified, with the conclusion that the peat area of PT ANJA Siais is 4,543.26 ha (4,461.42 Ha on planted area).

7.7.3

Based on the peat map, it is known that the peat at PT ANJ Siais is spread over several points. At LSU there are 9 subsidence markers and at LSS there are 6 subsidence markers, so there are a total of 15 points to monitor the rate of subsidence which when converted becomes 1 : 297,43 ha. Based on the results of interviews with management, because the peat in ANJ Siais is spread over several points, the number of subsidence points already represents the existing subsidence rate.

The company shows the subsidence rate data from 2015-2022 as follows:

- The results of measuring the subsidence rate for the period of semester 1 and semester 2 of 2022 at several location points show varying results. For example, the results of measurements at 9 LSU points show subsidence of peat soils between 2,29 – 3,10 cm/year
- The results of measuring the subsidence rate for the period of semester 1 and semester 2 of 2022 at several location points show varying results. For example, the results of measurements at 6 LSS points show subsidence of peat soils between 3,05 – 3,80 cm/year

The installation of subsidence markers varies from 2013 – 2015. The subsidence rate in the last 5 years (until semester 2 of 2022) is still meet the requirements of the Minister of Environment Regulation No. 7 of 2006. In block D 05 LSU, for example, from semester 1 of 2018 to semester 2 of 2022 there was a decrease of 14.15 cm. This indicates that the company's water management is considered quite good.

7.7.4

- The company shows several documents related to the management of peat areas, including the following:
 - Internal Audit review water management document for 2022 which explains that there were floods in 2018 and 2021 which caused 5,537 ha of land in LSU and 3,200 ha of land in LSS or around 70% of the total planted area inundated with floods with a height of 50-150 cm. The document also contains cost data required for the water management system program including ditches, embankments, piezometers, stop bunds, water gates, canals and culverts
 - There are several drainage maps, estate area maps, and topographical maps that depict the flow of water in the estates
 - The average results of Piezometer measurements from January to May 2023 show varied results, depending on the amount of rain that occurred in that month. For example, LSU Division 4 Piezometer Data at 15 monitoring points observed groundwater levels between 23 – 97 cm below the ground surface, with an overall average of 65 cm
 - The average results of Piezometer measurements from January to December 2022 show varied results, depending on the amount of rain that occurred in that month. For example, the LSU Division 4 Piezometer Data at 15 monitoring points observed groundwater levels between 32-59 cm below the ground surface, with an overall average of 47 cm
 - The average results of Piezometer measurements from January to December 2022 show varied results, depending on the amount of rain that occurred in that month. For example, LSS Division 7 Piezometer Data at 35 monitoring points observed groundwater levels between 29 – 65 cm below the ground surface, with an overall average of 46 cm
- Based on field observations at the Piezometer Division 4 Block K25 Lembah Subur Utara location, it is known that the ground water height is 74 cm below the peat soil surface. However, the average results from January – December

2022 show that the average groundwater level in the block is 54 cm.

- Planting was carried out in 2005-2009, so that the use of ground cover plants is no longer there, and there has been no replanting on the estate.

Based on the explanation above, it can be concluded that the company already has regulations for subsidence of high peat soil layers.

7.7.5

Planting was carried out in 2005-2009 so that at the time of the audit the age of the plants was between 14-18 years, so there was no plan to replanting and drainability assessment had not been carried out. In addition, the results of interviews with management as well as a review of the 5-Years Financial Projection 2023 – 2027 document informed that there is no replanting plan for the next 5 years so that a drainability assessment has not been carried out.

7.7.6

Based on soil survey analysis, it was known that all soils in certification unit was peat with various depth. The particular area has also prone to flooded and has a poor drainability soil property. The company shows Peat Management SOP which took effect on 26 October 2020 that explain several strategies as follows:

- Maintain the groundwater level 50 - 70 cm below the soil surface in the collection drain or 30 - 60 cm below the peat surface (reading in monitoring wells)
- During the dry season, areas with long historical or predicted dry months are recommended to increase the water level as high as possible at the end of the rainy season so that it is hoped that during the dry months the water level is maintained up to 40-50 cm inside the block or 50-60 cm below ground surface (collection drain).
- In the first 5 years after planting, it is recommended that the water level be maintained at a level of 35 cm from the top of the peat soil. Maintaining land cover crop which aims to retain soil moisture on the field.
- Fertilizer application as in accordance with Agronomist recommendation

The SOP for peat management explains that peat monitoring wells are installed with a ratio of 1: 100 ha. There are piezometer data installed in each division at LSU and LSS. Of the 10 divisions, it is known that the area of the division with the widest peat is in division 8 covering an area of 694.48 ha. The division installed 29 piezometers, 7 of which were damaged. Based on the comparison of the number of existing piezometers with the peat area in 8 division, it is known that the ratio is 31.56 ha.

Water level is monitored every week. An example of measurement data in the 8 division at LSS in January – December 2022 has a variation in the average value, ranging from 31 – 46 cm below the ground surface.

Based on field observations at the Piezometer Division 4 Block K25 Lembah Subur Utara location, it is known that the ground water height is 74 cm below the peat soil surface. However, the average results from January – December 2022 show that the average groundwater level in the block is 54 cm.

The company also shows Work Instruction No. Dock. IK-SOP AGR 05-001 (Rev. 01) dated June 1, 2005, concerning water management which includes, among other things, Watergate, overflow, stop bund, piezometer, subsidence rate pipes and water level arrangements. Based on field observations it is known that there are water gates, stop bunds, and water level stakes in the collection drain. Referring to the SOP for peat management, the measurement data is used for peat water management.

7.7.7

Based on hectare statement review, it was known that there is 82 ha unplanted and conserved peatland. Furthermore, there is no land clearance for non-corporate purposes areas in PT ANJA Siais.

	Status: Comply	
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7.8

Practices maintain the quality and availability of surface and ground water

7.8.1 and 7.8.2

The company has a routine water management plan which is included in the 2021/2022 water management document. The results of the identification of water sources / flows by the company are contained in the Conservation Area Identification Document and state that the plantation business area is included in the Batang Gadis watershed. Other rivers that flow within the plantation area include the Sibara-bara river, the Paraupan River and the Aek Lobu River.

Companies can show documents for the management and maintenance of water sources contained in the Report for Management of High Conservation Value Areas (HCV) Semester II of 2022. From the documents shown, it is known that several activities have been carried out by the management unit to manage water and maintain water sources, including:

- Training for employees regarding the management of conservation areas, including riparian areas, for activities to prohibit spraying and not dispose of waste into rivers on June 16, 2022
- Tree planting on riverbanks is to be carried out in February and November 2022.
- Conduct periodic monitoring of surface water quality in the Upper and Lower Rivers, which is carried out every 6 months.
- Determination of buffer zones for river border areas
- Installation and maintenance of warning signs, singboards, and boundary stakes in river riparian areas, which are carried out every 6 months.
- Security and protection of the area by means of security patrols, which are conducted every 4 months.

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

Based on interview with sprayer workers in Lembah Subur Utara Estate state that they didn't spray on the riparian boundaries that have been set because it protects the waterways and wetlands that they already have.

The company has conducted surface water quality testing for Semester 2 of 2022 which was carried out by the (LP-1284-IDN). The results of testing the quality of water downstream of the river show that the value in each parameter is still below the quality standard used, namely PP. 22 of 2021.

7.8.3

The company has the permit POME liquid waste disposal permits based on Permit document for waste disposal issued by the OSS agency for PT Austindo Nusantara Jaya Agri Sia's which has fulfilled the commitments and is effective based on the approval of the Tapanuli Selatan Regency issued on Januari 25, 2021.

Certified holder can show documents regarding the results of measuring the quality of liquid waste, namely the quarterly Liquid Waste Disposal Report and the Semesterly *RKL-RPL* Implementation Report in which there are results of measuring the quality of liquid waste every month. Testing is carried out by a KAN accredited laboratory (LP-416-IDN) with reference to the Regulation of the Minister of Environment of the Republic of Indonesia No. 5 of 2014 Appendix III concerning Wastewater Quality Standards for businesses and/or palm oil industry activities.

Monitoring the quality of wastewater at the outlet shows the results of the parameters that are monitored to meet environmental quality standards. From the results of data analysis during December 2022 there has never been a test result value that is above the established quality standard. This shows that the liquid waste generated from the FFB management activities at the Mill is feasible to be disposal to the body of water in accordance with the permit held.

7.8.4

Mill water use has been monitored and recorded in document of Water Usage Report Year 2022 (January – December) and 2023 (January – April). The record has been covered the FFB process, detail of water usage for process and non-

process, total water usage, and water usage per ton of FFB. For instance, the total water usage in 2023 (January to April) was 122,240 m³, that is 2.16 m³/ton FFB.

Status: Comply

7.9

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

7.9.1

The company has plans to increase the efficiency of the use of renewable fuels available in the GHG mitigation document, where one of them explains the use of renewable fuels for fossil fuel substitution. The company has reduced the use of fossil fuel by use of energy renewable. Realization of renewable energy have been monitored every day and documented on monthly report for fibre and shell usage.

Based on the monitoring document on the use of shell and fibre for 2022, it explains that for the period January to December 2022, there is an efficiency of 6,221,811 kWh of turbine from the use of shell and fibre. The total FFB processed during 2022 is 278,580.44 tons. From the total kWh produced and processed FFB, it is known that the efficiency of using renewable fuels is 11.14 kWh/ton FFB

Status: Comply

7.10

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

7.10.1 and 7.10.2

The company conducted an HCV assessment in 2013 before there was an obligation to estimate carbon stocks (HCS) in addition to that the last land clearing carried out by management was carried out in 2009, since 2009 until now (2023) there has been no new land clearing in the company's management area. So, the estimate of the carbon stock becomes irrelevant in the PT Austindo Nusantara Jaya Agri Siais unit.

To reduce pollution and emissions, the company has identified the source of pollution and greenhouse gases and measurement to manage them. The efforts made by the management unit to reduce the pollution and GHG emissions through the activities including engine maintenance, effluent management and waste utilization, conduct fertilization according to the doses, conduct pesticide application according to the procedure, etc. Waste water has been monitored every month and monitoring periods 2022 and 2023 shown that all of waste water testing parameters is compliant to the standards quality.

ANJ Agri Siais POM conduct GHG calculation and its monitoring using RSPO palm GHG calculator V4.0 for its supply base. Summary of GHG emission for ANJ Agri Siais POM for January to December 2022 periods are listed as follows:

Summary Emission period January – December 2022

Summary Emission

Emission per product	tCO ₂ e/tProduct
CPO	4.01
PK	4.01

Production	t/yr
FFB processed	278,571.64
CPO produced	55,279.207
PK produced	13,530.988

Extraction	%
OER	19.84

KER	4.86
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Land use	Ha
Planted area on mineral soil	3438.02
Planted area on peat	4461.42
Total planted area	7899.44
Conservation Area (Forested)	1350.24
Conservation Area (non forested)	0.00

Summary of Field Emission and Sinks

Description	Own crop		Group		3 rd	Total
	tCO2e	tCO2e/ha	tCO2e	tCO2e/ha	tCO2e	
Land conversion	68415.33	8.84	1493.22	9.48	0.00	69908.55
CO2 emissions from fertilizer	3732.42	0.48	51.19	0.32	0.00	3783.60
N2O emissions from Peat	33397.12	4.31	0.00	0.00	0.00	33397.12
N2O emissions from Fertilizer	5675.88	0.73	59.63	0.38	0.00	5735.50
Fuel consumption	1034.61	0.13	11.48	0.07	0.00	1046.09
Peat oxidation	243593.61	31.46	0.00	0.00	0.00	243593.61
Sinks						
Crop sequestration	-72477.97	-9.36	-1474.47	-9.36	0.00	-73952.44
Sequestration in Conservation area	-12381.70	-1.60	0.00	0.00	0.00	-12381.70
Total	270,989.29	35.00	141.04	0.90	4,260.06	275,390.39

Summary Oil Mill Emissions and Credits

Description	tCO2	tCO2e/t FFB
Emissions sources		
POME	7931.73	0.03
Fuel consumption	715.65	0.00
Grid electricity	0.00	0.00
Credits		
Export of grid electricity	-1892.36	-0.01
Sales of PKS	-6321.08	-0.02
Sales of EFB	0.00	0.00
Total	9321.94	0.04

Palm Oil Mill Effluent (POME) Treatment

Divert to compost (%)	63
Divert to anaerobic digestion (%)	37

POME Divert to Anaerobic Digestion

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

The auditor 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 Estate Lembah Subur Utara, Estate Lembah Subur Timur and Koperasi Tani Binasari Plasma, the planted area of Estate Lembah Subur Utara, Estate Lembah Subur Timur and Koperasi Tani Binasari Plasma and the distribution of planting years, as well as the area of HCV. GHG emissions in 2022 are higher than in 2021. However, the increase in emissions is not significant. This is because in 2022 FFB Process more than in 2021.

7.10.3

The company has a waste identification document including the emissions generated. The company has shown evidence for the realization to minimize GHG, for example monitoring the use of fossil fuels and the use of shells/fiber every month. Records of POME management have been listed in indicator 7.8.3, the company has carried out liquid waste management in the WWTP pond and also recorded the results of the monthly liquid waste quality test.

The company has a waste identification assessment risk document in 2021 which explains activities, potential waste, types of waste/emissions produced, risk level score, risk control, risk security and control guide documents.

In addition, the company also has a 2022 Mill Management Plan document which explains several management plans such as erosion control, environmental programs, EHS programs, production and quality, mill operations, improvement projects, each of which is further divided into several activities along with evaluation, analysis and improvement of the management plan program.

The company has carried out air quality measurements (emissions and ambient) which are contained and reported periodically in the *RKL-RPL* implementation report. The results of the air quality testing in semester 2 of 2022 are known to still be in accordance with the applicable quality standards.

Status: Comply

7.11

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

7.11.1

The certification unit has procedures for clearing land without burning, as stated in the SOP for Land Clearing without Burning No. SOP-AGR-03 Edition 01 dated August 1, 2013, which was approved by the Director of the Estate. The procedure describes the technique of clearing land by removing waste and debris and allowing them to decompose naturally in the field. Furthermore, the land was cleared in accordance with regulations from the Ministry of Environment. This is also in line with ANJ's Sustainability Policy dated October 31, 2019, in Section 3. Natural Resources and Environmental Management (Planet) Service Administrator in Section 3A. Environmental Protection and Management stated that "without burning land".

Based on field visits and area statements, it is known that the last planting activity was carried out in 2009, and until the implementation of the ASA 1.4 assessment, there had been no activity of opening new land or replanting.

7.11.2

The company shows the SOP for Land Fire Control Procedures with SOP Number-EHS-005 Edition 2 Revision 1, effective date August 10, 2018, and approved by the General Manager. These procedures include land clearing techniques and operational activities without burning, fire prevention, and fire control.

The unit of certification shows evidence that it has available human resources capable of preventing and tackling land fires, which among other things is shown that a fire management unit organization has been formed, which was approved by the General Manager in 2022. The organizational structure consists of the person in charge, the fire fighter's coordinator, operations, planning, field boss, logistics and safety. In addition, the unit of certification has also provided training to firefighters. The training was held by the Agency for Climate Change and Forest and Land Fire Control in the Sumatera Region, on September 13 – 14, 2021, and a certificate of basic training in forest and land fire control for PT ANJ Agri Siais firefighters can be shown, for example a worker certificate with initials D.T (initial) and H.H (initial) who participated in the training.

The unit of certification also has facilities and infrastructure for fire control. The list is listed in the Standard for Land Fire Fighting Facilities and Infrastructure PT ANJ Agri Siais reference to *Permentan* No. 5 of 2018 with Number FMR-EHS-005 Revision 1 for the period of Mei 2023 which was approved by the General Manager. Based on the document, it is known that the facilities and infrastructure owned have referred to the Ministry of Agriculture Number 5 of 2018. For example, 25 hand tools (*Gepyok* (Fire Beaters)), 10 High Pressure Pump (minimum 25 HP) plus 3 Peat injections (specifically for companies on peatlands) and this has met the applicable minimum number.

The unit of certification shows the reporting document on the implementation of fire prevention and control per semester to the Agriculture Agency Tapanuli Selatan Regency, which is listed in the Semester II Report on the Preparedness of the PT Austindo Nusantara Jaya Agri Siais Plantation Land Fire Control System, Facilities and Infrastructure. The document has been submitted to the relevant agency which is contained in the Proof of Receipt Number 01/EHS/DAMKAR/ANJAS/II/2023 on January 12, 2023. In summary, the points listed in the report include the presence or absence of fire incidents, prevention activities and others.

Based on interviews with the Agriculture Agency Tapanuli Selatan Regency obtained information that there were no fires in the area of the certification unit, training and prevention activities carried out by the certification unit and the certification unit were orderly in reporting fire prevention and control.

Based on the results of interviews with the PT Austindo Nusantara Jaya Agri Siais Fire Team, information was obtained that the Fire Team understands the early warning system and early detection, including ensuring that "no burning" warning signs are installed and well maintained in strategic positions, and conduct daily patrols of the certification unit area and surroundings. If the hotspots are known, the fire team will coordinate with each other to ensure that they are at the location and extinguish them on the spot.

Based on the results of field observations in the fire department warehouse, it is known that the fire control facilities and infrastructure are in accordance with the list shown. Then, based on the results of the fire simulation shown at the factory and Lembah Subur Utara, it is known that the fire control facilities and infrastructure owned are in good condition and suitable for use.

7.11.3

The certification unit has formed and included the Community Fire Care (*KTPA*) at Environmental of IX Parupuan (Binasari) in the Basic Training Program for Forest and Land Fire Control for the PT ANJ Agri Siais Fire Fighting Team and members of the Community Fire Care (*KTPA*) in collaboration with other agencies. Center for Climate Change and Forest and Land Fire Control in Sumatera Region on September 13th – 14th, 2021.

The certification unit has also carried out socialization/counselling related to fire prevention and control to workers, plasma farmers, contractors and the community around the certification unit. This is shown in several socialization implementation documents related to fire prevention/management for the period 2022 which are addressed to workers, contractors and the community, including the following:

- Socialization of emergency response team SOPs and OHS Policy to factory contractors which was held on April 12, 2022.
- Socialization on the prohibition of clearing/clearing land by burning to the community around the outskirts of PT ANJ Agri Siais' HGU which was held on March 24 – 27, 2022.
- Firefighter simulation scenario in an employee housing complex which was held on June 11, 2022.

The company reports on the implementation of fire prevention and control per semester to the relevant agencies listed in:

- 2022 Semester 1 Report on the Preparedness of PT ANJ Agri Siais' Plantation Land Fire Control System, Facilities, and Infrastructure. The document has been submitted to related agencies, for example, the Tapsel Regional Disaster Management Agency, which is contained in the Receipt of Receipt Number 018/EHS/ANJAS/VII/2021 on July 12, 2022.
- 2022 Semester 2 Report on the Preparedness of PT ANJ Agri Siais' Plantation Land Fire Control System, Facilities, and Infrastructure. The document has been submitted to related agencies, for example, the Regional Agriculture Service of Tapanuli Selatan Regency, which is contained in the Receipt of Receipt Number 01/EHS/DAMKAR/ANJAS/II/2023 on January 12, 2023.

Based on the explanation above, it is concluded that the certification unit has involved stakeholders in the location around the certification unit for fire prevention and control measures.

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
The company has conducted a Disclosure of Liability for ANJ Agri, which was submitted to the RSPO on July 16, 2014, while LUCA was submitted to the RSPO on August 24, 2015.
PT ANJ Agri Siais has conducted disclosure of liability and LUC analysis in accordance with the RSPO template since 2015. During 2016–2019, the company showed intense communication with the RSPO compensation panel related to LUCA progress for PT ANJ Agri Siais. As confirmed by RSPO email on October 21, 2020, the LUCA of PT. ANJ Agri Siais has been approved.

7.12.2
The company does not undertake new land clearing after November 15, 2018, so that the existing HCV assessment remains valid. All HCV and RTE species were identified by the RSPO approved assessor. RTE species that were identified based on regular monitoring and referred to the IUCN Red List are: EN: *Tapir (Tapirus indicus)* White-winged Duck, White-winged Wood Duck (*Calirina scutulata*); Sambar Deer (*Cervus unicolor*); Hairy-nosed Otter (*Lutra Sumaterana*); Southern Pig-tailed Macaque (*Macaca nemestrina*) status Vulnerable, Siamang (*Symphalangus syndactylus*); Owa (*Hylobates sp.*); False Gharial/Buaya senyulong (*Tomistoma schlegelii*). HCV identifying process conducted by using HCV identification guides in Indonesia on June 2008 and involved affected parties by public consultation with related affected parties, for example, Paraupan, Binasari, Lorong ANJ Siais, Labalasiak, and Janji Matogu community on December 21, 2012. The company has conducted an internal review of the HCV area and experienced an increase from the previous 1230.17 Ha (2018) to 1348.18 Ha (2020) and finally, in 2022, the HCV area will be 1,350.24 Ha due to the difference in area in re-measurement. There is no change in the overall HCV function (HCV 1.1; 1.2; 1.3; 1.4; 2.3; 4.1; 4.3).

The company has established an HCV management plan to maintain the HCV areas in the operation area of PT ANJA Siais, listed on the Management Plan HCV 2023 documents. HCV management activities that are taken by the management unit are maintaining HCV attributes (HCV boundary, sign board), HCV socialization (community and worker), maintaining HCV areas, patrolling around HCV areas, monitoring flora and fauna, and enriching riparian areas. The company has done HCV area monitoring, which is done every month and documented on the HCV Monitoring Report 2022, which contains the activities to manage HCV areas, including HCV area patrol, enrichment in riparian areas, and

monitoring of flora and fauna. Based on the evaluation of the HCV Monitoring Report on March 2023, there was no HCV area damaged when HCV monitoring was conducted.

7.12.3

Until now not relevant in Indonesia, until further decisions from the RSPO.

7.12.4

The management unit can show the 2023 HCV management and monitoring plan. Several things are being done to maintain and increase the existing conservation values, including:

- Protect the HCV area by means of regular patrols
- Monitoring land and forest fires on a regular basis
- Enrichment and reforestation for open areas
- Conduct campaigns and socialize HCV areas with the community or workers
- Make the HCV area a centre for environmental education
- Establish an HCV management partner
- Patrol with Partners
- Monitoring flora and fauna

The HCV management and monitoring plan is reviewed periodically during stakeholder meetings. The last stakeholder meeting activity was held on December 22, 2022. So far, the management and monitoring plans that have been set are still appropriate and have positive implications. So that the plan that has been running is maintained.

7.12.5

The results of document review and interviews with management or stakeholders revealed that the company's HCV area does not have any overlapping interests with the community.

7.12.6

All HCV and the RTE species were identified by the RSPO approved assessor. RTE species that were identified based on regular monitoring and referred to IUCN Redlist are: EN: Tapir (*Tapirus indicus*) White-winged Duck, White-winged Wood Duck (*Cairina scutulata*); Sambar Deer (*Cervus unicolor*); Hairy-nosed Otter (*Lutra Sumaterana*); Southern Pig-tailed Macaque (*Macaca nemestrina*) Vulnerable status, Siamang (*Symphalangus syndactylus*); Gibbons (*Hylobates* sp.); False Gharial / Grim Reaper (*Tomistoma schlegelii*). HCV identifying process conducted by using HCV identification guides in Indonesia on June 2008 and involved affected parties by public consultation with related affected parties for examples Parauhan, Binasari, ANJ Siais, Labalasiak and Janji Matogu community on 21 December 2012.

The management unit can show documentation of Socialization on HCV and RTE Species to workers or the community. Some examples of socialization that have been carried out include:

- Socialization for workers in the Division 10 area, which was held on April 7, 2022, and was attended by 83 participants.
- Socialization for workers in the Civil Engineering Department area, which was held on May 4, 2022, and was attended by 15 participants.
- Socialization with the community in the Binasari community area, which was carried out on May 3, 2023, and was attended by 16 participants.
- Socialization with the community in the Batang Gadis Watershed area, which was carried out on May 5, 2023, and was attended by 13 participants.

The company also has a Conservation Work Program document for the 2023 period. This document shows the schedule and targets for the implementation of the activities being managed. Broadly speaking, several programs related to the management of HCV areas listed in the document include:

- Joint Stakeholder Patrols conducted every 4 months.
- Monitoring of Protected Animals which is conducted every 2 months.

- Forestry of Open Areas which is carried out once every 1 year.
- Socialization and Development of Environmental Education which is carried out every 3 months.

The company has carried out activities in order to maintain protected areas and High Conservation Values which can be shown in the 2022 PT Austindo Nusantara Jaya Siais HCV Area Management Report, some of the activities include:

- Patrol with Partners in this case the Forest Management Unit (KPH) Region X Sumatera Utara in March 2022.
- Biodiversity Inventory in January 2022.
- HCV Outreach to Employees and Contractors in March 2022.
- Monitoring areas for land fires, where from 2022 to semester 1 of 2023 there were no fires occurring in the area of PT Austindo Nusantara Jaya Siais.

The company has also carried out reports regarding Protected Areas and High Conservation Values which are carried out every 6 months, including as an example:

- Report on Management of High Conservation Value Areas (HCV) for Semester II 2022, which was reported to the Conservation and Natural Resources Center of Tapanuli Selatan Regency on January 16, 2023.

The management unit has an SOP for Conservation of Biodiversity which is contained in the SOP for Management of High Conservation Value Areas (HCV and HCS) No. Document SOP-CSV-01 dated October 1, 2020 edition 01 revision 04 which explains the management procedures for the conservation area and the flora and fauna in it. In addition, the management unit has an animal protection policy.

7.12.7

The management unit can show the realization of HCV management and monitoring during 2022 and early 2023. In full, HCV area management activities can be seen in the High Conservation Value Areas report every semester.

- Socialization to Workers and Society.
- Monitoring the area of land fires, where during 2022 to semester 1 of 2022 no fires occurred in the PT ANJ SIAIS area.
- Carry out reforestation of open areas, where from 2021, 730 tree seedlings have been planted in the area for laterite extraction.
- Cooperation with KPH Region X Sumatera Utara in conducting security patrols in conservation areas
- Monitoring Flora and Fauna either by direct observation or using camera traps. Where exotic species are still found such as (*Argusianus argus*, *Pardofelis marmorata* & *Capricornis Sumateraniensis*).

The company has reports on the existence of priority flora and fauna which are submitted to institutions that handle the conservation and protection of wild plants and animals regularly every 6 months as evidenced in the 2022 semester II High Conservation Value Area Management Report (HCV) document which is reported to the Conservation and Conservation Agency. Natural Resources of Tapanuli Selatan Regency on January 16, 2023.

7.12.8

Based on verification auditor on ASA-1.4 the company showed the communication with RSPO according RaCP proses Compensation dan Remediation in accordance with the final liability which approve by RSPO on August 27, 2021. Then the company sending Concept Note and Remediation Document to the RSPO on June 14, 2022, and replied by RSPO on June 23, 2022 (RSPO sending question according to project that the company has been purpose). After that on July 7, 2022, a virtual meeting was held between the company and the RSPO regarding the RaCP compensation area proposed by the company.

Then, RSPO sends the results of a review regarding the Concept Note and Remediation documents and asks the company to explain one by one the list of questions from the RSPO Compensation team on July 18, 2022. Between July 2022 and March 2023, the company internally collected information and reviewed documents to complete questions from the RSPO, then from March 29, 2023, to April 5, 2023, a PT KAL RaCP Conservation Area Potential Survey was carried out (still in the same group as PT ANJA Siais). By the consultant to complete the information needed to answer RSPO inquiries.

On June 2, 2023, the Concept Note document was sent to the RSPO Compensation and received confirmation from the RSPO Compensation that the Concept Note document has been received and will be reviewed within the next 2 weeks on 6 June 2023. This creates an opportunity for improvement for the company to ensure the Remediation process and Compensation continues to show positive progress. (OFI)

	Status: Comply	
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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-1.4	ANJA Siais POM and its supply bases did not use trademark in the product or any of its activity	✓
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use	X or ✓
ASA-1.4	ANJA Siais POM and its supply bases did not use trademark in the product or any of its activity	✓
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product.	X or ✓
ASA-1.4	ANJA Siais POM and its supply bases did not use trademark in the product or any of its activity	✓
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or ✓
ASA-1.4	ANJA Siais POM and its supply bases did not use trademark in the product or any of its activity	✓
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

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

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

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

MUTU Auditor has verified company partial certification and concludes that:

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

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Company statement: The company are already doing internal audits.</p> <p>Auditor verification: Internal Audit for uncertified management unit</p> <ul style="list-style-type: none"> • PT Galempa Sejahtera Bersama has been conducted Internal Audit on 24 November – 2 December 2022.
2.1.2	No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance with RSPO criterion 7.3 (it has changed be Criterion 7.12 in P&C 2018)	<p>Company statement: The company has been reporting disclosure and zero liability to RSPO. Progress result of review LUCA at follow up by email to RSPO.</p> <p>Auditor Verification: ANJA and its subsidiaries have been reporting disclosure and zero liability to RSPO by email dated August 24, 2015. The validation progress of Remediation and Compensation Plan (RaCP) for the area opened since November 1, 2005, without preceded by the identification of HCV in accordance with RaCP Procedure will be observed again on the next visit audit.</p>
2.1.3	Any new plantings since January 1 st , 2010, must comply with the RSPO New Plantings Procedure.	<p>company statement: NPP has been applied.</p> <p>Auditor Verification:</p>

		<ul style="list-style-type: none"> PT Galempa Sejahtera Bersama, NPP date of notification on May 2, 2014
2.1.4	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO criteria 2.2, 6.4, 7.5 and 7.6 (it has changed be Criterion 4.8, 4.7 and 4.5 in P&C 2018).	<p>Company statement: There is land conflict, but there is documented evidence that land conflict has been process for resolution.</p> <p>Auditor verification: The company has had a mechanism for addressing land conflicts, described in the SOP of Handling Differences Opinion with the Community and Dispute Tenure (SOP-Leg-03, Issue 01, dated 1 September 2015).</p>
2.1.5	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3 (it has changed be Criterion 4.2 in P&C 2018).	<p>Company statement: There is no labour disputes.</p> <p>Auditor verification: The company has a mechanism for grievance described in SOP Handling of Differences of Opinion with Public and Land Dispute (Document No. SOP-EAD-01; Issue 01/00) dated August 1, 2013.</p> <p>A policy related to confidentiality of informant (whistle-blower) regulated in the SOP of Communication and Provision Information (Document No. SOP-Leg-02, Issue 01/04, dated 1 September 2015), is mentioned in section 6 of tis SOP.</p> <p>There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p>
2.1.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Company statement: All legal requirements for palm oil plantation has been comply.</p> <p>Auditor verification: PT Galempa Sejahtera Bersama</p> <ul style="list-style-type: none"> Status of PT GSB based on Forest Area Indicated (TGHK) is Non Forest Designated Area (Area Penggunaan Lain) Location Permit No. 525/535/KEP/HUTBUNTAMBEN/2012, 20 April 2012 Plantation Permit No. 525/423/KEP/HUTBUNTAMBEN/2013, 08 May 2013 HGU on process Environment Permit No. 211, 2013, dated 06 May 2013 SEIA No. 210, 2013, dated 1 May 2013

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-1.2 & 1.3

NCR No.	:	2022.01	Issued by	:	Rizliani Aprianita Hasibuan & Sabiah Dhiningtyas Utami
Date Issued	:	17 June 2022	Time Limit	:	ASA-1.4
NC Grade	:	Minor	Date of Closing	:	09 Juni 2022
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 (filled by auditor):					
<ul style="list-style-type: none">Company shows Internal Memo (IM) No. 042/GM/ANJAS/IM/II/2022 regarding Employment Provisions for Outsourced Companies/Contractors dated February 10th, 2022, the document explains several requirements, including: All outsourcing companies/contractors are required to comply with legality in accordance with the applicable laws and regulations.The company shows a list of contractor workers, for example PT Alam Lestari Angkola Selatan, it is known that there are 95 harvest helper workers.Tapanuli Selatan Regency Minimum Wage IDR 2,903,042/month or IDR 116,122/day.Free daily SPK between harvest helper and PT ALAS and PT ZBB on 31 December 2021. The SPK explains that the wage received per kg of loose fruit is IDR 125 and to achieve the daily minimum wage it takes 928 kg of loose fruit.					
Non-Conformance Description (filled by auditor):					
There is not enough evidence that harvest helpers who are workers from third parties have received wages based on the applicable minimum wage provisions.					
Root Cause Analysis (filled by organization audited):					
<ul style="list-style-type: none">There has not been a thorough calibration of harvesting activities in the field such as cutting FFB, picking loose fruit and placing it in the collection point, transporting and arranging FFB at the collection point, cutting and arranging the stems.					
Correction (filled by organization audited):					
<ul style="list-style-type: none">Re-calibrate to ensure the price per kg is equivalent to the Tapanuli Selatan district minimum wage.					
Increase the contract price from IDR 125/kg to the price of loose fruit according to the calibration results above.					
Corrective Action (filled by organization audited):					
<ul style="list-style-type: none">Monitoring the work of loose quotation contracts.Evaluating the work of each contractor.Maximizing the working hours of the contractor's work.Provide absenteeism of contract employees per day and per month.					
Assessor Evaluation and Conclusion (filled by auditor):					
Verification on 27 June 2022					
The management unit has conducted root cause analysis and determined corrective actions. Please re-analyze the root of the problem and show evidence of improvement according to the correction submitted.					

From the description above, some evidence of improvement is still needed. So, it can be concluded that this discrepancy has not been fulfilled.

Follow up on next audit (filled by auditor):

Verify 09 June 2023

In the ASA-1.4 activities carried out, the Company showed again the results of the root cause analysis, preventive actions and evidence of improvement in the form of:

- Calibration results as the basis for determining the *Kutib Brondolan* wages which were carried out on June 27, 2022.
- Internal Memo No. 243/GMO/Siais/IM/XII/2022 dated 30 December 2022 regarding Details of Contract Prices for *Kutib Brondolan*.
- Recapitulation of the Salary of the *Brondol* quotation employees in March 2023 according to the latest prices and not lower than the applicable Minimum Wage.

Based on this explanation, the discrepancy is declared to have been fulfilled.

Verified by : Septian Maulana

NCR No.	:	2022.02	Issued by	:	Septian Maulana
Date Issued	:	17 June 2022	Time Limit	:	16 September 2022
NC Grade	:	Major	Date of Closing	:	6 July 2022
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">• The results of the IBPPR/ANJAS/MILL/03 document review dated September 4th, 2021, it is known that for activities in the Sorting area and Boiler Area, one of the risk controls is using the required PPE including Helmets, Safety Shoes and Safety Glasses.• The results of the IBPPR/ANJAS/ESTATE/01 document review dated September 4th, 2021, it is known that for harvesting activities one of the risk controls is to use the required PPE including Helmets and Work Shoes.• The results of the IBPPR/ANJAS/CWT/10 document review dated September 4th, 2021, it is known that one of the risk controls for generator operational activities includes using PPE correctly and appropriately.• The results of the review of the PPE Needs Matrix document made by the EHS Coordinator are explained, including:<ul style="list-style-type: none">- PPE for harvesting activities including boots and helmets.- PPE required for generator operation activities including Boots, Helmet and Ear Muf / Ear Plug.• The results of field visits at Estate and Mill found the following facts:<ul style="list-style-type: none">- Found 6 workers in the sorting area working using rubber boots.- Found 2 boiler repair contractor workers using boots in the boiler area.- Found 2 contractor workers entering the Mill area using boots.- Found 3 harvest workers using short rubber boots at work.- At the location of the generator house, no PPE helmet was found, the results of interviews with workers and management obtained information that the helmet was carried by a colleague who repaired the generator about 2 days before the field visit was carried out.					

Non-Conformance Description (filled by auditor):

Based on the explanation above, it is concluded that the company has not been able to show evidence, all the results of the OHS risk identification have been carried out.

Root Cause Analysis (filled by organization audited):

- Frequent damage and loss of PPE inventory provided by the company at the grading site.
- Employees still lack understanding of PPE that is always available at work sites, for example at generator houses.
- There is no punishment system for the implementation of OHS.

Correction (filled by organization audited):

- Provide PPE shoes for Non Mill employees who work in Sorting (Assisting Grading activities) as needed.
- Replace the employee's short rubber shoes with rubber shoes that are in accordance with the SOP.
- Returning borrowed PPE Helmets at the generator house location and ensuring all PPE is always available at the work site.

Corrective Action (filled by organization audited):

- Disseminate the function of PPE and its availability at work locations to generator house officers.
- Disseminate the function and role of security in supervising everyone who enters the mill environment.
- Running the EHS SOP Number 17 regarding the SOP for contractor employees in the mill violation sanctions (Written warning, fine of IDR 200,000, temporary suspension of work, layoffs) for Boiler contractors and other contractors)

Evidence observed (filled by auditor):

- The results of the IBPPR/ANJAS/MILL/03 document review dated September 4th, 2021, it is known that for activities in the Sorting area and Boiler Area, one of the risk controls is using the required PPE including Helmets, Safety Shoes and Safety Glasses.
- The results of the IBPPR/ANJAS/ESTATE/01 document review dated September 4th, 2021, it is known that for harvesting activities one of the risk controls is to use the required PPE including Helmets and Work Shoes.
- The results of the IBPPR/ANJAS/CWT/10 document review dated September 4th, 2021, it is known that one of the risk controls for generator operational activities includes using PPE correctly and appropriately.
- The results of the review of the PPE Needs Matrix document made by the EHS Coordinator are explained, including:
 - PPE for harvesting activities including boots and helmets.
 - PPE required for generator operation activities including Boots, Helmet and Ear Muf / Ear Plug.
- The results of field visits at Estate and Mill found the following facts:
 - Found 6 workers in the sorting area working using rubber boots.
 - Found 2 boiler repair contractor workers using boots in the boiler area.
 - Found 2 contractor workers entering the Mill area using boots.
 - Found 3 harvest workers using short rubber boots at work.
 - At the location of the generator house, no PPE helmet was found, the results of interviews with workers and management obtained information that the helmet was carried by a colleague who repaired the generator about 2 days before the field visit was carried out.

Non-Conformance Description (filled by auditor):

Based on the explanation above, it is concluded that the company has not been able to show evidence, all the results of the OHS risk identification have been carried out.

Follow up on next audit (filled by auditor):

Based on the results of interviews with workers and management as well as field observations, the company has provided PPE that is suitable for operations at the company, for example in the sorting section PPE is provided with a

Borrowing mechanism for non-Mill workers. The workers interviewed already understood the use of PPE and Company Policy which requires everyone who enters the factory area to use PPE.

Verified by : Septian Maulana/ Iwan Perala

NCR No.	: 2022.03	Issued by	: Sabiah Dhiningtyas Utami
Date Issued	: 17 June 2022	Time Limit	: 16 September 2022
NC Grade	: Critical	Date of Closing	: 9 September 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 (filled by auditor): Harvest Helper <ul style="list-style-type: none"> Company shows Internal Memo (IM) Number 042/GM/ANJAS/IM/II/2022 regarding Employment Provisions for Outsourced Companies/Contractors dated February 10th, 2022, the document explains several requirements, including: All contractor workers must have a working relationship as evidenced by a work agreement between workers with outsourcing companies/contractors. Based on the results of interviews with several harvest helper workers, for example workers with the initials ALD (helper) in Block E9 Division 2 of the LSU estate who are partners with harvesters with the initials JHS. Then, based on the results of the review of the labor list document as of May 2022, it was found that the worker was not registered as a contractor worker. Harvesters with the initials JHS are known to have harvest helpers with the initials ML who have been registered as contractors for the Makmur Jaya Multipurpose Cooperative. 			
Non-Conformance Description (filled by auditor): The company has not been able to show sufficient evidence that the helpers encountered in the field have a clear working relationship.			
Root Cause Analysis (filled by organization audited): - The list of contractors for helper work has not been updated, which is updated every 15 th of every month.			
Correction (filled by organization audited): <ul style="list-style-type: none"> Stopping unregistered loose pick-up contractors. <ul style="list-style-type: none"> Ensure all loose pickers are registered as a list of contract employees. 			
Corrective Action (filled by organization audited): <ul style="list-style-type: none"> Socializing the mechanism for fulfilling the employment aspect to contractors. Make sure to update the list of labor contractors for help with loose quotations every 15th of every month to be registered in the BPJS program borne by the company. Ensure that there is a monitoring available list of contractor employees before work begins. Provide a sanction mechanism if there are loose pickers who are not registered with the contractor. 			
Assessor Evaluation and Conclusion (filled by auditor):			

Verification June 27th, 2022

The management unit has conducted root cause analysis, and determined corrective actions. Please show proof of improvement according to the submitted correction, including corrective action if one has already been done.

Verification July 8th, 2022

- The company shows a harvest helper attendance document with the initials ALD.
- The company shows the document of the List of Names of Harvest Helpers Quoting Brondolan Cooperative Makmur Jaya which informs the names of harvesters and harvest helpers in Division 2.
- The company shows the Socialization of Employment Provisions, Company Policy and Code of Ethics documents to the outsourcing company/contractor which will be held on June 29th, 2022.

Please show proof of improvement according to the auditor's response in the correction column and corrective action column.

Based on root cause analysis, corrections, corrective actions and evidence shown by the company, some evidence of improvement is still needed. So it can be concluded that this discrepancy has not been fulfilled.

Verification July 25, 2022

- The company shows a certificate of maternity examination from the Primary Clinic of PT ANJ Agri Siais with Number 03/CP/Anja Siais/VI/2022 dated June 1st, 2022. Based on the results of the pregnancy examination, workers with the initials ML (wife of harvest workers with the initials JHS) have entered 19 weeks gestation.
- Internal Memo Number 042/GM/ANJAS/IM/II/2022 concerning Employment Provisions for Outsourced Companies/Contractors dated February 10th, 2022. The document explains the monitoring and supervision of PT ANJ Agri Siais to outsourcing companies/contractors.

Auditor's Response

- Please add the latest information regarding the initial JHS Worker and Helper initials ALD as of July 15th, 2022. After being dismissed on June 15th, 2022, has ALD currently started working again and become a JHS Helper? If yes, please show a list of Multi-Business Cooperative contractor workers updated after July 15th and proof of ALD's participation in the BPJS program.
- If the ALD has not started working, please provide information on the reason why ALD has not been able to be used as a Helper until now, existing problems and further plans.

Verification September 09th, 2022

The management unit shows evidence of improvement in the form of:

List of Employees of the Makmur Jaya Cooperative for the period of July 15th, 2022, where until July 15th, 2022, workers with initials a.n JHS continue to work alone without using a helper. As for harvest helper with initials ALD, until now he has not started working again because he has not been registered with BPJS.

Based on the root cause analysis, corrections and corrective actions shown, nonconformities are declared **Fulfilled**.

Follow up on next audit (filled by auditor):

Based on the results of interviews and field visits with workers in the housing area, information was obtained that the company no longer uses workers as FFB Helpers. As for workers who help harvest activities for loose fruit quotations, they already have a work bond with the contractor. More details are explained in indicator 6.2.2.

Verified by : Sabiah Dhiningtyas Utami / Bayu Yogatama/ Septian Maulana

3.4.2 Identification of Findings, Corrective Actions and Observations at ASA-1.4

NCR No.	: 2023.01	Issued by	: Rizki Tanaya
Date Issued	: 09 June 2023	Time Limit	: RC
NC Grade	: Minor	Date of Closing	: 11 July 2023
Standard Ref. & Requirement	7.3.2 There is evidence of waste disposal according to procedures fully understood by workers and managers.		
Evidence observed (filled by auditor): <ul style="list-style-type: none">SOP for Hazardous Waste Management with SOP Number-EHS-13 dated November 15, 2021 which explains that the management of hazardous waste is handed over to the hazardous waste manager.Socialization document regarding SOP for hazardous waste management and SOP for Chemical Storage and Environmental OHS Policy to Mill employees on June 7, 2023.However, based on the results of field observations several facts are as follows:<ul style="list-style-type: none">In Landfill Block L25 Lembah Subur Utara Estate there are ex-motor vehicle lubricant packaging, used filter packaging, and ex-insect poison packaging in the landfill mixed with Domestic Waste.In the ANJA Siais Mill Scrap Metal Piling Area, there is hazardous waste such as ex-motor vehicle lubricant packaging, used filter packaging, ex-paint cans, ex-Grease Drums and ex-Thiner Cans.In Central Lembah Subur Utara Estate Housing, it was found that hazardous waste packaging was used in the form of ex paint buckets as water reservoirs and plant pots as well as ex motor vehicle lubricant packages which were not handed over to a licensed hazardous waste storage.			
Non-Conformance Description (filled by auditor): <p>Based on this explanation, the company has not been able to show evidence that waste disposal is in accordance with the procedures it has.</p>			
Root Cause Analysis (filled by organization audited): <ul style="list-style-type: none">Lack of employee awareness of hazardous waste management in accordance with the procedures set by the unit certificationInadequate supervision of waste management activities in housing and several work areas			
Correction (filled by organization audited): <ul style="list-style-type: none">Collect hazardous waste from the work environment (PKS scrap metal area) and submit it to TPS LB3 on June 6 and 7, 2023.Take all B3 waste from the employee housing environment and TPSA and submit it to TPS LB3 on June 8 and 9, 2023.Give warning to employees who have not carried out B3 waste management according to procedures.Conduct housing inspections during Clean Friday activities, which will be held on June 23, 2023.Submit the B3 waste resulting from housing inspections to TPS LB3 on June 24, 2023.			
Corrective Action (filled by organization audited): <ul style="list-style-type: none">Refreshing the socialization of hazardous waste management and conveying a mechanism for sanctions to employees and residents of housing for those who do not complyCreate a housing monitoring/inspection program to ensure hazardous waste management is in accordance with established standardsImposing sanctions on employees who commit hazardous waste management violations			
Assessor Evaluation and Conclusion (filled by auditor): <p>Verification July 11, 2023</p> <ul style="list-style-type: none">The company shows evidence of improvement, including:			

- Documentation of Corrective Action for Hazardous Waste Management.
- Temporary Hazardous waste Disposal balance updated June 2023.
- Monitoring the delivery of hazardous waste to the Central Workshop on June 06 – 07, 2023 from the CWT area.
- Monitoring of Hazardous Waste Delivery to the Central Workshop on June 08, 2023 from the Central residential area.
- Monitoring the delivery of hazardous waste to the Central Workshop on June 09, 2023 from the Land fill area.
- Letter of warning regarding burning garbage and using of hazardous waste to workers with the initials A.A.H, M.H and MSW dated June 09, 2023.
- Minutes of Socialization of hazardous waste Management, Chemical Storage, Prohibition of Burning Trash and Socialization of Environmental OHS Policy to Mill, CWT and Housing employees on June 07 and 09, 2023.
- PT Austindo Nusantara Jaya Agri Siais Environmental Management Examination Program June 2023 – July 2024.
- Documentation of Clean Friday Activities on June 23, 2023
- Documents for handing over and updating the of hazardous waste balance sheet for the June 2023 period after the B3 waste was sent to Temporary Hazardous waste Disposal.

Conclusion July 11, 2023

Based on the explanation above, it is concluded that the non-compliance is declared fulfilled and will be verified again during the next visit.

Follow up on next audit (filled by auditor):

Verified by : Rizki Tanaya

NCR No.	:	2023.02	Issued by	:	Rizki Tanaya
Date Issued	:	09 June 2023	Time Limit	:	RC
NC Grade	:	Minor	Date of Closing	:	11 July 2023
Standard Ref. & Requirement	:	7.3.3 The unit of certification does not use open burning for waste disposal			
Evidence observed (filled by auditor):					
<ul style="list-style-type: none">Based on a visit to Central Employee Housing, there was a warning against Burning Trash in Housing Areas then the management said that previously socialization had been carried out regarding the Prohibition of Burning Garbage to Employees and Housing Occupants.However, based on the results of field observations at the Central Employee Housing Complex in Lembah Subur Utara, 4 spots were found to have been used for burning domestic waste.					
Non-Conformance Description (filled by auditor):					
Based on this evidence, there is still open burning for the destruction of domestic waste found at the location of the certification unit.					
Root Cause Analysis (filled by organization audited):					
<ul style="list-style-type: none">Lack of employee awareness of waste management without burning according to established proceduresNot optimal monitoring of waste management activities without burning in residential areas					
Correction (filled by organization audited):					
<ul style="list-style-type: none">Cleaning up burnt trash found in the employee housing area on June 8, 2023Give a warning to employees who burn garbage					

<ul style="list-style-type: none"> Conduct housing inspections during Clean Friday activities which will be held on June 23, 2023 	
Corrective Action (filled by organization audited): <ul style="list-style-type: none"> Refreshing the socialization of waste management without burning and conveying the mechanism of sanctions to employees and residents of housing for those who do not implement it Create a housing monitoring/inspection program to ensure waste management without burning according to established standards Give sanctions to employees who burn garbage 	
Assessor Evaluation and Conclusion (filled by auditor): Verification July 11, 2023 <ul style="list-style-type: none"> The company shows evidence of improvement, including: Documentation of Corrective Action Burning Waste. Minutes of Socialization of LB3 Management, Chemical Storage, Prohibition of Burning Garbage and Socialization of Environmental OHS Policy to PKS, CWT and Housing employees on 07 and 09 June 2023. Letter of warning regarding burning garbage and using B3 waste to workers with the initials A.A.H, M.H and MSW dated 09 June 2023. PT Austindo Nusantara Jaya Agri Siais Environmental Management Examination Program June 2023 – July 2024. Documentation of Clean Friday Activities on June 23, 2023 Conclusion Verification July 11, 2023 Based on the explanation above, it is concluded that the non-compliance is declared fulfilled and will be verified again during the next visit.	
Follow up on next audit (filled by auditor):	
Verified by	: Rizki Tanaya

3.4.2. Opportunity for Improvement

No	Ref. Std.	Description
1	7.12.8	<p>If there is land clearing which was not preceded by an HCV assessment since November 2005, or which was not preceded by an HCV-HCS assessment since November 15 2018, then the Remediation and Compensation Procedure (RaCP) shall apply.</p> <p>The company has shown communication with the RSPO secretariat regarding Remediation and Compensation to PT ANJA Sia's updated on 02 June 2023, confirmation from RSPO Compensation that the Concept Note document has been received and will be reviewed within 2 weeks via email on 06 June 2023, this is an opportunity improvement to the company to ensure that the Remediation and Compensation process continues to show positive progress.</p>

3.4.3. Noteworthy Positive Components

No	Description
1	Commitment to implement the principles of sustainable oil palm plantation management.
2	Teamwork and competent human resources in their respective fields.
3	Green Propernas for the 2021-2022 period from the Ministry of Environment and Forestry
4	The company has received RSPO certificate.
5	The company no longer uses pesticides with the active ingredient paraquat.

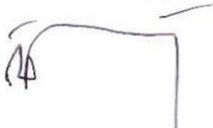

3.4 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Village Head of Pardomuan Dated: 6 June 2023</p> <ul style="list-style-type: none"> Based on the interview results obtained information: There was an increase in the community's economy because the community was able to sell FFB directly to PT ANJA Siais The opening of roads for community access There is assistance from the company related to mushroom cultivation training and start-up capital assistance Distance of about 30 km from the company office to the village Providing information on job vacancies to the public, there are also people who work at PT ANJA Siais There is a Musrembang meeting once a year There is no land overlapping Related requests for information are responded to within 3-7 days 	<p>There are no negative issues that need further verification</p>
<p>Village Head of Simarpinggan concurrently chairman of the Angkola Selatan Youth Organization 06 June 2023</p> <p>Based on the interview results obtained information:</p> <ul style="list-style-type: none"> The distance between the village and the office is approximately 1.5 hours drive There are residents who are also workers at PT ANJA Siais (Ka, initials) who provide information regarding job vacancies and other information to the Simarpinggan Village, however specifically from management there is no There is a program from PT ANJA Siais in the form of training on oil palm seeds There is assistance in the form of funds for community activities, public facilities, and holiday parcels Communities can sell FFB to companies There is a Musrembang meeting once a year No issues related to HCV and customary land Related requests for information and assistance are responded to by the company within 1 – 2 weeks There has been no delivery of CSR programs 	<p>Issues related to the involvement of local communities in the CSR program have been verified</p>
<p>Village Head of Pintu Padang 06 June 2023</p> <p>Based on the interview results obtained information:</p> <ul style="list-style-type: none"> Location about 20 km from the village to the company There is no area directly adjacent to the company There is assistance for mosques and independence day celebrations after submitting a proposal No issues related to HCV There is a meeting through the Musrembang at the sub-district office 	<p>Issues related to the involvement of local communities in the CSR program have been verified</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> There is no delivery of CSR information from PT ANJ 	
Koperasi UD Janji Matogu (FFB Supplier) 06 June 2023 Based on the interview results obtained information: <ul style="list-style-type: none"> The distance from the ANJA Sia's office is approximately 18 km Have been working with the company for about 8 years Source of FFB from the community in Janji Matogu There is an SPK between the cooperative and the company which contains criteria for fruit to be supplied, prohibition on illegal fruit, deductions, payment, return of FFB, etc. Supply between 2400-3000 tons per month Average cut 3-6 %, depending on fruit quality There is counselling for farmers regarding harvesting and maintenance 	There are no negative issues that need further verification
PT Sinisura Rayana Bangun Ersada (Weeding contractor) 06 June 2023 Based on the interview results obtained information: <ul style="list-style-type: none"> Start working together November 2022 The number of workers is 15 people with PKWT status PPE provided by PT ANJA Sia's BPJS is paid by PT ANJA Sia's PPE control is carried out by the PT ANJA Sia's HES team 	There are no negative issues that need further verification.
District Labor Office Tapanuli Selatan 06 June 2023 Based on the interview results obtained information: <ul style="list-style-type: none"> PT ANJA Sia's routinely reports regarding employment reports offline There are PKWT workers, BHL and the use of subcontractors, all of which have been reported There is an issue that there are still employees who do not have a K3 license 	Issues related to employees who do not have a OHS license have been verified
Koperasi Tani Binasari 07 June 2023 Based on the interview results obtained information: <ul style="list-style-type: none"> Cooperation started in 2011, with the type of contract in the form of selling FFB to PKS until 2036 Total area of 157.5 ha Profit sharing to cooperatives is given after sales proceeds are deducted by operational costs The price of FFB follows the regulation of PT ANJA Sia's which is not lower than the price set by the Plantation Agency 	There are no negative issues that need further verification.
CV. Usaha Bersama (Kernel Transport Contractor) Based on the interview results obtained information:	There are no negative issues that need further verification.

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> Is the contractor for transporting ANJA Siais kernels from the Simirik transit station to Dumai Have worked together since 2013, initially as a fertilizer supplier from a fertilizer supplier in Medan to PT ANJA Siais There are no problems while working together. Payment between 2 weeks – 1 month after transportation Having 26 fleets with 52 drivers PPE is provided by the contractor in the form of helmets, boots and vests All workers have Health and Employment BPJS 	
<p>Manpower and Transmigration Agency of Tapanuli Selatan District 06 Juni 2023</p> <p>Based on the results of the interviews, information was obtained that the company had completed all the required requirements, for example, routinely conducting online Mandatory Manpower Reports according to a predetermined schedule. The agency also added that the company has implemented the applicable minimum wage in Tapanuli Selatan Regency and has a wage scale structure for all levels of workers. Then the workers have been registered with BPJS for employment and health in accordance with applicable laws. Then, reporting and validation. Over the past year there have been no negative issues related to child labor, forced labor, illegal labor, discrimination, sexual harassment, etc.</p>	<p>There are no negative issues that need further verification</p>
<p>Labour Union of PT ANJ Agri Siais Chief of Labour Union 07 June 2023</p> <p>Based on the interview results, information was obtained that, during 2022 there was an issue regarding employment, but it has been resolved. The resource person also added information about the company's responsive response when there are complaints from workers regarding industrial relations problems or facilities and infrastructure.</p> <p>Then, the source added that until now, the PKB has been ratified however, there are 10 articles that are still being discussed with the management regarding the Collective Agreement (PB).</p>	<p>There are no negative issues that need further verification.</p>
<p>Worker Cooperative of ANJA Lestari Chief of Worker Cooperative 06 Juni 2023</p> <p>Based on the interview results obtained information that:</p> <ul style="list-style-type: none"> The employee cooperative is engaged in the business of providing Nine Staple Materials (<i>Sembako</i>). Workers can also make savings and loans. 	<p>There are no negative issues that need further verification.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> There is a mandatory saving of IDR 20,000 per month. Workers register as cooperative members voluntarily. The current total members are 1,288 workers and staff. 9 cooperative workers. 2 shifts. The RAT for the 2022 fiscal year will be held on May 26, 2023. The form of support from the company is the building as a convenience store facilitated by the company. Deductions for spending at the Cooperative through payroll. 	
<p>Plantation Agency of Tapanuli Selatan District. 06 Juni 2023</p> <ul style="list-style-type: none"> There was once an issue of complaints about customary land by the community, but the person concerned did not dare to go on a field visit so that it was concluded that the land claim was baseless. The last Plantation Business Assessment will be conducted in 2021. The company has made partnerships with the surrounding community through Plasma at Binasari and wholesale agreements. PT ANJA SIAIS already has fire prevention and control facilities and infrastructure and has involved the community with the establishment of a KTPA PT ANJA SIAIS is one of the companies required to submit K index component reports. So far there have been no complaints from the community either from operational disruptions or from ongoing partnerships. SIPERIBUN has not started yet in Tapanuli Selatan Regency, but the company has routinely sent reports on the development of plantation business every 3 months. The company is expected to increase CSR related to the development of the surrounding community. 	<p>There are no negative issues that need further verification.</p>
<p>Napa Village June 06, 2023</p> <ul style="list-style-type: none"> The company has good communication with the community. No problems of environmental pollution or land fires No conflicts or land disputes No complaints to the company 	<p>There are no negative issues that need further verification.</p>
<p>National Land Agency of Tapanuli Selatan District. 08 Juni 2023</p>	<p>During the audit activity, the audit party tried to contact by telephone, but the BPN was not willing to carry out stakeholder consultations, the BPN was only willing to be visited in person.</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT ANJA Siais Management Representative</p>  <p><u>Jekson Simaremare</u> Monday, 10 July 2023</p> </div> <div style="text-align: center;"> <p>MUTU International Lead Auditor</p>  <p><u>Hasiholan Sihombing</u> Monday, 10 July 2023</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	WWF	Jakarta	media@wwf.or.id	By Email	06 June 2023		✓
2	AMAN	Jakarta	rumahaman@cbn.net.id	By Email	06 June 2023		✓
3	Walhi	Jakarta	informasi@walhi.or.id	By Email	06 June 2023		✓
4	Sawit Watch	Jakarta	info@sawitwatch.or.id	By Email	06 June 2023		✓
5	Village Head of Pardomuan	Tapanuli Selatan Regency	-	By Phone	06 June 2023	✓	
6	Headman of Simarpinggan concurrently chairman of the Angkola Selatan Youth Organization (Karang Taruna)	Tapanuli Selatan Regency	-	By Phone	06 June 2023	✓	
7	Village Head of Pintu Padang	Tapanuli Selatan Regency	-	By Phone	06 June 2023	✓	
8	Village Head of Koperasi Janji Matogu	Tapanuli Selatan Regency	-	By Phone	06 June 2023	✓	
8	CV Usaha Bersama (local contractor)	Medan	-	By Phone	07 June 2023	✓	
9	Ministry of Manpower and Transmigration of Tapanuli Selatan Regency	Tapanuli Selatan Regency	-	By Phone	06 June 2023	✓	
10	Tapanuli Selatan District Land Office	Tapanuli Selatan Regency	-	By Phone	06 June 2023	✓	
11	PT Sinisura Rayana Bangun Ersada (weeding contractor)	Tapanuli Selatan Regency	-	Direct Interview	06 June 2023	✓	
12	ANJ Agri Siais POM <ul style="list-style-type: none"> • 13 workers at sortation (1 foreman) • 1 loading ramp operator • 2 pressing operator. • 1 engine room operator • 1 boiler operator 	Tapanuli Selatan Regency	-	Direct Interview	06 June 2023	✓	
13	Koperasi Tani Binasari	Tapanuli Selatan Regency	-	Direct Interview	07 June 2023	✓	
14	Lembah Subur Selatan Estate <ul style="list-style-type: none"> • 3 harvest workers • 3 weeding workers 	Tapanuli Selatan Regency	-	Direct Interview	06 June 2023	✓	

	<ul style="list-style-type: none"> • 2 daycare workers • 1 generator operator 						
15	Lembah Subur Utara Estate <ul style="list-style-type: none"> • 5 spraying workers • 3 harvest workers • 6 weeding workers • 1 Doctor • 1 nurse • 2 daycare workers • 1 composting workers • 2 warehouse workers • Firefighter team of ANJA Siais 	Tapanuli Selatan Regency	-	Direct Interview	07 June 2023	✓	
16	Labor union	Tapanuli Selatan Regency	-	Direct Interview	07 June 2023	✓	
17	LKS Bipartite	Tapanuli Selatan Regency	-	Direct Interview	06 June 2023	✓	
18	Employee cooperative	Tapanuli Selatan Regency	-	Direct Interview	06 June 2023	✓	

Appendix 2. Assessment Program

DATE	5 – 10 June 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 05 June 2023		
05.50 – 08.10	Jakarta (CGK) → Medan (KNO) (QG-910)	All Auditor
08.10 – 10.20	Transit on Medan (KNO)	All Auditor
10.20 – 11.15	Medan (KNO) → Sibolga (FLZ) (QG-1922)	All Auditor
11.15 – 14.30	Sibolga (FLZ) → CPO Storage Tank on Sidempuan	HAS
11.15 – 16.00	Sibolga (FLZ) → Site	SEP, RAN, IWP
16.00 – 17.00	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). 	SEP, RAN, IWP
Tuesday, 06 Juni 2023		
08.00 – 12.00	Public Consultation <ul style="list-style-type: none"> Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier and scheme smallholders. Stakeholder consultation to affected communities surrounding the plantations and previous land owner as well as Local NGO. Public consultation with stakeholder to relevant agency in Tapanuli Selatan by phone. Document review, basic info verification and metric template verification. 	IWP, RAN IWP, RAN IWP, RAN IWP, RAN
08.00 – 12.00	Field Observation to Lembah Subur Selatan Estate Aspect to be verified: <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect. Implementation of Environmental, and Waste Management Aspect (inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observatio of Workers Facilities (Housing, School, Worship Place). 	HAS HAS SEP
12.00 – 14.00	Break	All Auditor
14.00 – 16.30	Field Observation to ANJ Agri Siais POM Aspect to be verified: <ul style="list-style-type: none"> Supply Chain verification (FFB Receiving, Weighbridge). 	HAS

DATE	5 – 10 June 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
16.30 – 17.00	<ul style="list-style-type: none"> Implementation of Environmental Aspect, Inspection to Chemical Storage, Hazardous Waste Storage, Workshop, WTP, Fire Control Simulation. Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect, security post, FFB Sorting, Processing Activity, Despatch CPO). POME Pond, Land Application, Empty Bunch Area and Employees Housing Complex. Submission of audit progress. 	RAN SEP, IWP RAN All Auditor
Wednesday, 07 June 2023		
08.00 – 12.00	Field Observation to Lembah Subur Utara Estate dan Koperasi Tani Binasari Aspect to be verified: <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect. Implementation of Environmental, and Waste Management Aspect (inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). 	HAS SEP, IWP RAN All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 16.30	Continue Stakeholders Consultation, Document verification and completing checklist.	All Auditor
16.30 – 17.00	Submission of audit progress.	All Auditor
Thursday, 08 June 2023		
08.00 – 12.00	Continue Stakeholders Consultation, Document verification and completing checklist.	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 16.30	Continue Stakeholders Consultation, Document verification and completing checklist.	All Auditor
16.30 – 17.00	Submission of audit progress.	All Auditor
Friday, 09 June 2023		
08.00 – 12.00	Continue Stakeholders Consultation, Document verification and completing checklist.	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 15.00	Internal discussion by auditor team preparing for Closing Meeting.	All Auditor
15.00 – 16.00	CLOSING MEETING	All Auditor

DATE	5 – 10 June 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	<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 	
Saturday, 10 June 2023		
06.30 – 11.30	PT ANJ Agri Siais → Sibolga	All Auditor
13.05 – 14.00	Sibolga (FLZ) – Medan (KNO) (IW-1259)	All Auditor
14.00 – 15.00	Transit	All Auditor
15.00 – 17.25	Medan (KNO) – Jakarta (CGK) (ID-6885)	All Auditor