

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

[✓] Surveillance

Name of Management Organisation : Pangkatan Palm Oil Mill – PT Pangkatan Indonesia subsidiary of MP Evans Group PLC

Plantation Name : PT Pangkatan Indonesia: Pangkatan Estate
PT Bilah Plantindo: Bilah Estate
PT Sembada Sennah Maju: Sennah Estate

Location : Village of Perkebunan Pangkatan, Sub District of Pangkatan, District of Labuhanbatu, Province of Sumatera Utara, Indonesia

Certificate Code : **MUTU-RSPO/051**

Date of Initial Registration : 19 October 2012

Date of Certificate Issue : 09 December 2022 Date of License Issue : 19 October 2023

Date of Certificate Expiry : 18 October 2027 Date of License Expiry : 18 October 2024

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA 2.1	03 to 07 July 2023	Rahmat Abdiansyah (Lead Auditor), Septian Maulana, Alfiany Sukmawati, Afiffudin	Hasiholan Sihombing	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA 2.1	02 August 2023

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Figure 1. Location Map of PT Pangkatan Indonesia, PT Sembada Sennah Maju, PT Bilah Plantindo

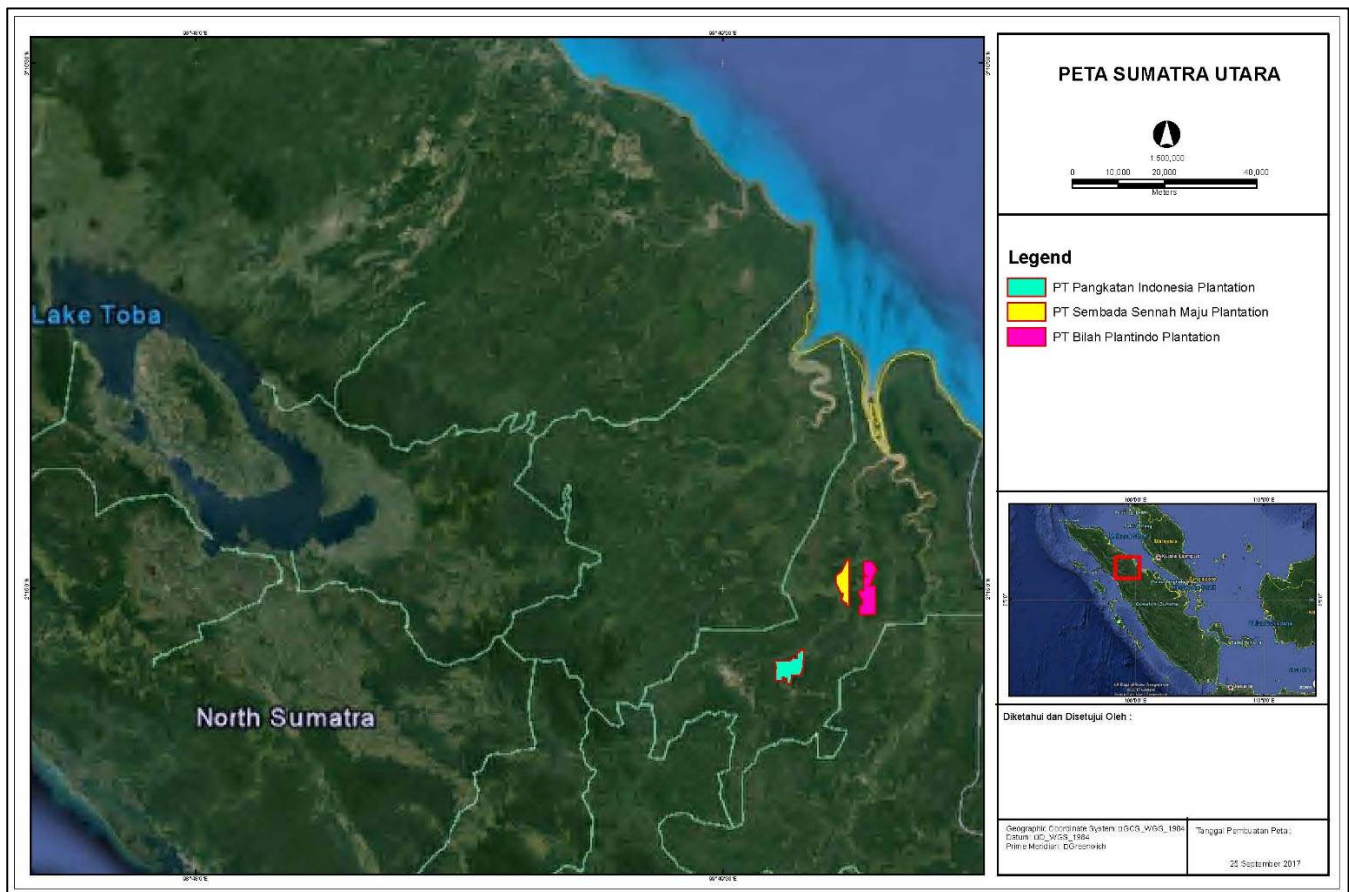


Figure 2. Operational Map of PT Pangkatan Indonesia

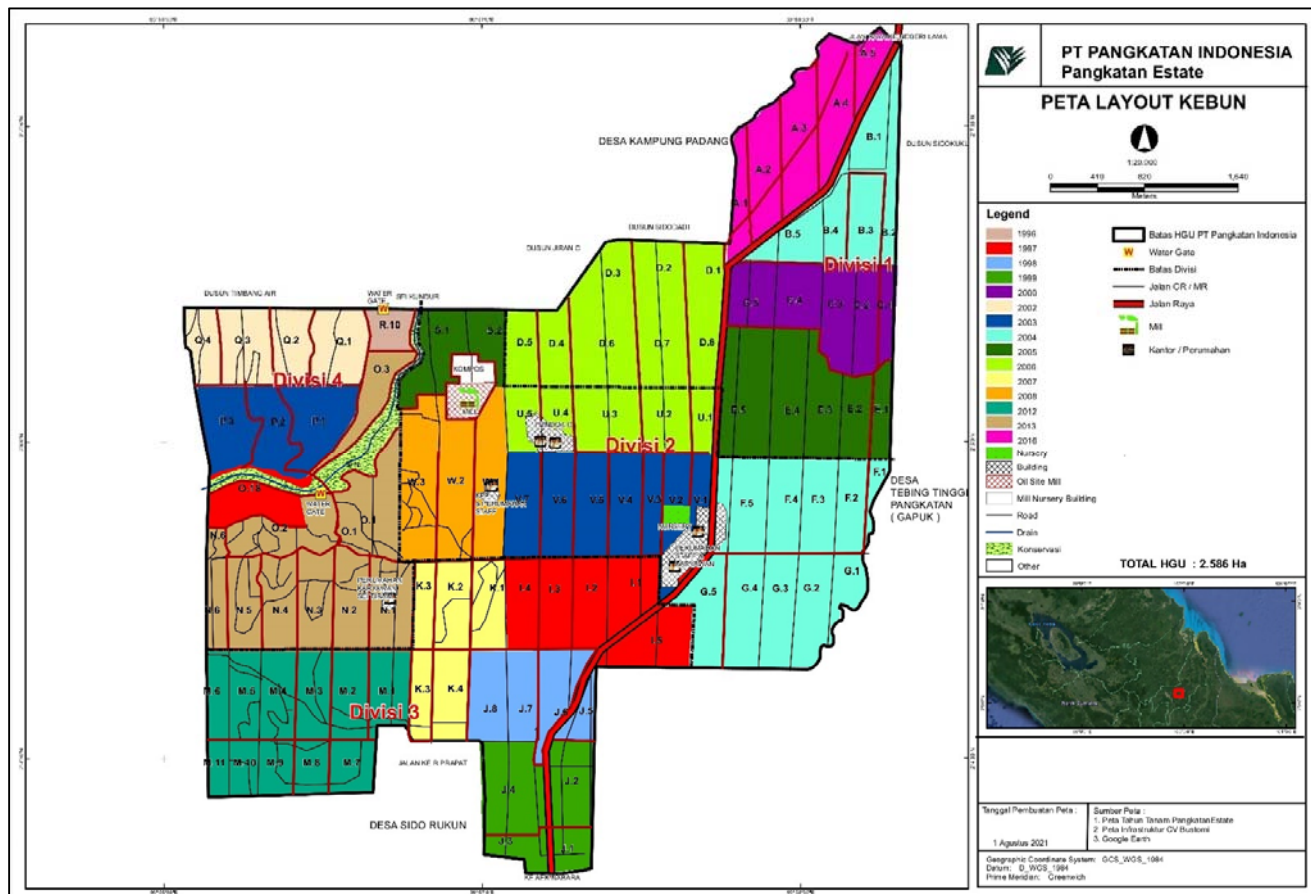


Figure 3. Operational Map of PT Bilah Plantindo

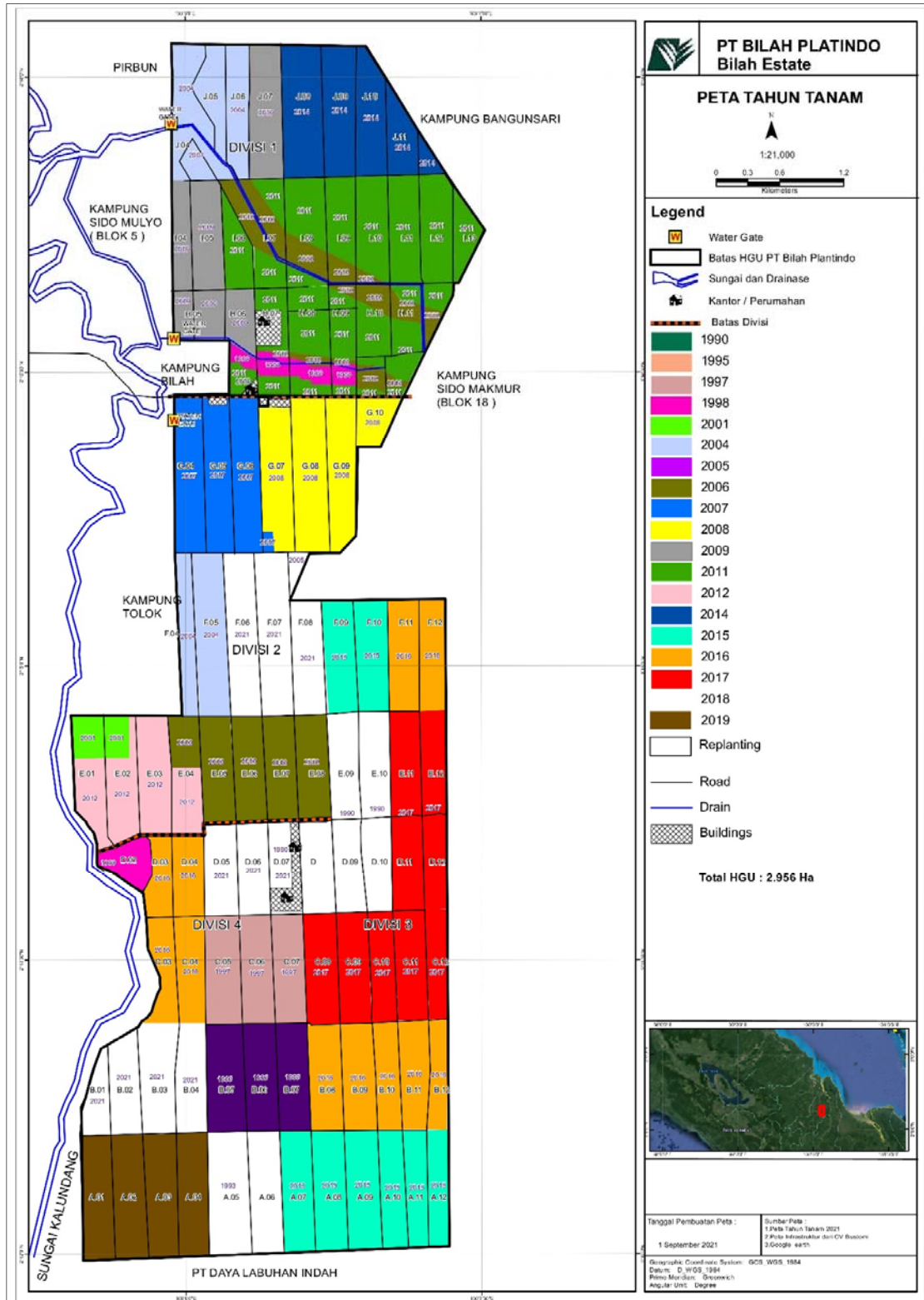
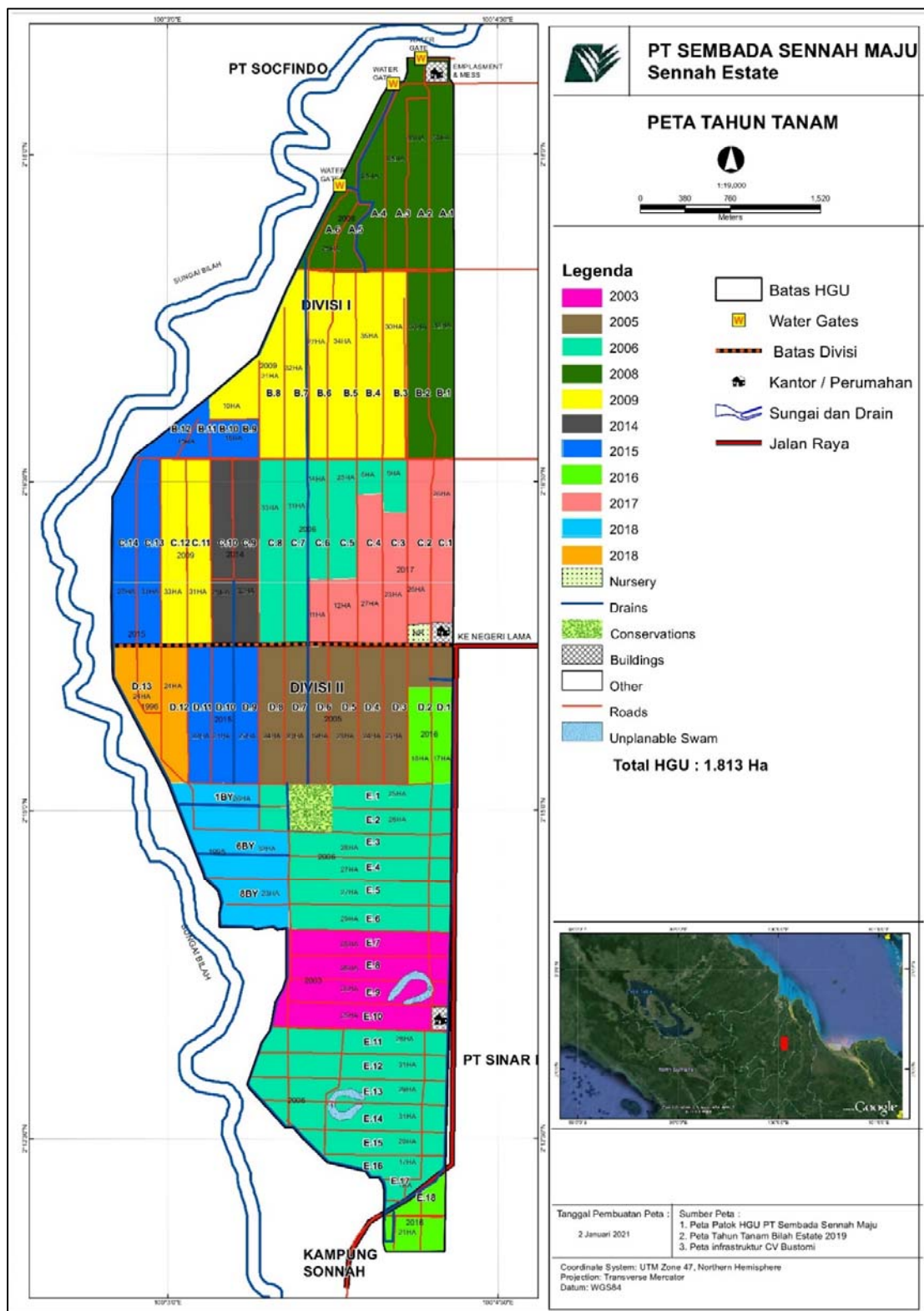


Figure 4. Operational Map of PT Sembada Sennah Maju



Abbreviations Used

AMDAL		Analisis Mengenai Dampak Lingkungan/Environmental Impact Analysis
ASA	:	Annual Surveillance Assessment
B3	:	<i>Bahan Berbahaya dan Beracun</i> (Hazardous Waste)
BIE	:	Bilah Estate
BMP	:	Best Management Practices
BP	:	Bilah Plantindo
BPD		<i>Badan Pengawas Daerah</i>
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Social Insurance)
CB	:	Certification Body
CH	:	Certificate Holder
CLA	:	Collective Labor Agreement
CPO	:	Crude palm oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate Social Responsibility
DLH	:	<i>Dinas Lingkungan Hidup</i> (Environment Agency)
DPMPSTP	:	<i>Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu</i>
DPRD	:	<i>Dewan Perwakilan Rakyat Daerah</i>
EFB	:	Empty Fruit Bunches
EIA	:	Environment Impact Assessment
FFB	:	Fresh Fruit Bunch
FPIC	:	Free, Prior, Informed and Consent
FR	:	Fatality Rate
GAP	:	Good Agricultural Practices
GHG	:	Green House Gas
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha</i> (Land Use Title/Right)
HK	:	<i>Hari Kerja</i> (Working Day)
ILO	:	International Labor Organization
IPLC	:	<i>Instalasi Pengolahan Limbah Cair</i> /Liquid Waste Treatment Plant
IPM	:	Integrated Pest Management
ISCC	:	International Sustainability Carbon Certification
ISPO	:	Indonesia Sustainable Palm Oil
JK	:	<i>Jaminan Kematian</i> (Died Insurance)
JKK	:	<i>Jaminan Kecelakaan Kerja</i> (Work Accident Insurance)
kWh	:	Kilowatt hour
LA	:	Land Application
LB3	:	<i>Limbah Bahan Berbahaya dan Beracun</i> /Hazardous and Toxic Waste
LCC	:	Legume Cover Crop
LD	:	Lethal Dosage
MCU	:	Medical Check Up
MSDS	:	Material Safety Data Sheet
MSPO	:	Malaysia Sustainable Palm Oil
NGO	:	Non-Government Organization
OFI	:	Opportunity For Improvement
OHS	:	Occupational Health and Safety
PI	:	Pangkalan Indonesia
PIC	:	Person In Charge

PGE	:	Pangkalan Estate
PGM	:	Pangkalan Mill
PK	:	Palm Kernel
PKWT	:	<i>Perjanjian Kerja Waktu Tertentu</i> /Contract Worker
PLC	:	Public Limited Company
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PP	:	<i>Peraturan Pemerintah</i> (Government Regulation)
PPE	:	Personal Protective Equipment
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i> / Occupational Health and Safety Committee
PT	:	<i>Perseroan Terbatas</i> /Limited Corporation
QC	:	Quality Control
RKL-RPL	:	<i>Rencana Pengelolaan dan Pemantauan Lingkungan</i> (Environment Management and Monitoring Plan)
RTE	:	Rare, Threatened and Endangered
SCCS	:	Supply Chain Certification System
SIA	:	Social Impact Assessment
SKU	:	<i>Syarat Kerja Umum</i>
SNE	:	Sennah Estate
SOP	:	Standard Operations Procedure
SR	:	Severity Rate
SSM	:	Sembada Sennah Maju
TTE	:	<i>Tanda Terima Elektronik</i> /Electronic Receipt
UKL-UPL	:	Environment management and Monitoring Plan
UNFCCC	:	United Nations Framework Convention on Climate Change
UPDKS	:	<i>Ulat Pemakan Daun Kelapa Sawit</i> /Palm Oil Caterpillars
WTP	:	Water Treatment Plan
WWTP	:	Waste Water Treatment Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none">• RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.• Indonesia National Interpretation of Principles and Criteria for Sustainable Palm Oil Production 2018, endorsed on 20th April 2020.	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	Pangkatan Palm Oil Mill subsidiary of MP Evans Group PLC	
1.2.2	Contact person	Donald Persadaan Ginting	
1.2.3	Organisation address and site address	RSPO registered company: Gedung Graha Aktiva Lt. 10, Jl. HR Rasuna Said Kav. 03 Blok X-1, Kuningan, Jakarta Selatan	
1.2.4	Telephone	021-52920338	
1.2.5	Fax	021-52920339	
1.2.6	E-mail	donaldg@mpevans.co.uk	
1.2.7	Web page address	www.mpevans.co.uk	
1.2.8	Management Representative who completed the application for certification	Donald Persadaan Ginting (Manager Sustainability & Certification)	
1.2.9	Registered as RSPO member	1-0027-06-000-00, since 8 October 2006	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base : <ul style="list-style-type: none">• Pangkatan POM (PT Pangkatan Indonesia)• Pangkatan Estate (PT Pangkatan Indonesia)• Sennah Estate (PT Sembada Sennah Maju)• Bilah Estate (PT Bilah Plantindo)	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			LatitudeLongitude
	Pangkatan POM	Perkebunan Pangkatan Village, Pangkatan Sub District, Labuhanbatu District, Sumatera Utara Province, Indonesia	N 02° 5.2' 59.5"E 99° 56' 52"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			LatitudeLongitude
	Pangkatan Estate (PT Pangkatan Indonesia)	Perkebunan Pangkatan Village, Pangkatan Sub District, Labuhanbatu District, Sumatera Utara Province, Indonesia	N 02° 05' 29"E 99° 58' 01"
	Sennah Estate (PT Sembada Sennah Maju)	Perkebunan Sennah Village, Bilah Hilir Sub District, Labuhanbatu District, Sumatera Utara Province, Indonesia	N 02° 15' 43"E 100° 04' 12"

	Bilah Estate (PT Bilah Plantindo)	Perkebunan Bilah Village, Bilah Hilir Sub District, Labuhanbatu District, Sumatera Utara Province, Indonesia		N 02° 16' 46"	E 100° 06' 22"
1.5	Description of Area Statement				
1.5.1	Tenure				
	• State		7,409.31 Ha		
	• Community		- Ha		
1.5.2	Area Statement				
	Description	Pangkatan Estate	Sennah Estate	Bilah Estate	Total
	• Total area	2,586.03	1,813.40	3,009.88	7,409.31 Ha
	• Mature area	2,430.00	1,681.00	2,316.00	6,427.00 Ha
	• Immature area	0	0	373.00	373.00 Ha
	• Mill	15.00	0	0	15.00 Ha
	• Infrastructure	98.63	95.40	100.00	294.03 Ha
	• Nursery	4.00	6.00	0	10.00 Ha
	• HCV / Conservation Area	38.40	13.00	1.00	52.40 Ha
	• Other (lowlands, Trenches, etc)	0	0	219.88	219.88 Ha
	• Not Plantable Area	0	18.00	0	18.00 Ha
1.6	Planting Year and Cycles				
1.6.1	Age profile of planting year				
	Planting Year	Hectarage (Ha)			
		Pangkatan Estate	Sennah Estate	Bilah Estate	Total
	1996	15.00	-	-	15.00
	1997	146.00	-	93.00	239.00
	1998	89.00	-	-	89.00
	1999	95.00	-	-	95.00
	2000	103.00	-	-	103.00
	2001	-	-	24.00	24.00
	2002	109.00	-	-	109.00
	2003	248.00	105.00	-	353.00
	2004	348.00	-	-	348.00
	2005	179.00	148.00	-	327.00
	2006	281.00	444.00	135.00	860.00
	2007	96.00	-	110.00	206.00
	2008	110.00	203.00	137.00	450.00
	2009	-	253.00	128.00	381.00
	2011	-	-	308.00	308.00
	2012	213.00	-	87.00	300.00
	2013	256.00	-	-	256.00
	2014	-	60.00	136.00	196.00
	2015	-	159.00	285.00	444.00
	2016	142.00	56.00	209.00	407.00
	2017	-	124.00	228.00	352.00
	2018	-	129.00	207.00	336.00
	2019	-	-	229.00	229.00

	Sub Total Mature	2,430.00	1,681.00	2,316.00	6,427.00							
	2021	-	-	302.00	302.00							
	2022	-	-	64.00	64.00							
	2023	-	-	7.00	7.00							
	Sub Total Immature	0	0	373.00	373.00							
	TOTAL	2,430.00	1,681.00	2,689.00	6,800.00							
1.6.2	New Planting area after January 2010		- Ha									
1.6.3	Planting Cycle		1 st Cycle or 2 nd Cycle									
1.7	Description of Mill and Supply Base											
1.7.1	Description of Mill											
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel						
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)					
	Pangkatan	40	239,933.10	54,553.72	22.74	12,192.03	5.08					
	<i>*Production data source from June 2022 to 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)	%					
						Pangkatan Estate	2,586.03	2,430.00	72,298.79	29.75	72,298.79	100
						Sennah Estate	1,813.40	1,681.00	48,065.57	28.59	48,065.57	100
						Bilah Estate	3,009.88	2,316.00	66,003.64	28.50	66,003.64	100
	TOTAL	7,409.31	6,427.00	186,368.00	29.00	186,368.00	100					
	<i>*Production data source from June 2022 to May 2023</i>											
1.7.3	FFB description from other source											
	Name of sources/Organisation (RSPO non-certified)	Type of Organisation	number of smallholders	Production Area (Ha)	Supplied to Mill							
					FFB (tonnes/year)							
					Anugerah Keluarga Mandiri	Independent Supplier	-	-	8,353.93			
					Dewi Maya	Independent Supplier	-	-	6,703.32			
					Teng Gaes Jaya	Independent Supplier	-	-	38,405.95			
	TOTAL				53,463.20							
	<i>*Production data source from June 2022 to May 2023</i>											
1.7.4	Product categories			FFB, CPO, PK								
1.8	Tonnage of Product											
1.8.1	Past Annual Claim Certified Product		Last Year Projected Certified Volume (MT) 19 January 2023 to 18 October 2023 + Extension Volume		Last Year Actual Certified Volume (MT) June 2022 to May 2023)							
	FFB Processed		249,463		186,368.00							
	CPO Production		57,649		46,116.03							
	Palm Kernel (PK) Production		12,800		9,775.28							

1.8.2	Product selling							
	Type of selling product			Actual selling product for last year (June 2022 to May 2023) (MT)				
	CSPO sold as RSPO certified product			9,035.67				
	CSPK sold as RSPO certified product			9,386.09				
	CSPO sold under other scheme (ISCC)			36,552.72				
	CSPK sold under other scheme							
	CSPO sold as conventional			-				
	CSPK sold as conventional			-				
				-				
1.8.3	Estimate of Certified FFB Claim							
	Name of Estates		Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)		
	Pangkatan Estate		2,586.03	2,430.00	74,000	30.45		
	Sennah Estate		1,813.40	1,681.00	52,000	30.93		
	Bilah Estate		3,009.88	2,316.00	67,000	28.92		
	TOTAL		7,409.31	6,427.00	193,000	30.10		
	<i>*Projected FFB production for 12 months of certificate ,</i>							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		Supply Chain Module
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	
	Pangkatan	40	193,000	44,390	23.00	9,650	5.00	MB
	<i>*Projected CSPO and CSPK production for 12 months of certificate</i>							
1.9	Other Certifications							
	ISO 9001:2015			-				
	ISO 14001: 2015			-				
	ISO 45001:2018			-				
	ISCC			EU-ISCC-Cert-DE119-62224280, valid thru 8 August 2023				
	ISPO			MUTU-ISPO/203, valid thru 16 July 2025				
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Unit							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
	MILL	Time Bound Plan						
	Pangkatan	2012	Pangkatan Estate (PT Pangkatan Indonesia)	2012	Labuhanbatu District, Sumatera Utara Province	Certified		
			Sennah Estate (PT Sembada Sennah Maju)	2012	Labuhanbatu District, Sumatera Utara Province	Certified		
			Bilah Estate (PT Bilah Plantindo)	2012	Labuhanbatu District, Sumatera Utara Province	Certified		

Bumi Permai	2013	PT Prima Mitrajaya Mandiri	2013	Kutai Timur District, Kalimantan Timur Province	Certified
		Koperasi Subur Makmur	2013	Kutai Timur District, Kalimantan Timur Province	Certified
		Koperasi Sawit Etam Bersama	2013	Kutai Timur District, Kalimantan Timur Province	Certified
		Koperasi Tanah Sama	2013	Kutai Timur District, Kalimantan Timur Province	Certified
		Koperasi Mitra Sawit Mandiri	2013	Kutai Timur District, Kalimantan Timur Province	Certified
		Koperasi Grenseng Indah	2013	Kutai Timur District, Kalimantan Timur Province	Certified
		Koperasi Maju Membangun	2013	Kutai Timur District, Kalimantan Timur Province	Certified
		PT Teguh Jaya Prima Abadi	2013	Kutai Timur District, Kalimantan Timur Province	Certified
		Koperasi Karya Bersama	2013	Kutai Timur District, Kalimantan Timur Province	Certified
		Koperasi Mitra Sejahtera Abadi	2013	Kutai Timur District, Kalimantan Timur Province	Certified
Rahayu	2021 Non Certified (Commissioning 2020)	PT Teguh Jaya Prima Abadi	2013	Kutai Timur District, Kalimantan Timur Province	Certified (currently supply FFB to Bumi Permai Mill)
		Koperasi Karya Bersama	2013	Kutai Timur District, Kalimantan Timur Province	
		Koperasi Mitra Sejahtera Abadi	2013	Kutai Timur District, Kalimantan Timur Province	
		Koperasi Maju Membangun II	2025	Kutai Timur District, Kalimantan Timur Province	Have not obtained the HGU
		Koperasi Sawit Etam Bersama II	2025	Kutai Timur District, Kalimantan Timur Province	Have not obtained the HGU
		Koperasi Tanah Sama II	2025	Kutai Timur District, Kalimantan Timur Province	Have not obtained the HGU
Benuang	2025 Non Certified (Commissioning)	Cendana Estate (PT BMA)	2025	Kutai Timur District, Kalimantan Timur Province	During the finalization on the Remediation and Compensation Procedure
		Damar Estate (PT BMA)	2025	Kutai Timur District, Kalimantan Timur	

	2021)			Province	
		Koperasi Dugai Jaya Mandiri	2025	Kutai Timur District, Kalimantan Timur Province	
		Koperasi Marukangan Sejahtera Mandiri	2025	Kutai Timur District, Kalimantan Timur Province	
		Koperasi Jaya Harapan Bersama	2025	Kutai Timur District, Kalimantan Timur Province	
Tengkalat	2017	PT Gunung Pelawan Lestari	2017	Bangka District, Kepulauan Bangka Belitung Province	Certified
		Koperasi Ikhtiar Sejahtera	2017	Bangka District, Kepulauan Bangka Belitung Province	Certified
		Koperasi Silip Lestari	2017	Bangka District, Kepulauan Bangka Belitung Province	Certified
		Koperasi Mapur Mandiri	2017	Bangka District, Kepulauan Bangka Belitung Province	Certified
		Koperasi Gunung Muda Sejahtera	2017	Bangka District, Kepulauan Bangka Belitung Province	Certified
Kenanga	2025	Tengkawang Estate (PT Evans Lestari)	2025	Musi Rawas District, Sumatera Selatan Province	Currently FFB delivered to outside mill
		Tamarind Estate (PT Evans Lestari)	2025	Musi Rawas District, Sumatera Selatan Province	Currently FFB delivered to outside mill
		Meranti Estate (PT Evans Lestari)	2025	Musi Rawas District, Sumatera Selatan Province	Currently FFB delivered to outside mill
		Kenanga Estate (PT Evans Lestari)	2025	Musi Rawas District, Sumatera Selatan Province	Currently FFB delivered to outside mill
		Koperasi Serba Usaha Perkebunan Kelapa Sawit Perigi Jaya	2025	Musi Rawas District, Sumatera Selatan Province	Currently FFB delivered to outside mill
		Koperasi Serba Usaha Perkebunan Kelapa Sawit La Maju Besar	2025	Musi Rawas District, Sumatera Selatan Province	Currently FFB delivered to outside mill
		Koperasi Produsen Petunang Bumi Sempurna	2025	Musi Rawas District, Sumatera Selatan Province	Currently FFB delivered to outside mill
		Koperasi Serba Usaha Perkebunan Kelapa Sawit Lubuk Ngin Bersatu	2025	Musi Rawas District, Sumatera Selatan Province	Currently FFB delivered to outside mill

		Koperasi Serba Usaha Perkebunan Kelapa Sawit Suno Sejahtera	2025	Musi Rawas District, Sumatera Selatan Province	Currently FFB delivered to outside mill
		Koperasi Serba Usaha Perkebunan Kelapa Sawit Gegas Makmur	2025	Musi Rawas District, Sumatera Selatan Province	Currently FFB delivered to outside mill
		Koperasi Produsen Berlian Lestari Jaya	2025	Musi Rawas District, Sumatera Selatan Province	Currently FFB delivered to outside mill
		Koperasi Serba Usaha Perkebunan Kelapa Sawit Peneban Lestari	2025	Musi Rawas District, Sumatera Selatan Province	Currently FFB delivered to outside mill
		Koperasi Serba Usaha Perkebunan Kelapa Sawit Babat Sejahtera	2025	Musi Rawas District, Sumatera Selatan Province	Currently FFB delivered to outside mill
	-	PT Simpang Kiri Plantation Indonesia	2025	Aceh Province	Currently FFB delivered to outside mill
	* TBP was approved by RSPO on 7 July 2023 via email from RSPO (certification@rspo.org)				
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard				
	Pangkalan POM and its supply bases does not have associated smallholder's scheme. FFB non-certified sources are from independent suppliers.				

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA 2.1	<ul style="list-style-type: none"> • Rahmat Abdiansyah (Lead Auditor). Indonesian citizen. Bachelor of Forestry from IPB University, with major in Forest Resources Conservation and Ecotourism. Has experience working in the Indonesian Palm Oil Farmers Organization and Indonesian private oil palm plantation companies. Participate in ISPO and RSPO Internal Auditor training in 2018, ISPO and P&C Certification Systems IHT in 2019, IHT ISO 19011, ISPO Auditor Training in 2020, RSPO Lead Auditor Training in 2020, SCCS in 2022, SMETA Training in 2022, ISO 14001 and ISO 9001 Lead Auditor Training in 2020, and awareness of the RSPO Certification System and the RSPO P&C in 2019 and 2020. During this audit, he was assigned to verify legal aspects, land dispute, SCCS, Best Practice and OHS. • 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 performs the assessment of worker welfare, transparency. • Afiffuddin (Auditor) Indonesian Citizen, Diploma III majoring in Oil Palm Plantation, Bogor Agricultural Institute. Work experience for 5 years since 2010 in an oil palm plantation company in Indonesia as an agronomy operational staff and attended several trainings, namely: Basic Plantation Management Program, Indonesian Sustainable Palm Oil (ISPO) Auditor Training, RSPO lead auditor training, K3 General Expert, System K3 Management based on PP 50 2012 and Management System Certification (ISO 9001-2015/SNI 19011-9001:2015) ISO 17021, ISO 17065, SA 8000 training. He has been involved in several audit activities related to sustainable palm oil certification since 2016 covering aspects Best Management Practices, aspects of occupational health and safety and aspects of worker welfare. In this assessment, an assessment is made of the BMP and OHS. • Alfiany Sukmawati (Trainee Auditor). Indonesian Citizen. Bachelor of Public Health, major in Environmental Health, University of Indonesia. Has experience working in as HSE specialist for 5 years. Has attended training in AMDAL A & B, ISO 14001 auditor training, OHSAS, ISPO by LPP, RSPO by Checkmark, <i>Lead Auditor</i> ISO 9001:2015, Awareness ISO 17021, Awareness ISO 17065, Awareness ISO 9001, Awareness ISO 45001, and Awareness ISO 19011. Has participated in several simulations of audit activities related to the certification system for sustainable palm oil plantations with environmental aspects. During the audit, she verified OHS, environment, waste management, GHG and conservation aspect. <p>Curriculum vitae (CV) of the members and the assessment team is available at the PT Mutuagung Lestari office.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA 2.1	<p>Number of auditors: 3 auditors and 1 auditor trainee</p> <p>Number of days for ASA 2.1 Onsite Audit: 5 days</p> <p>Number of working days for ASA 2.1 Onsite Audit: 15 Working days</p>
2.2.2	Assessment Process
ASA 2.1	<p>The assessment was conducted by measuring the implementation of certification system and standard conducted by PT Pangkatan Indonesia, Pangkatan POM Unit Certification based on:</p> <ul style="list-style-type: none"> • RSPO Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesian National Interpretation, Endorsed by the RSPO Board of Governors on 20th April 2020 • RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020 <p>The scope of certification consists of one mill (Pangkatan Mill) and three estates (Pangkatan Estate, Bilah Estate and Sennah Estate).</p>

The audit program is included as Appendix 2. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

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 directly observe the sufficiency of implementation on site.

Team of auditor started their trip from Jakarta to Medan and continued to site on 03 July 2023. Once arrived, team auditor conducted Opening Meetings in the Meeting Room of PT Pangkatan Indonesia. Opening meeting attended by Senior Estate Manager, Estate manager, Mill Manager, Senior Assistant, the Assistant, the Head of Administration, Sustainability staff and the other related personnel.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix 1.

Closing Meeting conducted in the region office of PT Pangkatan Indonesia on 07 July 2023. Closing meeting attended by Estate manager, Mill Manager, Senior Assistant, the Assistant, the Head of Administration, Sustainability staff and the other related personnel.

Commonly, the audit activities went smoothly with good cooperation from the unit management. The presentation of documents is presented quite well by involving related personnel and unit of certification accepted the recommendation from auditor team regarding certification process.

Some opportunities for improvement of the results & RC delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (ASA-2.2). All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of this assessment

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

The assessment program please find Appendix 2.

2.2.3 Locations of Assessment

ASA 2.1

The sampling location consider the issue arose from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:

PT Pangkatan Indonesia (Pangkalan Mill)

- **Security Post.** Observation to FFB transportation and acceptance process and interview with 2 Security Officers, on their understanding towards technical, RSPO supply chain, environment, safety and manpower aspect, as well as facilities provided by mill management.

- **Weighbridge Station.** Observation and interview with Weighbridge Operators, on their understanding towards technical, supply chain, environment, safety and manpower aspect, as well as facilities provided by estate management.
- **Laboratory.** Observation to laboratory works and interview with Laboratory Officers, on his understanding towards technical, environment, safety and manpower aspect, as well as facilities provided by mill management.
- **WTP.** Observations and interviews related work procedure, safety aspect, worker welfare, environment aspect etc.
- **Temporary Hazardous Waste Storage.** Observation and interview to store keeper related to OHS, waste management and worker welfare aspect.
- **Chemical and CaCO₂ Storage.** Observation and interview to store keeper related to OHS, waste management and worker welfare aspect.
- **Material Storage.** Observation and interview to store keeper related to OHS, waste management and worker welfare aspect.
- **Workshop.** Observation and interview to store keeper related to OHS, waste management and worker welfare aspect.
- **Grading Station.** Observations and interviews related to criteria for EFB grading, wages, sampling techniques, and PPE.
- **Loading Ramp Station.** Observations and interviews related work procedure, safety aspect, worker welfare etc
- **Fire-fighting simulation.** Observations to see the ability of officers in handling fires and interviews related to quick response activities, training that has been given etc.
- **Engine room.** Observations and interviews related to medical check-up, PPE, and operator understanding of emergencies.
- **Boiler Station.** Observations and interviews related to OHS, understanding of emergency response, and operator licenses.
- **Sterilizer Station.** Observations and interviews related to the duties and responsibilities of daily work.
- **Press Station.** Observations and interviews related to medical check-up, PPE feasibility, and operator responsibility.
- **WWTP.** Observation and interview with worker related to POME management, work procedure, OHS, environmental and worker welfare aspect.
- **Housing Area Pangkatan POM.** Observation and interview with residents about housing facilities, domestic waste management.
- **Reservoir.** Observation and interview related work procedure, employment, safety, and environmental aspect.
- **Composting Area.** Observation and interview related work procedure, waste utilization, employment, safety, and environmental aspect.

PT Pangkatan Indonesia (Pangkalan Estate)

- **Boundaries Poles No 36, 37, 38, 11, 12 and 13,** Observation the conditions and position of legal boundary.
- **HCV area riparian of Kundur River Block O1-2 Division 4.** Observation related to HCV management and monitoring.
- **Housing complex and Facilities (Mosque, Clinic, daycare, etc). Division 1 & 2.** Observation and interview regarding facilities and infrastructure housing area.
- **Land fill Block V02 Division 2.** Observation related domestic waste management.
- **Circle and Path Spraying Block A2 Division 1.** Observation and interview related worker welfare, BMP, OHS and environment aspects.
- **Harvesting Block A3 Division 1.** Observation and interview related worker welfare, BMP, OHS and environment aspects.
- **Land Application Area Block V7 Division 2.** Observation and interview related worker welfare, BMP, OHS and environment aspects.
- **Composting Application Block K1 Division 3.** Observation and interview related worker welfare, BMP, OHS and environment aspects.
- **Nursery.** Observation and interview related source of seeds.
- **Clinic.** Observation and interview related hazardous waste management and OHS aspect.
- **Temporary Hazardous Waste Storage.** Observation and interview related hazardous waste management.

- **Warehouses (Chemical, Fertilizer, Material, Lubricants).** Observation and interview related worker welfare, BMP, OHS and environment aspects.
- **Mixing and Rinse House.** Observation and interview related worker welfare, BMP, OHS and environment aspects.

PT Bilah Plantindo (Bilah Estate)

- **Boundaries Poles No 03, 04, 05, 36 and 35,** Observation the conditions and position of legal boundary.
- **Housing complex and Facilities (Mosque, Clinic, daycare, etc).** Division 1 & 2. Observation and interview regarding facilities and infrastructure housing area.
- **Land fill Block I06 Division 1.** Observation related domestic waste management.
- **Peat area, Block D10 and D11.** Observation peat area, water management, water level monitoring, piezometer monitoring and subsidence pole conditions and staff interviews on monitoring techniques.
- **HCV Area (Block I6 dan H10 Division 1).** Observation related to HCV management.
- **Replanting area (Planting Years 2023) Block J05 Division 1.** Observation related replanting activity, that conducted in 2021.
- **Harvesting Block I9 division I.** Observation and interview regarding FFB criteria and workers' understanding of their rights and obligations
- **Circle and Path Spraying Block G8 division 2.** Observation and interview regarding the implementation of weed control procedures and understanding in handling pesticides.
- **Fertilizer Warehouse.** Observation and interview related understanding towards work instruction, OHS, worker welfare, grievance mechanism and environment aspects, as well as facilities provided by the company.
- **Chemical Warehouse.** Observation and interview related understanding towards work instruction, OHS, worker welfare, grievance mechanism and environment aspects, as well as facilities provided by the company.
- **Logistic Warehouse.** Observation and interview related understanding towards work instruction, OHS, worker welfare, grievance mechanism and environment aspects, as well as facilities provided by the company.
- **Workshop Central.** Observation and interview related understanding towards work instruction, OHS, worker welfare, grievance mechanism and environment aspects, as well as facilities provided by the company.
- **Oil Warehouse.** Observation and interview related understanding towards work instruction, OHS, worker welfare, grievance mechanism and environment aspects, as well as facilities provided by the company.
- **Schedule Waste Storage.** Observation and interview related understanding towards work instruction, OHS, worker welfare, grievance mechanism and environment aspects, as well as facilities provided by the company.
- **Rinse House and PPE Storage.** Observation and interview related understanding towards work instruction, OHS, worker welfare, grievance mechanism and environment aspects, as well as facilities provided by the company.

PT Sembada Sennah Maju (Sennah Estate)

- **Circle and Path Spraying Block D10 Division 2.** Observation and interview related worker welfare, BMP, OHS and environment aspects.
- **Harvesting and Loose Fruit Picking Block D8 Division 2.** Observation and interview related worker welfare, BMP, OHS and environment aspects.
- **Nursery.** Observation and interview related source of seeds.
- **Fire Tower.** Observation related fire emergency equipment and OHS aspects.
- **Barn Owl Box No. 2 Block A2 Division 1.** Observation related biological pest management.
- **Temporary Hazardous Waste Storage.** Observation and interview related hazardous waste management.
- **Warehouses (Chemical, Fertilizer, Material, Lubricants).** Observation and interview related worker welfare, BMP, OHS and environment aspects.
- **Mixing and Rinse House.** Observation and interview related worker welfare, BMP, OHS and environment aspects.
- **HGU Pole No. 25, 26, 27.** Observation the conditions and position of legal boundary.
- **HCV (Swamp Area) Block E 08/09.** Observations related management of conservation areas and HCV attributes.
- **Housing Area Division I (Sennah).** Observation and interview with residents about housing facilities, domestic waste management.
- **Landfill Area.** Observation of domestic waste management.
- **Daycare.** Observation related to the condition of the facilities, employment and OHS aspects.

	<ul style="list-style-type: none"> • Clinic. Observation and interview with worker related to clinic condition, OHS, and environmental aspects. • River Osmosis Installation. Observations and interviews related to procedure implementation, clean water supply, and employment aspect.
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA 2.1	<p>Summary of stakeholder consultation process for PT Pangkatan Indonesia, PT Bilah Plantindo and PT Sembada Sennah Maju was held by:</p> <ul style="list-style-type: none"> • Public Notification on website on RSPO and MUTU Website on 19 June 2023. • Public consultation with NGOs (by email) such as WWF, WALHI, AMAN, and Sawit Watch on 26 June 2023 • Public consultation meeting with government institution in Labuhanbatu District (Land Agency, Plantation Agency, Manpower Agency, and Environmental Agency) on 04 July 2023 • Public consultation meeting with communities (<i>Kelurahan</i> Negeri Lama, Kampung Bilah Village, and Sidorukun Village) on 04 July 2023 • Public consultation meeting with internal stakeholders (Gender Committee, Worker Cooperative, and Worker Union) and contractor (CV Anugrah, CV Rongoh Abadi, and CV Teng Gaes Jaya) 04 and 06 July 2023 <p>Numbers of input from stakeholders were clarified by PT Pangkatan Indonesia, PT Bilah Plantindo and PT Sembada Sennah Maju.</p>
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit (ASA-2.1) will be conducted eight (9) months to twelve (12) months after date of certificate.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Pangkatan POM – PT Pangkatan Indonesia, MP EVANS Group PLC operation consisting of one (1) mill and three (3) oil palm estates.

During the assessment, there were No Nonconformities were assigned against Major Compliance Indicator, No Nonconformities were assigned against Minor Compliance Indicators and there are four (4) opportunities for improvement were identified.

MUTUAGUNG LESTARI found that Pangkatan POM – PT Pangkatan Indonesia, MP EVANS Group PLC 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 Governor on 12th 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 Certification Unit has procedure Information Transparency (PI/SOP/General-02) which explains the process of implementing the provision of information to relevant stakeholders in accordance with the principles of FPIC (free, prior, and informed consent). It was also explained that the company has appointed person in charge in the request for information from stakeholders. Separately, in the document transparency list documents for PT Pangkatan Indonesia 2023, it is stated that there are 52 types of documents that can be accessed by the public, including the period of storage, level of importance, period of providing information, and types of documents that cannot be provided to the public. Examples of documents that can be provided: <ul style="list-style-type: none"> • Company Vision & Mission • Company policy • Company Information • UKL-UPL Report • CSR • HCV Report • SIA report • Review Management • HGU permit • PKB For example, periodically, unit certification sends monitoring and management documents to the related institutions such as; Environment Agency, BKSDA, and Manpower Office.		
1.1.2 Based on document verification, all public documents (explained in 1.1.1) are accessible to relevant stakeholders by submitting an official letter of request for information. All information is provided in Bahasa.		

For example, are:

Environmental Aspect

PT Pangkatan Indonesia

- RKL-RPL Report Semester 2 of 2022 to the Head of DLH Labuhanbatu Regency and North Sumatera Province on 07 February 2023
- Hazardous Waste Report for Quarter I of 2023 with ID TTE 1681528452-5200, which was reported to KHLK and proof of delivery of the report to DLH Labuhanbatu Regency and DLH North Sumatera Province on 09 May 2023.
- POME Management Report for Quarterly I of 2023 to DLH Labuhanbatu Regency and DLH North Sumatera Province on 15 May 2023.
- PT Pangkatan Indonesia's HCV High Conservation Value Management for the period October 2021 - November 2022 which were reported on 07 December 2022 to the BKSDA of North Sumatera Province, the Labuhanbatu Regency Environmental Service.

PT Bilah Plantindo

- RKL-RPL Report Semester 2 of 2022 report to the Head of DLH Labuhanbatu Regency, and North Sumatera Province on 07 February 2023.
- E-reporting via SIMPEL for Hazardous Waste Management with ID No. 1681528452-5200 to DLH Labuhanbatu Regency, DLH North Sumatera Province and KLHK for the first quarter of 2023 on 15 April 2023.
- E-reporting via SIMPEL for Hazardous Waste Management with ID No. 1681528452-5200 to DLH Labuhanbatu Regency, DLH North Sumatera Province and KLHK for the fourth quarter of 2022 on 16 January 2023.
- E-reporting via SIMPEL for Hazardous Waste Management with ID No. 1665667108-5200 to DLH Labuhanbatu Regency, DLH North Sumatera Province and KLHK for the third quarter of 2022 on 11 October 2022.
- PT Bilah Plantindo's High Conservation Value HCV Management Implementation Report which also discusses the results of monitoring (field observations) of plant and animal species for the period October 2021 – November 2022 which were reported on November 23, 2022, to the BKSDA of North Sumatera Province, the Labuhanbatu Regency Environmental Service.

PT Sembada Sennah Maju

- RKL-RPL Report Semester 2 of 2022 report to the Head of DLH Labuhanbatu Regency and North Sumatera Province on January 19, 2023 (No. 25/SNE/UKL-UPL/I/2023).
- E-reporting via SIMPEL KLHK with TTE ID: 1675927947-5201 on February 9, 2023.
- E-reporting via SIMPEL for Hazardous Waste Management with ID No. 1686802152-3445 to DLH Labuhanbatu Regency, DLH North Sumatera Province and KLHK for the first quarter of 2023 on 15 June 2023.
- E-reporting via SIMPEL for Hazardous Waste Management with ID No. 1672884463-3445 to DLH Labuhanbatu Regency, DLH North Sumatera Province and KLHK for the fourth quarter of 2022 on 05 January 2023.
- E-reporting via SIMPEL for Hazardous Waste Management with ID No. 1665801477-3445 to DLH Labuhanbatu Regency, DLH North Sumatera Province and KLHK for the third quarter of 2022 on 15 October 2022.
- PT Sembada Sennah Maju High Conservation Value HCV Management Implementation Report which also discusses the results of monitoring (field observations) of plant and animal species for the period October 2021 – November 2022 which were reported on 01 December 2022 to the BKSDA of North Sumatera Province, the Labuhanbatu Regency Environmental Service.

Legal Aspect

- The report on the utilization of PT Pangkatan Indonesia's HGU for the 2022 period was reported to the Labuhanbatu District Land Office on January 25, 2023.
- The PT Bilah Plantindo HGU Utilization Report for the 2022 period was reported to the Land Office of Labuhanbatu Regency on February 2, 2023.
- The PT Sembada Sennah Maju HGU Utilization Report for the 2022 period was reported to the Land Office of Labuhanbatu Regency on February 7, 2023.
- The report on PT Pangkatan Indonesia's plantation business development activities for the second semester of 2022 was reported to the Agriculture Service for Plantation of the Labuhanbatu Regency on January 18, 2023.
- The report on PT Bilah Plantindo's plantation business development activities for the second semester of 2022 was reported to the Department of Agriculture for Plantation of Labuhanbatu Regency on February 2, 2023.
- The report on PT Sembada Sennah Maju's plantation business development activities for the second semester of 2022 was

reported to the Agriculture Service for Plantation of Labuhanbatu Regency on January 19, 2023.

- Investment activity report for Quarter 1 of 2023 PT Pangkatan Indonesia (Mill and Estate) with date received 05 April 2023 by the Ministry of Investment/BKPM.
- Report on investment activities for the 1st Quarter of 2023 PT Sembada Sennah Maju with the date received 05 April 2023 by the Ministry of Investment/BKPM.
- Report on investment activities for the 1st Quarter of 2023 PT Bilah Plantindo with date received April 5, 2023, by the Ministry of Investment/BKPM.

Occupational Health and Safety Aspect

Based on the results of document review and interviews with agencies in Labuhanbatu District for example Plantation Service, the Environment Service, the Land Office, and the Manpower Office, it was known that the information presented by the certification unit has been presented in an appropriate language (Bahasa) and appropriate form. There is a sample document that informed the company is:

Pangkalan Estate and Mill

P2K3 Report First Quarter 2023 to the Department of Manpower and Transmigration of Sumatera Utara Province and the Labor Inspection Unit of Labuhanbatu District on April 10, 2023.

Bilah Estate

P2K3 Report First Quarter 2023 to the Department of Manpower and Transmigration of Sumatera Utara Province and the Labor Inspection Unit of Labuhanbatu District on April 10, 2023.

Sennah Estate

P2K3 Report First Quarter 2023 to the Department of Manpower and Transmigration of Sumatera Utara Province and the Labor Inspection Unit of Labuhanbatu District on April 10, 2023.

Worker Welfare Aspects

- The company has shown evidence of submitting information on employment data and its progress to the local Manpower Office once every 1 (one) year. For example, PT Pangkatan Indonesia's online Employment Report No. 21462.20230613.0002 dated 13 June 2023 with the obligation to report back on 13 June 2024.
- The company has shown evidence of submitting information on employment data and its progress to the local Manpower Office once every 1 (one) year. For example, PT Bilah Plantindo's online Employment Report No. 21471.20230320.0003 dated March 20, 2023 with the obligation to report back on March 20, 2024.
- The company has shown evidence of submitting information on employment data and its progress to the local Manpower Office once every 1 (one) year. For example, PT Sembada Sennah Maju's online Employment Report No. 21471.20220810.0001 dated 10 August 2022 with the obligation to report back on 10 August 2023.

1.1.3

From the results of the document review on the recording of incoming and outgoing mail logs from Unit of Certification in 2022-2023 (Pangkalan Mill, Pangkatan Estate, Bilah Estate, and Sennah Estate), there is a data request letter from the local government of Labuhanbatu district with letter No. 005/351/DPRD/2023, namely for units:

- Bilah Estate: on March 28, 2023
- Pangkatan Estate: on March 25, 2023

As an invitation and request for company data in the form of: HGU Permit, IPLC Permit, and Production Machinery Permit. The company did not reply to the letter, but immediately attended the invitation to the meeting on April 10, 2023, which took place at Commission I of the Labuhanbatu district DPRD.

1.1.4

Unit of Certification has SOP No. PI/SOP/UMUM-02 dated 04 September 2013 concerning Information Transparency. The SOP explains that every person and society have the right to freedom of requesting information without pressure from any party. Every time there is an information request, the information request must be written in the logbook. The parties that provide and respond to information are Head of Administration / Head of Section and Manager. Based on the SOP, the period of response to requests for

information is 2 weeks.

Based on verification document and interview with external stakeholders, management responds the information request no longer than 3 working days. Based on interviews with representatives of Sidorukun Village and Environmental Agency of Labuhanbatu Tamiang District, it is known that stakeholders know about the mechanism for delivering information.

1.1.5

Unit of certification has a recording of an updated stakeholder list made for PT Pangkatan Indonesia, PT Bilah Plantindo, and PT Sembada Sennah Maju and explains the name of the institution/organization, address, contact number and name of the serving personnel, such as contractors, labor unions, government institutions, villages around the company, etc. The person to be contacted clearly stated in the stakeholder list. From the results of interviews via telephone with stakeholders (e.g Manpower Agency, Environmental Agency, Kampung Bilah Village, Sidorukun Village, CV Rongoh Abadi, and CV Teng Gaes Jaya) referring to the list, it can be connected, and the information found is valid.

Status: Comply

1.2

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

1.2.1

The company has a policy regarding an honest and corruption-free business code of conduct which is contained in the Evans Group Indonesia Sustainability and Business Ethics Policy which was published in October 2021. This policy applies to all the Group's operational areas in Indonesia. Subsidiaries, employees, contractors, consultants and group guests must comply with this policy. This policy is freely available on the Group's website and is regularly updated to reflect changes in applicable regulations and standards. The policy deals with transparency and complaints; occupational Health and Safety; anti-bribery and anti-corruption as well as workers' rights.

Based on the results of interviews with the Village Head of Negeri Lama Village, the Head of Sidorukun Village and the Head of Kampung Bilah Village, information was obtained that the company has routinely conducted consultations and outreach including the Company's Code of Ethics.

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

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

- Carried out through monitoring complaints that explained on procedure of grievances or complaint which presented in document No. PI/SOP/Umm-02 to submit complaints including complaints of violations of the code of ethics. Based on log book of complain, it is known that there were no complaints regarding violations of the code of ethics.
- Through internal audits which are conducted regularly every year. For example, the RSPO Mill Internal Audit was conducted on 05 - 10 November 2022 and the Pangkatan Estate was conducted on 01 - 03 November 2022, the Bilah plantation on 04 - 07 November 2022, and the Sennah Estate on 08 - 10 November 2022.

Based on the interviews with mill and estate workers known that information was obtained that there was no charge to employees or deductions to employee wages. In addition, the average employee who enters the certification unit is done individually without going through the agent/ labour supplier.

Status: Comply

PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS

2.1

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

2.1.1

The company has list of regulations of 2022 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

The company shown evidence over its compliance toward the applicable regulation related to the aspects of land legality (HGU and IUP). As for the land cultivation permit, Certification Unit has owned the Plantation Business Permit, namely:

- PT Pangkatan Indonesia: Plantation Business Registration Letter (SPUP) No. 211/Menhutbun-VII/2000 dated March 10, 2000 on behalf of PT Pangkatan Indonesia covering an area of 2,586 ha issued by the Ministry of Forestry and Plantations of the Republic of Indonesia.
- The company also has a Decree of the District Head of Labuhanbatu Number 593/464/HUKUM/2003 concerning the Granting of Principle Permits for the Location of Palm Oil Mills for PT Pangkatan Indonesia in the Plantation Village of Pangkatan, District of Pangkatan, Regency of Labuhanbatu on November 6, 2003, which explains that granting Principle Permits for Palm Oil Mills for PT Pangkatan Indonesia Pangkatan Plantation with a Capacity of 40 Tons of FFB/Hour. In addition, there is also a Labuhanbatu Regent Permit No. 503/465/HUKUM/2003 concerning Business Permits for the Plantation Industry of PT Pangkatan Indonesia in the Plantation Village of the Pangkatan sub-district Pangkatan Labuhanbatu Regency on November 6, 2003, which explains that PT Pangkatan Indonesia was granted a business permit for the plantation industry Palm Oil Factory. (Mill)
- PT Sembada Sennah Maju: Plantation Business Registration Letter (SPUP) No. HK.350/201/Bun.5/III/2001 Dated March 16, 2001, on behalf of PT Sembada Sennah Maju (Sennah Estate) Issued by the Director General of Plantations (on behalf of the Minister of Forestry and Plantations) Covering an area of 1,586 Ha Located in Bilah Hilir Sub District, Labuhanbatu District, Sumatera Utara Province. Then there is a Letter of Statement No: 522,525/525/1443/V/2014, dated December 3, 2014, from the Forestry and Plantation Service of Labuhanbatu District which explains that the Plantation Business Registration Letter No: HK.350/201/Bun.5/III/2001 has an area of not true. The correct one is 1,813.40 Ha.
- PT Bilah Plantindo: Plantation Business Registration Letter (SPUP) No. 212/Menhutbun-VII/2000 dated March 10, 2000, on behalf of PT Bilah Plantindo (Bilah Estate) issued by the Director General of Plantations (on behalf of the Minister of Forestry and Plantations). In the decree, it is stated that the types of plants permitted are Palm Oil with an area of 2,960.61 Ha located in Bilah Hilir Sub District, Labuhanbatu District, Sumatera Utara Province.

BMP

In best management practices, it is known that plantation and mill management have implemented several laws and regulations in Indonesia, for example, having to use mechanical or non-burning methods during land clearing, the oil palm planted comes from seed producers, which are recognized by the Indonesian government. Furthermore, the plantations (every management unit) have implemented integrated pest control, biological control and only use pesticides registered on the government website pesticide.id.

OHS

In the OHS Aspect, the certification unit has established a committee structure for occupational health and safety in each management unit and this committee has received approval from the Labuhanbatu District Manpower Office which has provided emergency and other facilities as well as related operator certificates in each unit are in accordance with the applicable laws and regulations and the license is still valid.

Operator License

For example, it is indicated by a class I boiler operator license Number Reg P.12.3221.OPK3-PUBT-B.I / XII / 2018, Plate welder with license no 28900.7212.00.0.0069241.2022. The company also has monitoring of operator license validity period. Based on this monitoring, it is known that several licenses have expired, however, a certificate of the SIO extension process can be shown by the occupational health and safety service companies which extends, for example Certificate Number Reg P.12.3220.OPK3-PUBT-B.I / XII / 2017 from PT Lentera Safety regarding the extension of the license Boiler operator.

Worker Welfare

- The company has ensured that work is still not carried out by workers with temporary worker and daily worker status.
- The company has registered all employees in the Health and Employment BPJS program.
- All workers have copies of employment relations documents.
- The company has ensured that workers receive wages not lower than the minimum wage.

Environmental aspects:

PT Pangkatan Indonesia

- Environmental permits contained in the Revised Environmental Management Efforts (UKL) and Environmental Monitoring Efforts

(UPL) for Oil Palm Plantations with an area of 2,586.03 and Palm Oil Mills with a Production Capacity of 40 Tonnes/Hour and Composting in the Pangkatan Plantation Village, Pangkatan District, Labuhanbatu Regency, North Sumatera Province and has been approved by the Environmental Agency of Labuhanbatu Regency with Number 04/UKL-UPL on 08 July 2010.

- Water Resources Exploitation Permit (PB-UMKU) against Technical Recommendation No. 610/2513/III/2022 dated 25 November 2022, with a water source from Sei Kundur in the Plantation Village of Pangkatan, District of Pangkatan, Labuhanbatu Regency, North Sumatera dated 21 December 2021 valid until 21 December 2024.
- Permits and Temporary Storage for hazardous waste Based on the Decree of the Head of the Investment and DPMPTSP of Labuan Batu Regency Number. 503.660.31/205/DPMTSP-BP2MNP/2020 dated 7 September 2020 valid for 5 years.

PT Bilah Plantindo

- Environmental permits of UKL-UPL revision documents which have been approved by the Head of the Labuhanbatu Regency Environmental Agency, number 660/223/BLH-LB/AM/2012 on May 14, 2012, with operational areas covering an area of 2,961 ha.
- Permits and Temporary Storage for hazardous waste based on the Decree of the Head of the DPMPTSP of Labuan Batu Regency Number. 503.660.31/204/DPMTSP-BP2MNP/2020 dated September 7, 2020, valid for 5 years.

PT Sembada Sennah Maju

- Environmental permits of UKL-UPL revision documents which have been approved by the Head of the Labuhanbatu Regency Environment Agency, number 660/215/BLH-LB/AM/2012 on May 14, 2012, with operational areas covering an area of 1,813.40 ha.
- Permits and Temporary Storage for hazardous waste based on Decree of the DPMPTSP of Labuhanbatu Regency Number 503.660.3/137/DPMTSP-BP2MNP/2021 dated February 10, 2021.

2.1.2

Procedure of legal requirement which presented in document No: PI/SOP/Umum-01; SSM/SOP/Umum-01; BP/SOP/Umum-01, dated 2 May 2011 mentioned that legal/HR manager, manager RSPO and staff RSPO has responsibility to arranged and monitored legal related laws and/or regulation. The implementation of this procedure is the issuance of a law register document containing regulations that must be fulfilled and relevant to the company's operational activities, including for third parties working with the company (contractors). The law register is divided into several aspects, namely: Occupational safety and health, the environment, employment, and plantations. To ensure whether there are additions and subtractions to relevant regulations, a review is conducted every once a year with the last updated in 2023. The company have shown list of updated regulation related to the field of employment, environment, HCV, OHS, and legality of land use.

In addition, companies can show documents evaluating the results of contractor work assessments, for example for PT Rongoh Abadi evaluation date January 9 - May 8, 2023, which contains indicators such as BPJS registration for contractor workers, no child labor under 18 years old, ensuring there is no environmental pollution, workers have earned wages not lower than the minimum wage, etc.

2.1.3

Procedure of legal boundary poles monitoring, and maintenance is presented in document No. LGL-SOP02-01, dated 1 October 2019. Procedure mentioned that maintenance was carried out by field head assistant and assistant, Estate Manager and Department Sustainability. Monitoring the boundaries of the HGU is done every 6 months. Based on monitoring in Semester 1 2022 it was known all boundaries poles in each estate are available and the conditions was good with well maintained.

Field observations to several HGU boundary markers in Pangkatan Estate (No.36; 37; 38; 11; 12; 13), Bilah Estate (No. 03, 04, 05; 35 and 36), Sennah Estate (No. 25; 26; 27) it was known if the boundaries pile is available in the field and well-maintained. Verification using GPS indicates that the pole coordinate is in accordance with the provisions of the land.

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 company already has a list of contractors and suppliers who work with the company which is contained in the most recent

Stakeholder List document, for example as follows:

- PT Bilah Plantindo has 13 local suppliers and 4 contractors (FFB transportation, replanting work, LB3 transportation and sampling).
- PT Pangkatan Indonesia has 9 local suppliers, 3 FFB suppliers and 4 contractors (FFB transportation, school bus transportation, LB3 transportation and sampling).
- PT Sembada Sennah Maju has 10 local suppliers and 1 contractor.

2.2.2

Separate clauses regarding the fulfillment of relevant legal obligations are included in all contracts with contractors and FFB suppliers, for example in the Work Agreement Letter between PT Bilah Plantindo and PT Rongoh Abadi No. BP/BIE/01/2023/0005-REPLANTING is contained in Article 9 "Provisions for the Implementation of Work" which briefly states *"the second party is obliged to comply with the applicable provisions, including the rules contained in the RSPO; ISPO rules and ISCC rules."*

In addition, companies can show documents evaluating the results of contractor work assessments, for example for PT Rongoh Abadi evaluation date January 9 - May 8, 2023, which contains indicators such as BPJS registration for contractor workers, no child labor under 18 years old, ensuring there is no environmental pollution, workers have earned wages not lower than the minimum wage, etc.

2.2.3

Separate clauses prohibiting practices involving child labour, forced labour, and workers from human trafficking have been included in the employment contract. For example, in the work contract between PT Bilah Plantindo and PT Rongoh Abadi No. BP/BIE/01/2023/0005-REPLANTING is contained in Article 7 *"Jamsostek and Manpower"* which briefly explains, including:

- In carrying out work, the Second Party must provide its own workforce and the Second Party must comply with applicable labor laws and regulations and follow the terms and/or regulations set by the First Party.
- The Second Party is required to pay wages to its workforce in accordance with the Second Party's work agreement with its workers and submit proof of payment to the First Party.
- The Second Party is prohibited from employing children (child workers) with a minimum age limit of 18 years in accordance with the laws and regulations and policies of the First Party.

In addition, based on the results of interviews with the Labuhanbatu District Manpower Office, information was obtained that so far there have been no complaints related to indications of practical actions involving child labor, forced labor, and workers from human trafficking in the company's operational activities.

Status: Comply

2.3

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

2.3.1

The unit of certification can present list of FFB supplier that accepted by mill that divided with direct and indirect supplier, as mentioned below:

1. Direct Supplier

The direct supplier of FFB that accepted in Pangkatan Mill originally from its own estate under the scope of certifications, Namely

- Bilah Estate (PT Bilah Plantindo) → RSPO Certified
- Pangkatan Estate (PT Pangkatan Indonesia) → RSPO Certified
- Sennah Estate (PT Sembada Sennah Maju) → RSPO Certified

2. Indirect Suppliers

- Dewi Maya (Non-Certified RSPO)
- CV Teng Gaes Jaya (Non-Certified RSPO)
- Koperasi Anugerah Keluarga Mandiri (Non-Certified RSPO)

2.3.2

Based on explanation on indicator 2.3.1 it was known there are six (6) indirect FFB suppliers in Pangkatan Mill, during this assessment the mill unable to fulfil the requirement of this indicator by November 2021. As RSPO Announcement on 15 February 2022 regarding

Interim Measure for Fulfilment of Indicator 2.3.2 of the 2018 RSPO Principles & Criteria — On Legality of Indirect FFB Supplies, Pangkatan Mill has been registered their case to RSPO on 20 October 2022 by sending an email to certification@rspo.org and it has been registered through notification emails on 20 October 2022 which described if the company's case has been registered in our (RSPO) record.

Based on document verifications there are several obstacles during traceability as follows manpower from the company, reluctance of farmers related to providing information to companies (concerns), uncertain supplier dynamics between vendors, farmers sending FFB to several vendors/suppliers in accordance with higher FFB Prices and distribution of farmers.

When the ASA 2.1 assessment is carried out, the company can show progress in completing the requirements for indicator 2.3.2, namely:

- FFB supplier CV Teng Gaes Jaya with a total of 26 farmers with land ownership documents in the form of SHM and SKT. For geolocation information, for example, for farmers on behalf of Iswandi with coordinates 99°55'40.85"E dan 2°5'2.67" N.
- Supplier of FFB from Anugerah Keluarga Mandiri Cooperative with a total of 5 farmers with land ownership certificates in the form of SHM and SKT. For geolocation information, for example for farmers on behalf of Mistoni with coordinates 100°01'50.38"E dan 2°4'11.91" N.

Based on the results of interviews with company representatives, it is known that the company will continue to complete the requirements for indicator 2.3.2 until November 2023. Based on this explanation, the company has the opportunity to ensure that the requirements for indicator 2.3.2 have been fulfilled 100%. (OFI)

Status: Comply

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

3.1

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

3.1.1

The Company shows the Long-Term Plan as stated in the 2023-2028 Long Term Projection document for each plantation and mill. The document contains information about the plantation business including maintenance costs, fertilizing costs, harvesting costs, transportation costs, depreciation, FFB production, OER, KER, CPO production, kernel production, production prices, CPO prices, company profits, Purchase of Plasma Farmers, etc. The annual plan is also evaluated annually and compared with its realization. Annual plans can be adjusted based on field conditions, financial conditions or other reasons. The plantation and mill management unit stated that the long-term plans mentioned above can be changed and reviewed annually by management taking into account actual trends and dynamic situations that are expected to change in the future. The Sustainability Department together with the Estate and Mill Management is responsible for ensuring that all technical implementation is in accordance with procedures, which aims to achieve optimal results for budget fulfillment purposes through monitoring, training and outreach.

Based on the description above, it can be concluded that the company can prove that it has a record of planning, monitoring and evaluating the plantation business.

3.1.2

The company already has a replanting plan as stated in the 2023 - 2035 Long Term Replanting Projection document. The document explains that the replanting plan that the company will carry out will be carried out in 2023-2035 for the planned replanting of Bilah Estate in 2023 covering an area of 173 Ha. As for the Estate Pangkatan, the plan for replanting will be carried out in 2025 and for the Sennah estate there are no plans for replanting until 2028 because the plants still productive. The plan is prepared based on the results of an annual evaluation which is carried out by considering the production of FFB from the oldest plants.

3.1.3

Records of periodic evaluations contained in the Management Review document conducted on 17 February 2023. These records inform the annual plans that have been prepared and evaluate their achievements and see the conformity of the implementation of operational activities and their budgets in the field with ISPO, RSPO and ISCC certification.

Status: Comply

3.2

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

3.2.1

The company has carried out an internal audit which was conducted on 23-29 May 2023. The results of the internal audit are as follows:

- Pangkatan Estate there are 9 discrepancies and have been corrected on June 10, 2023.
- Pangkatan Mill there are 5 discrepancies and have been corrected on June 10, 2023.
- Bilah Estate there are 11 discrepancies and have been corrected on June 10, 2023.
- Sennah Estate there are 8 discrepancies and have been corrected on June 10, 2023.

The company has also conducted a management review which was conducted on June 19, 2023, with discussions such as follow-up on internal audit results, suggestions for improvement, customer satisfaction, programs and targets for 2023, and conclusions.

The company has a record of implementing continual improvement. In the Best Management Practices Aspect, for example, the Plantation has a strategy of installing fruit traps and natural predators (cycanus) to control moths (fire worm moths or insect worms) related to time efficiency and increased safety during installation. For the OHS aspect, the company has identified needs and conducted training for workers who are required to have special competencies as regulated in regulations such as steam aircraft operators, lift transportation operators, OHS experts, and diesel motor operators.

Environmental Aspects

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:

- Management and monitoring of fires in company border areas that benefit the community.
- The HCV Management Plan improved in terms of both the quantity and the quality of monitoring.
- Ambient in air quality management and monitoring through road maintenance, air quality testing and reporting to the Environmental Agency
- Management and monitoring of surface water through testing ground water quality and reporting it to the Environmental Agency
- Hazardous waste management through Hazardous Waste Storage in permitted, management and monitoring of Hazardous waste also reported to the Environmental Agency.
- Greenhouse Gas (GHG) Management. Implement a zero-burning policy, regular engine maintenance, and regular emission quality tests.

3.2.2

Certification Unit already has an annual report document using the RSPO metric template format that has been provided to the auditor team at the time of the assessment. The summary in the report, for example, is as follows:

Name of RSPO Member	: MP Evans Group PLC
RSPO Membership Number	: 1-0027-06-000-00
Name of Certified Unit	: Pangkatan Palm Oil Mill
Name of Certification Body	: Mutu Certification International
RSPO Palmtrace ID Number	: RSPO_PO1000000283
Number of Mills	: 1
Number of Estates	: 3
Production Area (ha) - Estate	: 6,427
High Conservation Value (HCV) Area (ha)	: 52.4
Peatlands - Planted (ha)	: 821.66

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

The company has oil palm cultivation and processing procedures (SOPs) which are available in Indonesian. Cultivation procedures regulate activities ranging from land clearing, seeding, planting, maintenance, harvesting, delivery of FFB to factories to replanting, while processing procedures regulate activities from FFB receipt to product quality testing. SOP has covered key processes such as harvesting, transportation, fertilization, IPM, GAP, and SCCS). The SOPs that are owned are as follows:

SOP Estate			
No	Number Document	Name Document	Date
1	IDN-AGR-SOP01-01	Nursery	03 March 2020
2	IDN-AGR-SOP02-01	Land Clearing	03 March 2020
3	IDN-AGR-SOP03-01	Palm Oil Planting	03 March 2020
4	IDN-AGR-SOP04-01	LCC Planting	03 March 2020
5	IDN-AGR-SOP05-01	Water and Soil Conservation	03 March 2020
6	IDN-AGR-SOP06-01	Immature Plants	03 March 2020
7	IDN-AGR-SOP07-01	Pest and Disease Control	03 March 2020
8	IDN-AGR-SOP08-01	Maintenance of Mature	03 March 2020
9	IDN-AGR-SOP09-01	Fertilization	03 March 2020
10	IDN-AGR-SOP10-01	Harvest and Transport	03 March 2020
11	IDN-AGR-SOP11-01	Vehicles and Heavy Equipment	03 March 2020
12	IDN-AGR-SOP12-01	Replanting	03 March 2020
13	IDN-AGR-SOP13-01	Water Management	03 March 2020
14	IDN-AGR-SOP14-01	Compost App	03 March 2020
15	IDN-AGR-SOP15-01	POME Application	03 March 2020
SOP Mill			
1	SOP/4.1/15	Boiler Ash	15 July 2011
2	SOP/4.2/9	Production Loss Analysis	15 July 2011
3	SOP-LAB/4.1/8	Production quality analysis	15 July 2011
4	SOP/4.1/7	Boiler And Engine Room	15 July 2011
5	SOP/4.1/16	Grading	15 July 2011
6	SOP/4.2/4	Kernel Recovery	15 July 2011
7	SOP/4.1/4	Press	15 July 2011
8	SOP/4.2/3	Pressing	15 July 2011
9	SOP/4.1/12	Sounding	15 July 2011
10	SOP/4.2/2	Threshing	15 July 2011
11	SOP/4.1/2	Sterilizer	15 July 2011
12	SOP/4.3/5	Stock Opname	15 July 2011
13	SOP/4.1/3	Thresher	15 July 2011
14	SOP/4.1/8	Turbine	15 July 2011
15	SOP/4.1/9	WTP	15 July 2011

Procedures are available at the audit site (estate and mill offices) and are written in an Indonesian that is easy for workers to understand. Based on field observations at mills and plantations during the audit, it is known whether procedures have been implemented and workers can explain and demonstrate their work in accordance with procedures, referring to operational, safety and environmental best practices.

Based on the review of the procedure documents, it can be concluded that the agronomic, processing and safety procedures of oil palm are still relevant to the current situation and cover all major aspects from the field to the mill. All procedures are available in Indonesian. Likewise with the results of interviews with employees where the understanding of estate and mill employees on technical and safety matters is considered very satisfactory. All estate and mill procedures have not changed and are still the same as the previous year.

3.3.2

Companies use several methods to monitor the implementation of procedures. Among other things, an internal RSPO audit is conducted annually to monitor the implementation of procedures. Operational internal audit evaluates the operational implementation

and administration of plantations and mills. Meanwhile, RSPO internal audits evaluate the implementation of sustainability procedures in plantations and mills. Furthermore, management representatives (assistant, managers and relevant superiors) regularly visit the inspectorate to control the implementation of procedures. Internal supervision is carried out on a daily basis with supervisory levels starting from the Foreman, Assistant Division, Assistant Head, to the Plantation/Factory Manager.

Each unit has documented plantation operations and factory production such as daily reports, supervisor workbooks, etc. Site visits to factories show that the unit has documented daily activities in daily production reports which are documented using a computerized system. Based on the procedure, the certificate holder is known to routinely conduct internal audits. Internal audit is carried out by the Internal Auditor and is carried out 2 times in 1 year to carry out inspections related to the operations of the management unit (plantation and factory). The Company conducts RSPO internal audits regularly every year with the last internal audit being carried out on 01 - 03 November 2022 at the Pangkatan Estate and Bilah Estate conducted on 04 - 07 November 2022, Pangkatan Mill conducted on 05 - 10 November 2022 and for the Sennah Estate conducted on 08 - 10 November 2022.

For the 2023 internal audit will be carried out in July 2023 according to the internal audit schedule every 6 months. when the audit is carried out at the same time as the internal audit is carried out so that the internal audit will be carried out after RSPO audit activities completed.

Internal audit implementation includes several criteria including cash and bank administration, inventory administration, vehicle and heavy equipment asset administration, personnel and payroll administration, weighbridge administration, inventory, plant maintenance, plant production, wages and personnel.

3.3.3

Companies can show documents of internal audits of the RSPO management system carried out in each plantation. Based on the Internal Audit Discrepancy and Observation Forms, it is known that the unit is given corrective action a maximum of three months before the next internal audit period. Monitoring records and corrective actions have been observed, including RSPO Operations and Internal Audits, Monthly Reports, etc. For example, the RSPO Mill Internal Audit was conducted on 05 - 10 November 2022 and the Pangkatan Estate was conducted on 01 - 03 November 2022, the Bilah plantation on 04 - 07 November 2022, and the Sennah Estate on 08 - 10 November 2022. Operational audits are conducted every 6 months covering aspects of quality and quantity of harvest, fertilization, circle and lane quality, and harvest losses. All discrepancies have been followed up and fulfilled by each management unit. The audit has covered several aspects of the contractor such as minimum payments, payment grace periods, payment of work insurance and administrative records of warehouse stock.

The Company has conducted a management review according to the planned time, for example in the Minutes of the Management Review Meeting which was held on 17 February 2023.

The results of field visits and interviews with harvest supervisors show that they also record all operational activities for each activity and submit these reports every day to the field assistants. Daily reports describe the type of work, number of workers, material usage, and individual employee achievements. Furthermore, all operational activities of the company are recorded in the form of monthly reports for both plantations and factories. The operational activity report is a recapitulation of daily activities. The company also discusses each activity item. The evaluation mechanism for all operational activities, both plantations and factories, is carried out by the management. These reports are routine reports prepared by plantation and mill unit managers and submitted to top management.

Status: Comply

3.4

A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.

3.4.1

The certification unit has several documents related to social and environmental impact assessments which are carried out independently and in a participatory manner, involving affected stakeholders. The document covers the pre-construction activities, the operation stage and the post-operation stage. Some of the documents held by the certification unit include:

Environmental Impact Assessment (EIA)

The company already has an environmental impact analysis contained in several documents, including:

- **PT Pangkatan Indonesia (Pangkalan POM and Pangkatan Estate)**

The company already has an environmental permit document in the form of a UKL-UPL Revision document which has been approved by the Environmental Agency of Labuhanbatu Regency number 660/274/BLH-LB/AM/2010 on July 8, 2010. The operational area of the oil palm plantation is 2,586.03 ha and a palm oil processing factory with a capacity of 40 tons of FFB/hour and composting activities.

- **PT Bilah Plantindo (Bilah Estate)**

The company already has an environmental permit document in the form of a revised UKL-UPL document which has been approved by the Head of the Environmental Agency for Labuhanbatu Regency, number 660/223/BLH-LB/AM/2012 on May 14, 2012, with an operational area of 2,961 ha.

- **PT Sembada Sennah Maju (Sennah Estate)**

The company already has an environmental permit document in the form of a revised UKL-UPL document which has been approved by the Head of the Environmental Agency for Labuhanbatu Regency, number 660/215/BLH-LB/AM/2012 on May 14, 2012, with an operational area of 1,813.40 ha.

In general, the aspects that must be managed by the company based on the recommendations from the UKL-UPL study include:

- Testing the quality of river water, well water and water biota.
- Management of solid waste (EFB, fiber, shells, and sludge).
- Management of ambient air quality, noise, dust and odors.
- Management of domestic waste.
- Management of emissions from immovable sources or air pollution.
- Management of hazardous wastes and toxic.
- Management of surface water quality and ground water quality.
- Fire management.
- Management of job opportunities for the surrounding community.
- Community perceptions and OHS.

The company has not cleared new land since 2005, the company also has documents identifying areas with high conservation value for each estate which are divided into 3 documents. All studies were carried out by a consulting agency (Envirologic Consulting) from May to October 2011 led by Dr Sanath Kumaran who has been approved as HCV assessors. The identification activity used The HCV toolkit for Indonesia Version 2008. Based on the identification results, It is known that the total HCV area in the Pangkatan Estate is 38.40 Ha, PT Bilah Plantindo is 1.00 Ha, and Sennah Estate is 12.31 Ha. The total conservation area owned by the Pangkatan Mill certification unit is 52.40 Ha.

Social Impact Assessment (SIA)

Certification unit already conducted a Social Impact Assessment (SIA) for Palm Oil Plantations and Mills within the scope of Unit Certification Pangkatan POM that carried out by Envirologic Consulting in June 2011. The scope of the SIA 2011 study is for all company under Unit Certification Scope namely PT Pangkatan Indonesia, PT Bilah Plantindo, and PT Sembada Sennah Maju. Social impact assessment is included as part of Complementary to all environmental impact assessments. The assessment involved all parties affected by both internal and external stakeholders, including employees, workers union, village heads around the plantations and local NGOs. Participatory evidence with affected parties is shown in the form of attendance at FGD meetings and photos during interviews. The villages surrounding the company involved in the SIA study are:

- **PT Pangkatan Indonesia:** Sidorukun Village, Kampung Padang Village and Pondok Batu village, as well as workers of estate and POM.
- **PT Sembada Sennah Maju:** Perkebunan Sennah Village, Kampung Sennah Village, and Negeri Lama Village and plantation workers.
- **PT Bilah Plantindo:** Perkebunan Bilah Village, Bilah Hilir Village, and plantation workers.

Community representatives who became resource persons in this assessment were the village head, village secretary, *BPD*, hamlet head, traditional leaders, village midwives, and farmers/fishermen/laborers. The types of data collected were primary and secondary data. Primary data collection for monitoring social impact management was obtained from informants as the affected party as well as local village officials who represented the community and as verifiers. The secondary data or indirect data collection is in the form of evidence, notes, archives or published historical reports as well as references in the form of AMDAL, HCV documents, local

government literature, notes on CSR implementation and others.

The aspects of the assessment are Economic Life (Natural Potential, Livelihoods, Local Economy, Food Security, Vulnerable Groups, Company Contribution, Plasma Plantation Development) and Social and Cultural aspect. Meanwhile, another secondary data is obtained indirectly through intermediary media in the form of published evidence, records, archives, or historical reports. Retrieval of secondary data through literature studies. Secondary data is obtained from related units in order to document impact management as well as additional data from relevant affected parties. The reading material used is documentation of the implementation of impact management, internal company data, correspondence between the company and affected parties, and so on. Secondary data is also obtained from parties that are not directly related, such as sub-district data or news or pages from the media. Negative and positive issues were summarized during the assessment included management recommendations.

3.4.2

Environmental Impact Assessment (EIA)

Based on the results of document verification, it can be concluded that all management and monitoring parameters requested in environmental documents have been implemented. Based on the results of the evaluation, it is known that all parameters are still appropriate by the related Quality Standards, and there is no indication of contamination.

The implementation of environmental management has been carried out in accordance with all RKL-RPL documents and Environmental Permits owned by the unit of certification. The certification unit makes RKL-RPL reports based on attachment of Environmental Permit where the matrix is a compilation of all previously owned.

The environmental management report is carried out periodically and submitted to the relevant agency, can be proof with:

- **PT Pangkatan Indonesia:**
 - RKL-RPL report Semester 2 of 2022 to the Head of DLH Labuhanbatu Regency and North Sumatera Province on 07 February 2023
 - Report on the Implementation of High Conservation Value HCV Management of PT Pangkatan Indonesia for the period October 2021 – November 2022 which was reported on 07 December 2022 to the BKSDA of North Sumatera Province, Labuhanbatu Regency Environmental Service
- **PT Sembada Sennah Maju:**
 - RKL-RPL report Semester 2 of 2022 to the Head of DLH Labuhanbatu Regency and North Sumatera Province on 19 January 2023
 - Report on the Implementation of High Conservation Value HCV Management of PT Sembada Sennah Maju for the period October 2021 – November 2022, which was reported on December 1, 2022 to the BKSDA of North Sumatera Province, and the Labuhanbatu Regency Environmental Service
- **PT Bilah Plantindo:**
 - RKL-RPL report for Semester 2 of 2022 to the Head of DLH Labuhanbatu Regency and North Sumatera Province on 07 February 2023
 - Report on the Implementation of High Conservation Value HCV Management of PT Bilah Plantindo for the period October 2021 – November 2022 which was reported on November 23 2022 to the BKSDA of North Sumatera Province, Labuhanbatu Regency Environmental Service

Social Impact Assessment (SIA)

Review report on the management and monitoring plan of the social impact of oil palm plantations of PT Pangkatan Indonesia, PT Bilah Plantindo, and PT Sembada Sennah Maju for the 2021-2022 period. This study involved stakeholders related to the social impacts caused by unit of certification activities. The participant for SIA adequate compares their operational activities because already covered representatives from; affected parties, community leaders, women, local residents, youth leaders, contractors, and village representatives around the plantations and mills as well as internal company employees, includes Gender Committee, Union Representatives, residents in the employee housing area, women, and contractors, for example are:

- Sennah: held on 26 January 2023 attended by 30 participants from representative of Perkebunan Sennah Village, Negeri Lama Village, Kampung Jati Village, Kampung Nelayan Village, Sennah Village, EFB transporter, gender committee, cooperation, etc
- Pangkatan: held on 25 January 2023 attended by 21 participants from representative of Perkebunan Pangkatan Village, Sidodai Village, Sukamulia Village, Sidorukun Village, T. Tinggi Pangkatan Village, LKMD, BPD, NGO, contractor, gender committee, etc
- Billah: held on 27 January 2023 attended by 15 participants from representative of Perkebunan Bilah Village, Kampung Bilah

Village, Negeri Baru Village, Negeri Lama Village, gender committee, NGO, pers, contractor, etc

Related the opportunity of improvement from previous assessment, the company has developed the SIA monitoring with participated key of stakeholder wider so that social issues are discussed more comprehensively managed and documented.

In the 2021-2022 period, Unit Certification has managed social impacts on potential negative impacts identified from the results of the previous review.

Based on the information above, it can be concluded that the company already has the relevant documents assessment of social and environmental impacts and their management and monitoring plans by involving the participation of affected stakeholders.

3.4.3

Environmental Impact Assessment

The company has documents, the implementation of the results of the environmental permit including reports to agencies in the form of RKL-RPL documents which are conducted every semester and reported to related agency (explain in indicator 3.4.2). The effectiveness of environmental management and monitoring can be seen from the results of environmental management and monitoring analysis, which can also be seen from the suitability between the management and monitoring plans and their implementation in the field. The RKL-RPL document also shows that the company has managed all the critical impacts recommended in Environmental permits.

From field observation found that environmental management in accordance with the RKL-RPL by installing signboard for conservation areas, marking in the form of stakes, and red paint marks for spray-boundary areas and other chemical applications. Based on the results of interviews with sprayer and fertilizer workers, they also stated that they were aware of the prohibition on applying chemicals to the buffer zone marked in red. In addition, they do not apply chemicals when they are close to water bodies such as canals, reservoirs, or artificial ponds.

The unit of certification has carried out activities in order to maintain protected areas and High Conservation Values that has been stated in the 2021-2026 HCV Management Plan document with management scope and targets update every year which implemented in line according with the HCV management and monitoring plan period 2023 also reviewed periodically every year involved consultation with relevant stakeholders such as villagers around.

Social Impact Assessment (SIA)

The company has managed and monitored social impacts in accordance with what has been stated in the Social Impact Monitoring Report year period of 2021-2022. In general, social impact management activities have been carried out with the aim of reducing the identified negative impacts.

Based on SIA monitoring, it is known that the unit of certification has implemented social management programs through the CSR programs that have been implemented in 2022 for social, health, infrastructure, and economic aspect.

	Status: Comply	
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3.5

A system for managing human resources is in place.

3.5.1

The procedures governing recruitment, selection, and job acceptance are briefly contained in the Recruitment SOP document No. IDN-HRD-SOP01-01 dated 01 February 2021. The SOP document explains the stages of hiring *SKU* (Permanent Worker) and *PKWT* (Temporary Worker) workers, briefly explained as follows:

- Recruitment of new *SKU* employees must refer to the annual workforce plan approved by the President Director.
- Administrative data of applicants must be stored properly and correctly.
- Before starting work, prospective *SKU* employees must know and understand the contents of the CLA or Company Regulations (*PP*)
- Every new *SKU* employee must go through a probationary period of no longer than 3 (three) months and is counted as working period which is stated in writing and informed to *SKU* employees.
- The company prohibits and does not condone discrimination against race, caste, nationality, ethnicity, religion, disability, gender,

sexual orientation, union membership, political affiliation, or age in the form of worker selection and supports equal rights in obtaining job opportunities according to individual abilities.

- The company supports gender equality in recruiting and selecting new *SKU* employees.
- The acceptance of new *PKWT* employees at the company is adjusted to the needs of companies whose work is one-time (Project) or seasonal.

The procedure explains that the minimum age for workers is 18 years, recruitment information is done openly, recruitment is free of charge, and there is no retention of workers' personal documents.

In addition, the company also shows the Promotional SOP with No. IDN-HRD-SOP06-01 and SOP for Employee Assessment with No. IDN-HRD-SOP05-01 dated 01 February 2021. The SOP document for Employee Assessment explains the procedures for evaluating *SKU*, Staff, and appraisal flowcharts. The procedures for assessing *SKU* employees include the following:

- *SKU* employee assessment is carried out in order to measure the implementation of duties/responsibilities and work performance to determine the relative value (according to the assessment criteria)
- The *SKU* employees who are assessed are all *SKU* employees after passing the probationary period and/or *SKU* employees who are proposed to be promoted to a class or position at the time the evaluation is carried out by the company.
- Assessment is carried out by direct superiors and indirect superiors up to a higher level.
- The evaluation period for *SKU* employees is carried out from September 1 of the previous year to August 31 of the current year for *SKU* employees who are proposed to be promoted to a class or position.
- Assessment for *SKU* employees who have been transferred is carried out by the employee's supervisor, both the previous boss and the new boss, according to the length of time the person has worked in each unit.
- The supervisor's assessment of the transferred *SKU* employees is carried out before the employee concerned leaves the old location/work unit, and will be handed over to the supervisor at the new location/work unit.
- The assessment also considers absenteeism (M), tardiness (T), personal permit (P1), illness (S), and warning letter (SP).

In the Collective Labor Agreement between the company and the union for the 2021-2023 period which was ratified by the Labuhanbatu District Manpower Office, it also regulates employee retirement and layoff mechanisms.

Based on the results of interviews with both Mill and Estate workers (Harvesters, Sprayers, Daycare Worker, Mill Processing, etc.) as well as trade union representatives, information was obtained that workers had an understanding of the employment procedures set by the company.

3.5.2

Companies can show records of the implementation of employment procedures, for example:

Recruitment

- PT Pangkatan Indonesia
 - Job Vacancies "Bookkeeping" and "Office Boy"
 - Job Application Letter along with other supporting documents by workers with the initials "NAP" and Job Acceptance Letters on June 1, 2023.
- PT Bilah Plantindo
 - Backhoe Loader Helper Job Vacancy and minutes of posting of job vacancies in villages around the company on 22 February 2023.
 - Job application letter along with other supporting documents by workers with the initials "SFP" and SPK who are shown proof of handover on April 1, 2023.
- PT Sembada Sennah Maju
 - Weighbridge Clerk job application letter with the initials "HR" along with other supporting documents.
 - Acceptance letter for work on March 1, 2022, and proof of handover of work agreement letter on March 30, 2022.

Promotion

- Submission of appointment of 9 workers with *SKU-H* status at Bilah Estate (harvesters, carpenters, water supply workers, helper backhoe loaders and sprayers) on 30 June 2023, accompanied by the results of their job evaluation.

- Submission of appointment of 9 workers with *SKU-H* status at the Pangkatan Estate (harvesters, scouters, truck helpers, and JCB helpers) on 30 September 2022, accompanied by the results of their job evaluation.
- Submission of appointment of 3 workers with *SKU-H* status at Sennah Estate (security, OHS officers, and raiders) on January 28, 2023, accompanied by the results of their job evaluation.

Termination/ Pension

- Joint Agreement Letter between PT Pangkatan Indonesia and workers with the initial's "S" No. 002/SPB-PGE/III/2023 dated March 13, 2023, concerning termination of the employment relationship along with documentation of payment of pension/severance pay.
- Letter of Collective Agreement between PT Bilah Plantindo and workers with the initials "JG" No. 21/BIE/052023 dated 27 May 2023 regarding termination of employment relationship along with documentation of calculation and payment of pension/severance pay.
- The Joint Agreement Letter between PT Sembada Sennah Maju and the initial employee "Ir. P" No. 002/SPB-PGE/III/2023 dated March 13, 2023, concerning termination of the employment relationship along with documentation of the calculation and payment of pension/severance pay.

Status: Comply

3.6

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

3.6.1

The company already has an Occupational Health and Safety Policy. The company's OHS policy is listed in the Policy on sustainability and business ethics which includes:

- Ensure compliance with all laws and regulations relating to OHS.
- Ensuring a safe work system or pattern has been formulated and implemented properly and correctly.
- Ensure the implementation of training and supervision regarding OHS.
- Ensure the provision of good safety instructions or instructions in all aspects of operational activities.
- Ensure safe work procedures and emergency procedures are in place and implemented in all aspects of operational activities.

The company shows the updated Hazard Identification and Risk Assessment (HIRAC) Form on June 26, 2023 (Estate) and June 28, 2023 (Mill), prepared by the OHS Expert and approved by the Manager. During the audit, the company shows records of hazard identification and risk assessment (HIRAC) in each work unit including plantations and factories, with work activities/processes covering land clearing, seeding, planting, land maintenance, harvesting and transportation, fertilizing, spraying, warehouses, gas stations, hazardous waste warehouses, clinics, electrical installations, generator houses, lawn mowers, infrastructure (heavy equipment, road maintenance), infrastructure, plantation offices, workshops, harvesting mechanization, housing, fire patrols, environmental monitoring, process station, loading road, Sorting etc.

The Company has plans related to OHS in the workplace which aim to improve occupational health and safety, for example the 2022-2023 OHS program as follows:

- HIRAC Reviews and Updates
- OHS socialization OHS training.
- OHS meeting
- OHS inspection and monitoring.
- OHS reporting dissemination of medical check-up result
- Socialization of harvest activities

Based on interviews with sorting workers, sterilizer operators, boiler operators, machine room operators, kernel operators, and press station operators, it can be concluded that workers understand OHS policies and it is recognized that every morning meeting and socialization of OHS policies are always reaffirmed about the importance of OHS and the use of PPE at work and safety at work.

Based on the results of interviews with harvesting workers, warehouse operators, fertilizer warehouse workers, spraying workers and loaders, it can be concluded that workers understand the policy regarding OHS and it is recognized that every morning assembly is always reiterated about the importance of OHS and the use of PPE in work and the importance of periodic health checks

3.6.2

The company has an SOP for Medical Check Up for Workers with Number IDN-OHS-SOP04-03 dated 19 April 2023 which explains that periodic health checks are carried out in the form of a physical health check which is carried out at least once in 1 year. Special medical examinations are also carried out for workers with certain risks which are carried out at least once a year.

The company has conducted employee health checks for employees for the 2023 period, for example:

- The results of an audiometric examination conducted in May 2023 on 7 employees of the Estate Pangkatan with fit and fit results with a record of needing exercise.
- Results of an audiometric examination conducted in May 2023 on 5 Bilah Estate employees with decent work results.
- Results of audiometric examinations conducted in May 2023 on 97 Pangkatan Mill Employees with decent work results.
- The results of the Periodic Health Examination of the Pangkatan Estate which was carried out in May 2023 on 308 workers with healthy results for work.
- The results of the Bilah Estate periodic health check conducted in May 2023 on 411 workers with healthy results for work.
- Results of Sennah Estate's periodic health checks conducted in May 2023 on 279 workers with fit to work results.
- The results of the Pangkatan Mill periodic health checks conducted in May 2023 on 74 workers with healthy results for work.

Based on interviews with harvest sorting workers, sterilizer operators, boiler operators, machine room operators, kernel operators, and press station operators, it can be concluded that workers understand the policy on OHS and it is recognized that every morning call is always reiterated about OHS, the importance of OHS and the use of PPE in the workplace.

Interviews were conducted with harvesting, spraying and warehouse workers. Based on the results of the interviews, it can be concluded that the workers understand the policy regarding OHS and it is recognized that every morning assembly is always reiterated about the importance of OHS and the use of PPE in the workplace.

Monitoring the effectiveness and evaluation of realized programs, monitored and carried out through P2K3 meetings which are held every month. The company's P2K3 organization that is responsible for monitoring and implementing OHS in the company's environment.

Based on the results of field visits to warehouses and residential areas of the Pangkatan Estate, Bilah Estate, and Sennah Estate, the company has provided housing facilities for employees in good condition and well maintained and there are warning signs related to Occupational Health and Safety in several strategic locations and warnings regarding mandatory use personal protective equipment and speed limits. Currently the company has provided a special area for storing sharp work tools and not bringing them home (*dodos/egrek*) so they don't pose a hazard and are safer at work and work tools are given sharp diaper wrapping so as to reduce the effects of the hazard.

Status: Comply

3.7

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

3.7.1

The company has identified training needs for each of its workers and stakeholders (contractors/suppliers, local communities, etc.) according to the scope of work and activities, here are some of them:

- Firefighting training, HCV, animal mitigation, first aid, RSPO/ISPO/ISCC, gender committee, etc.
- Socialization of women's reproductive rights.
- Procedures for fertilizer, planting, replanting, harvesting, transporting FFB, etc.
- Emergency response training.

3.7.2

Companies can show records of training realization, for example:
PT Pangkatan Indonesia

- Records of consultation activities and socialization of the Vision & Mission, Procedures and Company policies to stakeholders (village communities, contractors, agencies, etc.) on January 25, 2023.
- Minutes of socialization of the committee on gender and sexual harassment to employees of the Pangkatan Estate on March 10, 2023.

PT Bilah Plantindo

- Records of consultation activities and socialization of Vision & Mission, Procedures and Company policies to stakeholders (village communities, contractors, agencies, etc.) on January 27, 2023.
- Minutes of harvester OHS outreach to Bilah Estate workers on 6 February 2023.

PT Sembada Sennah Maju

- Records of consultation activities and socialization of the Vision & Mission, Procedures and Company policies to stakeholders (village communities, contractors, agencies, etc.) on January 26, 2023.
- Minutes of employment SOP training for Sennah Estate employees on June 7, 2023.

Based on interview with workers on Estate and Mill (Harvester, Spraying Worker, Mill Process, etc), information was obtained that workers had received regular training related to their work, training on company procedures and policies, OHS, etc. In addition, workers already have an understanding of the work they do.

3.7.3

The certificate holder shows that they have properly documented every training and socialization activity that has been carried out to all workers, contractors and related stakeholders. SCCS training was conducted on 27 May 2023 for security, weigh stations, grading, analysis and CPO shipping operators. Based on interviews with workers involved in supply chain operations, such as security (to verify receipt of FFB), weighbridge operators (to divide the number of certified and non-certified sources), PICs linked to the supply chain have an understanding of supply chain mechanisms, and MB records been carried out and properly monitored.

Status: Comply
3.8
Supply Chain Requirements for Mills
3.8.1 and 3.8.2

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 FFB and products (CPO and PK) from certified and uncertified sources. The Mill only claims certified products from certified sources.

3.8.3

Estimated certified product recorded in the last assessment report. The estimates of certified production for the next license period describe at ASA-2.1 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 (19 Januari 2023 – 18 October 2023) (MT)	Actual (June 2022 – May 2023) MT	Projected Certified Volume (MT)
FFB Certified (MT)	195,000	186,368	193,000
CSPO (MT)	44,850	42,544.22	44,390
CSPK (MT)	9,750	9,531.49	9,650

Based on the table above, there is no overproduction carried out by the company. However, if the production of CSPO and CSPK is added to the Opening Stock, there is overproduction by the company, namely:

Products	Last Year Projected Certified Volume (19 Januari 2023 –	Actual (June 2022 – May 2023) + Opening Stock
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	18 October 2023) (MT)	MT
FFB Certified (MT)	195,000	186,368
CSPO (MT)	44,850	46,116.03
CSPK (MT)	9,750	9,775.28

The company has submitted an additional CSPO and CSPK quota to CB on July 6, 2023, with details:

- CSPO of 12,799 MT.
- CSPK of 3,050 MT.
- FFB of 54,463 MT.

3.8.4

The mill has been registered in IT platform palm trace RSPO <https://palmtrace.rspo.org/web/rspo/member-directory> which information as follows:

- Member Name: Pangkatan Palm Oil Mill
- License ID: CB141605
- Core Product: Palm Oil
- Member ID: RSPO_PO1000000283
- RSPO Membership Number: 1-0027-06-000-00 (M.P. Evans Group PLC)
- Type of Business: Oil Mill
- Supply chain model: Mass Balance

All transaction has been announced to RSPO IT Platform and confirmed shipped. During license it was known there is product sold as RSPO certified and non-certified/conventional as described in indicator 3.8.8 and 3.8.16. The company has been removed of certified stock for products sold as another scheme.

3.8.5

The Mill already has procedures related to supply chain, such as the RSPO Supply Chain SOP (No. IDN-SUS-SOP05-01 dated 25 January 2021). These procedures are in accordance with the latest RSPO Supply Chain System. The procedures cover all aspects of the MB SCCS model, such as receiving and recording that identify traceability of RSPO certified and non-certified sources and products, FFB processing, RSPO Palmtrace announcements, key people such as security, weighbridge staff, delivery/kernel officers. , production officers, Head of Administration, as well as training.

Based on field observations, information was obtained that key persons implementing SSCS (such as weighbridge operators, security guards, and Head of Administration) understand supply chain implementation. FFB from certified and non-certified sources is received and verified by a software program to classify and segregate RSPO certified and non-certified sources.

3.8.6

Internal audit mechanism and schedule is explained in the RSPO sustainability manual for palm oil mill (MNL/4.1/3) clause 4.0 who described if the company should conduct internal audit and preparation for external audit by independent CB. Internal audits include compliance, traceability and mass balance, SCCS audit and others should be carried out prior external audit by CB.

The company has carried out an internal audit which was conducted on 23-29 May 2023 include SCCS. The results of the internal audit are as follows:

- Pangkatan Estate there are 9 discrepancies and have been corrected on June 10, 2023.
- Pangkatan Mill there are 5 discrepancies and have been corrected on June 10, 2023.
- Bilah Estate there are 11 discrepancies and have been corrected on June 10, 2023.
- Sennah Estate there are 8 discrepancies and have been corrected on June 10, 2023.

The company has also conducted a management review which was conducted on June 19, 2023, with discussions such as follow-up on internal audit results, suggestions for improvement, customer satisfaction, programs and targets for 2023, and conclusions.

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:

Period	FFB (Ton)		
	Certified	Non-Certified	Total
June 22	19,137.82	83.43	19,221.25
July 22	17,697.52	1,723.22	19,420.74
August 22	20,280.35	4,131.87	24,412.22
September 22	18,615.85	5,154.08	23,769.93
October 22	16,026.89	5,274.53	21,301.42
November 22	16,028.53	5,626.24	21,654.77
December 22	13,990.19	5,297.85	19,288.04
January 23	14,051.62	6,505.42	20,557.04
February 23	11,231.65	5,749.07	16,980.72
March 23	12,024.56	5,264.32	17,288.88
April 23	11,058.64	4,546.69	15,605.33
May 23	16,224.38	4,106.48	20,330.86
Total	186,368.00	53,463.20	239,831.20

Estimated certified product recorded in the last assessment report. The estimates of certified production for the next license period describe at ASA-2.1 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 (19 Januari 2023 – 18 October 2023) (MT)	Actual (June 2022 – May 2023) MT
FFB Certified (MT)	195,000	186,368
CSPO (MT)	44,850	42,544.22
CSPK (MT)	9,750	9,531.49

Based on the table above, there is no overproduction carried out by the company. However, if the production of CSPO and CSPK is added to the Opening Stock, there is overproduction by the company, namely:

Products	Last Year Projected Certified Volume (19 Januari 2023 – 18 October 2023) (MT)	Actual (June 2022 – May 2023) + Opening Stock MT
FFB Certified (MT)	195,000	186,368
CSPO (MT)	44,850	46,116.03
CSPK (MT)	9,750	9,775.28

The company has submitted an additional CSPO and CSPK quota to CB on July 6, 2023, with details:

- CSPO of 12,799 MT
- CSPK of 3,050 MT
- FFB of 54,463 MT.

Mechanism to handling and control nonconformance product are described in SOP that regulating among others controlling / handling of raw materials received (FFB), product identification in process, control of final product to be shipped to buyer and controlling/handling the improper document. In the procedure described if any occurring of non-conforming of oil product or document, the product is not claimed to be an RSPO certified product.

3.8.8

Based on documents verifications, interview with management as well as verification through Palm Trace it was known during period June 2022 – May 2023 there are 9,035.67 MT CSPO; 9,386.09 MT CSPK and 36,552.72 MT CSPO sold under another scheme Sold under RSPO Certified. Based on documents verification, it was known that the CSPO and CSPK from the Mill were sold has met the requirements of certified product information. The selling documentations shown were contract agreement, delivery order, delivery ticket, report of loading, weighing minutes, weighing card, and delivery note. Those documents cover information of delivery date, description of product and supply chain model, product quantity, identification number (unique code), certificate number, sender name and address of the seller. For example, PK certified delivery on 31 March 2023 with shipping announcement TR-13a7afc2-8c66. The information provided on invoices are:

- The name and address of the buyer (PT Multimas Nabati Asahan-Medan);
- The name and address of the seller (PT Pangkatan Indonesia – Pangkatan Mill);
- The loading or shipment / delivery date (31 Januari – 03 February 2023);
- A description of the product supply chain model (MB);
- The date on which the documents were issued (26 January 2023);
- The quantity of the products delivered (250,000 Kg);
- Any related transport documentation (transport by PT Sumatera Sarana Sekar Sakti);
- A unique identification number (PGI-PK/DO/0123/0005);
- RSPO certificate number (Mutu-RSPO/051);
- etc.

3.8.9, 3.8.10 and 3.8.11

All the product, processing and other physical handling of certified product done and legally owned by the Pangkatan POM. Pangkatan POM is not outsourced activities to independent third parties, either subcontractors for storage, transport or other outsourced activities. The buyer takes the certified product directly in the Pangkatan POM.

3.8.12

The company has had the up-to-date record and report that are kept in mill office, complete, accurate and up-to date. All the record can be accessed by the auditor, such as record of certified product shipping, sales contract, delivery order/invoice, production report and product sales.

The Mill has SOP of Supply Chain RSPO No. IDN-SUS-SOP05-01 dated 25 January 2021, stated that all records shall be kept minimum for 10 years. To the auditors the company can show all the required documents covering all aspects of this RSPO Supply Chain Certification Standard requirements such as record of certified product shipping, sales contract, delivery order / invoice, production report and product sales. Based on document review known that the mill kept the document according to the procedure.

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):

Period	CPO Production (ton)			CSPO Despatch (ton)			
	Certified	Non-Certified	Total	RSPO	Other Scheme (ISCC)	Non-Certified	Total
Stock	3,571.81	174.82					
June 22	4,565.01	21.90	4,586.91	3,131.64	2,500.00	0.00	5,631.64
July 22	4,180.91	378.67	4,559.58	2,392.98	3,200.00	0.00	5,592.98

August 22	4,636.92	935.88	5,572.80	1,811.05	2,500.00	0.00	4,311.05
September 22	4,232.97	1,165.99	5,398.96	1,700.00	2,601.99	0.00	4,301.99
October 22	3,617.36	1,177.61	4,794.97	0.00	4,161.65	0.00	4,161.65
November 22	3,638.43	1,271.48	4,909.91	0.00	3,323.73	0.00	3,323.73
December 22	3,121.81	1,176.94	4,298.75	0.00	4,112.63	0.00	4,112.63
January 23	3,156.23	1,464.60	4,620.83	0.00	2,500.00	0.00	2,500.00
February 23	2,470.69	1,267.43	3,738.12	0.00	2,500.00	0.00	2,500.00
March 23	2,677.04	1,174.69	3,851.73	0.00	2,500.00	0.00	2,500.00
April 23	2,471.00	1,027.81	3,498.81	0.00	2,486.56	0.00	2,486.56
May 23	3,775.87	946.48	4,722.35	0.00	4,166.16	0.00	4,166.16
Total (Jun 2022 – May 2023)	42,544.22	1,2009.50	54,553.72	9,035.67	36,552.72	0.00	45,588.39
Grand Total	46,116.03	12,184.32	58,300.36	9,035.67	36,552.72	0.00	45,588.39

Period	PK Production (ton)			PK Despatch (ton)			
	Certified	Non-Certified	Total	RSPO	Other Scheme (ISCC)	Non-Certified	Total
Stock	243.79	35.26					
June 22	1,058.11	4.57	1,062.68	975.95	0.00	0.00	975.95
July 22	961.10	87.19	1,048.29	1,249.50	0.00	0.00	1,249.50
August 22	1,068.49	216.96	1,285.45	893.63	0.00	0.00	893.63
September 22	972.04	265.45	1,237.49	1,003.16	0.00	0.00	1,003.16
October 22	812.09	266.89	1,078.98	938.29	0.00	0.00	938.29
November 22	806.85	281.35	1,088.20	850.00	0.00	0.00	850.00
December 22	695.70	260.49	956.19	553.04	0.00	0.00	553.04
January 23	681.85	315.79	997.64	660.44	0.00	0.00	660.44
February 23	536.98	274.77	811.75	486.55	0.00	0.00	486.55
March 23	583.47	254.95	838.42	606.55	0.00	0.00	606.55
April 23	536.81	227.75	764.56	487.14	0.00	0.00	487.14
May 23	818.00	204.38	1,022.38	681.84	0.00	0.00	681.84
Total (June 2022 – May 2023)	9,531.49	2,660.54	12,192.03	9,386.09	0	0.00	9,386.09
Grand Total	9,775.28	2,695.80	12,471.08	9,386.09	0	0.00	9,386.09

3.8.13 and 3.8.14

Based on document verifications and interview with management it was known there is no conversion rate of production of CPO (OER) and PK (KER) that applied by the mill. The production of CPO (OER) and PK (KER) are based on actual daily, monthly, and yearly production. For example, for OER and KER in the period March 2023, OER is 22.28% and KER is 5.01%.

3.8.15

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

3.8.16

Documentation for the Sustainable Certified Product (CSPO and CSPK) consists of a daily record of the FFB acceptance, a daily record of certified production, which is classified as the CSPO and CSPK, a sales record, a stock record that has been reconciled with the FFB acceptance, monthly production and sale and annual recapitulation. Based on document verification and interview with management representative obtained information in last 12 months before audit (June 2022 – May 2023) it was known the product only sold under certified product as described in table below:

	Dispatch period (MT)	
	June 2022 – May 2023	Total
CSPO sold under RSPO Scheme	9,035.67	9,035.67
CSPO sold under other scheme	36,552.72	36,552.72
CSPO sold as conventional	-	-
CSPK sold under RSPO Scheme	9,386.09	9,386.09
CSPK sold under other scheme	-	-
CSPK sold as conventional	-	-

RSPO IT Platform member registration number for Pangkatan POM is RSPO_PO1000000283. 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 Multimas Nabati Asahan dated 29 March 2023 for 200 MT and transaction creates in IT Palm Trace dated 31 March 2023 with Transaction ID TR-22011097-869f.
- Certified PK sold to PT Multimas Nabati Asahan dated 20 February 2023 for 150 MT and transaction creates in IT Palm Trace dated 31 March 2023 with Transaction ID TR-a61ab1af-6ffd.

Removing Stock

Unit of certification sold all CSPK as RSPO product. For the CSPO that sold as other scheme or as conventional, the company has been removed the stock from the palm trace, as example remove stock of CSPO dated 31 March 2023 for 7,474.89 MT (transaction ID: ST-TR-03ce97f5-21a6).

3.8.17

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

Status: Comply

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

4.1

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

4.1.1

The Company had a Policy concerning on Sustainability and Business Ethics (October 2021). This policy applies to all operational areas of Evans Group Indonesia. The Group's subsidiaries, employees, contractors, consultants and group's guests are required to obey the policy. This policy is freely available on the Group's website and is regularly updated to reflect changes in regulations and standards. This policy deals with:

- Transparency and complaints.
- Occupational health and safety.
- Quality.
- Anti-bribery and anti-corruption.
- Responsibility of manpower (modern slavery, provision of a decent wage, affordable housing and food, sexual harassment, equality of opportunity and anti-discrimination, child labor, workers' cooperation).
- Worker rights (freedom of association, forced labor, reproductive rights).

In addition, companies can show records of the socialization of these policies to stakeholders, for example:

- Records of consultation activities and socialization of the Vision & Mission, Procedures and Company policies to PT Pangkatan Indonesia stakeholders (village communities, contractors, agencies, etc.) on January 25, 2023.
- Records of consultation activities and socialization of the Vision & Mission, Procedures and Company policies to PT Bilah Plantindo stakeholders (village communities, contractors, agencies, etc.) on January 27, 2023.
- Records of consultation activities and socialization of Vision & Mission, Procedures and Company policies to PT Sembada Sennah Maju stakeholders (village communities, contractors, agencies, etc.) on January 26, 2023.

4.1.2

Based on the results of interviews with stakeholders such as trade union representatives, workers both at the Mill and at the Estate, government agencies in Labuhanbatu Regency (Labor Office, Agriculture Service, Land Office and Environment Service), village representatives around the company (Sidorukun Village, Kampung Bilah Village, Negeri Lama Village), information was obtained that so far there has been no indication of violence or any form of intimidation by the company in its operational activities.

Status: Comply

4.2

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

4.2.1

The company already has a complaint handling system from stakeholders which is contained in the Internal and External Complaint SOP documents with No. PI/SOP/General-05 dated 25 April 2013 which is a reference in resolving every complaint both internally and externally (stakeholders) properly and quickly. The SOP states the procedure for handling conflicts as follows:

- Every complaint or complaint, both internal and external, must first be entered into the complaint book available at the office before further processing.
- In addition to the complaint book, the company also receives complaint letters or complaints from internal and external parties. Complaint letters or books are submitted through the respective unit heads.
- Within 2 weeks the head of the unit must seek a settlement by taking into account the existing facts.
- If it is not resolved by the unit head, it will be forwarded in writing accompanied by complaint documents to the Head of Representative with a copy to the unit head's direct supervisor (group manager/senior manager).
- The head of the representative must seek resolution within 2 weeks and schedule a meeting.
- If not completed, it will be forwarded to the Legal/HR Manager at head office.
- Legal/HR Manager must complete within 2 weeks.
- If the complaint cannot be resolved by the Legal/HR manager, the complaint can be brought to legal channels in the settlement stage for both parties and upholds the results of the decision to legal channels.
- Each stage of completion, both completed and unfinished, must be documented.

In addition, the company also has a Whistleblowing Policy which explains confidentiality, protection and support for whistleblowers, investigations and results as well as hotline and whistleblowing officer contact information which was ratified in August 2020.

Based on the results of interviews with representatives of the surrounding villages (Negeri Lama Village, Kampung Bilah Village, and Sidorukun Village), information was obtained that the village had an understanding regarding the complaints and grievance mechanisms owned by the company.

4.2.2

The Company has established a system for handling complaints and complaints for all affected parties which is documented in the Grievance Handling and Complaints Procedure. There are additional provisions regarding the implementation of communication and consultation procedures to stakeholders, where the socialization of this procedure is carried out by displaying the procedure in writing or by showing pictures so that it can be understood by stakeholders who cannot read and write.

The procedure states that all complaints must be registered in the Complaint Form in clear and easy to understand language. All complaint forms will be collected and registered monthly into the Grievance Register Book. Certification unit will respond to each

complaint within 14 days from the date the complaint request was received.		
The procedure has been socialized to estate and mill workers as well as to the surrounding community on 25 – 27 January 2023. Certification units can show the minutes and attendance lists for the socialization.		
4.2.3; 4.2.4 Records of receiving and handling complaints and grievances from workers have been documented in the Internal and External Complaints Log Book. Based on the results of the document review, information was obtained that during 2023 there were no complaints submitted either internally or externally.		
In addition, in the previous assessment the company has opportunities for improvement in Indicator 4.2.4 including: <ul style="list-style-type: none"> Ensuring that the payment of former BHL employees is in accordance with the court's decision and this can be demonstrated by a joint agreement between the company and the former worker which serves as proof of delivery of compensation money and signed on 10, 13 and 15 December 2023. Ensuring the process of completing the layoffs of factory employees and this has been demonstrated by a joint agreement between the company and each worker as well as documentation of payment of compensation money. 		
	Status: Comply	
4.3 The unit of certification contributes to local sustainable development as agreed by local communities.		
4.3.1 Unit of certification carries out strategic planning and community development plans by involving the community through FGD activities to discuss community development work plans which are attended by the Village government, elderly and community representatives. In the preparation activity, there were several discussions related to community development work plans, including in the fields of cultural aspect, social aspect, and community development aspect. For example; <ul style="list-style-type: none"> Sennah: held on 26 January 2023 attended by 30 participant from representative of Perkebunan Sennah Village, Negeri Lama Village, Kampung Jati Village, Kampung Nelayan Village, Sennah Village, EFB transporter, gender committee, cooperation, etc. Pangkalan: held on 25 January 2023 attended by 21 participant from representative of Perkebunan Pangkatan Village, Sidodai Village, Sukamulia Village, Sidorukun Village, T. Tinggi Pangkatan Village, LKMD, BPD, NGO, contractor, gender comitee, etc. Billah: held on 27 January 2023 attended by 15 participant from representative of Perkebunan Bilah Village, Kampung Bilah Village, Negeri Baru Village, Kelurahan Negeri Lama Village, gender committee, NGO, pers, contractor, etc. During the audit the company has shown the realization of the CSR program for the period of 2022, for example: <ul style="list-style-type: none"> Social: youth and sports event donation (soccer competition in Kp. Dalam). Education: honorariums to local teachers MDTA in Kampung Billah Village. Health: <i>posyandu</i> for toddlers. Infrastructure: road maintenance (grading), road watering, bridge repair. Economy: donation for Old Widows, local contractor empowerment program, bazar. Religion: donation for isramiraj and chrismast. Etc. The results of interviews with representatives of the surrounding community (Kelurahan Negeri Lama, Kampung Bilah, and Sidorukun Village) known that the company has been realized assistances or CSR as a form of community development contribution and was carried out based on consultation with the 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 company already has HGU for both PT Pangkatan Indonesia, PT Sembada Sennah Maju, and PT Bilah Plantindo, namely: PT Pangkatan Indonesia – Pangkatan Estate		

- HGU Certificate No. 02 of 1997 on behalf of PT Pangkatan Indonesia covering an area of **2,586.03 Ha** located in Perkebunan Pangkatan Village, Pangkatan Sub District, Labuhanbatu District, Sumatera Utara Province, valid for 25 years (until 31 December 2023). The company has applied for a Cultivation Right (HGU) on behalf of PT Pangkatan Indonesia which was addressed to the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency u.p. Head of the Regional Office of the National Land Agency for North Sumatera Province on April 11, 2022. Furthermore, there has also been a Staff Review of the Minutes of Data Processing (RPD) Renewal of Cultivation Rights in the Name of PT Pangkatan Indonesia for Land located in Labuhanbatu Regency Number 92/RPD/PHP /HGU/X/2022 on October 13, 2022 with conclusions and follow-up considered for the proposed Renewal of Cultivation Rights with a Period of 30 Years on the grounds that it has fulfilled the technical, juridical and administrative requirements. The company has the opportunity to ensure that the HGU renewal issuance process can run positively. (OFI)

PT Sembada Sennah Maju – Sennah Estate

- HGU Certificate No. 01 of 2002 on behalf of PT Sembada Sennah Maju covering an area of **1,813.40 Ha** located in Perkebunan Sennah Village, Bilah Hilir Sub District, Labuhanbatu District, Sumatera Utara Province valid for 25 years (until 12 March 2032).

PT Bilah Plantindo (on behalf of PT Surya Makmur) – Bilah Estate

Bilah Estate has 2 valid HGU certificates and 1 HGU which is currently in the process of being submitted, namely:

- HGU Certificate No. 31 of 2010 on behalf of PT Surya Makmur covering an area of **1,315.07 Ha** located in Perkebunan Sennah Village, Bilah Hilir Sub District, Labuhanbatu District, Sumatera Utara Province valid for 25 years (until 31 December 2036).
- HGU Certificate No. 1 of 1989 on behalf of PT Surya Makmur covering an area of 1,641 hectares with a validity period of up to 31 December 2018. During the audit, the company showed that the HGU Extension Certificate No. 81 of 2021 on behalf of PT Surya Makmur covering an area of **1,516.63 Ha** on 2 June 2021 and valid until 31 December 2043. However, the area is reduced compared to the area in the previous HGU certificate. The company said that in fact there was no physical area increase from the previous HGU.
- Therefore, the company showed an application letter for HGU covering an area of **178.18 Ha** to the Head of Land Office Labuhanbatu District on 6 February 2020. The company showed evidence that the area had obtained a Location Permit covering an area of 178.18 Ha on 26 July 2018. Then a letter was also shown from Ministry of Agrarian and Spatial Planning / National Land Agency Regional Office of the National Land Agency of Sumatera Utara Province No: 78/UND-300.HT.01.02/V/2020 dated 8 May 2020 regarding invitations to several agencies to carry out inspections, research and field reviews as well as The meeting of the Land Inspection Committee B in the context of making Minutes of Land Inspection "B" related to the HGU application on behalf of Aleksa Sihombing who acted as Director of PT Surya Makmur covering an area of 178.18 Ha located in the Village of Bilah Plantation, District of Bilah Hilir, Labuhanbatu District, Sumatera Utara Province. However, until this audit was carried out, the company had not received further information regarding the Committee B trial process. The results of interviews with the Labuhanbatu District Land Office found that the 178.18 Ha HGU process for PT Pangkatan has not been completed and will wait for the company directly next to it (PT Daya Labuhan Indah) to extend their HGU to ensure that there is no land overlap between the two companies. In addition, the company has sent back a follow-up letter on the application for Cultivation Rights on behalf of PT Surya Makmur covering an area of 178.18 Ha to the Regional Office of the National Land Agency for North Sumatera Province on March 9, 2023. However, up to the ASA 2.1 assessment, there has been no follow-up from the Agency. Therefore, companies are encouraged to ensure that the process of obtaining land rights in the form of HGU in an area of 178.18 Ha is carried out positively. (OFI)

Due to the change in the area of PT Bilah Plantindo from 1,641 Ha (HGU Certificate No. 1 of 1989) to 1,516.63 Ha on the extension of the new HGU certificate (HGU Extension Certificate No. 81 of 2021) as described above and also there is an application letter for HGU covering an area of 178.18 Ha to the Head of Land Office Labuhanbatu District, so that there is a change in document area but in actual physical area there is no increase or decrease in the area. This has resulted in a written document covering the scope of RSPO certification in the previous audit to change from 7,355.50 ha to 7,409.31 Ha. The results of field visits to HGU boundary markers revealed that there is no potential for additional area around the company because the company already borders community plantation areas and other company concession areas.

4.4.2, 4.4.3, 4.4.4, 4.4.5 and 4.4.6

The certification units are one of long-established plantations company since Dutch colonial era. In related to the maps of an appropriate scale that showing legal, customary or user right through participatory mapping and copies of negotiated agreements detailing process of FPIC is not applicable. This is due to no longer records dating back to the time of the decision making. According

to information gathered during stakeholder consultation with communities and Plantation Agency of Labuhanbatu District, it was clearly mentioned that no customary rights is available within the plantations.		
Based on document verification and interviews with surrounding villages (Kampung Bilah Village, Sidorukun Village, and Negeri Lama Village) there was no identification of customary land or land compensation in the company's concession area. Furthermore, information was obtained that there were no land rights owned by the community in the company's operational areas, either individually or in groups, both formally and informally. The results of the interviews also confirmed that the company's territory had been controlled before the village was formed. People already know clearly the boundaries of the company. The existence of the company and its boundaries are recognized by the community and no claims are made by the community over the land.		
	Status: Comply	
4.5 No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.		
4.5.1; 4.5.2; 4.5.3; 4.5.4; 4.5.5; 4.5.6; 4.5.7; 4.5.8 There is no land expansion 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 comprising 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; 4.6.2 The company has procedure of Land Acquisition and Compensation, document No. PI/SOP/Umm-21 dated 28 December 2011 related to identifying legal, customary or user rights, and for identifying people entitled to compensation. Based on public consultation with village representatives known that they know about the procedure through the socialization given and they agree with the procedure. The certification unit are one of long-established plantations company since Dutch colonial era. In related to the maps of an appropriate scale that showing legal, customary or user right through participatory mapping and copies of negotiated agreements detailing process of FPIC is not applicable. This is due to no longer records dating back to the time of the decision making.		
4.6.3 and 4.6.4 The certification unit are one of long-established plantations company since Dutch colonial era. In related to the maps of an appropriate scale that showing legal, customary or user right through participatory mapping and copies of negotiated agreements detailing process of FPIC is not applicable. This is due to no longer records dating back to the time of the decision making. Based on documents verifications and interview with surrounding (Kampung Bilah Village, Sidorukun Village, and Negeri Lama Village) there was no identified the presence of indigenous land or land compensation in the concession area of company. Furthermore, obtained information that there are no land rights in the company operational area, either individually or in groups, both formally and informally. The results of the interview also confirmed that the company area had been controlled before the village was formed. People already know clearly company boundaries. The existence of the company and its boundaries are recognized by the community and no claims have been made by the community on these lands.		
	Status: Comply	
4.7 Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.		
4.7.1 & 4.7.2 The certification unit has been operating since the Dutch colonial period which in 1968 finally had the right to erphact. Until now, the		

land rights owned are HGU which are still valid. However, the company has established procedure regarding land acquisition and identifying people and/or community groups entitled to compensation, in the document's procedure of Land Acquisition and Compensation, document No. PI/SOP/Umum-21, dated 28 December 2011. 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 consultations with village representatives from Kampung Bilah Village, Sidorukun Village, Negeri Lama Village, it is known that they are aware of the procedure through the socialization provided and they agree with the procedure.

This unit of certification has been in operation since the Dutch colonial period which in 1968 finally got its rights. Until now, the land rights owned are valid HGU. However, the company has established procedures regarding land acquisition and identifying people and/or community groups entitled to compensation, in the Land Acquisition and Compensation procedure document, document No. PI/SOP/Umum-21, December 28 2011. The procedure describes how to calculate and distribute compensation that is fair and gender equal in all activities related to the process of compensation for land rights cultivated by the Company, the aim is to ensure that the plantation area free from the rights of others. Based on public consultation with village representatives it was found that they knew about the procedure through the socialization provided and they agreed with the procedure.

4.7.3

The unit of certification is a plantation company that has been around for a long time since the Dutch colonial era. Linked to appropriate scale maps showing legal, customary or user rights through participatory mapping and copies of negotiated agreements detailing the FPIC process do not apply. This is because there are no more records that come from the time of decision making.

Based on public consultations with village representatives from Kampung Bilah Village, Sidorukun Village, Negeri Lama Village, it is known that the certification unit routinely provides CSR and there are people living around the company who work as employees in the certification unit.

Status: Comply

4.8

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

4.8.1 – 4.8.4

The company has established the mechanism for conflict resolution and land dispute in the procedure No. HRD-SOP15-01 dated 3 February 2020. Based on public consultations with related government agencies in Labuhanbatu Regency and village representatives (Kampung Bilah Village, Sidorukun Village, Negeri Lama Village) it is known that there have been no cases of land disputes in the last 2 years. During the site visit, the auditor observed random areas and did not see any areas of land disputes. Based on these facts the auditor concluded that there were no cases of land disputes at PT Pangkatan Indonesia, PT Sembada Sennah Maju and PT Bilah Plantindo.

Status: Comply

PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION

5.1

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

5.1.1

The company does not have independent farmers who supply FFB to the Pangkatan Mill, but the company cooperates with nearby FFB suppliers as a form of improving the welfare of the surrounding community.

5.1.2; 5.1.6

FFB pricing for suppliers follows the price set by company. Based on interviews with the CV Teng Gaes, it is known that they have received an explanation regarding the determination of the FFB price and also known the price is fair and there has never been a late payment. It can be proved also by payment receipt for FFB CV Teng Gaes on May 11, 2023, for the March 2023 period via bank transfer.

The price of FFB is informed using the WhatsApp and telephone from the PIC every month.

5.1.3; 5.1.8

Based on the results of interviews with the company that the company does not have farmers who supply FFB directly to the company.

5.1.4; 5.1.5

The unit of certification cooperates with third parties in purchasing FFB, this is one way to improve people's welfare. The company also has evidence of a cooperation agreement for the sale and purchase of FFB and the contract has also been understood by both parties.

An example of the contents of the cooperation agreement for the supplier CV Teng Gaes Jaya (05/MKT/PGI/II/2022) dated January 23, 2023, includes:

- The object of buying and selling is FFB.
- The FFB will be weighed at the company's weighing bridge.
- The FFB price will be determined daily and no later than 18.30.
- Payment and tax procedures.
- Guarantee that the FFB sent is legal FFB and belongs to the first party.
- The term of the agreement is 1 year.
- Etc.

Based on an interview with the supplier CV Teng Gaes Jaya, they were given the freedom to determine the parties to assist in accordance with based on cooperative membership, including if there are women who are involved. Based on the results of the document review, it is known that the agreement has been made fairly, in accordance with applicable law, and is transparent, and has an agreed timeframe. And signed by both parties on stamp. Based on explanation known that the company and the FFB supplier have agreed and entered into a cooperation agreement based on legal provisions.

5.1.7

The results of document verifications it was known that the certification unit has routinely calibrated the weighing equipment carried out by UPTD Metrologi Labuhanbatu Regency, there are:

- Certificate of Test Results No. 510.3/124/DagInd-Met/KHP/8/2022 Brand: Avery Weight Tronix which was carried out on 09 August 2022.
- Certificate of Test Results No. 510.3/123/DagInd-Met/KHP/8/2022 Brand: Avery Weight Tronix which was carried out on 09 August 2022.

The results of observations and interviews with weigh bridge operators obtained information that the certification unit has routinely performed the calibration of weighing equipment by third parties.

5.1.9

The company has a Standard Operating Procedure regarding Internal and External Complaints No.PI/SOP/Uum-05 No. rev 01 dated April 25, 2013, which explains how to resolve any internal and external complaints properly and quickly. The document also explains among other things:

- Every complaint, both internal and external, must be entered into the Complaints Book.
- Within 2 weeks, each head of the unit is obliged to make an effort to resolve it first by taking into account the facts.
- If at the end of the stage at the Legal / HR Department it cannot be completed, then in the context of settlement and both parties must uphold the results of the decision according to legal channels.

Apart from that in the Communication and Consultation SOP No. PI / SOP / Umum-19 dated April 27, 2015, at point 4.5 every time there is a conflict the company prioritizes the familial process and communication between the two parties to reach a consensus between the two parties, management takes action to the applicable legal channels in accordance with the SOP for Internal and External Complaints. Furthermore, the Evans Group Indonesia Policy on Business Continuity and Ethics in July 2019 also discusses transparency and complaints, which can be accessed through www.mpevans.co.uk

Status: Comply

5.2

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

5.2.1;5.2.2;5.2.3;5.2.4;5.2.5		
Based on the results of interviews with the company that the company does not have farmers who supply FFB directly to the company. However, the company cooperates with third parties in purchasing FFB, as a form to improving the welfare of the surrounding community		
	Status: Comply	
PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS		
6.1		
Any form of discrimination is prohibited.		
6.1.1		
The company shows a Policy document on Sustainability and Business Ethics which has been in effect since October 2021. The document states that the company provides fair and equal opportunities to all of its employees. The company seeks to prevent discrimination in the workplace which is explained as follows:		
<ul style="list-style-type: none"> • Provide equal opportunities for all workers to obtain decent work and income and to develop their careers without distinction as to race, caste, nationality, ethnicity, religion, disability, gender, sexual orientation, trade union membership, political affiliation or age. • Assign all workers in accordance with the expertise, suitability, ability, skills and experience of individuals, as well as the needs of the company. • Will not tolerate any discrimination based on sex, such as role restriction, labeling, violence, intimidation and excessive workload • Comply with laws on discrimination in the termination process, terms and conditions of employment, wages and benefits, promotion and transfer opportunities, training, recruitment and redundancy. 		
Based on the results of interviews with workers (Harvesting, Spraying and Processing at the Mill), and trade unions, information was obtained that the company has provided equal opportunities and treatment to workers to obtain jobs and employment opportunities. In addition, so far there have been no complaints regarding discriminatory acts committed by the company in any operational activities.		
6.1.2		
Based on the results of interviews with workers (Harvesting, Spraying and Processing at the Mill), and trade unions, information was obtained that the company has provided equal opportunities and treatment to workers to obtain jobs and employment opportunities. In addition, so far there have been no complaints regarding discriminatory acts committed by the company in any operational activities.		
6.1.3		
In Recruitment SOP with No. IDN-HRD-SOP01-01 dated 01 February 2021, one of which explains that there should be no acts of discrimination, for example:		
<ul style="list-style-type: none"> • The company prohibits and does not condone discrimination against race, caste, nationality, ethnicity, religion, disability, gender, sexual orientation, union membership, political affiliation, or age in the form of worker selection and supports equal rights in obtaining job opportunities according to individual abilities. • The company supports gender equality in recruiting and selecting new <i>SKU</i> employees. 		
Based on the results of interviews with workers (Harvesting, Spraying and Processing at the Mill), and trade unions, information was obtained that the company has provided equal opportunities and treatment to workers to obtain jobs and employment opportunities. In addition, so far there have been no complaints regarding discriminatory acts committed by the company in any operational activities.		
6.1.4		
Based on the results of interviews with clinical health officers and representatives of the gender committee, it was stated that the company does not conduct pregnancy tests for discrimination purposes. The pregnancy test is carried out to ensure workers who are pregnant do not do work related to chemicals.		
6.1.5		
The Company has a gender committee that has been formed chaired by the chair of the committee and coordinators in several sections and there are representatives in each unit. The gender committee structure consists of female and male workers. The main purpose of establishing gender committee is to provide a forum that can accommodate the aspirations or complaints of workers, as		

certification unit partners in carrying out socialization activities related to gender and other policies related to workers' reproductive rights.

Further explained that the gender committee provides support for female employees, including protection and maintenance of women's health, maintenance of family life and welfare, protection from sexual harassment and violence, providing continuing education that gender equality exists in the unit of certification.

The Company also showed the policy against sexual harassment, violence, and reproductive rights. It stated that the certification unit committed to support the reporting of all incidents of sexual harassment, violence, abuse, and violations of reproductive rights experienced by any individual (regardless of gender and age).

6.1.6

The Auditor Team has reviewed several workers' salary slip documents for the period March - May 2023 including 2 harvest workers with the initials "P" and "JP" and 2 spray workers with the initials "HG" and "S" with SKU-H status (PT Pangkatan Indonesia) , 2 harvest workers with initials "P" and "YG" with SKU-H status and 2 initial spray workers "EI" with SKU-B and "S" status with SKU-H status (PT Bilah Plantindo) and 2 initial harvest workers " Su" and "Se" as well as 1 spray worker with the initials "FA" and 1 employee with the initials "AP" with SKU-H status (PT Sembada Sennah Maju), it is known that the company has provided equal pay for the same scope of work including taking into account period of employment.

Status: Comply

6.2

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

6.2.1

The company has documentation of applicable wage conditions and working conditions, including:

- Decree of the Governor of North Sumatera No. 188.44/1004/KPTS/2022 dated December 7, 2022, concerning Determination of the Minimum Wage for Labuhanbatu Regency in 2023, information was obtained that the minimum wage is IDR 3,116,458.11.
- Decision Letter No. 027/SK.UPAH/SSM-HR/IV/2023 dated 4 April 2023 concerning the Daily Wages for Freelance Workers of PT Pangkatan Indonesia for 2023 in Labuhanbatu Regency, explaining "The Freelance Daily Wages (BHL) IDR. 124,659, -/day according to working days effective for 7 (seven) working hours a day".
- Decree No 028/SK.UPAH/SSM-HR/IV/2023 dated 4 April 2023 concerning the 2023 Fixed Daily Employee Wages (SKU-H) of PT Pangkatan Indonesia in Labuhanbatu Regency, explaining:
- Fixed Daily Employee Wages (SKU-H) in 2023 is IDR 3,174,000 / month.
- Wages Per Month + Years of Service

Year	Wages + Year of Service
0 - 1	IDR 3,174,000
> 1 - 7	IDR 3,174,000 + Rp 3,000 /Bulan
> 7 - 12	IDR 3,174,000 + Rp 5,000 /Bulan
> 12 - etc	IDR 3,174,000 + Rp 7,000 /Bulan

- Decision Letter No. 029/SK.UPAH/SSM-HR/IV/2023 dated 4 April 2023 concerning Monthly & Contract Employee Wages of PT Pangkatan Indonesia in 2023 in Labuhanbatu Regency, explaining wages for Monthly Employees (SKU-B) and Contract Employees (PKWT) whose status the equivalent group of Monthly Employees (SKU-B) is increased by IDR 11,000 from the old salary.
- The 2023 Employee Pay Scale Structure informs the number of wages for each class starting from the lowest Grade "P" Group 1 in the amount of IDR 3,311,000 and the highest Grade "EL" Group 6 in the amount of IDR 4,086,000.
- Memorandum No. 003/SM/II/2022 dated 3 January 2022 which was signed by the Senior Manager regarding Output (Agronomy Job Targets) explained, among others:

Occupation	Sub Unit	Target (Output/Wages/Day)
Circle And Path	Micron Herby Sprayer	5 Ha

	Micron Herby Sprayer Hilly Area	4 Ha
	SA Flat Mature Area	3 Ha
	SA Hilly Mature Area	2 Ha
	SA Flat Immature Area	2 Ha
	SA Hilly Immature Area	1.8 Ha
Komposting Application	Mature	5 Ton
	Immature	3.5 Ton
Fertilizer Application	Anorganik Makro Mature	3.3 Ha
	Anorganik Makro Immature	2.5 Ha
	Anorganik Mikro	5 Ha

- PT Pangkatan Indonesia's Minutes of Change in Harvest and Brondolan Bases dated June 20, 2022, informs that the Harvest Base is between 900 Kg – 1,150 Kg with an over base premium of Rp. 48.76/Kg and a Base Achievement Premium of Rp. 500.-. In addition, the base is 200 kg with an extra base premium of IDR 159/Kg.

Based on the results of interviews with spray workers, harvest workers and lozenges, information was obtained that the workers already knew the work targets and the details of the wages they received after completing a job including premiums if they exceeded the targets set.

6.2.2

Companies can show examples of work relations documents between companies and employees that inform employee status, worker responsibilities, wages and benefits and other conditions according to the Collective Labor Agreement, for example:

- Letter of Acceptance for example No. 11/SK-(SKU-H/SKU-B)/(PGE)/2023 dated 1 June 2023 and proof of submission of a copy of the Letter of Acceptance on 1 June 2023.
- Letter of Acceptance for example No. 002/SK-MP/BIE2023 dated 1 April 2023 and proof of submission of a copy of the Letter of Acceptance on 1 April 2022.
- Letter of Acceptance for example No. 10/SK-(SKU-H/SKU-B)/(SNE)/2022 dated March 1, 2022, and proof of submission of a copy of the Job Acceptance Letter on March 30, 2022.

Based on the results of interviews with workers (sprayers, harvesters, etc.) as well as trade union representatives, information was obtained that each worker has a copy of the employment relationship document contained in the Acceptance Letter document in accordance with applicable labor regulations.

6.2.3

Companies can show proof of legal compliance for regular working hours, deductions, overtime, sick leave, entitlement to holidays, maternity leave, reasons for termination, notice period before dismissal, and other employment conditions, for example:

- Employee Leave Letter of PT Bilah Plantindo with the initials "RS" which informs the number of leave entitlements, length of leave and management approval.
- Letter of Birth Certificate (H2) from a Polyclinic Doctor for employees of PT Bilah Plantindo with the initials "MR" informing them of 3 months of rest.
- PT Sembada Sennah Maju Employee Leave Letter with the initials "S1" which informs the amount of leave entitlements, length of leave and management approval.
- Certificate of Childbirth (H2) from a Polyclinic Doctor for PT Sembada Sennah Maju workers with the initials "HK" informing them of 3 months of rest.
- Joint Agreement Letter between PT Pangkatan Indonesia and workers with the initials "S" No. 002/SPB-PGE/III/2023 dated March 13, 2023 concerning termination of the employment relationship along with documentation of payment of pension/severance pay.
- Letter of Collective Agreement between PT Bilah Plantindo and workers with the initials "JG" No. 21/BIE/052023 dated 27 May 2023 regarding termination of employment relationship along with documentation of calculation and payment of pension/severance pay.

- The Joint Agreement Letter between PT Sembada Sennah Maju and the initial employee "Ir. P" No. 002/SPB-PGE/III/2023 dated March 13, 2023, concerning termination of the employment relationship along with documentation of the calculation and payment of pension/severance pay.
- Salary slip documents for the period March - May 2023 for several workers including: 2 harvest workers with the initials "P" and "JP" and 2 spray workers with the initials "HG" and "S" with SKU-H status (PT Pangkatan Indonesia), 2 harvest workers with initials "P" and "YG" with SKU-H status and 2 spray workers with initials "EI" with SKU-B status and "S" with SKU-H status (PT Bilah Plantindo) and 2 harvest workers with initials "Su" and "Se" as well as 1 spray worker with the initials "FA" and 1 loose worker with the initial "AP" with SKU-H status (PT Sembada Sennah Maju), it is known that the company has provided equal wages for the same scope of work including taking into account the employee's length of service.
- Based on the results of interviews and review of salary slip documents and calculation of overtime workers at Pangkatan Mill (1 Engine Room worker, 2 sorting workers, and 2 loading ramp workers), information was obtained that the company provides appropriate overtime calculations and payments and there is no coercion in doing work overtime because the worker has agreed to work overtime according to the Overtime Order.

6.2.4

The company already has facilities and infrastructure for workers' welfare, including: Housing facilities, sports fields, prayer facilities, child care areas, employee halls and clinics.

In addition, the company already has a maintenance program included in the CE work program, for example in 2023, such as painting buildings and repairing roofs.

Based on the results of the field visit for example on Housing Complex Pangkatan Estate, it is known that the facilities and infrastructure for employee welfare are in good condition and proper for workers including sanitation facilities in residential areas.

Thus, it is concluded that the company already has facilities and infrastructure for the welfare of workers in proper and well-maintained conditions.

6.2.5

Based on field observations and interviews with estate, and mill employees revealed that in the certification unit's environment there are basic food cooperatives, vegetable vendors and stalls in the employees' homes that provide their daily needs at affordable prices.

6.2.6

The Company 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. 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 for 25 years (technical considerations of buildings are feasible to use). The calculation result of prevailing wages and in-kind benefits received by employees is IDR. 3,572,293/ month (Minimum wages in 2023, IDR. 3,174,000/ month + in-kind benefit, IDR. 1,461,359/ month).

6.2.7

Based on the results of a review of the labor list document for May 2023, it is known that there are no workers with *PKWT* status in the Pangkatan Estate and Pangkatan Mill. In addition, based on the results of interviews with trade unions, information was obtained that there was no use of workers with *PKWT* status, there were a total of 39 workers with *PKWT* status in Bilah Estate for types of work including: Composting, Drivers, Spraying, Fertilizers and Maintenance, and there were a number 14 workers with *PKWT* status at Sennah Estate for types of work including: Composting and Fertilizing. In addition, based on the results of interviews with trade unions.

However, based on the results of interviews with trade unions, information was obtained that there was no use of workers with *PKWT* status for harvesting or processing work at the Mill.

Thus, it is concluded that the company has ensured that all permanent work 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		
Policies related to trade unions, one of which is contained in the Policy on Sustainability and Business Ethics which took effect in October 2021. The document explains, among other things:		
<ul style="list-style-type: none"> • Respect workers' right to freedom of association and organization with other individuals and jointly express, encourage, pursue and defend common interests. • Provide opportunities for all workers to establish free, open, independent, democratic and responsible trade unions and to register these unions with the relevant legal authorities. • Giving all workers the choice to become members of a trade union or not without coercion from any party. • Recognizes employees' right to freedom of association and assembly. 		
Companies can show documents forming a labor union, including:		
<u>PT Pangkatan Indonesia</u>		
<ul style="list-style-type: none"> • Decree of the Head of the Labuhanbatu Regency Manpower Office No. KEP: 560/2216/DTK-4/2022 dated 9 August 2022 concerning Registration of Bipartite Cooperation Institutions in Companies. The management composition has placed representatives from Employers and Labor Unions. • Proof of registration of the Workers' Union at the Labuhanbatu District Manpower Office Number. 560/2780/DTK-4/2020 dated 18 August 2020. 		
<u>PT Bilah Plantindo</u>		
<ul style="list-style-type: none"> • Decree of the Head of the Labuhanbatu Regency Manpower Office No. KEP: 560/2027/DTK-4/2022 dated 25 July 2022 concerning Registration of Bipartite Cooperation Institutions in Companies. The management composition has placed representatives from Employers and Labor Unions. • Proof of Registration of the Independent Bilah Workers Union at the Labuhanbatu Regency Manpower Office No. 560/2780/DTK-4/2020 dated 18 August 2020. In addition, the company showed Decree No. 01/X1/PPKSPBM/2021 November 8, 2021 concerning the Appointment and Approval of the Chairman of the Mandiri Bilah Workers Union for the 2021 – 2025 period which has been known by the Labuhanbatu District Manpower Office. 		
<u>PT Sembada Sennah Maju</u>		
<ul style="list-style-type: none"> • Decree of the Head of the Labuhanbatu Regency Manpower Office No. KEP: 560/1630/DTK-4/2022 dated 24 June 2022 concerning Registration of Bipartite Cooperation Institutions in Companies. The management composition has placed representatives from Employers and Labor Unions. • Proof of registration of the Workers' Union at the Labuhanbatu District Manpower Office Number. 560/855/DTK-4/2023 dated 17 April 2023. 		
Companies can show documentation of meetings, for example the one held on April 3, 2023, regarding a joint agreement between the company and the union regarding the 2023 wage increase.		
Based on the results of interviews with workers (harvesters, sprayers, etc.), information was obtained that workers were aware of the existence of trade unions and were given the freedom to become members or not. In addition, the results of interviews with trade unions obtained information that the company has supported the activities of trade union organizations and there has been no intervention regarding the selection of union officials.		
		Status: Comply
6.4		
Children are not employed or exploited.		
6.4.1; 6.4.2; 6.4.3; 6.4.4		
The company shows a Policy document on Sustainability and Business Ethics which has been in effect since October 2021. In the		

document it is stated that the company recognizes that children who are forced to work are children who are deprived of their rights to childhood and education and are at risk of endangering their physical, mental and social well-being, their social life so that the company seeks to:

- Prohibiting the use of child labor in all operational activities, both those carried out by themselves and those carried out by their suppliers.
- The minimum age to work for the Group is 18 years, with the exception that such work is part of the school curriculum.
- Allowing workers aged 14-17 only if approved by legal authorities and part of the school curriculum, or their participation in a certified vocational orientation or training program.
- Contractors, contract workers and volunteers working for companies are subject to minimum age restrictions.
- Provide access to school, or transportation to school, for employees' children under 18 years of age.

Based on the results of the field visit, it was found that the company had posted a warning regarding the prohibition of using workers under the age of 18 installed in an easily visible area. In addition, based on the results of a review of the labor list document for May 2023 as well as interviews with trade unions and the Labuhanbatu Regency Manpower Office, information was obtained that there was no use of workers under the age of 18 when they first entered work.

Thus, it is concluded that the company already has and implements a policy regarding Prohibition of Employing Underage Children.

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 to ensure that workers are free from all forms of harassment, threats, abuse both physically and mentally from fellow workers or Plantation Unit Certification which are contained in the Policy document on Sustainability and Business Ethics which has been in force since October 2021. The document states that that the company seeks to:

- Prohibit the use of corporal punishment, mental or physical coercion, physical restraint, excessive verbal abuse, intimidation, harassment by management or employees.
- Thoroughly investigate every case of sexual harassment in every reported operational activity.
- Referring cases of well-founded sexual harassment to appropriate authorities for legal action. If proven, the company will take decisive action, such as termination of employment for employees who are found guilty of this violation.

Based on the results of interviews with workers, trade unions, the gender committee and the Labuhanbatu District Manpower Office, information was obtained that so far there had been no complaints related to harassment, threats, physical or mental abuse.

6.5.2

The company has a Policy to ensure that workers have reproductive rights, especially for women, which is contained in the Policy document on Sustainability and Business Ethics which has been in force since October 2021. The document states that the company seeks to:

- Give special dispensation to female workers who suffer from menstrual pain, who are pregnant or breastfeeding in accordance with the rules and regulations in the countries where they work.
- Provide guidance and education on reproductive health and fertility to workers and their families with the assistance of professional medical staff.
- Will not allow employees who are pregnant, breastfeeding women or employees who have medical limitations to carry out high-risk work that threatens the safety/mother/person and/or child such as lifting heavy loads, operating heavy equipment and handling chemicals such as pesticides, herbicides, fertilizers and laboratory chemicals.

Based on the results of interviews with representatives of the gender committee and clinical medical officers, information was obtained that the company had and implemented reproductive rights protection policies such as granting menstrual leave rights to female workers and providing pre and postnatal leave rights, etc.

6.5.3

Based on the results of interviews with clinical medical officers and representatives of the gender committee, information was obtained

that the company had identified the needs of mothers who had just given birth by asking for their opinion. The company can show its documentation in the form of a questionnaire contained in the Maternal Needs Identification Form.

The questions include:

- Who is responsible for looking after the child when left at work?
- Does Daycare provide adequate places and facilities for early childhood?
- Have you experienced any complaints (pain/pain) until now?
- Does working time affect breastfeeding opportunities?
- Etc.

Based on field observation on Housing Complex and interview with workers especially women, it has known that The Company has provided the needs of mothers such as: special time for breastfeeding, place to breastfeed, availability of adequate daycare for toddlers and babies.

6.5.4

The Company showed the procedure to accommodate complaints and grievances from employees specifically in sexual harassment and violence. In the procedure described that if requested, the certification unit guarantees the confidentiality of the reporting identity and the disclosure of disgrace or incident (whistle-blower).

Besides that, the certification unit has formed gender committee for handling the harassment issue around female workers. Complaint can be submitted to board of gender committee, or their foreman. Based on interview with the board of gender committee in each unit, the certification unit provides the female worker with menstrual leave, pregnant and nursing leave for about 3 months. Pregnant and nursing female worker is prohibited to work related to chemical. And also, certification unit give special breast-feeding time for female worker, but prohibit the worker from working with chemical material.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1

A written policy stating that it prohibits all forms of forced labor or slavery in carrying out operational activities has been contained in the October 2021 Business Sustainability and Ethics Policy document which explains, among other things:

- Ensure that its operations do not create or support modern slavery or human trafficking.
- Prohibit forced or compulsory labor and illegal overtime. All working time, including overtime, for each employee will be recorded and wages paid.
- Prohibit the use of corporal punishment, mental or physical coercion, physical restraint, excessive verbal abuse, intimidation, harassment by management or employees.

Based on the results of interviews with workers at both the Mill and Estate (Sprayers, Harvesters and Processing Mills) as well as trade union representatives and gender committees, information was obtained that the parties had knowledge regarding forced labor policies and so far there have been no incidents or complaints regarding acts of forced labor carried out in the company's operational activities.

6.6.2

The certification unit still have workers with contract status (*PKWT*). All the rights for each employment status have been distinguished for workers with contract status (*PKWT*) and the permanent status (*PKWTT*). Certification unit also registered the contract worker with to Manpower and Transmigration Agency of Labuhanbatu in each unit.

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 formed an Occupational Safety and Health Committee (P2K3) to be in charge of the OHS program, with details as

follows:

- P2K3 Pangkatan Estate based on the Decree of the Head of the Manpower Office of Labuhanbatu District Number KEP.401/P2K3/DTK-4/2017. The secretary of P2K3 Leni Anggraini with the Decree on the Appointment of OHS Expert of the Minister of Manpower of the Republic of Indonesia No. 5/2379/AS.02.04/III/2020 on behalf of Leni Anggraini dated March 3, 2020, valid for 5 years.
- P2K3 Pangkatan POM based on the Decree of the Head of the Office of Social Affairs, Manpower and Transmigration of Labuhanbatu District Number KEP.09/P2K3/DSTKT-4/2016. The secretary of P2K3 an. Rizky Hendra with the Decree on the Appointment of OHS Expert of the Minister of Manpower of the Republic of Indonesia No. 5/2379/AS.02.04/III/2020 on behalf of Leni Anggraini dated March 3, 2020, valid for 5 years.
- P2K3 Bilah Estate based on the Decree of the Head of the Office of Social Affairs, Manpower and Transmigration Labuhanbatu District No. 134/P2K3/DSTKT-4/2014. The secretary of P2K3 Jefri with the Decree on the Appointment of OHS Expert of the Minister of Manpower of the Republic of Indonesia No. 5/2378/AS.02.04/III/2020 on behalf of Jefri on March 3, 2020, valid for 5 years.
- P2K3 Sennah Estate based on the Decree of the Head of the Office of Social Affairs, Manpower and Transmigration Labuhanbatu District No. KEP.902/P2K3/DSTKT-4/2014 dated December 3, 2014. As for the secretary of P2K3 Sumarlin with the Decree on the Appointment of OHS Expert of the Minister of Manpower of the Republic of Indonesia No. 5/2381/AS.02.04/III/2020 on behalf of Sumarlin dated March 3, 2020, valid for 5 years.

The company routinely sends quarterly P2K3 reports to the Labuhanbatu District Labor Inspection Unit, for example:

- P2K3 Quarter I Year 2023 Report to the Office of Manpower and Transmigration of North Sumatera Province and the Labor Inspection Unit of Labuhanbatu Regency on April 10, 2023. (POM and Pangkatan Plantation).
- Report on P2K3 Quarter I of 2023 to the Office of Manpower and Transmigration of North Sumatera Province and UPT of Labor Inspection of Labuhanbatu Regency on April 10, 2023. (Bilah Estate).
- P2K3 Quarter I Year 2023 Report to the Office of Manpower and Transmigration of North Sumatera Province and the Labor Inspection Unit of Labuhanbatu Regency on April 10, 2023 (Sennah Estate).

The company holds a P2K3 meeting every month, for example:

- Estate Pangkatan on March 24, 2023, with discussions related to OHS performance reports, Work Accident Analysis, OHS Month Updates, PPE procurement status, North Sumatera Audit Preparation, Darkalhutla Readiness, and other items such as OHS signs attended by 14 members.
- Pangkatan Mill on March 24, 2023, with discussions related to OHS performance reports, Work Accident Analysis, OHS Monthly Updates, PPE procurement status, North Sumatera Audit Preparation, Darkalhutla Readiness, and other items such as OHS signs which were attended by 14 members.
- Estate Bilah dated March 24, 2023, with discussion related to OHS performance reports, Work Accident Analysis, OHS Month Update, PPE procurement status, North Sumatera Audit Preparation, Darkalhutla Readiness, and other items such as OHS signs attended by 14 members.
- Sennah Estate on March 24, 2023, with a discussion related to OHS performance reports, Work Accident Analysis, OHS Monthly Updates, PPE procurement status, North Sumatera Audit Preparation, Darkalhutla Readiness, and other items such as OHS signs attended by 14 members.

6.7.2

The company demonstrates OHS procedures in Indonesian that workers can understand, some of which are listed in the following document:

- Personal Protective Equipment, Document number IDN-OHS-SOP02-04 effective date 07 March 2023.
- P2K3, document number IDN-OHS-SOP03-02 effective date 03 May 2023.
- Medical Examination, Document Number IDN-OHS-SOP04-03 effective April 19, 2023.
- First aid kit Document number IDN-OHS-SOP-07-01 effective date 13 April 2021.
- Work accident document number IDN-OHS-SOP-12-01 effective date 24 May 2022.
- Plantation Fire Control document number IDN-OHS-SOP-20-00 effective date 23 June 2023.
- Identification of Potential Hazards and risk assessment number IDN-OHS-SOP06-02 effective date 19 April 2023.
- Handling of emergencies number OHS-SOP07-01 effective date 01 October 2019.

The results of field observations and interviews in the Estate and Mill area showed that harvest workers, sprayers, warehouse workers, and Mill workers could explain OHS procedures including emergency response procedures and those procedures were clearly understood by all workers.

Unit Certification have an emergency response organization. Unit Certification show the organizational structure of the Land and Forest Fire Management Task Force in the document of the Emergency Management Team which was ratified in 2023 which is briefly explained as follows:

- Chairman.
- Vice Chairman.
- Security Sector, Evacuation Sector, Health Sector, Communication and Social Relations Sector, and Evacuation Sector.
- Member.

There are officers assigned to the field and work sites who have received first aid training in accidents as evidenced by a training certificate. The officers are:

- Pangkatan Estate and Mill on behalf of Yosia Adetyawan Prasetyo with first aid officer license number No. 101-7/P3K/WIL-IV/DTK/SU/2022 with a validity period of up to August 3, 2025.
- Bilah Estate on behalf of Imran Maruli Tua Sihombing with first aid officer license number No. 102-7/P3K/WIL-IV/DTK/SU/2022 with a validity period of up to August 3, 2025.
- Sennah Estate on behalf of Tri Azrul Disyamto with a first aid officer license number No. 103-7/P3K/WIL-IV/DTK/SU/2022 with a validity period of up to August 3, 2025.

The company can show a list of the first aid kits they have that are placed in the workplace or those brought by the foreman/foreman to the field at the Estate and Mill. The number of first aid kits owned by the company are:

- Pangkatan Estate is 61 First Aid Boxes.
- Pangkatan Mill is 8 First Aid Boxes.
- Bilah Estate totalling 43 First Aid Boxes.
- Sennah Estate a total of 32 first aid boxes.

Based on the results of field observations in the Estate and Mill areas, it is known that the first aid kit is complete with a total of 21 items in accordance with the regulations and the contents of the first aid kit can be used at any time and First aid kit is available at work. In addition, based on verification, the number of first aid kits owned by the company complies with the provisions of the Minister of Manpower and Transmigration Regulation Number 15 of 2008.

The company can also show a record of work accidents listed in the P2K3 Quarterly reports which are reported regularly to the relevant agencies. The report describes the number of work accident cases, the action plan carried out, current status, the person in charge and the target time. In addition, the company can show evidence of investigations into work accidents, for example:

Work Accident on March 8, 2023, due to male flower pollen hitting the eye so that he had to be rushed to the South Labuhanbatu Regional General Hospital. Work accident case reports stage I and stage II BPJS of Employment and work accident case reports were reported on March 8, 2023. All company obligations have been fulfilled by the company.

Based on the results of field observations in the Estate and Mill area, it is known that the company has installed the OHS symbol, has a fire extinguisher, installed an MSDS, and has a Hydrant that complies with established regulations and hazard identification and is easy to reach in case of an emergency.

6.7.3

From the auditor's observation during the audit activity, it was concluded that each worker is given PPE in accordance with the results of the identification of sources of danger and risk control carried out by the company's P2K3 secretary.

Based on the results of interviews with harvest officers, spraying and manual maintenance in the estate and operators at POM, it is known that each employee has used PPE according to their respective jobs and PPE is provided by the company free of charge and can be replaced if PPE is damaged. In addition, the PPE provided is free of charge and all PPE is provided by the company.

From observations made on rinse houses in the Pangkatan Estate, Bilah Estate, and Sennah Estate, it is known that sanitation facilities are available for spraying workers such as bathing, changing clothes and so on. Rinsing wastewater is stored in a permanent place to prevent contamination of water sources or soil bodies.

As a result of field observations and document review, the company replaced PPE in the form of Safety Shoes for workers at the Sorting, Boiler, Tippler, Kernel and Press stations. This is also in accordance with the results of interviews with workers at the station, it is known that the company replaces PPE for safety shoes once a year and is provided free of charge. If damage occurs, workers can report to their superiors with damaged shoes and the company will replace them free of charge.

6.7.4

Companies can show a list of workers participating in the BPJS program along with proof of payment via bank transfer, for example for May 2023 as follows:

Unit	Description	Number of Employee
Pangkatan Estate	Workers on Mei 2023	420
	BPJS Health Participants on Mei 2023	529
	BPJS Employment Participants on Mei 2023	420
Pangkatan Mill	Workers on Mei 2023	98
	BPJS Health Participants on Mei 2023	529
	BPJS Employment Participants on Mei 2023	98
Bilah Estate	Workers on Mei 2023	486
	BPJS Health Participants on Mei 2023	496
	BPJS Employment Participants on Mei 2023	486
Sennah Estate	Workers on Mei 2023	279
	BPJS Health Participants on Mei 2023	279
	BPJS Employment Participants on Mei 2023	279

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

6.7.5

Companies can show a work accident record using the Lost Time Accident (LTA). The calculation of work accidents using LTA until May 2023 is as follows:

- Pangkatan Mill: FR 0 and SR 0
- Pangkatan Estate: FR 8.07 and SR 8.07
- Bilah Estate: FR 7.22 and SR 12.03
- Sennah Estate: FR 8.44 and SR 8.44

The reference for calculating FR and SR include working hours, number of employees, work accident cases, and lost working days.

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 integrated pest control plan is contained in the annual budget document which refers to the procedures in place, including:

- Carry out detection, census and monitoring of pest attacks of rats and leaf-eating caterpillars periodically in accordance with procedures.
- Carrying out biological pest control by using owls to control the population of rats and planting beneficial plants as habitats for predators of leaf-eating caterpillars.

Based on information from the estate manager and document review, it was found that the potential pests were leaf-eating caterpillars and rats, but based on early observations it was concluded that the pest attack was still below the threshold set.

Identification of potential pests listed in the Pest and Disease Control SOP. Types of pests identified that can cause potential include Rats.

The company also controls caterpillar pests by planting and maintaining natural enemies of caterpillars, such as *Turnera subulata*. The company can show the record of the development of the beneficial plant.

Based on the monitoring document of owl cages, it is known that the company has used *Tyto alba* as a biological pest control method with a total of 174 owl's nest. The results of field visits, for example in Block J10 Division 1 Bilah Estate, found that the owl cages were in good condition and active.

The company has identified plant-disturbing organisms such as rats and caterpillars that eat oil palm leaves. Companies can show documentation of early detection systems against pest attacks, for example as follows:

- Based on the recording of the rat pest census, for example, in the period of April 11, 2023, it was known that there were attacks by rats with attack criteria of 4,30%. The results of field visits, for example, the G04 Division II block, did not find any signs of rat pest attack. (Pangkalan Estate).
- Based on the recording of the rat pest census, for example, in the period of Maret 08, 2023, it was known that there was an attack of rat pests with attack criteria of 1,80%. The results of field visits, for example, block H11 Division 1, did not find any signs of rat infestation. (Bilah Estate).
- Based on the recording of the rat pest census, for example, in the period of April 04, 2023, it is known that there was an attack of rat pests with an attack criteria of 3.20%. The results of field visits, for example, Block E06 Division 2, did not find signs of rat infestation. (Sennah Estate).

Based on the results of field visits, for example to Block I9 Division I, Bilah Estate it was found that there was no indication of rat infestation on plants. This is in accordance with the recording of the rat pest census conducted by the company where the rat pest attack is still below the threshold.

7.1.2

Verification of documents and interviews with management of the Pangkatan, Bilah, and Sennah Estate as well as field observations in the estates found that no species were referenced in the global database and CABl.org and environmental and forestry Ministerial Decree no. P94/MENLHK/SEKJEN/KUM.1/12/2016 regarding the type of invasive used by the unit of certification. Furthermore, based on document review, field observations, as well as interviews with workers and external stakeholders, it is known that the company does not use fire for pest control.

7.1.3

Based on the review of pest control documents, pest control procedures owned by the company, as well as interviews with workers in the field during the assessment activities, it is known that the company does not use fire in pest control.

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 has a safety policy on the use of chemicals that are listed in the procedures for managing hazardous materials, hazardous waste and procedures for controlling weeds, pests and diseases. The procedure explains the use of PPE for employees and the management of used pesticide containers.

The company has shown a list of pesticides used by the company during the 2023 period. The types of pesticides used are as follows:

Merk	Active ingredients	Target
Dipel SC	<i>Bacillus thuringiensis</i>	Caterpillar control
Brantas 25 EC	<i>Lambda cyhalothrin</i>	Caterpillar control
Prima Jos 865 SL	<i>2,4-D dimethylammonium</i>	Control broadleaf, narrow and cone weeds
Meta Prima 20 WG	<i>Metsulfuron methyl</i>	Broadleaf weed, Ageratum conyzoides, Borreria alata, Crassocephalum crepidiodes, Cleome rutidosperma
Prima Up 480 SL	<i>Glyphosate isopropyl</i>	Broadleaf weed, Borreria alata Mikania micrantha, grass group, Ottochloa nodosa Paspalum conjugatum
Capture 50 EC	<i>Cypermethrin</i>	Caterpillar control
Starlon 665 EC	<i>Triclopyr butoxyl ethyl ester</i>	Control of weed seeds
Omni care 288 EC	<i>Fluroxypyr methyl ester</i>	Broadleaf weed, Cromolaena odorata, Cliderrhina hirta, Mikania micrantha Melastoma Malabathricum
CBA Fip 50 SC	<i>Fipronil</i>	Pest protection on crops
Megathion 1200L	<i>Malathion</i>	Caterpillar control
Cypertop 200 EW	<i>Cypermethrin</i>	Caterpillar control

The company has guidelines for the use of pesticides which are documented in the appendix to the List of Pesticides Used. In the document there are several guidelines, namely, how to choose selectively, store, use, deal with contamination, understand the signs and symptoms of pesticide poisoning, instructions for first aid, and instructions for medical treatment for poisoning.

Based on field visits and interviews with spray workers in Pangkatan Estate, Bilah Estate, and Sennah Estate, it was concluded that workers knew about the function of chemicals used and were selective when spraying activities, for example, glyphosate was used to spray circles and paths only while weeds in the dead goal is not sprayed.

7.2.2

The certification unit has SOPs and work instructions for weed management, guidelines covering selection, storage, application, handling of contamination, knowing the signs and symptoms of pesticide poisoning, and first aid for poisoning cases. To ensure that the pesticides used are in accordance with the target, the unit of certification identifies the types of weeds found in the operational area.

The unit of certification has documented pesticide toxicity records in the Monthly Pesticide Toxicity Data document. The document records the product name, active ingredient, area treated, amount of active ingredient applied per Ha, and total application. This document is continuously recorded and updated by the Estate Sustainability Officer on a monthly basis.

Merk	Active ingredients	License number	Validity period	Utilization
Starlon 665 EC	<i>Triclopyr butoxyl ethyl ester</i>	RI. 01030120072899	27 Juni 2027	Spraying Selective, Circle Spraying
Meta Prima 20 WP	<i>Metsulfuron methyl</i>	RI. 01030120031897	03 September 2023	Spraying Selective, Circle Spraying
Rollup 480 SL	<i>isopropyl amina glyphosate</i>	RI 010030120042133	03 September 2023	Weeding Selective

Based on the document review, it is known that the company has used registered pesticides and there is no ban on the use of pesticides. Example of recording in documents relating to the use of META PRIMA WP pesticides, active ingredient: Metsulfuron methyl, area treated at the estate rank with a total area of 2,430 Ha, amount of active ingredient used per Ha: 0.0060782, and a total application of 14.77 liters in a month May 2023 for all operational estate area.

7.2.3

The IPM plans that have been implemented include planting beneficial plants as perch for predators of caterpillars that eat oil palm leaves and developing owl populations as natural enemies of rats. In addition, the company has also carried out routine early detection which is listed in the monthly early warning system report.

Based on the pesticide use data shown, the use of pesticides for pests has been minimized because the application will only be carried out if the census results are above the control threshold. The unit of certification does not use pesticides prophylactically. If the conditions of the ring and harvest path are still quite standard, weed control will be postponed. Based on observations of spraying activities, the application method is not a preventive application but is selective for locations that have weeds. The circle and lane spraying are carried out by the certification unit three times a year using selective pesticides. Field observation, Block D5 Pangkatan Estate, Block G8, Division II Bilah Estate, and Block D10, Division II, Sennah Estate were known if workers already know how to selectively spray, for example only spraying circles or paths that have weeds and if there are no weeds no spraying, then Based on document review, field observations, as well as stakeholder consultation, knowing that the company does not apply pesticides from the air.

7.2.4

There is no prophylactic method in the use of pesticides by the company. The company only controls using pesticides if the pest attack census shows results above the threshold. Field observation, D5 Pangkatan Estate, Block G8, Division II Bilah Estate, and Block D10, Division II, Sennah Estate found out if workers already know how to selectively spray, for example only spraying circles or paths with weeds, and if there are no weeds no spraying, then Based on document review and field observations, as well as stakeholder consultation, knowing that the company does not apply pesticides from the air.

7.2.5

The company uses chemicals that are registered and authorized by the Government as www.pesticide.id. Based on document verification, field visits to pesticide storage places, and interviews with management and pesticide applicators, information is obtained if the company does not use pesticides prohibited by the government as stated in Attachment II to Regulation of the Minister of Agriculture Number 39 of 2015 concerning Pesticide Registration. Based on the list of pesticides used in 2022 - 2023 the company does not have any pesticides listed in the World Health Organization (WHO) Class 1A or 1B or included in the Stockholm or Rotterdam Conventions, and paraquat.

Based on document review and field observations in chemical storage the company does not stock pesticides Class 1A or 1B and paraquat.

7.2.6

Based on field observations and interviews with workers Field observations in Block D5 Pangkatan Estate, Block G8, Division II Bilah Estate, and Block D10, Division II, Sennah Estate as well as interviews with management, the unit of certification can be presented that pesticide application is carried out by trained people and in accordance with applicable guidelines on product labels. and storage, as evidenced by:

- Workers are equipped with PPE such as shoes, helmets equipped with face shields, aprons, shirts and trousers, masks, and nitrile gloves. The type of PPE is in accordance with the MSDS recommendations for Glyphosate and methyl metsulfuron.
- Workers are able to explain and demonstrate work according to procedures, such as justifying pesticide use, considering wind flow when spraying, mixing pesticides, pesticides, and their targets, and restricted areas for spraying (eg HCV and riparian areas).
- The pesticide solution is mixed in the pesticide warehouse and transported by special vehicles for safety aspects and to reduce environmental pollution.
- Regarding food brought to the field, the management unit has been provided with a special box to minimize the risk of negative impacts
- Spraying activities are carried out selectively with a knapsack sprayer whose nozzle is calibrated periodically. After work, the knapsack sprayer and PPE are stored in a special warehouse at the Estate.
- Minutes of pesticide handling training conducted on May 22, 2023 which was attended by 14 spray workers. (Pangkalan Estate)
- Minutes of pesticide handling training conducted on May 23, 2023, which was attended by 23 workers. (Bilah Estate)
- Minutes of pesticide handling training conducted on May 23, 2023, which was attended by 22 workers. (Sennah Estate).

7.2.7

The results of field visits to the chemical warehouses of Pangkatan Estate, Bilah Estate, and Sennah Estate revealed that all pesticides stored were in accordance with the best practices, pesticide storage was adjusted according to type, liquid pesticides were stored at the bottom, each pesticide was stored according to its group.

7.2.8

The unit of certification already has SOPs or work instructions related to the management of company Toxic and Hazardous Waste listed in the PI/SOP/OHS-11 procedure document dated 2 May 2011. In general, this procedure explains that all empty used pesticide packages must be properly controlled and managed and may not be used for employee needs, such as for water containers, food containers, and others. Used pesticide packaging that is not reused must immediately have a hole punched in the bottom and sent to the Hazardous and Toxic Waste Storage.

Based on document review, the company can show the number of used pesticide packages that leave the central warehouse and enter (after field application) to the hazardous and toxic waste warehouse. Pesticide packaging that is recorded based on each type of pesticide from each plantation. The unit of certification does not reuse the packaging for other purposes.

Based on the results of field visits to the residential areas of the Pangkatan Estate, Bilah Estate, and Sennah Estate, it was found that there were no traces of pesticide packaging that were reused, for example as water reservoirs or flower pots.

7.2.9

The results of document review and interviews with management revealed that the company does not apply pesticides by air.

7.2.10

The certification unit has conducted a special medical checkup (cholinesterase) for chemical operators which is carried out annually by an accredited certification unit clinic. The 2023 inspection has been carried out based on the report in May 2023. The results of the health check are informed to workers and all pesticide operators are in good health (normal results). In addition, based on interviews with workers, it is known that they have never had a work accident caused by chemicals such as irritants.

7.2.11

Based on verification of the list of pesticide applicators in each unit revealed that all pesticide applicators were male. Based on field observations and interviews with pesticide applicators in each unit is known that there are no pesticide applicators with medical limitations.

Status: Comply

7.3

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

7.3.1

The Unit of Certification already has SOPs and work instructions related to waste management, stated in PI/SOP/OHS-11 Toxic and Hazardous Waste Management, rev 4, dated 2 May 2011. This procedure explains chemical packaging (washed 3 times and sent to hazardous waste, recording of waste produced, PPE used by officers, storage period of 90 days, and collection and transportation by licensed collectors.

The identification of waste sources for the 2023 period with details: used pesticide packaging, medical waste, used iron, used fertilizer sacks, palm fronds, organic waste, an organic waste, paper waste, and residential waste water.

Hazardous and Toxic Waste

- **PT Pangkatan Indonesia (Pangkalan Estate)**
Permit Based on the Decree of the Head of the DPMPSTSP of Labuan Batu Regency Number. 503.660.31/205/DPMPSTSP-BP2MNP/2020 dated 7 September 2020 valid for 5 years.
- **PT Bilah Plantindo (Bilah Estate)**
Permit Based on the Decree of the Head of the DPMPSTSP of Labuan Batu Regency Number. 503.660.31/204/DPMPSTSP-BP2MNP/2020 dated 7 September 2020 valid for 5 years.
- **PT Sembada Sennah Maju (Sennah Estate)**
Permit Based on the Decree of the Head of the DPMPSTSP of Labuan Batu Regency Number. 503.660.3/137/DPMPSTSP-

BP2MNP/2021 dated 10 February 2021 valid for 5 years.

Based on field observations at the licensed hazardous waste storage located at Pangkatan Estate, Sennah Estate, and Bilah Estate, it is known that the storage building is a permanent building with ventilation according to the coordinates on the permit. In addition, there are emergency response facilities such as fire extinguisher, eye wash, alarm, emergency response procedures, symbols and labels, sand powder to clean up spills, first aid kits, and a logbook.

In its management, unit of certification has a cooperation agreement as a party to collect and transport, namely **PT Wira Gemilang Anugrah** based on the document agreement;

- **PT Pangkatan Indonesia (Pangkalan Estate)** Number 094/PI-WGA-WI/SPKLB3/X/2022 dated 04 October 2022 which is valid until 03 October 2023.
- **PT Bilah Plantindo (Bilah Estate)** Number 117/BP-WGAT-WGAP/SPKLB3/XII/2022 dated 10 December 2022 which is valid until 09 December 2023.
- **PT Sembada Sennah Maju (Sennah Estate)** Number 118/SSM-WGAT-WGAP/SPKLB3/XII/2022 dated 10 December 2022 which is valid until 09 December 2023.

As for the types of waste that can be handled are used lubricating oil, used batteries, used filters, TL lamps, used pesticide containers, medical waste, used cartridges, used sacks, rags, and contaminated sand. For utilization and/ processing of waste, PT Wira Gemilang Anugrah as the transporter collaborates with advanced waste processors, namely **PT Wastec International** with work agreement Number 096/BP-WGA-WI/SPKLB3/X/2022 made on 4 October 2023 valid until 03 October 2023.

From the results of a document review by comparing balances and logbooks, it can be seen that the submission of waste to storage for June 2023 has been appropriate and there is no difference in the amount submitted. Thus it can be concluded that there are no recording errors and discrepancies based on the Balance Sheet, Logbook and Festronik documents, this shows that the company has properly documented the storage and handling of waste.

Solid Waste

The solid waste produced by the company is shell, fiber and empty fruit bunch. The management plan is carried out by reusing solid waste such as shells, fiber, and EFB to be reused as boiler fuel. Solid waste utilization data is explained in more detail in indicator 7.9.1.

Liquid Waste (POME)

Liquid waste generated from the factory is discharged into water bodies before being managed first at the WWTP with the aim that the quality of the liquid waste accordance with the provisions. POME management is explained in more detail in indicator 7.8.3.

Domestic Waste

Domestic waste generated from housing and offices will be disposed of in Landfills. Afterward, grey water generated housing complex and office be managed on septic tanks.

7.3.2

Unit of Certification has implemented hazardous waste management in accordance with its procedures and PP Number 22 of 2021 and has carried out document reporting every quarter, including by;

- Recording and documenting the hazardous waste stored in a logbook and balance sheet for the period up to May 2023 the categories of types of waste stored; used oil, liquid contaminated waste, used batteries, filters, medical waste, used pesticide packaging, used fertilizer sacks, rags, contaminated sand, contaminated waste, used oil containers, used oil drums.
- Recording and documenting the hazardous waste handed over to the collectors and transporters in the form of festronic manifest evidence.

In its implementation, it can be proven that waste disposal is in accordance with procedures that are fully understood by workers, from the following documents:

- Document on Results of Identification of Waste Sources, which provides information regarding sources of hazardous and domestic waste that have been identified by the company from plantations.

- Balance Sheet and Logbook for storing waste at hazardous waste. The recording is carried out to determine the incoming and outgoing waste and to determine the shelf life of waste at storage.
- Conduct socialization to employees which can be proven through minutes of socialization in the form of attendance and photos
- OHS Completeness Monitoring Document for the 2023 period which informs the condition and completeness of emergency response facilities areas such as first aid kits, eye wash and shower checks, fire extinguishers, spill kits and alarms.
- Routine reporting of quarterly to District and/or Provincial Environmental Agency to related offices.

From the results of a field visit to the Pangkatan Estate, Sennah Estate, and Bilah Estate housing estates, no scattered trash was found. The results of interviews with workers in the Sennah Estate warehouse and workshop area show that they understand the practice of waste disposal, segregation, and the prohibition on the use of used chemical packaging.

7.3.3

The unit certification does not use open burning for waste disposal. It can be proven through document review and management interviews. Evans Group Indonesia has Sustainable Policy regarding Environment, specifically related to fires;

- The Group prohibits open burning and the use of fire for land clearing
- The Group prohibits the use of fire as a method of disposing of domestic waste
- Companies under the group will carry out patrols in extinguishing fires that occur as a result of natural causes or unauthorized individual actions in the concession area.

It is also proven through the waste transportation manifest and the results of field observations in housing area there are no traces of burning waste in which there is residual plastic waste. Based on interview with residence in Pangkatan Estate, Sennah Estate, and Bilah Estate housing area, they don't burn waste due to company policy and availability of good waste management and company sanctions.

Status: Comply

7.4

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

7.4.1

The company has Procedure Practices to maintain soil fertility at, or where possible improve soil fertility as described in several documents:

- Fertilization Work Instruction No.IDN-AGR-SOP09-01 which was last revised on March 3, 2020.
- Fertilization Nursing Management Procedure (Document No. AGR-SOP01-01).
- Oil palm cultivation manual book PT. Evans Indonesia.

These procedures establish a set of strategies to maintain and improve long-term fertility, by combining efficient and scalable organic fertilization, taking into account oil palm age and soil nutrient properties by conducting leaf and soil sampling. Efficient and moderate organic fertilization is very important to maintain soil structure and texture, combined with fertilization with POME land application and EFB mulch application. Fertilization is carried out mainly in the interior with low nutrient properties, to improve soil structure and texture, microbiological properties, and minimize inorganic fertilization if possible. There is a defined replanting activity procedure that the biomass in replanting will return to the soil for the nutrient cycle strategy.

The implementation and monitoring of SOPs can be seen from the monitoring of fertilization work by each division, while the monitoring of fertilization performance results is carried out by the agronomy quality control section.

7.4.2

The company has shown a recapitulation of the results of leaf analysis and soil analysis results, namely:

Pangkatan Estate

- Soil Analysis Number 98533/DMBPAP dated August 18, 2022, issued by Sucofindo for a total of 4 samples. The parameters analyzed were N, Pb, P, Cd, Cu, Zn, pH, C-Organic, Fe, Al, Mn, Ca, Mg, and K.
- Leaf Analysis Number 016/RD/EXT/L/Feb/2022 dated 12 February 2022 published by PT Nusa Pusaka Kencana Analytical & QC Laboratory for a total of 8 samples. The parameters analyzed include Ash, N, P, K, and Mg. Ca, B, Cu, Zn, Mn, Fe, S and Cl.

Bilah Estate

- Soil Analysis Number 98282/DMBPAP dated August 18, 2022, issued by Sucofindo for a total of 4 samples. The parameters analyzed were N, Pb, P, Cd, Cu, Zn, pH, C-Organic, Fe, Al, Mn, Ca, Mg, and K.
- Leaf Analysis Number 136/RD/EXT/L/JUL/2022 dated 20 July 2022 published by PT Nusa Pusaka Kencana Analytical & QC Laboratory for a total of 68 samples. The parameters analyzed include Ash, N, P, K, and Mg. Ca, B, Cu, Zn, Mn, Fe, S and Cl.

Sennah Estate

- Soil Analysis Number 48703/DMBPAO dated December 12, 2022, issued by Sucofindo for a total of 3 samples. The parameters analyzed were N, Pb, P, Cd, Cu, Zn, pH, C-Organic, Fe, Al, Mn, Ca, Mg, and K.
- Leaf Analysis Number 154/RD/EXT/L/AGT/2022 dated August 08, 2022, published by PT Nusa Pusaka Kencana Analytical & QC Laboratory for a total of 42 samples. The parameters analyzed include Ash, N, P, K, and Mg. Ca, B, Cu, Zn, Mn, Fe, S and Cl.

The results of the laboratory analysis are used as a consideration in calculating the annual fertilizer recommendation.

7.4.3

The company's recycling strategy is to use EFB and liquid waste as fertilizer.

Applications Empty Fruit Bunch May 2023: 18,208 tons

Utilization data for Land Application Mei 2023 is 28,567 M3.

7.4.4

The unit of certification shows fertilizer application records for the period from January to May 2023. For example, a summary of fertilizer applications in 2023:

Pangkatan Estate

No	Fertilizer Type	Recommendation	Realization
		Kg	Kg
1	Borate	32.254	32.254
2	Kieserite	114.771	114.550
3	MOP	436.274	436.300
4	RP	185.161	185.150
5	Urea 1	241.487	241.350

Bilah Estate

No	Fertilizer Type	Recommendation	Realization
		Kg	Kg
1	Borate	25.631	25.731
2	Kieserite	112.325	112.300
3	MOP	517.712	517.829
4	RP	436.315	436.300
5	Dolomite	74.423	55.150
6	Urea 1	250.572	250.640

Sennah Estate

No	Fertilizer Type	Recommendation	Realization
		Kg	Kg
1	Borate	10.180	10.180
2	Kieserite	34.388	34.388
3	MOP	197.650	197.650
4	RP	150.548	150.548
5	Urea 1	121.445	121.445

Based on the table above, it is known that fertilization has been well recorded by the manager. Based on document review and interviews with staff, fertilization realization in each Estate reached 100% and the fertilization that has been done is in accordance

with the recommendations set by the company.

Status: Comply

7.5

Practices minimize and control erosion and degradation of soils.

7.5.1

The company can show a land type map of each estate which can be detailed as follows:

- Bilah Estate with document No. BIE-AGR-SOILMAP01-01 scale 1: 50,000. Soil types in the Bilah Estate are: Sulfic Endoaquepts, Typic Endoaquepts, Histic Endoaquepts, Sapric Haplohemist. With a land area of 3,049 hectares
- Pangkatan Estate with document No. PGE-AGR-SOILMAP01-01 scale 1: 35,000 soil types contained in Pangkatan Estate are: Typic Endoaquepts, Histic Endoaquepts, Typic Dystrudepts, Typic Kandiodults, Typic Kanhapudults. With a land area of 2,626 hectares
- Sennah Estate with document No. SNE-AGR-SOILMAP01-01 scale 1: 45,000 soil types contained in Sennah Estate are: Sulfic Endoaquepts, Typic Endoaquepts, Aquic Eutrudepts, Typic Eutrudepts. With a land area of 1,811 hectares

In addition, the company can also show a plantation slope map which can be detailed as follows:

- Bilah Estate Slope Map

Class	Slope (Degree)	Hectare	Percentage
Flat	0 – 2	2,960.66	97.09
Undulating	2 – 6	88.64	2.91
Total		3,049.30	100

- Pangkatan Estate Slope Map

Class	Slope (Degree)	Hectare	Percentage
Flat	0 – 2	956.93	36.44
Undulating	2 – 6	1,587.35	60.45
Rolling	6 – 10	80.49	3.06
Hilly	10 – 20	1.40	0.05
Total		2,626.17	100

- Sennah Estate Slope Map

Class	Slope (Degree)	Hectare	Percentage
Flat	0 – 2	1,479.22	81.70
Undulating	2 – 6	331.31	18.30
Total		1,810.53	100

7.5.2

Based on field observations at the Pangkatan Estate, Bilah Estate, and Sennah Estate, it was found that the areas were relatively flat and there were no contoured terraces, but individual terraces in certain areas. Specific slope management includes found EFB application, forward stacking using a U-shape system, and selective weeding in between. Oil palm plantations in the operational area are the first cycle of Pangkatan and Bilah Estate, there are no new plantings, only replanting activities in the Bilah Estate. From the results of field observations in the Replanting area of Blocks J05 of the Bilah Estate, it is known that replanting activities are not carried out in areas with steep slopes.

7.5.3

Based on field observations at Pangkatan Estate, Bilah Estate, and Sennah Estate, it is known that the area is relatively flat and there are no contoured terraces, but individual terraces in certain areas. Specific slope management includes found EFB application, forward stacking using a U-shape system, and selective weeding in between. Oil palm plantations in the operational area are the first cycle of Pangkatan and Bilah Estate, there are no new plantings, only replanting activities in the Bilah Estate. From the results of field observations in the Replanting area of Blocks J05 of the Bilah Estate, it is known that replanting activities are not carried out in areas with steep slopes.

		Status: Comply	
7.6			
Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1			
The is no new planting and/or new development area in the unit of certification. However, the existing oil palm has been developed considering the soil survey and mapping.			
7.6.2			
The specific best practices to maintain and improve the limitation, especially in marginal suitable soil has been observed by implementing EFB mulching application dose 100 kg/tree, to improve soil nutrition. For undulating or hilly area, the company implementing individual terrace/platform.			
7.6.3			
The existence of a land map that contains information on soil classification, texture, drainage, limiting factors, rocks, and information on suitability for oil palm plantation development has helped companies that are used by companies to arrange blocks, roads, drainage, bridges, etc. The Company also has a Road Maintenance Program which is equipped with adequate facilities and infrastructure to carry out the work. Based on the results of the field visits, the roads are in good condition and the harvested FFB can be transported smoothly to the mills. The oil palm plantations in the operational area are the first cycle of the Pangkatan Estate and the Sennah Estate, there are no new plantings, only replanting activities in the Block J05, Bilah Estate.			
		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			
Based on document verification, it is known that the company is not clearing new land but replanting activities in the Bilah Estate. The results of the field visit in Blocks J05 of the Bilah Estate revealed that replanting activities were not carried out on peatlands.			
7.7.2			
Based on the Peat Inventory document, PT MP Evan has peatland located on the Bilah Estate covering an area of 821.66 hectares and it was reported to the last RSPO on 18 September 2020. However, at the time of the audit, there was no new planting on peat since 2018. Based on document verification, it is known that the peat inventory has been reported to the RSPO on 18 September 2020 and the reported peat area is in accordance with the actual conditions in the field.			
7.7.3			
The company shows records of the arrangement for subsidence of high peat soil layers, including the following: Based on the monitoring results of peat soil subsidence on September 30, 2022, it is known that the subsidence stake for Division III for Block D11 has decreased by 0.1 cm, Block B06 has not decreased and Block D10 has not decreased.			
Based on the results of interviews with water management officers, it is known that these personnel understand and can explain the mechanism for regulating peat subsidence.			
7.7.4			
The company shows records of water and land cover management programs, including the following:			
<ul style="list-style-type: none"> • Surface Water Level Based on the results of monitoring the surface water level for the period of June 2022, it is known that the average condition of the water level is in the range of 40-55 cm. Based on the results of field visits in Blocks B10 and B11 Division 3 of the peat area, it is known that the surface water level is 50 cm. • Groundwater Level Based on the results of monitoring groundwater levels for the period of June 2022, it is known that the average water level is in the range of 50-60 cm. The results of field visits in Blocks B10 and B11 Division 3 revealed that the surface water level was 60 cm. • Peat subsidence 			

Based on the monitoring results of peat soil subsidence on September 30, 2022, it is known that the subsidence stake for Division III for Block D11 has decreased by 0.1 cm, Block B06 has not decreased and Block D10 has not decreased.

Based on the results of interviews with water management officers, it is known that these personnel understand and can explain the mechanism for regulating peat subsidence.

Based on the description above, it can be concluded that the company has made arrangements for subsidence of high peat soil layers.

7.7.5

Based on the results of interviews with management and a review of documents regarding the replanting plan, there will be no replanting activities on peatlands for the next 5 years. Peatlands are only in the Bilah Estate.

7.7.6

The company has procedures or work instructions for planting peat in the Peatland Management Procedure Document (AGR-SOP16-01 dated October 1, 2019). However, in this procedure, there is no guideline for installing/placing subsidence piles as a measurement tool for peat soil subsidence, which refers to the "RSPO Peatland Working Group meeting on 13-14 September 2018 to clarify potential audit guidance for Criteria 7.7 (as adopted by GA)". Where the company must have 1 subsidence marker in every 240 ha of peat area. For peat areas with more than 5000 ha, the number of stakes can be deducted from this requirement if the company has justification. Based on field observations, it is known that the company has 3 land subsidence markers in the Bilah Estate (821.66 hectares of peat area), while the piezometer is 46 units. The results of field observations are known that the company has a piezometer, and the measurements are carried out every month.

7.7.7

Based on the results of document verification, information was obtained that the peat area is in the Bilah Estate area, which is a planting area, based on the HCV area identification document there is no peat area classified as HCV peat conservation, only the HCV numbers for riverbanks and graves.

Status: Comply

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

The management unit has a water conservation policy (No. AGR-SOP05-01, dated 3 March 2020). This procedure is aimed to ensure that all water and soil conservation activities pay attention to environmental, social, work safety aspects and comply with technical guidelines. And, to control all water and soil conservation activities to comply with environmental and social management objectives. It also explains the person in charge and the procedure for the types of water and soil conservation activities.

Test results related to surface water quality monitoring in December 2022 located in the Air Alur River were carried out by a KAN-accredited laboratory with Number LP-389-IDN. The test results are all parameters that are in accordance with the applicable quality standards.

The company also provides alternative drinking water that can be consumed directly in the form of water that comes from drilled wells but has gone through a very good and controlled filtering process at the Reverse Osmose (RO) filtering installation. Drinking water testing is also carried out by the company to see the quality of drinking water taken from drilled wells which is carried out by a KAN-accredited laboratory. The results of testing the quality of drinking water also show that all the parameters of the test results are still in accordance with the applicable quality standards, namely Regulation of the Minister of Health Number 32 of 2017.

Based on the results of observations and interviews in the housing area in Pangkatan Mill and Billah Estate, information was obtained that clean water facilities for housing were obtained from drilled wells and rainwater collection facilities. Therefore, the unit of certification has made efforts to manage water sources for continuous availability and avoid negative impacts. Access to clean water is also adequate and not restricted for workers and residents of housing who have met the requirements for water sanitation hygiene and can be used properly.

7.8.2

The Unit of Certification has SOP for the maintenance of protected areas and areas of high conservation value Number PI/SOP/General-07 dated 2 May 2011. The procedure contains matters as follows:

- Procedures for the management of peatland areas which confirm that areas with peat depths of more than 3-meters are recommended not to be cleared in planning conservation activities.
- A river riparian management procedure which stipulates that the left and right sides of the river are absolutely excluded from the land clearing area, even if there are no important vegetation (trees) in it. With the reason that the area will later be carried out forest rehabilitation activities so that its condition can be restored.
- Determination of the boundaries of the riparian area that must be conserved, namely for a river with a width of less than 10-meters has a width of conservation areas to the left and right of the river that is 50 meters long, and a river with a width of more than 10-meters has a width of conservation areas to the left and right of the river along 100-meters.

Based on the RKL-RPL document, the identification results of the 2011 HCV high conservation value areas, as well as maps of river flows and water sources that have been mapped at a scale of 1:21,000 it can be seen that there is only 1 point of river flow that is within the Pangkatan POM Certification Unit area, namely the Kundur River and is in Pangkatan Estate. Meanwhile, the Bilah Estate and Sennah Estate are not crossed by rivers in their management area.

Based on the results of field observations in HCV Area Sekundur River at Pangkatan Estate Block O1 Division 4, it can be seen that there is an HCV area information sign, and no traces of application were found chemicals, there is no replanting in the HCV area, and there are efforts to enrich the species by planting local plants.

7.8.3

Management of POME from oil palm processing from the Pangkatan Mill with totalling 6 waste ponds with total volume 131,040 m³ using single feeding system then processed to reduce pollutant elements so that they are suitable for disposal into water bodies. Based on these data, and when compared with the responsibility contained in the Permit document from Decree of the Head of DPMPTSP Number 503.660/153/DPMPTSP-BP2MNP/2020 on 02 July 2020 indicates that the company has complied with. Before being wasted, the liquid waste is processed until it reaches the standard for wastewater utilization in oil palm plantations, with pH 6-9 and BOD 5000 mg/l. POME is managed in accordance with applicable national regulations, according PermenLH No. 5 2014 attachment III regarding Technical Guidelines for Assessment of Wastewater Utilization from Palm Oil. Wastewater from the WWTP pond outlet then discharged into an artificial canal in the company area.

The company can show documents regarding the results of the measurement of the quality of POME, namely the POME Report per quarter and the RKL-RPL Implementation Report per semester which includes the results of the measurement of the quality of POME every month and land application monitoring well. The test is carried out by the KAN accredited laboratory. Based on the analysis of the test document, it shows that all the parameters tested are in accordance with the applicable quality standards (especially for pH and BOD) and for waste water utilization to be applied to land its does not cause pollution to the environment.

The results of interviews with workers and the surrounding community also obtained information that there were no complaints regarding the waste produced by the company. This is also in line with the results of interviews with Environment Agency of Labuhanbatu Regency.

7.8.4

The certification unit already has a surface water utilization permit for Pangkatan Mill based on the Technical Recommendation dated 25 November 2022 Number 610/2513/III/2022. The water source is taken from Sei Kundur, Perkebunan Pangkatan Village, Labuhanbatu Regency, Sumatera Utara Province.

The water usage for FFB processing has been monitored and documented. The document of water usage in period of June 2021 - May 2022 shown that the water usage ratio in the range of 13.475,83 m³/month, this range is still in accordance with the water quotas that can be utilized and in accordance with the quota on the budget determined by the company, namely 110.016 m³/month. The unit certification also paid of water usage retribution every month for the entire scope of certification.

From the results of field observations to the Water Treatment Plan (WTP) and Water Intake in Pangkatan Mill shows that the flowmeters used are still functioning properly. The results of interviews with the operator also show that he understands about work

procedure and record flowmeter data every day.																																	
		Status: Comply																															
7.9 Efficiency of fossil fuel use and the use of renewable energy is optimized.																																	
7.9.1 The unit of certification using of fossil fuels to increase the efficiency and to optimize monitored and renewable energy. This can be proven by recording documents on the application of the use of shells, and from the rest of the mill production process as renewable fuel for boiler purposes in June 2022 – May 2023. Currently, the company has not utilized methane gas to produce electricity-producing biogas.																																	
Based on the results of interviews and document verification, it shows that all solid waste in the form of shells and is used to substitute diesel fuel, this utilized, and the usage data recorded in detail and traceable for the period 2022. From data shows, it is known that the company has saved 85.20% of diesel fuel of the total diesel that should have been used as evidence of energy efficiency produced from use of renewable energy. From the results of interviews with management, this savings is also due to the use of electric (PLN) as an alternative energy source.																																	
The company has also made efforts to improve the efficiency of the use of fossil fuels in the transportation area (use of vehicles), among others by carrying out regular maintenance to reduce incomplete combustion and analyzing fuel use by selecting efficient transportation routes.																																	
		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 minimize GHG emissions.																																	
7.10.1 The Certification Unit has carried out a GHG inventory contained in the 2023 Greenhouse Gas Emission Mitigation Program document, based on document analysis it can be concluded that the company has identified the source of GHG produced by the Pangkatan POM unit and its suppliers. Identification of significant sources of GHG emissions identified and mitigation plans have been developed by the company covering mills and plantations. Significant GHG emissions include changes in land use, processing of POME, use of fertilizers and pesticides, use of fossil fuels for operations and transportation. The mitigation plan includes, among other things, the correct dosage of fertilizer uses and application as recommended, reducing reuse and recycling actions, limiting the use of electricity, transportation and machine maintenance, as well as periodic air quality tests. The company has also reported the results of GHG calculations to the public which are submitted to the RSPO GHG website.																																	
The reduction of fossil fuels in the Pangkatan POM has been carried out by using fiber and shells for fuel substitution. The company also conducted wastewater testing monitoring with the results meeting the applicable quality standards. Based on document review for example: pesticide use monitoring, diesel fuel monitoring, HCV identification and others it was found that accurate data has been entered into RSPO GHG Calculator version 4.0. The summary of GHG emissions for the January-December 2023 period is as follows:																																	
General Information																																	
<table><tr><td>Association</td><td>No. of Estates/Plantations</td><td>FFB Processed (t)</td><td>Planted Area (ha)</td></tr><tr><td>Own Plantation</td><td>3</td><td>192,573.71</td><td>6,966.00</td></tr><tr><td>Group Plantation</td><td>0</td><td>0,00</td><td>0.00</td></tr><tr><td>3rd Party</td><td>1</td><td>39,083.21</td><td>0.00</td></tr><tr><td>Total</td><td>4</td><td>231,656.92</td><td>6,966.00</td></tr></table>				Association	No. of Estates/Plantations	FFB Processed (t)	Planted Area (ha)	Own Plantation	3	192,573.71	6,966.00	Group Plantation	0	0,00	0.00	3rd Party	1	39,083.21	0.00	Total	4	231,656.92	6,966.00										
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OER	23.01	%	Conservation area (non-Forested)	39.40	Ha
KER	5.24	%	FFB Production per hectarage	33.26	t/ha

Mill Emissions and Credits & Emissions from Palm Kernel Crusher					
Mill Emissions and Credits			Emissions from Palm Kernel Crusher		
Emission Source and Credits	tCO2e	tCO2e/t FFB	Emission Source	tCO2e	
POME	26433.18	0.11	PK from own mill	0.00	
Fuel Consumption	462.44	0.00	PK from other sources	0.00	
Grid Electricity Utilization	0.00	0.00	Fuel Consumption	0.00	
Export of Excess Electricity to Housing & Grid	0.00	0.00	Total Crusher Emissions	0.00	
Sale of PKS	0.00	0.00			
Sale of EFB	0.00	0.00			
Total	26895.62	0.12			

Estate / Plantation Field Emissions and Sinks				
Description	Emission (tCO2e)			TOTAL
	Own	Group	3rd Party	
Emission Source				
Land Conversion	66291.93	0.00	0.00	66291.93
CO2 Emissions from Fertilizer	5188.16	0.00	0.00	5188.16
N2O Emissions from Peat	6150.67	0.00	0.00	6150.67
N2O Emissions from Fertilizer	4467.42	0.00	0.00	4467.42
Fuel Consumption	1135.28	0.00	0.00	1135.28
Peat Oxidation	44862.09	0.00	0.00	44862.09
Sinks				
Crop Sequestration	-61712.54	0.00	0.00	-61712.54
Sequestration in Conservation Area	-119.21	0.00	0.00	-119.21
Total	66263.80	0.00	66441.46	132705.25

Palm Oli Mill Effluent Treatment		
Description	Unit	Value
Diverted to Compost	%	0
Diverted to anaerobic digestion	%	100
• POME to anaerobic pond	%	100
• POME to methane capture (flaring)	%	0
• POME to methane capture (electricity generation)	%	0
Total N2O emission from POME	tCO2e/yr	0.23

**POME is only processed in WWTP*

7.10.2

Unit of certification (Pangkalan POM, Pangkatan Estate, Bilah Estate, and Sennah Estate) does not extend of new plantation area over 2014. There is only a replanting activity that have been conducted. Estimation of carbon stock is not carried out and does not apply to unit of certification.

7.10.3

The unit of certification has identified source of waste pollution and emissions from Estate and Mill activities for the period 2023, as well as its sources, such as in estate emissions sources are from fossil fuel usage for transportation and generator, emission from fertilizer usage, pesticide usage and electricity usage. Identified the sources of emission and pollution from mill such as fossil fuel usage, electricity usage and WWTP. In addition, the company also conducts tests related to odour and noise tests in work and residential areas.

Fossil fuel reducing have been implemented on Pangkatan Mill by fiber and shell usage. Realization of renewable energy have been monitored on monthly report. Monitoring for emission and pollutants (air emission and air ambient) from Estate and Mill was done periodically and comply with the standards quality, it's covered on RKL/RPL implementation report and reported to Environmental Agency of Labuhanbatu Regency.

From the tests results it is known that the test parameters include air emissions in boilers, generators, and ambient air, as well as noise and odour testing in accordance with threshold value (TLV), and quality standards, however for noise measurements there are still several areas that are above the threshold value.

Company has also made management efforts and mitigation plans to reduce pollution from immovable disturbances, including:

1. Using ear plugs or earmuffs for processing factory workers, or in activities that are close to pollutant sources that exceed the threshold. (>70 dB (A))
2. Conduct direct socialization for workers to use work safety equipment, especially in rooms with high noise, also through safety signs posted at operational stations.
3. Conduct periodic inspections of the hearing organs of employees working on instruments with a fairly high noise level.
4. Perform maintenance on factory machines.
 - Audiometri Medical Check Up for factory workers
 - Installation of dust collector / dust cyclone in an effort to reduce airborne dust.
 - Planting / reforestation in the factory to reduce air pollution (CO₂)
 - Management of both hazardous and liquid & solid waste according to procedures.

Therefore, it can conclude that the plans to reduce or minimize the pollutants are implemented and monitored well by management.

Status: Comply

7.11

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

7.11.1

Based on the results of a document review and field visit, it is known that the company has not made any new plantings. However, there has been replanting activity, as evidenced by the minutes of 2023 at Bilah Estate which explained that land preparation was carried out using mechanical (chipping method) and zero burning.

The results of interviews with representatives of the Labuhanbatu Regency Plantations Offices revealed that there was no history of fires or the appearance of hotspots in the company's concession area. Based on the results of field observations in the replanting area at Bilah Estate, information was obtained that there were no signs of land clearing by burning. All land clearing activities were carried out mechanically.

7.11.2

The unit of certification has established fire prevention and control measures for the lands it manages directly by showing evidence that there are land fire prevention and control activities, which include;

- The existence of document procedure for land fire control
- There is a trained fire team, contained in the Organizational Structure of the Emergency Response Team for each unit (Pangkalan Estate, Bilah Estate, and Sennah Estate)
- Socialization of land fire prevention to workers and community around.
- Conducting patrols/monitoring of fire-prone areas (hotspots).
- Carry out water management.
- The company has carried out emergency and fire simulations attended by firefighting team, on 21-23 June 2023.
- Monitoring the list of facilities and infrastructure owned by referring to the standardization of equipment in Ministerial Regulation 5 of 2018, which is listed in the List of Fire Fighting Equipment with the latest update in June 2023. The company also has a budget plan to continue completing the needs of team personnel who stated in the 2023 budget. For example, includes a budget related to procurement, repair and maintenance of firefighting facilities and infrastructure in each estate.
- Report on Land Fire Prevention and Management for Semester II of 2022 to the Department of Plantation of Labuhanbatu Regency. In addition, it is known that there were no fire incidents around unit of certification.

Based on the results of field observations at firefighting warehouses in all plantation units, it is known that the fire control facilities and infrastructure are in accordance with the list that has been shown consisting of individual extinguishing equipment, teams, hand tools, water pumps and accessories, data processing and communication facilities, as well as means of transportation. Based on the results of the fire simulation shown, it is known that the fire control facilities and infrastructure owned are in good condition and fit for use.

7.11.3

The unit certification also involves the community in monitoring fire prevention as a preventive and control measure by conducting socialization of land fire prevention to the public around PT Pangkatan Indonesia, PT Bilah Plantindo, and PT Sembada Sennah Maju. Through the socialization, society is encouraged not to clear land by burning around the company and immediately informs the company if they know of any hotspots in the company area and/or in the village area around the company by calling the company's Emergency Response Team number.

Fire Prevention and Fighting Efforts made by the company to prevent, monitor, and manage fire incidents are include;

- The existence of SOP for land fire control.
- Existence of a firefighting team.
- Socialization of land fires to employees.
- Monitoring fire-prone areas on a regular basis. This is indicated by the existence of monitoring recordings with the hot spot system and immediately checking the hot spot points.
- Conducting a firefighting team simulation, for example a simulation held on 21-23 June 2023
- Routinely check the equipment on a monthly basis.

Based on interview with representative of Sidorukun Village, that there were no fire incidents for the last two years, the identification of the hotspot done routinely by the company with patrol and hotspot monitoring. The company also provides assistance, training, and socialization in the prohibition of land burning activities to minimize the risk of greater fires.

Status: Comply

7.12

Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.

7.12.1 and 7.12.8

Unit of certification did not carry out any expansion/development of new plantations after November 2005, but only replanting activities.

An HCV assessment was also carried out for all estates included in the scope of certification; the HCV was carried out concurrently in 2011. A Liability Disclosure for MP Evans Group PLC was sent to RSPO via email on 23 July 2014. In addition, confirmation is available from RSPO via email dated April 14, 2017, that MP Evans Group PLC has submitted disclosure on non-compliant land clearance for all units with the conclusion of having no non-compliant land clearance or Zero Liability.

7.12.2

The company has not cleared new land since 2005, the company also has documents identifying areas with high conservation value for each estate which are divided into 3 documents. All studies were carried out by a consulting agency (Envirologic Consulting) from May to October 2011 led by Dr Sanath Kumaran who has been approved as HCV assessors. The identification activity used The HCV toolkit for Indonesia Version 2008. Based on the identification results, the following information was obtained:

HCV Type	Areal	(Ha)	Location
HCV 1.3	Kundur River	36,77	Division IV
HCV 6	Cemetery	0,077	Block A2
HCV 6	Cemetery	0,259	Block V6
HCV 6	Cemetery	0,008	Block M3
HCV 6	Cemetery	0,008	Block P2
Total HCV Area of PT Pangkatan Indonesia		38,40	

HCV Type	Areal	(Ha)	Location
HCV 6	Cemetery	1,00	Block H10
HCV 6	Cemetery		Block I6
Total HCV Area of PT Bilah Plantindo		1,00	
HCV Type	Areal	(Ha)	Location
HCV 1.4	Swamp Land as Habitat of <i>Oriental Pled Hornbill</i>	12,00	Block E13, E14 and E16 Divisi 3
HCV 6	Cemetery	0,31	Block A1
HCV 6	Cemetery		Block A2
HCV 6	Cemetery		B Block E16
Total HCV Area of PT Sembada Sennah Maju		12,31	

The total conservation area owned by the Pangkatan Mill certification unit is **52.40 Ha**. The difference between the area of the HCV study that has been conducted and the area of the company's HGU has been explained in indicator 4.4.1.

7.12.3

Until now it is not relevant in Indonesia, so this indicator is not applicable in Indonesia until there is a further decision from the RSPO.

7.12.4

The unit of certification has carried out activities in order to maintain protected areas and High Conservation Values, that has been stated in the 2021-2026 HCV Management Plan document with management scope and targets update every year which implemented in line according with the HCV management and monitoring plan period 2023 also reviewed periodically every year involved consultation with relevant stakeholders such as villagers around.

The company also has an HCV management plan document for the 2023 period in accordance with the results of the review in 2022. The following HCV area management programs are listed, including:

- Outreach to the community and workers regarding the understanding of HCVs and protected animals.
- Monitoring of animals and flora, including RTE species.
- Maintenance and inventory of installed HCV sign boards, as well as warnings against hunting of wild animals in river riparian areas and conducting land clearing activities.
- Enrichment of forest plants with species capable of reducing the rate of erosion, water storage, and sources of animal feed.
- Marking the spray boundary area.
- Boundary marking on forested areas.
- Checking and maintenance of limits.

Based on the results of field observations in the HCV Sekundur River Block O1 Divisi 4, which is a riparian area, it is seen that there are information signs on the HCV area, protected fauna information board, coordinates point and types of HCV, there is a spray boundary board placed on the right and left of the river.

7.12.5

Based on the results of the document review and field verification, it is known that there are no HCV areas that overlap with the interests or rights of the community within the unit of certification's HCV areas.

However, the company continues to pursue an approach to protect HCV areas in a way that also protects the rights and livelihoods of local communities. Among them by conducting socialization about HCV periodically to find out the extent of community understanding of the existence of HCV and installing sign boards as an indirect socialization effort in areas that are often passed by the community.

7.12.6

The Unit of Certification already has a Biodiversity conservation procedure that has not changed from the previous assessment contained in the SOP for Handling Wildlife Documents dated 02 May 2011.

The SOP has also explained a number of things, including:

- Carry out preventive measures in terms of socialization programs, namely the prohibition of catching, keeping or killing animals that are protected by state regulations.
- Carry out identification/census of wild animals in the plantation area both on land and in water areas as well as making an inventory list of the existence of protected wild animals so that conservation measures can be determined.
- Company employees and contractors are not allowed to trade wild animals, whether protected or not. If it is proven that there is involvement in trading the wild animals in question, severe sanctions will be imposed, including dismissal or cancellation of the contract.
- Carry out a confiscation program that applies in all company areas, including in employee housing, where wild animals are conditioned as having been caught by unscrupulous employees and their family members.

The company also has a flora and fauna monitoring program which is scheduled every semester to update flora and fauna data found in the company area. Based on the document on the results of monitoring animals and plants for the 2022 period, identification results were obtained within the company area, including:

- **Flora:** there are no protected flora species.
- **Fauna:** consisting of *Nisaetus cirrhatus*, *Ardea purpurea*, *Oriolus cinensis*, *Gallus*, *Psittacula longicauda*, *Copsychus saularis*, *Oriolus cinensis*, and *Alcedines*.

The company has a report on the existence of priority flora and fauna that is submitted to institutions that handle conservation and protection of wild plants and animals on a regular basis every semester as evidenced in the HCV Management Evaluation Report for October 2021 – November 2022 and has been reported to the BKSDA Sumatera Utara Province on December 01, 2022.

Based on the results of interviews with representatives of the village community, it is known that the community understands the existence of the HCV area and the existence of flora and fauna in the company area. The village community understands that the company protects the HCV area and its flora & fauna already know about the protected fauna species, the prohibition to hunt, cut down and burn the forest. Respondents added, that apart from direct socialization, the company also installed warning boards or signboards marking HCV areas as well as prohibitions on environmental destruction which were an indirect form of socialization. Based on this explanation, it can be concluded that the company already has a plan and evidence of the implementation of the socialization and is known by the surrounding community.

7.12.7

The unit of certification has conducted annual monitoring and evaluation for the management of HCV areas where this activity aims to identify risks and impacts on conservation areas and improve protection efforts.

The company also has an HCV management plan document for the 2023 period in accordance with the results of the review in 2022. The following HCV area management programs are listed, including:

- HCV Patrol Report for the 2022 period to ensure the Signboard and condition of HCV areas against poaching and illegal logging.
- Outreach to workers and the community regarding HCV and Wildlife.
- Monitoring of HCV attributes every 3 months.
- Report on flora and fauna monitoring conducted every 6 months.
- Monitoring Tree Planting in HCV Areas in 2022.

The company has shown evidence that HCV area management has been carried out quite well, the results of field visits to several HCV area locations show that HCV is in a stable condition. No destruction of HCV or entanglement of animals was found. The results of interviews with employees in the field conveyed that employee had received socialization regarding the prohibition of hunting and spraying in the riparian area.

The results of HCV monitoring in 2022 are carried out in accordance with the master plan and annual planning evaluated by management and involving relevant stakeholders.

Status: Comply

3.2 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and logo from Certification Body which submitted by Client	X or ✓
ASA 2.1	The Mill does not use RSPO Trademark on its product (on-product) and non-product (off-product).	✓
	Status: Comply	
2.	Implementation of certificate and logo used by Client comply with size and type (shape) against Guideline of Logo Use	X or ✓
ASA 2.1	The Mill does not use RSPO Trademark on its product (on-product) and non-product (off-product).	✓
	Status: Comply	
3.	Implementation of Certificate and Logo is not used on product	X or ✓
ASA 2.1	The Mill does not use RSPO Trademark on its product (on-product) and non-product (off-product).	✓
	Status: Comply	
4.	Controlling of Certificate and Logo, including withdrawing inappropriate logo.	X or ✓
ASA 2.1	The Mill does not use RSPO Trademark on its product (on-product) and non-product (off-product).	✓
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of MP Evans Group PLC against the rules for partial certification was determined through Self-Assessment in accordance with RSPO Certification System clause 5.5.3. A summary of findings is as stated below.

MP Evans Group PLC Time Bound Plan (TBP) is explained in table 1.10. MP Evans Group PLC has twenty-seven (27) management units with five (5) mills. MP Evans Group PLC has informed the TBP progress, MUTU has considered that MP Evans Group PLC is complied with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by MP Evans Group PLC on 7 July 2022.

MUTU has verified partial certification for un-certified unit's subsidiary of MP Evans Group PLC based on their Time Bound Plan. There are two (2) uncertified mills and nine (9) uncertified estates management units of MP Evans Group PLC. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

- There 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

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>Yes and positive assurance is developed under MP Evans Group PLC</p> <p>Auditor verification Based on the document review, there is a company internal audit that was conducted on 29-31 August 2022 and the positive assurance is at this table that is also been verified.</p>
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)	<ul style="list-style-type: none"> - PT. Simpang Kiri Plantation Indonesia. RACP is not applied for this unit because the last land clearing was conducted before November 2005. The unit does not have mill. - PT. Evans Lestari (PT.EL) has conducted HCV and SIA identification by Forestry Faculty of Institute Pertanian Bogor (IPB) on March 2013 led by Dr. Ir. Jarwadi Budi Hernowo Msc. Before land clearing, therefore the unit has no liability related to RACP. PT Evans Lestari also conducted NPP on 17 December 2013 conducted by Certification Body of Control Union. - PT Bumi Mas Agro has an HCV identification document made in December 2014 in collaboration with PT Sonokeling with a total HCV area of 382.72 Ha <p>Auditor verification Based on internal audit results and evidence provided (communication to RSPO on liability disclosure) the three uncertified units of: PT Simpang Kiri Plantation Indonesia Last land clearing happened before November 2005 and there is no new land clearing of new planting.</p> <p>PT Evans Lestari</p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		Land clearing was conducted after November 2005 but has been first conducted HCV identification before land clearing. Liability of disclosure has been sent to RSPO Compensation Team on 23 July 2014.
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>New planting/land clearing after 1st January 2010.</p> <p>Auditor verification Based on internal audit, documented time of land clearing and liability disclosure sent to RSPO, there is new planting/land clearing after 1st January 2010 for PT Gunung Pelawan Lestari and PT Evans Lestari, but NPP has been conducted for these units. Evidence of submission to RSPO is provided and the NPP notification are at RSPO website.</p>
2.1.4	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO criteria 2.2, 6.4, 7.5 and 7.6 (it has changed be Criterion 4.8, 4.7 and 4.5 in P&C 2018).	<p>There is no land conflicts.</p> <p>Auditor verification Based on evidence provided, the company merely conducted planting on the area that has been compensated from the land owner by FPIC. The documentation of each land compensation/leasing is documented.</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>There is no labor disputes. There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p> <p>Auditor verification There is no indication of labor disputes. 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	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1 (it has changed be Criterion 4.2 in P&C 2018).	<p>Yes, there is process for land legality.</p> <p>Auditor verification Land legal process is still going on and there is a detail update progress documented by the company for each year. PT Simpang Kiri Plantation Indonesia and PT Bumi Mas Agro already have been HGU.</p> <p>Update legal for PT Evans Lestari: the company has got plantation business permit (IUP) from Bupati Decree of Musi Rawas No. 891/KPTS/Disbun/2012 dated 12 November 2012 for 20,000 ha. It is in accordance with the scale of the company location permit (Decree of Bupati Musi Rawas No. 578/KPTS/BPM-PTP/2012 dated 30 October 2012 for 20,000 ha). However the location permit has been expired – need further HGU process information or any other legal process.</p>

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

3.4.1. Identification of Findings, Corrective Actions and Observations at Recertification

NCR No.	:		Issued by	:	
Date Issued	:		Time Limit	:	
NC Grade	:		Date of Closing	:	
Standard Ref. & Requirement	:				
Evidence observed (filled by auditor):					
Non-Conformance Description (filled by auditor):					
<i>No Non-Conformance were found in this audit activity</i>					
Root Cause Analysis (filled by organization audited):					
Correction (filled by organization audited):					
Corrective Action (filled by organization audited):					
Assessor Evaluation and Conclusion (filled by auditor):					
Verified by	:				

3.4.2. Identification of Findings, Corrective Actions and Observations at ASA 2.1

NCR No.	:		Issued by	:	
Date Issued	:		Time Limit	:	
NC Grade	:		Date of Closing	:	
Standard Ref. & Requirement	:				
Evidence observed (filled by auditor):					
Non-Conformance Description (filled by auditor):					
<i>There is no Non-Conformance were found in this audit activity</i>					
Root Cause Analysis (filled by organization audited):					
Correction (filled by organization audited):					
Corrective Action (filled by organization audited):					
Assessor Evaluation and Conclusion (filled by auditor):					
Verified by	:				

3.4.3. Opportunity for Improvement

No	Ref. Std.	Description
1	2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1</p> <p>Based on the explanation of indicator 2.3.1, it is known that there are seven (3) indirect FFB suppliers at Pangkatan Mill, in this assessment the factories cannot meet the requirements of this indicator until November 2021. This is also in accordance with the results of the previous assessment. As with the RSPO Announcement on 15 February 2022 regarding Interim Measures for Compliance with Indicator 2.3.2 RSPO Principles & Criteria 2018 — Concerning the Legality of Indirect FFB Supply, Pangkatan Mill have registered their case with RSPO on 20 October 2022 by sending an email to certification@rspo.org and has been registered via email notification on 20 October 2022 explaining if the company's case has been registered in the records (RSPO). A phased plan outlining actions and a projected timeline towards complete fulfillment of the requirements of Indicator 2.3.2. The latest deadline for 100% fulfillment of Indicator 2.3.2 as stated in the plan should not be later than November 2023.</p> <p>When the ASA 2.1 assessment is carried out, the company can show progress in completing the requirements for indicator 2.3.2, namely:</p> <ul style="list-style-type: none"> • FFB supplier CV Teng Gaes Jaya with a total of 26 farmers with land ownership documents in the form of SHM and SKT. For geolocation information, for example, for farmers on behalf of Iswandi with coordinates 99°55'40.85"E dan 2°5'2.67" N. • Supplier of FFB from Anugerah Keluarga Mandiri Cooperative with a total of 5 farmers with land ownership certificates in the form of SHM and SKT. For geolocation information, for example for farmers on behalf of Mistoni with coordinates 100°01'50.38"E dan 2°4'11.91" N. <p>Based on the results of interviews with company representatives, it is known that the company will continue to complete the requirements for indicator 2.3.2 until November 2023. Based on this explanation, the company has the opportunity to ensure that the requirements for indicator 2.3.2 have been fulfilled 100%. (OFI)</p>
2	3.4.3	<p>Social and environmental management and monitoring plans are implemented, monitored and updated periodically in a participatory manner.</p> <p>The certification unit has carried out social management of the company's social impacts caused by operational activities which were prepared by involving an independent party, namely Envirologic Consulting in July 2011. In carrying out annual management as stated in the Social Impact Review document for the period November 2021 – October 2022. In The study discussed the positive and negative impacts arising from the company's operations.</p> <p>In 2020 it is known that there are social issues that are developing, for example the issue of daily workers up to the court stage. The BHL issues include termination of employment without severance pay and other related compensation, there is no written work agreement for casual daily workers, etc. The results of interviews with company representatives revealed that the company had managed and monitored the issue, such as following and obeying court decisions, and had paid the compensation agreed to with daily workers. The activities that have been managed and monitored are only documented in the Department of Finance and Security Region and have not been integrated with documentation related to the SIA.</p> <p>From this description, the company has the opportunity to be able to ensure that social issues managed and monitored by other Departments can be integrated with the SIA Management and Monitoring Program.</p>
3	4.4.1	<p>Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p>

		<p>The company already has HGU for both PT Pangkatan Indonesia, PT Sembada Sennah Maju, and PT Bilah Plantindo, namely:</p> <p>PT Pangkatan Indonesia – Pangkatan Estate</p> <p>HGU Certificate No. 02 of 1997 on behalf of PT Pangkatan Indonesia covering an area of 2,586.03 Ha located in Perkebunan Pangkatan Village, Pangkatan Sub District, Labuhanbatu District, Sumatera Utara Province, valid for 25 years (until 31 December 2023). The company has applied for a Cultivation Right (HGU) on behalf of PT Pangkatan Indonesia which was addressed to the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency u.p. Head of the Regional Office of the National Land Agency for North Sumatera Province on April 11, 2022. Furthermore, there has also been a Staff Review of the Minutes of Data Processing (RPD) Renewal of Cultivation Rights in the Name of PT Pangkatan Indonesia for Land located in Labuhanbatu Regency Number 92/RPD/PHP /HGU/X/2022 on October 13, 2022 with conclusions and follow-up considered for the proposed Renewal of Cultivation Rights with a Period of 30 Years on the grounds that it has fulfilled the technical, juridical and administrative requirements.</p> <p>The company has the opportunity to ensure that the HGU renewal issuance process can run positively.</p> <p>PT Bilah Plantindo</p> <p>Bilah Estate has 2 valid HGU certificates and 1 HGU which is currently in the process of being submitted, namely:</p> <ul style="list-style-type: none"> • HGU Certificate No. 31 of 2010 on behalf of PT Surya Makmur covering an area of 1,315.07 Ha located in Perkebunan Sennah Village, Bilah Hilir Sub District, Labuhanbatu District, Sumatera Utara Province valid for 25 years (until 31 December 2036). • HGU Certificate No. 1 of 1989 on behalf of PT Surya Makmur covering an area of 1,641 hectares with a validity period of up to 31 December 2018. During the audit, the company showed that the HGU Extension Certificate No. 81 of 2021 on behalf of PT Surya Makmur covering an area of 1,516.63 Ha on 2 June 2021 and valid until 31 December 2043. However, the area is reduced compared to the area in the previous HGU certificate. The company said that in fact there was no physical area increase from the previous HGU. <p>Therefore, the company showed an application letter for HGU covering an area of 178.18 Ha to the Head of Land Office Labuhanbatu District on 6 February 2020. The company showed evidence that the area had obtained a Location Permit covering an area of 178.18 Ha on 26 July 2018. Then a letter was also shown from Ministry of Agrarian and Spatial Planning / National Land Agency Regional Office of the National Land Agency of Sumatera Utara Province No: 78/UND-300.HT.01.02/V/2020 dated 8 May 2020 regarding invitations to several agencies to carry out inspections, research and field reviews as well as The meeting of the Land Inspection Committee B in the context of making Minutes of Land Inspection "B" related to the HGU application on behalf of Aleksa Sihombing who acted as Director of PT Surya Makmur covering an area of 178.18 Ha located in the Village of Bilah Plantation, District of Bilah Hilir, Labuhanbatu District, Sumatera Utara Province. However, until this audit was carried out, the company had not received further information regarding the Committee B trial process. The results of interviews with the Labuhanbatu District Land Office found that the 178.18 Ha HGU process for PT Pangkatan has not been completed and will wait for the company directly next to it (PT Daya Labuhan Indah) to extend their HGU to ensure that there is no land overlap between the two companies. In addition, the company has sent back a follow-up letter on the application for Cultivation Rights on behalf of PT Surya Makmur covering an area of 178.18 Ha to the Regional Office of the National Land Agency for North Sumatera Province on March 9, 2023. However, up to the ASA 2.1 assessment, there has been no follow-up from the Agency the.</p> <p>Therefore, companies are encouraged to ensure that the process of obtaining land rights in the form of HGU in an area of 178.18 Ha is carried out positively.</p>
4	7.3.1	<p>There is a waste management plan that is documented and implemented in accordance with applicable laws and regulations, including reduction, recycling, reuse and disposal, based on the characteristics of poisons (toxicity) and other hazards.</p> <p>From the results of the field visit at Pangkatan Mill, it is known that the hazardous waste is stored in a satellite TPS before being handed over to a licensed hazardous waste storage. Proof of submission, for example the Waste</p>

	<p>Introductory Letter on March 30, 2023 (No. 03/PG/POM/V/2023) with items submitted in the form of used oil, used chemical packaging, rags, and used oil drums. However, the company has not been able to show a mechanism for handing over hazardous waste (not limited to) waste recording and management of the time it is stored.</p> <p>Companies have the opportunity to ensure the mechanism for transferring hazardous waste to licensed hazardous waste storage.</p>
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3.4.4. Noteworthy Positive Components

No	Description
1	The Company's commitment to implementing the principles of sustainable palm oil management.
2	Good cooperation from staff/PIC related to audit implementation.
3	Has received BLUE PROPER for the 2021-2022 period from the Ministry of Environment and Forestry
4	Has got ISPO & ISCC certificate
5	No longer using pesticides with the active ingredient Paraquat

3.5 Summary of Arising Issues from Public and Auditor Verification



Public Issues (Institution/ NGO/Community)	Auditor Verification
Land Agency of Labuhanbatu District <ul style="list-style-type: none"> No negative issue related to land conflict. Land utilization report done yearly. Land use title still valid. No issue related to land fire. <p>Had good relationship with company.</p>	<p>There are no issues that need to be further verified</p>
Plantation Agency of Labuhanbatu District <ul style="list-style-type: none"> There have been no land fires in the last year. There are no indigenous peoples in the company's operational areas. <p>The certification unit carries out CSR programs on a regular basic.</p>	<p>There were no negative issues that need further verification.</p>
Manpower Agency of Labuhanbatu District <ul style="list-style-type: none"> In the last two years period there were no industrial relations problems. The CLA is still valid. Labour union has been formed without any intervention from the certification unit. There are no complaints regarding the granting of rights and facilities provided by the certification. All workers have been registered in the health insurance and employment insurance programs. 	<p>There were no negative issues that need further verification.</p>
Labuhanbatu Regency Environmental Service Source: Environmental Supervisor Date: 04 July 2023 Routine monitoring is carried out every year, the last in 2022, and will be scheduled in the fourth quarter for 2023. The company's commitment to the environment can be seen from routine reporting in the form of management and monitoring documents, periodic management of hazardous waste and liquid waste, as well as the company's participation in the program. PROPER in 2022 with a blue rating for PT Pangkatan Indonesia. Until June 2023, there were no reported issues or complaints from the public regarding environmental pollution and there were no conflicts with wild or protected animals.	<p>There were no negative issues that need further verification.</p>
Villages Around PT Sembada Sennah Maju: Kelurahan Negeri Lama Date: 04 July 2023 The relationship between the company and the village is well established. The existence of the company is quite helpful to the community, starting from employment to CSR assistance provided by the company, for example for assistance with religious activities, social activities, and road repairs.	<p>There are no negative issues from the village community around the company that need further verification.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Until June 2023, there were no complaints from the public regarding environmental pollution and fires around the company. In addition, until now there has been no land dispute between the company and the community. Information related to job vacancies is informed to the village by letter. The company also routinely conducts outreach regarding company policies, protected flora and fauna, burning prohibition, and filing complaints.</p>	
<p>Villages Surrounding PT Bilah Plantindo: Kampung Bilah Village Date: 04 July 2023</p> <p>The relationship between the company and the village is well established. The existence of the company is quite helpful to the community, starting from employment to CSR assistance provided by the company, for example for assistance with religious activities, social activities, and road repairs.</p> <p>Until June 2023, there were no complaints from the public regarding environmental pollution and fires around the company. In addition, until now there has been no land dispute between the company and the community. Information related to job vacancies is informed to the village by letter. The company also routinely conducts outreach regarding company policies, protected flora and fauna, burning prohibition, and filing complaints.</p> <p>Regarding complaints of road damage, the BPD stated that the company had provided assistance in the form of materials to the village for road repairs.</p>	<p>Related complaints of road damage, it has been explained in the related indicators.</p>
<p>Villages Surrounding PT Pangkatan Indonesia: Sidorukun Village Date: 04 July 2023</p> <p>The relationship between the company and the village is well established. The existence of the company is quite helpful to the community, starting from employment to CSR assistance provided by the company, for example for assistance with religious activities, social activities, and road repairs.</p> <p>Until June 2023, there were no complaints from the public regarding environmental pollution and fires around the company. In addition, until now there has been no land dispute between the company and the community. Information related to job vacancies is informed to the village by letter. The company also routinely conducts outreach regarding company policies, protected flora and fauna, burning prohibition, and filing complaints.</p>	<p>There are no negative issues from the village community around the company that need further verification.</p>
<p>CV Rongoh Abadi (Replanting Contractor) Date: July 06, 2023</p> <p>Contractor activities in the field of heavy equipment for the preparation of replanting land in Bilah Estate. The cooperative relationship with the</p>	<p>There are no negative issues that need further verification.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>company is going well. Contractor payments are made on time with a period of every 1 month.</p> <p>Provision of PPE is carried out by the contractor, in the form of safety helmets, shoes and gloves. The contractor has enrolled its employees in the BPJS health program, in handling accidents through the nearest clinic or puskesmas.</p> <p>While working, contractors receive supervision from the company, in the form of mandatory use of PPE and safety briefings.</p>	
<p>CV Teng Gaes Jaya</p> <p>The cooperation that has been established is as a supplier of FFB (collectors). The relationship is going well with the company, there have never been any problems related to cooperation after the agreed contract. Payment for FFB is made on time. Information regarding prices is conveyed via whatsapp and telephone.</p>	<p>There are no negative issues that need further verification.</p>
<p>CV Anugrah (Local Contractor) Dated: 04 July 2023</p> <p>Contractor activities in the field of empty basket transporters and FFB at PT Pangkatan Indonesia. The cooperative relationship with the company has been going well since 2017. Contractor payments are made on time with a period of every 2 weeks.</p> <p>Provision of PPE is carried out by the contractor, in the form of safety helmets, shoes and gloves. The contractor has enrolled its employees in the BPJS health program, in handling accidents through the nearest clinic or puskesmas.</p> <p>While working, contractors receive supervision from the company, in the form of mandatory use of PPE and safety briefings.</p>	<p>There are no negative issues that need further verification.</p>
<p>Gender Committee of PT Pangkatan Indonesia Gender Committee of PT Bilah Plantindo Gender Committee of PT Sembada Sennah Maju Source: Chair of the Gender Committee Date: 04 July 2023</p> <ul style="list-style-type: none"> • The committee is formed with the management and membership of female employees and male representation. • The committee's duties include conducting counselling on maternal and child health, women's skills, as well as preventing harassment and reporting procedures and providing assistance if there are complaints from members/employees regarding incidents of harassment. • There were no reports/complaints regarding acts of harassment or regarding gender-related violations experienced by members during 2022-2023. 	<p>There are no negative issues that need further verification.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
Employee Cooperative of PT Pangkatan Indonesia Source: Cooperative Secretary Date: 04 July 2023 The cooperative is currently engaged in selling groceries to workers and the community at PT Pangkatan Indonesia. Current membership is for workers and employees. The last <i>RAT</i> (annual member meetings) is in February 2023, with an agenda for the distribution of <i>SHU</i> and a board meeting. Company support in the form of cooperative buildings and operational loans (has been paid).	There are no negative issues that need further verification.
Workers' Union of PT Bilah Plantindo Workers' Union of PT Pangkatan Indonesia Workers' Union PT Sembada Sennah Maju Source: Chairman Date: 04 July 2023 <ul style="list-style-type: none"> • The unit of certification supports employee organizational activities and never intimidates or intervenes. • All employees working on plantations and factories are permanent workers. • Already have a Collective Labor Agreement. • The wage reference used is the 2022 <i>UMK</i>. • No problems related to work in the last 1 year. 	There are no negative issues that need further verification.
2 Casual workers that terminated in Pangkatan Estate Problems between workers and the company have been resolved through several processes, until finally the handover of an amount of money as compensation for termination of employment, which is accompanied by a joint agreement letter stamped and signed by the company representative and each worker.	It has been explained in the related indicators.
Internet Issues 1. https://cyberpost.id/m-p-evans-group-plc-pt-pangkatan-indonesia-di-duga-tidak-membayar-gaji-buruhnya/ 2. https://www.koranperdjoeangan.com/pt-pangkatan-indonesia-mp-evan-group-diduga-abaikan-putusan-mahkamah-agung-dan-gelapkan-sebagian-hak-bhl/ 3. https://radarmedan.com/pt-bilah-Plantindo-diduga-larang-karyawan-buka-warung-manajer-bungkam 4. https://indahsuaranews.co/warga-tuding-angkutan-milik-pt-bilah-	1. PT Pangkatan Indonesia, PT Bilah Plantindo and PT Sembada Sennah Maju do not yet have a Smallholder Scheme. 2. Problems between workers and the company have been resolved through several processes, until finally the handover of an amount of money as compensation for termination of employment, which is accompanied by a joint agreement letter stamped and signed by the company representative and each worker. 3. The prohibition to open a shop has been contained in the Collective Labor Agreement agreed upon by the Company and the Labor Union.

Public Issues (Institution/ NGO/Community)	Auditor Verification
sumbangkan-kerusakan-jalan/	4. Companies can show evidence of road repair assistance as stated in the documentation of CSR realization.

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><div><p>PT Pangkatan Indonesia Management Representative</p><p><u>Donald Persadaan Ginting</u> Friday, 21 July 2023</p></div><div><p>MUTU International Lead Auditor</p><p><u>Rahmat Abdiansyah</u> Friday, 21 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 Comm	Date of Contact	Response	
						Yes	No
1	Land Office	Labuhanbatu District	-	Via phone	July 04, 2023	✓	
2	Plantation Agency	Labuhanbatu District, Sumatera Utara	-	Via phone	July 04, 2023	✓	
3	Environmental Agency	Labuhanbatu District, Sumatera Utara	-	Via phone	July 04, 2023	✓	
4	Manpower Agency	Labuhanbatu District, Sumatera Utara	-	Via phone	July 04, 2023	✓	
5	Kelurahan Negeri Lama Village	Labuhanbatu District, Sumatera Utara	-	Via phone	July 04, 2023	✓	
8	Kampung Bilah Village	Labuhanbatu District, Sumatera Utara	-	Via phone	July 04, 2023	✓	
9	Sidorukun Village	Labuhanbatu District, Sumatera Utara	-	Via phone	July 04, 2023	✓	
10	CV Anugerah (EFB Transporter)	Labuhanbatu District, Sumatera Utara	-	Via phone	July 04, 2023	✓	
11	CV Teng Gaes Jaya (FFB Suppliers)	Labuhanbatu District, Sumatera Utara	-	Via phone	July 04, 2023	✓	
	CV Rongoh Abadi (Replanting Contractor)	Labuhanbatu District, Sumatera Utara	-	Via phone	July 06, 2023	✓	
12	Employment Cooperative	Labuhanbatu District, Sumatera Utara	-	Direct Interview	July 04, 2023	✓	
13	Gender Committee PT Pangkatan Indonesia	Labuhanbatu District, Sumatera Utara	-	Direct Interview	July 04, 2023	✓	
14	Worker Union PT Pangkatan Indonesia	Labuhanbatu District, Sumatera Utara	-	Direct Interview	July 04, 2023	✓	
15	Worker Cooperative PT Pangkatan	Labuhanbatu District, Sumatera Utara	-	Direct Interview	July 04, 2023	✓	
16	Gender Committee PT Sembada Sennah Maju	Labuhanbatu District, Sumatera Utara	-	Direct Interview	July 04, 2023	✓	
17	Worker Union PT Sembada Sennah Maju	Labuhanbatu District, Sumatera Utara	-	Direct Interview	July 04, 2023	✓	
18	Gender Committee PT Bilah Plantindo	Labuhanbatu District, Sumatera Utara	-	Direct Interview	July 04, 2023	✓	
19	Worker Union PT Bilah Plantindo	Labuhanbatu District, Sumatera Utara	-	Direct Interview	July 04, 2023	✓	
20	Worker Cooperative PT Bilah Plantindo	Labuhanbatu District, Sumatera Utara	-	Direct Interview	July 04, 2023	✓	
21	2 Casual workers that terminated in Pangkatan Estate	Labuhanbatu District, Sumatera Utara	-	Direct Interview	July 04, 2023	✓	
22	Pangkatan POM (21 workers)	Labuhanbatu District, Sumatera Utara	-	Observation and Interview	04 July 2023	✓	
23	Pangkatan Estate: (25 Workers)	Labuhanbatu District, Sumatera Utara	-	Observation and Interview	04 July 2023	✓	
24	Bilah Estate: (16 Workers)	Labuhanbatu District, Sumatera Utara	-	Observation and Interview	05 July 2023	✓	
25	Sennah Estate: (23 Workers)	Labuhanbatu District, Sumatera Utara	-	Observation and Interview	05 July 2023	✓	

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Comm	Date of Contact	Response	
						Yes	No
26	WWF	Jakarta	wwf-indonesia@wwf.or.id	Email	26 June 2023		✓
27	WALHI	Jakarta	informasi@walhi.or.id	Email	26 June 2023		✓
28	AMAN	Jakarta	rumahaman@cbn.net.id	Email	26 June 2023		✓
29	Sawit Watch	Bogor	info@sawitwatch.or.id	Email	26 June 2023		✓

Appendix 2. Assessment Program

DATE / TANGGAL	03 – 08 July 2023	
PLANNED TIME RENCANA WAKTU	PROCESSES / CLAUSES TO BE AUDITED PROSES / HAL YANG DIAUDIT	AUDITOR
Monday, 03 July 2023		
05.50 – 08.10	Jakarta (CGK) → Medan (KNO) (QG-910)	All Auditor
08.30 – 16.00	Medan (KNO) → Site PT Pangkatan Indonesia	All Auditor
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). 	All Auditor
Tuesday, 04 July 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. 	ALS, AFF ALS, AFF
08.00 – 12.00	Field Observation to Pangkatan 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), Observation of Workers Facilities (Housing, School, Worship Place). 	RAB SEP RAB
12.00 – 14.00	Break	All Auditor
14.00 – 16.30	Field Observation to Pangkatan POM Aspect to be verified: <ul style="list-style-type: none"> Supply Chain verification (FFB Receiving, Weighbridge). 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 	RAB ALS/AFF SEP

DATE / TANGGAL	03 – 08 July 2023	
PLANNED TIME RENCANA WAKTU	PROCESSES / CLAUSES TO BE AUDITED PROSES / HAL YANG DIAUDIT	AUDITOR
16.30 – 17.00	Complex. Submission of audit progress.	ALS All Auditor
Wednesday, 05 July 2023		
08.00 – 12.00	Field Observation to Bilah 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), Observation of Workers Facilities (Housing, School, Worship Place). 	RAB RAB RAB
08.00 – 12.00	Field Observation to Sennah 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), Observation of Workers Facilities (Housing, School, Worship Place). 	SEP/ALS/AFF SEP/ALS AFF
12.00 – 14.00	Break	SEP/ALS
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, 06 July 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

DATE / TANGGAL	03 – 08 July 2023	
PLANNED TIME RENCANA WAKTU	PROCESSES / CLAUSES TO BE AUDITED PROSES / HAL YANG DIAUDIT	AUDITOR
Friday, 07 July 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 <ul style="list-style-type: none"> Presentation of audit findings (Noteworthy Positive Component, Non-Conformities, OFI, Timeline of CAR's, Conclusion). Comments, Responses and Questions 	All Auditor
17.00 – 23.00	PT Pangkatan Indonesia → Medan	All Auditor
Saturday, 08 July 2023		
10.30	Transit at Medan	All Auditor
10.30 – 12.55	Medan (KNO) – Jakarta (CGK) (GA-185)	All Auditor