

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

Name of Management : **Berangir POM - PT PERKEBUNAN NUSANTARA IV subsidiary of PT**
Organisation **PERKEBUNAN NUSANTARA III**

Plantation Name : PT Perkebunan Nusantara IV: Berangir Estate

Location : Village of Perkebunan Berangir, Sub District of NA IX-X, District of Labuhanbatu Utara, Province of Sumatera Utara, Indonesia

Certificate Code : **MUTU-RSPO/118**

Date of Initial Registration : **20 July 2018**

Date of Certificate Issue : 17 October 2023 Date of License Issue : 20 October 2023

Date of Certificate Expiry : 19 July 2028 Date of License Expiry : 19 July 2024

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
RC-1	10 th – 13 th July 2023	Rahmat Abdiansyah (Lead Auditor), Rizki Tanaya, Afiffudin and Dinda Febrima Napitupulu	Harso Yuli Antena	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
RC-1	17 October 2023

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Figure 1. Location Map of PTPN IV - Berangir

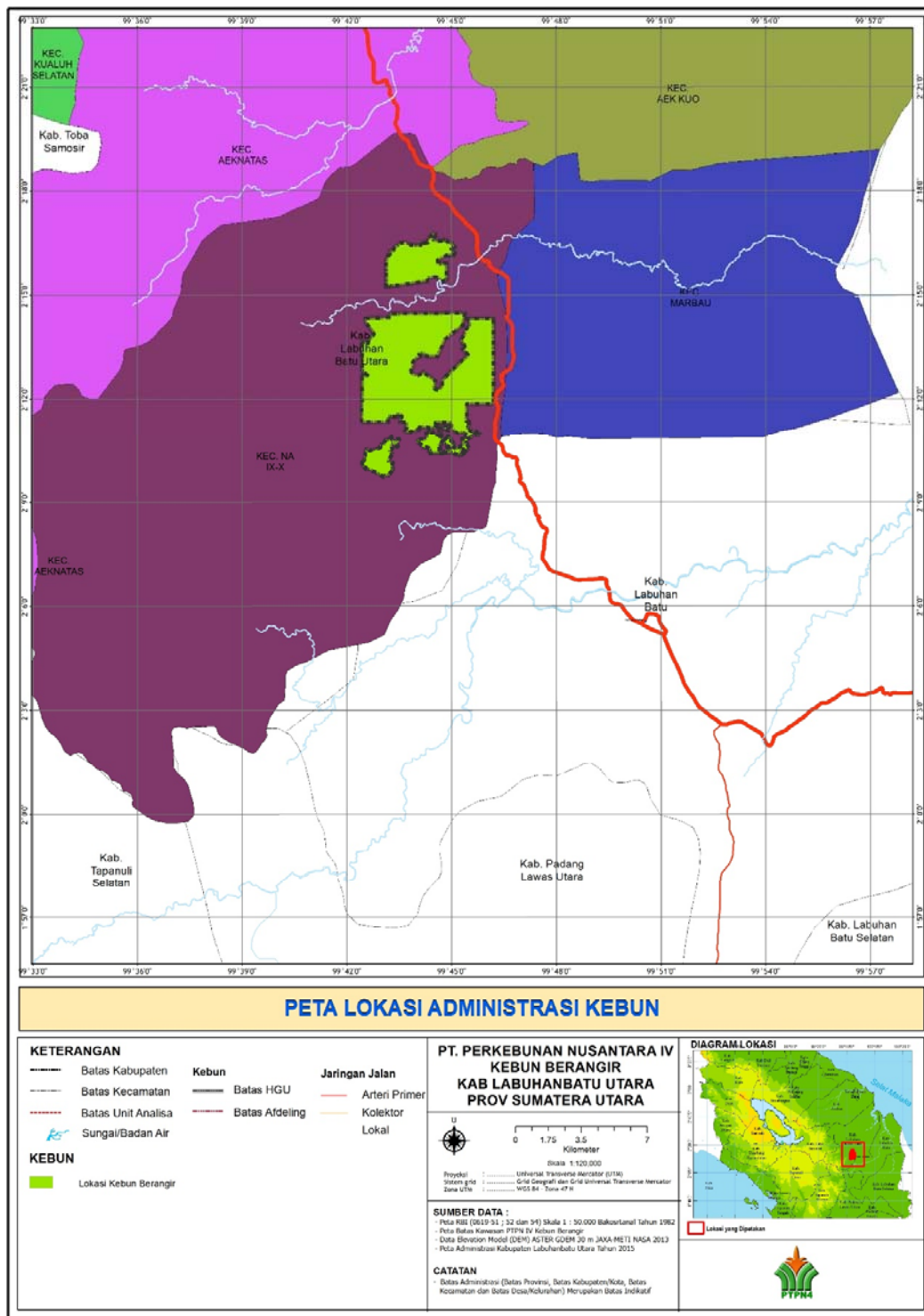
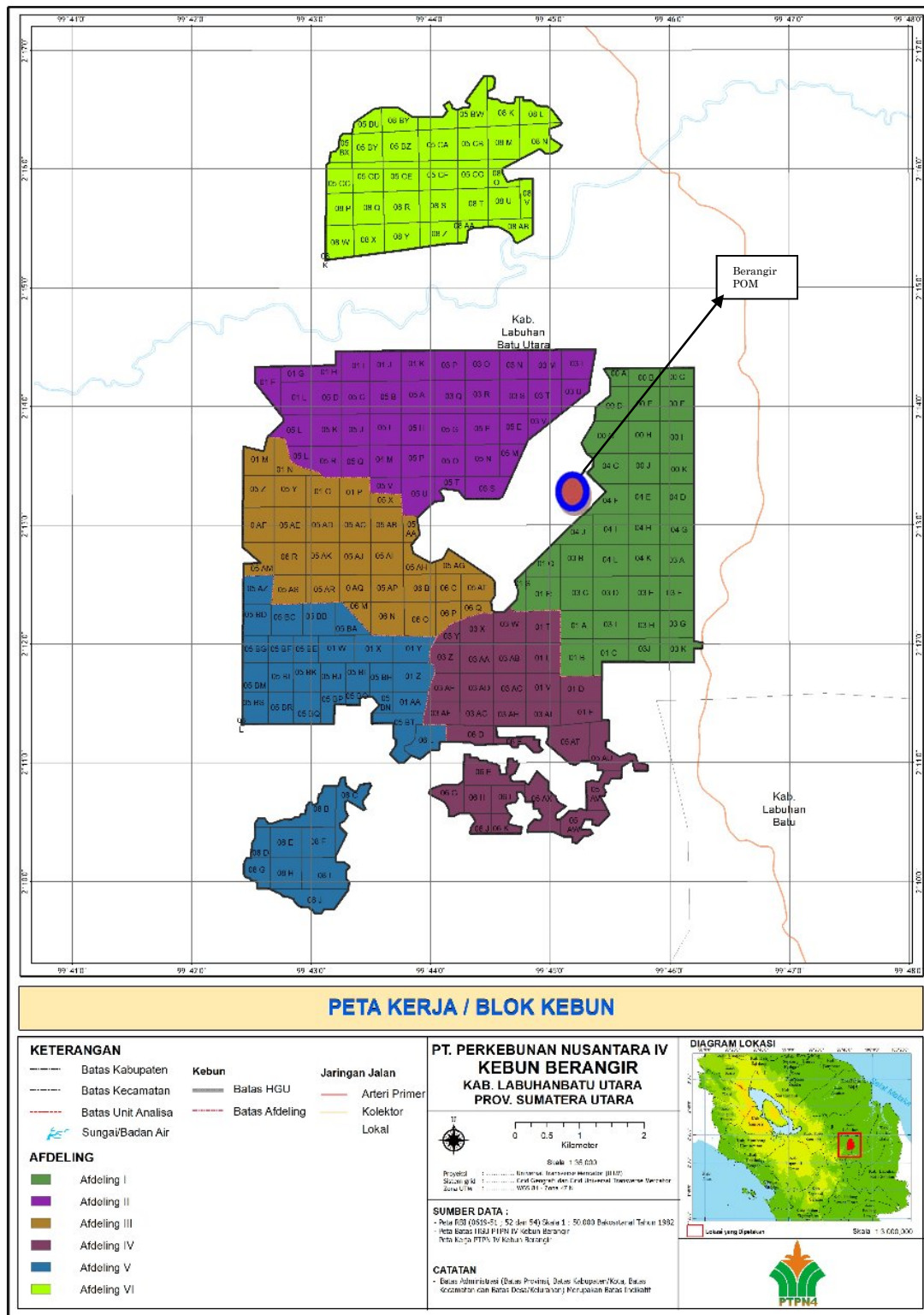


Figure 2. Operational Map of PTPN IV - Berangir



Abbreviations Used

ACOP	:	The Annual Communication of Progress
ASA	:	Annual Surveillance Assessment
Bapedalda	:	<i>Badan Pengendalian Dampak Lingkungan Daerah</i> (Regional Environmental Impact Management Agency)
BOD	:	Biological Oxygen Demand
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> / Social Security Agency
BHL	:	<i>Buruh Harian Lepas</i> / Daily Contract Worker
CB	:	Certification Body
CH	:	Certification Holder
CPO	:	Crude Palm Oil
CLA	:	Collective Labor Agreement
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate Social Responsibility
EBA	:	Empty Fruit Bunch Area
EFB	:	Empty Fruit Bunch
EIA	:	Environment Impact Assessment
FFB	:	Fresh Fruit Bunch
GHG	:	Greenhouse Gas
HCV	:	High Conservation value
HGU	:	<i>Hak Guna Usaha</i> (Land Use Permit)
IPM	:	Integrated Pest Management
ISPO	:	Indonesian Sustainable Palm Oil
KCD	:	<i>Kesatuan Contoh Daun</i> / Leaf Sample Unit
KER	:	Kernel Extraction Rate
LA	:	Land Application
LSU	:	Leaf Sampling Unit
MSDS	:	Material Safety Data Sheet
OER	:	Oil Extraction Rate
OHS	:	Occupational, Health, and Safety
P2K3	:	<i>Panitia Pembina Kesehatan dan Keselamatan Kerja</i> / OHS Committee
P & C	:	Principle and Criteria
PDIK	:	<i>Pedoman dasar & instruksi kerja</i> (Guidelines and work instruction)
PK	:	Palm Kernel
PKS	:	<i>Pabrik Kelapa Sawit</i>
PKWT	:	<i>Perjanjian Kerja Waktu Tertentu</i> / Contract Workers
PKWTT	:	<i>Perjanjian Kerja Waktu Tidak Tertentu</i> / Permanent Workers
PLN	:	<i>Perusahaan Listrik Negara</i>
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPAB	:	<i>Permintaan dan Pengajuan Anggaran Belanja</i> (Budget Request Number)
PPD	:	<i>Petugas Pengendali Dokumen</i> / Document control officer
PPE	:	Personal Protective Equipment
PPh	:	<i>Pajak Penghasilan</i> / Income Tax
PPN	:	<i>Pajak Pertambahan Nilai</i> / Value-Added Tax
PPKS	:	<i>Pusat Penelitian Kelapa Sawit</i> / Indonesian Oil Palm Research Institute
PTPN	:	<i>Perusahaan Terbatas Perkebunan Nusantara</i>
RKL/RPL	:	<i>Rencana Pengelolaan Lingkungan / Rencana Pemantauan Lingkungan</i>

RSPO	:	Roundtable Sustainable Palm Oil
SCCS	:	Supply Chain Certification Standard
SIA	:	Social Impact Assessment
SIUP	:	<i>Surat Izin Usaha Perdagangan</i> (Business License)
SOP	:	Standard Operational Procedures
SPBUN	:	<i>Serikat Pekerja Perkebunan</i> (Plantation Labor Union)
SPK	:	<i>Surat Perjanjian Kerja</i> (Work Order Number)
SPI	:	<i>Satuan Pengawas Internal</i> (The Internal Audit Unit)
SSU	:	Soil Sampling Unit
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none"> Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020. RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020 	
1.2	Organization Information		
1.2.1	Organization name listed in the certificate	Berangir POM - PT PERKEBUNAN NUSANTARA IV subsidiary of PT PERKEBUNAN NUSANTARA III	
1.2.2	Contact person	Pirgok Panggabean	
1.2.3	Organization address and site address	Head Office: Jalan Letjen Suprpto No. 2, Kode Post 20151, Medan, Sumatera Utara, Indonesia.	
1.2.4	Telephone	(62-61) 415 4666	
1.2.5	Fax	(62-61) 457 3117	
1.2.6	E-mail	perencanaan@ptpn4.co.id	
1.2.7	Web page address	www.ptpn4.co.id	
1.2.8	Management Representative who completed the application for certification	Pirgok Panggabean (Head of Planning and Sustainability)	
1.2.9	Registered as RSPO member	1-0030-06-000-00 – 13 December 2006	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base (Berangir Mill, Berangir Estate)	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate Latitude Longitude
	Berangir POM	Village of Perkebunan Berangir, Sub District NA IX – X, District Labuhanbatu Utara Province Sumatera Utara, Indonesia	N 02° 13' 29" E 99° 45' 37"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate Latitude Longitude
	Berangir Estate	Village of Perkebunan Berangir, Sub District NA IX – X, District Labuhanbatu Utara Province Sumatera Utara, Indonesia	N 02° 13' 20" E 99° 46' 35"
1.5	Description of Area Statement		
1.5.1	Tenure		

	<ul style="list-style-type: none">StateCommunity	4,583.67 Ha	- Ha				
1.5.2	Area Statement						
	<ul style="list-style-type: none">Total area	4,583.67	Ha				
	<ul style="list-style-type: none">Mature area	4,013.36	Ha				
	<ul style="list-style-type: none">Immature area	-	Ha				
	<ul style="list-style-type: none">Mill	7.79	Ha				
	<ul style="list-style-type: none">Workshop	0.51	Ha				
	<ul style="list-style-type: none">Warehouse	2.40	Ha				
	<ul style="list-style-type: none">Emplacement	68.47	Ha				
	<ul style="list-style-type: none">WWTP	7.00	Ha				
	<ul style="list-style-type: none">Cemetery	3.08	Ha				
	<ul style="list-style-type: none">Worship House	2.25	Ha				
	<ul style="list-style-type: none">Road and Ditch	267.67	Ha				
	<ul style="list-style-type: none">Elementary School	2.50	Ha				
	<ul style="list-style-type: none">HCV (Planted Area)	208.64	Ha				
1.6	Planting Year and Cycles						
1.6.1	Age profile of planting year						
	Planting Year	Hectarage (Ha)					
		Berangir Estate	Total				
	2000	175.71	175.71				
	2001	512.41	512.41				
	2003	718.00	718.00				
	2004	263.50	263.50				
	2005	1,615.45	1,615.45				
	2006	240.57	240.57				
	2008	487.72	487.72				
	Sub Total Mature	4,013.36	4,013.36				
	TOTAL	4,013.36	4,013.36				
1.6.2	New Planting area after January 2010	- Ha					
1.6.3	Planting Cycle	2 nd Cycle					
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	Berangir	30	136,447,940	28,624.66	20.98	6,005.08	4.40
*Production data source from 12 months before assessment (July 2022 – June 2023)							
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)	%
	Berangir	4,583.67	4,013.36	105,271.87	26.23	105,271.87	100
	<i>*Production data source from July 2022 – June 2023</i>						
1.7.3	FFB description from other source						
	Name of sources/Organization (RSPO certified / non- certified)	Type of Organization	Number Of Smallholders	Production Area (Ha)	Supplied to Mill		
					FFB (tonnes/year)		
	Meranti Paham Estate (Certified RSPO)	Group PTPN IV	-	-	5,168.85		
	Ajamu Estate (Certified RSPO)	Group PTPN IV	-	-	889.38		
	CV Kurnia Mitra Mandiri (Non-Certified RSPO)	Third Party	-	-	9,370.40		
	PT Aidil Putra Perdana (Non-Certified RSPO)	Third Party	-	-	15,589.20		
	TOTAL					31,017.83	
	<i>*Production data source from 12 months before assessment (July 2022 – June 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)		Last Year Actual Certified Volume (July 2022 – June 2023)		
	FFB Processed		151,547		111,330.10		
	CPO Production		32,230		27,559.98		
	Palm Kernel (PK) Production		6,230		5,120.75		
1.8.2	Product selling						
	Type of selling product		Actual selling product for last year (July 2022 – June 2023) (MT)				
	CSPO sold as RSPO certified product		7,000				
	CSPK sold as RSPO certified product		1,057.37				
	CSPO sold under another scheme		-				
	CSPK sold under another scheme		-				
	CSPO sold as conventional		16,019.71				
	CSPK sold as conventional		3,697.43				
1.8.3	Estimate of Certified FFB Claim						
	Name of Estate(s)	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)		
	Berangir	4,583.67	4,013.36	107,000	26.50		
	<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 (%)	
	Berangir	30	107,000	22,470	21.00	4,815	4.50	MB
<i>*Projected CSPO and CSPK production for 12 months of certificate</i>								
1.9	Other Certifications							
	ISO 9001:2008			-				
	ISO 14001: 2004			-				
	OHSAS 18001:2007			-				
	ISCC			-				
	Others			ISPO Certificate by TUV Nord on March 2022.				
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
	Mill	Time bound						
	Pulau Tiga (PTPN I)	2022	Pulau Tiga Estate	2022	Aceh Tamiang District, Aceh Province	September 2022 Certified		
	Tanjung Seumantoh (PTPN I)	2022	Lama Estate	2023	Aceh Timur District, Aceh Province	-		
			Baru Estate	2023	Aceh Timur District, Aceh Province	-		
			Tualang Sawit Estate	2024	Aceh Timur District, Aceh Province	-		
			Julok Rayeuk Selatan Estate	2024	Aceh Timur District, Aceh Province	-		
	Cot Girek (PTPN I)	2022	Julok Rayeuk Utara Estate	2024	Aceh Utara District, Aceh Province	-		
			Cot Girek Es-tate	2023	Aceh Utara District, Aceh Province	-		
	Sawit Hulu (PTPN II)	2022	Sawit Hulu Estate	2022	Langkat District, Sumatera Utara Province	Audit on December 2022		
	Kwala Sawit (PTPN II)	2022	Kwala Sawit Estate	2023	Langkat District, Sumatera Utara Province	-		
			Air Tenang Estate	2023	Langkat District, Sumatera Utara Province	-		
	Sawit Seberang (PTPN II)	2022	Batang Serangan Estate	2023	Langkat District, Sumatera Utara Province	-		
			Sawit Seberang Estate	2022	Langkat District, Sumatera Utara Province	Audit on December 2022		
			Tanjung Jati (Rayon) Estate	2023	Langkat District, Sumatera Utara Province	-		
	Pagar Merbau (PTPN II)	2022	Tanjung Garbus Estate	2022	Deli Serdang District, Sumatera Utara Province	Certified		
			Melati Estate	2023	Deli Serdang District, Sumatera Utara Province	-		

		Patumbak Estate	2023	Deli Serdang District, Sumatera Utara Province	-
		Limau Mukur Estate	2023	Deli Serdang District, Sumatera Utara Province	-
		Tandem (Rayon) Estate	2023	Deli Serdang District, Sumatera Utara Province	-
Sisumut (PTPN III)	2015	Sisumut Estate	2015	Labuhanbatu Selatan District, Sumatera Utara Province	October 15, 2015 (Certified)
		Aek Nabara Utara Estate	2015	Labuhanbatu Selatan District, Sumatera Utara Province	October 15, 2015 (Certified)
Rambutan (PTPN III)	2016	Tanah Raja Estate	2016	Serdang Bedagai District, Sumatera Utara Province	Sept 1, 2016 (Certified)
		Gunung Monaco Estate	2016	Serdang Bedagai District, Sumatera Utara Province	Sept 1, 2016 (Certified)
		Silau Dunia Estate	2016	Serdang Bedagai District, Sumatera Utara Province	Sept 1, 2016 (Certified)
		Sarang Ginting Estate	2016	Serdang Bedagai District, Sumatera Utara Province	Sept 1, 2016 (Certified)
		Sei Putih Estate	2016	Serdang Bedagai District, Sumatera Utara Province	Sept 1, 2016 (Certified)
		Rambutan Estate	2016	Serdang Bedagai District, Sumatera Utara Province	Sept 1, 2016 (Certified)
		Bandar Betsy Estate	2022	Simalungun District, Sumatera Utara Province	-
Sei Daun (PTPN III)	2015	Sei Daun Estate	2015	Labuhanbatu Selatan District, Sumatera Utara Province	Sept 8, 2016 (Certified)
		Bukit Tujuh Estate	2015	Labuhanbatu Selatan District, Sumatera Utara Province	Sept 8, 2016 (Certified)
Torgamba (PTPN III)	2015	Torgamba Estate	2015	Labuhanbatu Selatan District, Sumatera Utara Province	Sept 7, 2016 (Certified)
Sei Meranti (PTPN III)	2016	Sei Meranti Estate	2016	Labuhanbatu Selatan District, Sumatera Utara Province	Sept 14, 2016 (Certified)
Sei Silau (PTPN III)	2017	Sei Silau Estate	2017	Asahan District, Sumatera Utara Province	Apr 3, 2017 (Certified)
		Pulau Mandi Estate	2017	Asahan District, Sumatera Utara Province	Apr 3, 2017 (Certified)
		Ambalutu Estate	2017	Asahan District, Sumatera Utara Province	Apr 3, 2017 (Certified)
		Hutapadang Estate	2017	Asahan District, Sumatera Utara Province	Apr 3, 2017 (Certified)
Sei Mangkei (PTPN III)	2017	Dusun Hulu Estate	2017	Batubara District, Sumatera Utara Province	Oct 2017 (Certified)
		Bangun Estate	2017	Simalungun District, Sumatera Utara Province	Oct 2017 (Certified)
		Gunung Para Estate	2017	Serdang Bedagai District,	Oct 2017

				Sumatera Utara Province	(Certified)
		Gunung Pamela Estate	2017	Serdang Bedagai District, Sumatera Utara Province	Oct 2017 (Certified)
		Sei Dadap Estate	2017	Asahan District, Sumatera Utara Province	Oct 2017 (Certified)
Sei Baruhur (PTPN III)	2018	Sei Baruhur Estate	2018	Labuhanbatu Selatan District, Sumatera Utara Province	April 2018 (Certified)
		Sei Kabara Estate	2018	Labuhanbatu Selatan District, Sumatera Utara Province	April 2018 (Certified)
Hapesong (PTPN III)	2020	Hapesong Estate	2020	Tapanuli Selatan District, Sumatera Utara Province	October 2020 (certified)
		Batang Toru Estate	2020	Tapanuli Selatan District, Sumatera Utara Province	October 2020 (certified)
Aek Nabara Selatan (PTPN III)	2014	Aek Nabara Selatan Estate	2014	Labuhanbatu District, Sumatera Utara Province	May 23, 2014 (Certified)
		Rantau Prapat Estate	2014	Labuhanbatu District, Sumatera Utara Province	May 23, 2014 (Certified)
		Merbau Selatan Estate	2014	Labuhanbatu Utara District, Sumatera Utara Province	May 23, 2014 (Certified)
		Membang Muda Estate	2014	Labuhanbatu Utara District, Sumatera Utara Province	May 23, 2014 (Certified)
		Labuhan Haji Estate	2014	Labuhanbatu Utara District, Sumatera Utara Province	May 23, 2014 (Certified)
		Bandar Selamat Estate	2014	Asahan District, Sumatera Utara Province	May 23, 2014 (Certified)
Aek Torop (PTPN III)	2014	Aek Torop Estate	2014	Labuhanbatu Selatan District, Sumatera Utara Province	June 17, 2014 (Certified)
Aek Raso (PTPN III)	2014	Aek Raso Estate	2014	Labuhanbatu Selatan District, Sumatera Utara Province	June 30, 2014 (Certified)
Pabatu (PTPN IV)	2015	Pabatu	2015	Serdang Bedagai, Sumatera Utara	Certified on September 2015
Dolak Ilir (PTPN IV)	2015	Dolak Ilir	2015	Simalungun, Sumatera Utara	Certified on September 2015
		Laras	2018	Simalungun, Sumatera Utara	Certified on December 2018
Pulu Raja (PTPN IV)	2015	Pulu Raja	2015	Asahan, Sumatera Utara	Certified on August 2015
Adolina (PTPN IV)	2018	Adolina	2018	Serdang Bedagai dan Deli Serdang, Sumatera Utara	Certified on April 2018
Bah Jambi (PTPN IV)	2018	Bah Jambi	2018	Simalungun, Sumatera Utara	Certified February 2018
		Marihat	2018	Simalungun, Sumatera Utara	Certified February 2018
		Bah Birung Ulu	2022	Simalungun, Sumatera Utara	Stage-1 Audit

		Marjandi	2019	Simalungun, Sumatera Utara	Certified on 20 may 2019 (1,802.0 Ha)
		Marjandi	2022	Simalungun, Sumatera Utara	Out of scope Certification 2 nd Stage Audit (30.0 Ha)
Dolok Sinumbah (PTPN IV)	2018	Dolok Sinumbah	2018	Simalungun, Sumatera Utara	Certified on April 2018 (3,757.0 Ha)
		Dolok Sinumbah	2022	Simalungun, Sumatera Utara	Out of scope Certification 2 nd Stage Audit (35.94 Ha)
		Balimbingan	2018	Simalungun, Sumatera Utara	Certified on April 2018
Mayang (PTPN IV)	2021	Mayang	2019	Simalungun, Sumatera Utara	Certified on March 2019
		Bukit Lima	2022	Simalungun, Sumatera Utara	Preparation
Gunung Bayu (PTPN IV)	2019	Gunung Bayu	2019	Simalungun, Sumatera Utara	Certified on September 2019
		Tanah Itam Ulu	2019	Simalungun, Sumatera Utara	Certified on September 2019
Tinjowan (PTPN IV)	2019	Tinjowan	2019	Simalungun, Sumatera Utara	Certified on March 2019
		Aek Nauli	2019	Simalungun, Sumatera Utara	Certified on March 2019
		Padang Matinggi	2019	Simalungun, Sumatera Utara	Certified on March 2019
Air Batu (PTPN IV)	2018	Air Batu	2019	Asahan, Sumatera Utara	Certified on May 2019
		Air Batu	2022	Asahan, Sumatera Utara	Out of Scope certification 2 nd Stage Audit
Berangir (PTPN IV)	2018	Berangir	2018	Labuhanbatu Utara, Sumatera Utara	Certified on July 2018
		Berangir	2022	Labuhanbatu Utara, Sumatera Utara	Out of scope Certification 2 nd Stage Audit (10.0 Ha)
Sawit Langkat (PTPN IV)	2018	Sawit Langkat	2018	Langkat, Sumatera Utara	Certified on June 2018
		Sawit Langkat	2022	Langkat, Sumatera Utara	Out of scope Certification 2 nd Stage Audit (301.50 Ha)
Pasir Mandoge (PTPN IV)	2020	Pasir Mandoge	2020	Asahan, Sumatera Utara	Certified on October 2018

		Sei Kopas	2020	Asahan, Sumatera Utara	Certified on October 2018
		Tonduhan	2020	Simalungun, Sumatera Utara	Certified on October 2018
		Sei Kopas (HPK)	2023	Asahan, Sumatera Utara	-
Timur (PTPN IV)	2022	Timur	2023	Mandailing Natal, Sumatera Utara	-
		Balap	2024	Mandailing Natal, Sumatera Utara	-
Ajamu (PT PN IV)	2021	Ajamu	2019	Labuhanbatu Utara, Sumatera Utara	Certified on September 2019
		Meranti Paham	2019	Labuhanbatu Utara, Sumatera Utara	Certified on September 2019
		Panai Jaya	2024	Labuhanbatu Utara, Sumatera Utara	Preparation
Sosa (PTPN IV)	2022	Sosa	2022	Padang Lawas, Sumatera Utara	Certified on November 2019
PT Agro Sinergi Nusantara (PTPN IV)	2022	PT Agro Sinergi Nusantara	2022	Aceh Barat, Aceh	Preparation
PT Sinergi Perkebunan Nusantara (PTPN IV)	2022	PT Sinergi Perkebunan Nusantara	2022	Morowali Utara, Sulawesi	Preparation
Tandun (PTPN V)	2016	Tandun Estate,	2016	Tapung Hulu District, Kampar District, Riau Province, Indonesia	Certified
		Sei Berlian Estate	2016	Tapung Hulu District, Kampar District, Riau Province, Indonesia	Certified
		Sei Lindai Estate	2016	Tapung Hulu District, Kampar District, Riau Province, Indonesia	Certified
		Sei Lindai 98 ha	2021	Tapung Hulu District, Kampar District, Riau Province, Indonesia	Certified
		Sei Berlian 866 ha	2023	Tapung Hulu District, Kampar District, Riau Province, Indonesia	-
Sei Rokan (PTPN V)	2016	Sei Rokan Estate	2016	Rokan Hulu District, Riau Province, Indonesia.	Certified
Sei Tapung (PTPN V)	2019	Sei Tapung	2019	Rokan Hulu District, Riau Province, Indonesia.	Certified
		Sei Siasam	2019	Rokan Hulu District, Riau Province, Indonesia.	Certified
		KUD Makarti Jaya	2023	Rokan Hulu District, Riau Province, Indonesia.	-
		KUD Karya Mukti	2023	Rokan Hulu District, Riau Province, Indonesia.	-

		KUD Dayo Mukti	2023	Rokan Hulu District, Riau Province, Indonesia.	-
		KUD Tani Sejahtera	2023	Rokan Hulu District, Riau Province, Indonesia.	-
Sei Intan (PTPN V)	2019	Sei Intan	2019	Rokan Hulu District, Riau Province, Indonesia	Certified
Tanjung Medan (PTPN V)	2022	Tanjung Medan	2022	Rokan Hilir District, Riau Province, Indonesia	Audited on November 2022
Tanah Putih (PTPN V)	2019	Tanah Putih	2019	Rokan Hilir District, Riau Province, Indonesia	Certified
		Tanah Putih Plasma	2023	Rokan Hilir District, Riau Province, Indonesia	-
Lubuk Dalam (PTPN V)	2019	Lubuk Dalam	2019	Siak District, Riau Province, Indonesia	Certified
		Lubuk Dalam Plasma	2023	Siak District, Riau Province, Indonesia	-
Sei Buatan (PTPN V)	2022	Sei Buatan	2022	Siak District, Riau Province, Indonesia	July 2022 Certified
		Air Molek 1	2023	Siak District, Riau Province, Indonesia	-
		Air Molek II	2023	Siak District, Riau Province, Indonesia	-
		KUD Karya Darma	2023	Siak District, Riau Province, Indonesia	-
		KUD Tunas Karya	2023	Siak District, Riau Province, Indonesia	-
Sei Galuh (PTPN V)	2023	Sei Galuh	2023	Kampar District, Riau Province, Indonesia	April 2022 Certified
		Sei Galuh Plasma	2023	Kampar District, Riau Province, Indonesia	-
Sei Pagar (PTPN V)	2019	Sei Pagar	2019	Kampar District, Riau Province, Indonesia	October 2020 (Certified)
		Sei Pagar Plasma	2023	Kampar District, Riau Province, Indonesia	-
Sei Garo (PTPN V)	2019	Sei Garo	2019	Kampar District, Riau Province, Indonesia	Certified
		Sei Garo Plasma	2023	Kampar District, Riau Province, Indonesia	-
Terantam (PTPN V)	2019	Terantam	2019	Kampar District, Riau Province, Indonesia	Certified
		Terantam 2 (725.44 ha)	2023	Kampar District, Riau Province, Indonesia	-
		Tamora	2023	Kampar District, Riau Province, Indonesia	-
		Sei Kencana	2023	Kampar District, Riau Province, Indonesia	-
		Sei Batu Langka	2023	Kampar District, Riau Province, Indonesia	-
Rimbo Dua (PTPN VI)	2018	Rimbo Satu	2018	Jambi Province	Certified
		Rimbo Dua	2018	Jambi Province	Certified

		Batang Hari	2022	Jambi Province	May 2022 Certified
Bunut (PTPN VI)	2022	Bunut	2022	Jambi Province	May 2022 Certified
Ophir (PTPN VI)	2022	Ophir	2022	Sumatra Barat Province	January 2023 Certified
		Pangkalan 50 Kota	2023	Sumatra Barat Province	-
Aur Gading (PTPN VI)	2023	Durian Luncuk	2023	Jambi Province	December 2022 Certified
Solok Selatan (PTPN VI)	2023	Solok Selatan	2023	Sumatra Barat Province	-
Tanjung Lebar (PTPN VI)	2022	Tanjung Lebar	2023	Jambi Province	-
		Bukit Cermin	2023	Jambi Province	-
Bekri (PTPN VII)	2022	Bekri	2022	Lampung Province	April 2022 Certified
		Rejosari	2022	Lampung Province	April 2022 Certified 2022
		Padang Ratu	2022	Lampung Province	April 2022 Certified
Betung (PTPN VII)	2022	Betung	2022	Lampung Province	Certified
		Bentayan	2026	Lampung Province	-
Talang Sawit (PTPN VII)	2023	Betung Krawo	2023	Musi Banyuasin District, Sumatera Selatan Province	Audited on December 2022
Sungai Lengi (PTPN VII)	2023	Sungai Lengi	2023	Muara Enim District, Sumatera Selatan Province	December 2022 Certified
Kertajaya (PTPN VIII)	2022	Kertajaya	2022	Lebak District, Banten Province	September 2022 Certified
		Cisalak Baru	2023	Lebak District, Banten Province	-
		Bojongdatar	2023	Lebak District, Banten Province	-
Cikasungka (PTPN VIII)	2022	Cikasungka	2023	Bogor District, Jawa barat Province	-
		Sukamaju	2023	Sukabumi District, Jawa barat Province	-
Gunung Meliau (PTPN XIII)	2022	Gunung Meliau	2023	Sanggau District, Kalimantan Barat Province	-
Rimba Belian (PTPN XIII)	2023	Rimba Belian	2023	Sanggau District, Kalimantan Barat Province	-
		Gunung Mas	2023	Sanggau District, Kalimantan Barat Province	-
		Sungai Dekan	2023	Sanggau District, Kalimantan Barat Province	-
Parindu (PTPN XIII)	2023	Parindu	2023	Sanggau District, Kalimantan Barat Province	-
Luwu (PTPN XIV)	2022	Luwu	2022	Luwu Timur, District, Sulawesi Tengah	December 2022 Certified
		Keera-Maroon	2024	Luwu Timur, District, Sulawesi Tengah	-

			Malili	2026	Luwu Timur, District, Sulawesi Tengah	-
			Asera	2025	Luwu Timur, District, Sulawesi Tengah	-
	Date Approval TBP on November 2022.					
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard					
	PTPN IV- Berangir POM does not have smallholders' scheme. The other suppliers of Berangir POM are include to other scope in accordance with the time bound plan.					

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
RC	<p>1. 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, ISO 14001 and ISO 9001 Lead Auditor Training in 2020, awareness of the RSPO Certification System and the RSPO P&C in 2019 and 2020, and Completed Awareness Social Audit SMETA in 2022, and SCCS RSPO in 2022. During this audit, he assigned to verify, SCCS, TBP and partial certification aspect, Worker Welfare, environment aspect, GHG and HCV.</p> <p>2. Rizki Tanaya (Auditor). Indonesian citizen, Bachelor of Agriculture, Majoring Socio-Economic Agriculture, Padjadjaran University. Training that has been attended include ISPO Auditor Training and Refreshment New ISPO Ministry of Agriculture 38 of 2020, RSPO SCCS Auditor Training, RSPO P&C Lead Auditor Training, ISO 9001:2015 Lead Auditor Training, General OHS Expert Training, ISO 19011:2018, ISO 17021:2015, ISO 17065:2012, ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, ISO 50001:2018, FSC CoC, BAP, SEDEX/SMETA, and Global GAP. Has carried out several audit activities on environmental, conservation, Best Management Practices, OHS, Labor and Social aspects. In this audit activity, he is verification is carried out on aspects of Best Management Practices and OHS Aspect.</p> <p>3. Afiffuddin (Auditor) Indonesian citizen, Diploma III majoring Palm Oil Plantation, Bogor Agricultural University. Five years working experience since 2010 at Oil Palm Plantation Company in Indonesia as agronomy operational staff and followed several trainings namely: Basic Plantation Management Program, Auditor Training Indonesian Sustainable Palm Oil (ISPO), Training of RSPO lead auditor, OHS General Expert, OHS System Management based on PP 50 2012 and Management System Certification (ISO 9001-2015/SNI 19011-9001:2015) ISO 17021, ISO 17065, SA 8000 training. He has been involved in several audit activities related to sustainable palm oil certification since 2016 covering Best Management Practices aspect, health and safety aspect and worker welfare aspect. In this assessment, he verified the Worker Welfare Transparency aspect, legal aspect and land dispute.</p> <p>4. Dinda Febrima Napitupulu (Auditor Trainee). Bachelor of Social and pursuing her Double Degree Master Program in Environmental Science at Padjadjaran University Bandung and University of Twente the Netherlands. Experienced as Sustainability Officer and Internal Auditor for Environmental Management System (ISO 14001). She has participated in Quality Management System (ISO 9001), ISPO and RSPO trainings. During the audit, she verified the social, environment aspect, GHG and HCV under the supervision of Lead Auditor.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
RC	<p>Number of auditors: 3 auditor and 1 Auditor trainee</p> <p>Number of days for Recertification: 4 days</p> <p>Number of working days for RC audit: 12 Working days</p>
2.2.2	Assessment Process
RC	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Perkebunan Nusantara IV – Berangir POM to the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard Endorsed by the RSPO Board of Governors on 12 November 2020.</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) <i>interview</i>, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p>

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 1.1.

Improvement of findings from ASA 4 findings were observed by auditors at this **RC** assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of **RC**.

The opening meeting was held on 10th July 2023 at Meeting Room Office. As for the participants who attended the opening meeting included Sub Head Estate and Mill Sub Head, Support Team from Medan and other staff from Estate and POM. Closing meeting was held on 13th July 2023, which was attended by the same participants as the opening meeting. Management of PT Perkebunan Nusantara IV accepts all the RC audit results.

The assessment program please find in Appendix 2

2.2.3	Locations of Assessment
RC	<p>The sampling location is considered by the fundamental and crucial issue arise from the documents review and consultation with stakeholder. On this assessment, the visited sample locations and interview with respondent by auditor team are:</p> <p>Berangir POM</p> <ul style="list-style-type: none"> • Security Post. Observation and interview related to work procedure, emergency response facility, OHS, worker welfare and supply chain aspect. • Weighbridge Station. Observations and interviews related to work procedures, worker welfare, OHS, environmental and supply chain aspect. • Sorting Station. Observation of FFB sorting work practices according to SOPs, implementation of OHS and environmental aspects. • Boiler Station. Observation of boiler work process according to SOP, implementation of OHS and environmental aspects. • Engine Room Station. Observation of work processes in the Engine Room according to SOPs, implementation of OHS and environmental aspects. • Clarification Station. Observation of the oil refining process according to SOP, implementation of OHS and environmental aspects. • Mill Drainage. Observations mill effluent lines, sanitation mill and flow of leaching mill. • Solid Waste. Observation of the management of Solid waste consist of EFB, fiber and shell from the production process of mill. • Workshop. Observations and interviews related to work procedures, worker welfare, OHS, and environmental aspects. • Chemical Storage. Observations and interviews related to work procedures, work procedures, worker welfare, OHS, and environmental aspects. • Material Storage. Observations and interviews related to work procedures, worker welfare, OHS, PPE stock, and environmental aspects. • Oil Storage. Observations and interviews related to work procedures, worker welfare, OHS, and environmental aspects. • Hazardous Waste Temporary Storage. Observations and interviews related to work procedures, worker welfare, OHS, hazardous toxic and waste stock as well as environmental aspects. • Water Treatment Plant (WTP). Observations and interviews related to work procedures, worker welfare, OHS, and environmental aspects. • WWTP. Observation on WWTP, indication of waste overflow, OHS implementation, and interview with worker about worker welfare, OHS, and company's policies. • Empty bunch area. Field observations related to empty bunch managed for composting. • Reservoir. Field observations and interview related water source management, OHS, and environmental aspect.

- **Employee Housing.** Observation of the availability of infrastructure such as employee housing facilities, clean water facilities, educational facilities, religious facilities, health facilities and sports facilities.

Berangir Estate

- **HCV 6 moslem tomb Afdeling V.** Observation related to HCV area management.
- **Riparian Aek Merah Afdeling V.** Observation related to riparian area and environment aspect.
- **Harvesting Activity at Block 03AB Division 4 and Block 13CC Division 6.** Observations and interviews with workers related to work procedures, environmental management, OSH, employment and complaint mechanisms.
- **Ganoderma Census (Pest Census) at Block 01K Division 2.** Observations and interviews with workers related to work procedures, environmental management, OSH, employment and complaint mechanisms.
- **Chemical warehouse.** Observations and interviews for material handling, OHS, and hazardous materials handling.
- **Fertilizer warehouse.** Observation of material handling, OHS, and handling of hazardous materials.
- **HGU stakes and land demarcation No. 143, No. 144, No. 142, No. 149, and No. 48.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **HCV Kayu Raja Riparian Area, Block 05 AH.** Observation the implementation of management in HCV of riparian area.
- **Land application, Block 00F Division 1.** Observation for waste water management and nutrient cycle strategy.
- **Landfill, Block 05BT Division 5.** Observation related to waste management and environmental aspect.
- **Employee Housing Complex Division 5,** Observation and interview related to waste management, house condition and infrastructure for the welfare of workers and their family.
- **HCV Titi Gambang Riparian Area, Block 01 X Division 5.** Observation the implementation of management in HCV of riparian area.

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
RC	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Perkebunan Nusantara IV was held by:</p> <ul style="list-style-type: none"> • Public Notification on RSPO website 6th June 2023 • Public Notification on PT Mutuagung Lestari website 10th July 2023 • Public consultation meeting with government institution at Labuhan Batu Utara Regency 11th July 2023 • Public consultation meeting with communities (Pasang Lela Village and Perkebunan Berangir Village) including previous land owner 11th July 2023 • Public consultation meeting with internal stakeholders and contractor 11th July 2023 <p>Numbers of input from stakeholders were clarified by PT Perkebunan Nusantara IV.</p>
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
	The next visit ASA 1.1 will be conducted eight (8) months to twelve (12) months after date of licensed issued.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of **Berangir POM – PT Perkebunan Nusantara IV subsidiary of PT Perkebunan Nusantara III**, Operation consisting of one (1) mill and one (1) oil palm estates.

During the assessment, there was Five (5) nonconformities were assigned against Major Compliance. There were four (4) nonconformities against Minor Compliance Indicators and two (2) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective action(s) that had been reviewed and accepted by Auditors in form of documentation evidences e.g. document record/photographic/etc. Those corrective actions taken that consist of *five (5)* Major non-conformity(s) and *four (4)* Minor non-conformity(s) had been closed out shall be verified during next assessment.

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

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY		
1.1	The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
1.1.1	<p>The company has Circular Letter No. 04.01/SE/02/II/2018 on February 27th 2018, concerning Management of Company Data/Document/Information Provision which explains that the request for data/documents/information can be done by visiting the website of PT Perkebunan Nusantara IV (www.ptpn4.co.id/kip/) or by request letter to the Head of the Corporate Secretary Section (if the request is to the unit, the district/unit manager must coordinate with the Head of the Corporate Secretary).</p> <p>The company has a Decree of the Board of Directors of PT Perkebunan Nusantara IV No. 04.03/Kpts/02/II/ 2018 on 5th February 2018 which was approved by the President Director. The decision states that there are 22 information (company profile, land permit, audited financial statements, licensing/permitting documents, waste management, disposal plan, etc.) that can be published and accessed in general and 27 information (company articles of association, bonus formula/production services, formula selling price of commodities, etc.) which cannot be published publicly.</p> <p>These documents are stored in each business unit and PTPN IV headquarters depending on the type of information. However, it can be given to stakeholders if they submit a request for information to the company. This accessible information is provided and distributed to stakeholders related to the company during both formal and informal meetings. In addition, requests for information can be made through the PTPN IV website so that all stakeholders can access it easily. The officer appointed to provide and update information is the General HR department.</p>	

The company has shown documents related to mandatory reports that are carried out regularly and sent to government agencies, for example: Environment Management and Monitoring (*RKL-RPL*) Report of PT Perkebunan Nusantara IV for second semester 2022 submitted to Environment Agency of Labuhanbatu Utara No BER/X/55/IV/2023 on 28th April 2023 and Environment Ministry through environmental electronic reporting system (SIMPEL) with ID number 1688139372-2129.

1.1.2

Based on document review, the company has an information service procedure for stakeholders. It is explained in SPO 03 (Communication Consultation with the Community) revision 03 on 2nd January 2017. The procedure stated that communication and consultation for the community in the immediate plantation unit is recorded by HR assistants and the general representing managers to communicate with the *Muspika*, traditional religious leaders and the community around the operational area, if there is a direct request for information known to the directors then it will be conveyed to the manager of the GUU (Business Unit Group), next it will be relayed back to the Directors and will be followed up on.

Information Request SOP and Communication & Consultation SOP have covered all the elements in indicator 1.1.1 above. The time to respond is 30 working days after the letter is received by management. The company no longer records the log book of incoming and outgoing letter manually. Since 2021, an application named element 4 is provided to store the incoming letters information as well as the responding letter. Based on interviews result with internal and external stakeholders including workers, local community representatives, and relevant agencies in Labuhanbatu Utara Regency, it is known that they have known the mechanism for communication and request of information with the company.

The company has sent several mandatory reports to the relevant agencies, namely:

- Report on the development of PTPN IV's plantation business Berangir Business Unit for semester 2 of 2022 has been reported to the Plantation Office of North Labuhanbatu Regency on January 5, 2023.
- The Berangir Business Unit PTPN IV Land Utilization Report for the 2022 period was reported to the North Labuhanbatu Regency State Land Agency on May 17, 2023.
- Investment Activity Report (LKPM) for Quarter 1 of 2023 Estate and Mill units have been approved and accepted by the Ministry of Investment/BKPM on April 10, 2023.

Worker Welfare Aspect:

- Employment Report (*WLTK*) of Berangir Estate - PT Perkebunan Nusantara IV with reporting Number 21454.20221121.0001, date of report on November 21st, 2022, and obligation to report back on November 21st, 2023.
- Employment Report (*WLTK*) of Berangir Mill - PT Perkebunan Nusantara IV with reporting Number 21454.20221227.0004, date of report on December 27th, 2022, and obligation to report back on December 27th, 2023.
- The results of interviews with the Department of Labor and Industry of North Labuhanbatu Regency obtained information that the unit of certification had never reported the use of *PKWT* workers during 2022 and 2023.
- Based on the results of the document review, it is known that:
 - In the manpower document for the June 2023 period, there are 49 *PKWT* harvest workers. Then, the unit of certification shows a Specific Time Work Agreement, for example:
 - Peak-Crop Harvest Work Agreement Letter Number BER/S.Perj/45/II/2022 with the initials PI who was accepted to work from 1 February – 30 April 2022.
 - Peak-Crop Harvest Work Agreement Letter Number BER/S.Perj/97/IV/2023 with the initials JR who was accepted to work starting April 1 – June 30, 2023. The worker renews the work contract from the previous year, namely Peak-Crop Harvest Work Agreement Letter Number BER/S.Perj/ 26/II/2022 with a period of 1 February – 30 April 2022.
 - Reporting on the use of *PKWT* workers to UPT Labor Inspection Region IV of the North Sumatra Province Manpower Office for the period May 2021, it is known that 11 non-harvest *PKWT* workers were reported.
 - In Article 14 of Government Regulation no. 35 of 2021 explains that:
 - 1) The *PKWT* must be registered by the entrepreneur at the ministry that administers government affairs in the field of manpower online no later than 3 (three) days after signing the *PKWT*.
 - 2) In the event that *PKWT* registration online is not yet available, the *PKWT* registration shall be carried out by the entrepreneur in writing at the agency that administers government affairs in the district/city manpower sector, no later than 7 (seven) days from the signing of the *PKWT*.

The unit of certification has not been able to show evidence of information related to the reporting of *PKWT* workers for the latest periods in 2022 and 2023 to the Department of Manpower. This has been **Nonconformity Number 2023.01 with minor category**

1.1.3

Mechanism for requesting information and responses is contained in SOP of Information Request No. SPO 06 No. revision 03 on 1st August 2017. The time to respond is 30 working days after the letter is received by management. The company no longer records the log book of incoming and outgoing letter manually. Since 2021, an application named element 4 has been provided to store the incoming letters information as well as the responding letter. Result of information verification from element 4, it is known that there is no request of information from external stakeholders. Most of the incoming letters from external stakeholders are related to invitation for events or meetings and proposal for financial aid. For example, the company received a letter for financial assistance from Regent of Labuhanbatu Utara on 9th January 2023 no 508.6.18/55/*pembangunan*/2023. It was responded with letter no BER/SEVP.Op.II/01/1/2023 on 17th January 2023.

1.1.4

Based on document review, the company has an information service procedure for stakeholders. It is explained in SPO 03 (Communication Consultation with the Community) revision 03 on 2nd January 2017. The procedure stated that communication and consultation for the community in the immediate plantation unit is recorded by HR assistants and the general representing managers to communicate with the *Muspika*, traditional religious leaders and the community around the operational area, if there is a direct request for information known to the directors then it will be conveyed to the manager of the GUU (Business Unit Group) then it will be relayed back to the Directors and will be followed up on.

The company has shown the minutes of meeting of public communication socialization with all stakeholders on 11th January 2023. The event was held to maintain the good communication and engagement with all stakeholders related to certification, SOP, and company policy in order to create a conducive atmosphere. The participants in the event namely, the unit manager, plantation head of assistant, Afdeling assistant, estate personnel assistant, administration head assistant, vendor, foreman, and staff.

1.1.5

The company has stakeholder information in PT Perkebunan Nusantara IV Berangir Estate and Palm Oil Mill Company's Stakeholders document. It provides the agency name, contact person, position, and phone number. The listed stakeholder consists of national, province, regency, and district agency, internal stakeholders, partners/vendors, NGO, as well as journalist. The public consultation was conducted by contacting the name in the list such as the Environment Agency, Land Office, Manpower Agency, Perkampungan Berangir and Pasang Lela Head Villages, FFB suppliers, and other contractors.

1.1.2

Status: Nonconformity Number 2023.01 with minor category

1.2

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

1.2.1

The unit certification showed commitment to ethical behavior is contained in the Code of Conduct PT Perkebunan Nusantara IV Medan – North Sumatera – Indonesia, which was ratified on December 16th, 2016, by President Directors. The policy consists of commitments and attitudes, rights and obligations, prohibitions, ethics in conducting business. The policy also regulates compliance with and violations of the code of ethics. Socialization regarding this policy has been carried out in estate and mill unit, and also carried out to external stakeholders, for example, socialization on February 14th, 2023.

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

1.2.2.

The unit of certification has a mechanism to monitor compliance and the implementation of ethical business policies and practices through compliance inspection and evaluation. For example, conducting regular internal audits to ensure operational units comply with policies and SOPs. The scope of the internal audit is the compliance of each unit in plantations and mills with all aspects contained in the RSPO P&C such as aspects of legality, SCCS, labor, environment, BMP and other aspects. The latest internal audit was carried out on June 3 – 7th, 2023 with 3 nonconformities and has been fulfilled on July 8th, 2023.

In addition, there is a Whistle Blowing System that determines the flow of complaints/reports of violations to all employees, without worry, willing to convey the possibility of fraudulent practices occurring within the certification unit. This has been regulated in the SOP for Internal Communication and Handling of Employee Complaints as well as the SOP for Communication and Consultation with the Community.

Based on the results of document review and interviews with management representatives, it is known that the mechanism for monitoring compliance in implementing the code of ethics policy is considered to have been effective. From the results of field visits and interview with estate and mill workers and stakeholders (contractor/supplier FFB), it was also discovered that there were no deviations in business practices. They are already known about the company's policies to respect human rights, commitment to ethical behavior in all work operations (code of conduct) and the Whistle Blowing System.

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 relevant regulation in 2023, such as:

Environment:

- Environmental Management and Monitoring Plan (RKL-RPL) for PTPN IV Berangir Unit on 24th January 2005 which was approved by the Head of Bapedalda Province of Sumatera Utara No. SK 137 / BPD.LSU /BTL /2005. This document has also been legalized through Environmental Permit from the One Stop Investment Service and Licensing Office of Labuhanbatu Utara Regency with No: 503/05/DPM-PPTSP/II /2019 on 27th February 2019.
- Letter from Environment Agency of Labuhanbatu Utara No. 660/260/DLH-02/2022 on 16th June 2022 related to Hazardous and Toxic Waste Storage Technical Detail for PT Perkebunan Nusantara IV.
- Letter from Environment Agency of Labuhanbatu Utara no 660/324/DLH-02/2022 on 8th August 2022 related to Technical Approval Compliance Standard for waste water PT Perkebunan Nusantara IV Berangir POM and Estate.

Legal

The company has complied with laws and regulations, for example in terms of legality, namely:

- Has a Cultivation Right (HGU) in accordance with the provisions with a total HGU area of 4,583.67 Ha.
- Has a Plantation Class as class II (Good) in accordance with the Decree of the North Labuhanbatu Regent Number 521.4/362/DIPERTAN/2022 on May 17, 2022.
- PT Perkebunan Nusantara IV – Berangir Unit has Plantation Permit Business for Cultivation or “Izin Usaha Perkebunan – Budidaya” (IUP-B) as presented by Decree of Labuhanbatu Utara Regent No. 503/2159/TAPEM/2012 dated October 24th 2012, which mentioned that permit is given for oil palm cultivation on **± 4,648.74 ha** area, located on Village of Perkebunan Berangir, Sub- Regency of NA IX-X, Regency of Labuhanbatu Utara, Province of Sumatera Utara.

Compliance with Best Management Practices Regulation:

In terms of BMP, several regulations towards applicable regulation conducted by the unit of certification are presented as follows:

- Has conducted zero burning for land preparation.
- Has committed to reducing and avoiding the use of pesticides, especially those classified on WHO 1A, 1B, and Paraquat.
- Has used seeds from producers recognized by the Government of Indonesia.
- Unit of certification has adopted integrated pest management which consists of the early warning system, census, biological control, chemical control with justification and evaluation.
- Conduct leaf and soil analysis for fertilizer recommendations.

Compliance with OHS Regulation

The certification unit, in general, has complied with OHS regulations, including:

- The establishment of the OHS Committee which has been explained in indicator 6.7.1.

- Provision of PPE for free to all workers and arrange the use of PPE according to the type of work based on the free predetermined HIRAC which has been explained in indicator 6.7.3.
- Have permits for all factory operating machines such as Boilers, Generator sets, Heavy Equipment (Wheel Loader), Electrician Technicians, and others. There is a permit for Boiler Operator License on behalf of E.S (initials) with **Reg.14980.OPK3-PUBT-B.I/IV/2019** date of expiry April 30, 2023.
- Has a license/competency for some special jobs that require more expertise such as OHS experts, *Hygiene Perusahaan, Kesehatan dan Keselamatan Kerja*, boiler operators, diesel engine operators, welders, wheel loader operators, and others in accordance with the requirements contained in the legislation.

Compliance with Manpower Regulation

Certification unit in general has complied with manpower regulation, including:

- The company has complied with the implementation of minimum wages for all employees in accordance with applicable regional regulations (Decree of the Governor of North Sumatera concerning Province Minimum Wages for 2022).
- Overtime pay for workers in accordance with Government Regulation Number 35 of 2021.
- Implementation of the structure and scale of wages for all levels of workers in accordance with Government Regulation Number 36 of 2021.
- All employees have been registered in *BPJS Ketenagakerjaan* and *BPJS Kesehatan* social security.

2.1.2

The unit of certification has guidelines for compliance with applicable legal rules and requirements listed in the Compliance Evaluation Report document on Legislation, Regulations and Other Requirements Related to the Application of RSPO/ISPO which has been stipulated on June 7th, 2023. The document describes the company's mechanism to ensure that all legal regulations both local, national and international that have been ratified and related to plantation activities have been complied with. By having a list of legal compliance regulations, the unit of certification can ensure that not only workers, but also all contractors, suppliers and stakeholders who have a relationship with the company both operationally and those affected have complied with the law. The unit of certification has shown a document listing regulations for the 2023 period that are applied in the company's operational area. The document describes several lists of regulations related to legal aspects, BMP, environment, OHS, employment, social and others. For example, compliance with the latest labor regulations, such as the provision of wages to workers in accordance with the Governor of North Sumatera concerning Province Minimum Wages for 2023.

2.1.3

Based on the results of document verification and field visits, the following evidence was obtained:

- The SOP for Maintenance of HGU Boundary Markings SPO Number 12 dated 02 January 2015 No. Revision 03 explains that one of the managements of the boundary stakes is to carry out maintenance of the boundary markers and the surrounding area so that the boundary markers can be seen clearly, and the position of the stakes must be in accordance with the HGU Map and Every six months the Afdeling Assistant monitors the boundary markers by checking the physical condition or state of the markers.
- Based on the results of a field visit to Boundary Stakes No. 142, 143 and 144 in Block 05 BG Afdeling V it is known that the condition of the stakes does not have a stake number.
- In the previous assessment (ASA 4) it was found that the number of stakes had become an Opportunity for Improvement (OFI) and the company had planned to improve the condition of several stakes based on a letter from the Berangir unit manager No.: BER/04.01/eM-145/VIII/2022. However, the OFI is still found in the Recertification assessment.

Based on this evidence, the Company has not been able to show evidence that the HGU Stake Treatment/Maintenance is in accordance with the letter from the Berangir unit manager No.: BER/04.01/eM-145/VIII/2022 and its SOP. This became **Nonconformity Number 2023.02 with minor category**

2.1.3 | Status: NCR No 2023.02 with Minor Category

2.2

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

2.2.1

The unit of certification maintains a list of contractors stating the contractor's name, address, telephone number, job description and others. The list of contractors corresponds to the information in the list of stakeholders and all third parties have been registered, such as CPO and PK transporters, hazardous and toxic waste contractors, etc. The unit of certification has shown a list of contractors for the 2023 period, which are as follows:

- Contractors/Partnership:
 - PT Wahana Adidaya Pertiwi, Cooperation in CPO transportation.
 - CV Karya Mandiri, Cooperation in PK transportation.
 - PT Veronica Tannaga, Cooperation in hazardous toxic and waste transportation.
 - CV GAS, Cooperation in FFB transportation
 - PT Aidil Putra Perdana, Cooperation in FFB transportation
 - PT Surya Max Industry, Cooperation in boiler installation and repair
 - PT Karyawan Nusantara Jaya, Cooperation in labor service provider
 - PT Jaya Wira Manggala, Cooperation in labor service provider
 - Etc.
- FFB Suppliers:
 - CV Kurnia Mitra Mandiri.
 - PT Aidil Putra Perdana.

The unit of certification also shows work agreement documents with third parties. As an example:

- Work agreement letter number 04.05-Peng/S.Perj/02/III/2023 between CV Karya Mandiri and PTPN IV for the work of PK transporting. The work agreement is valid from March 10th, 2023, until December 31st, 2023.
- Work agreement letter number PKS BER/SP.01/VIII/2022 between CV Kurnia Mitra Mandiri and PTPN IV for the work of FFB transportation. The work agreement is valid from August 13th, 2022 until August 2nd, 2023.

The work agreement document displayed contains unit of certification information including name acting as management representative and company address, contractor information in the form of representative name and contractor address, unit of company/contractor rights and obligations, term of work agreement, work location, monitoring, appraisal and payment as well sanctions and settlement of disputes, etc.

2.2.2

The unit of certification shows the work agreement document with the contractor/FFB Suppliers. In the cooperation contract it is explained that there is an article which stipulates that the contractor/FFB Suppliers is obliged to follow the labor laws in force in Indonesia. For example, work agreement document between the certification unit and PT Karyawan Nusantara Jaya (labor service provider contractor) with number 04.07/S.Perj/18/III/2022 dated March 21st, 2022. The document explains that the second party must comply with applicable labor regulations, such as wages for contractor workers, prohibition of the use of underage workers, provision of work facilities, work accident insurance and worker health, etc.

Based on the results of the document review, it is known that:

- Proof of *BPJS* payment for June 2023 period, for example:
 - Proof of payment for *BPJS Ketenagakerjaan* for 706 workers of PT Karyawan Nusantara Jaya via bank transfer on July 4th, 2023.
 - Proof of payment for *BPJS Kesehatan* for 666 workers of PT Karyawan Nusantara Jaya via bank transfer on July 4th, 2023. There is a difference of 40 workers with *BPJS Ketenagakerjaan* payments because these workers have been registered with the Indonesian government's health insurance program, namely *PBI* and *JAMKESDA*.
 - Proof of payment for *BPJS Ketenagakerjaan* for 42 workers of CV GAS via bank transfer on June 16th, 2023.
- Third parties (contractors/FFB suppliers) show proof of payment of wages to contractor workers. Here are some examples:
 - Salary slips for FFB unloading workers/drivers of CV GAS with the initials JAS who receive wages in May 2023 of IDR 4,209,253.
 - Salary slips for workshop workers of PT Karyawan Nusantara Jaya with the initials IA who receive wages in June 2023 of IDR 4,976,676 with a wage component consisting of a basic salary of IDR 2,311,360; fixed allowance of IDR 770,453;

and premium allowances.

Based on the results of interviews with representatives of contractors and FFB supplier, information was obtained that once a year the certification unit has carried out socialization related to OHS, compliance with labor regulations, environmental management, etc., to contractors and contractor workers. As a form of compliance with applicable policies, the unit of certification also conducts work evaluations for contractors in the company's operational area regarding compliance with applicable laws and regulations in Indonesia.

Based on the description above, the unit of certification has its own clause regarding the fulfilment of relevant legal obligations, and can be proven by the third party concerned.

2.2.3

Based on the results of a review of the contractor/FFB supplier work agreement document, for example cooperation agreement letter between PT Karyawan Nusantara Jaya (labor service provider) with the unit of certification with number 04.07/S.Perj/18/III/2022, it is explained that the contractor is required to provide PPE for its workers, guarantee and include all workers in the BPJS program BPJS Ketenagakerjaan and BPJS Kesehatan, do not employ children under the age of 18, do not practice forced labor and illegal labor. Then based on interviews with the contractor, information was obtained that the contractor representative could explain related to several prohibitions in accordance with labor laws such as the prohibition on the use of underage labor, forced labor and human trafficking. The certification unit also shows a list of contractor workers along with a work agreement between the contractor and contractor workers. For example, a contractor worker at PT Karyawan Nusantara Jaya with the initials JR is over 18 years old (born in 2001).

As a form of compliance with the implementation of the clauses contained in the work agreement, the certification unit evaluates the contractor's performance as outlined in the Contractor Evaluation Form. The criteria assessed in the evaluation are quality of work, completion of work and compliance with labor laws. For example, the work evaluation document for FFB supplier and FFB transporter PT Aidil Putra Perdana for the assessment period in 2022, received a good score so that the unit of certification recommended continuing work again in the next period.

From the explanation above, it can be concluded that all contracts have their own clauses that prohibit practices involving child labor, forced labor, and workers from human trafficking.

Status: Comply

2.3

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

2.3.1 & 2.3.2

Based on document verification, it is known that the company receives FFB directly and indirectly from FFB suppliers. The POM Berangir FFB Suppliers for the period July 2022 – June 2023 are as follows:

Direct

- Berangir Estate (PTPN IV) → Certified RSPO
- Meranti Paham Estate (PTPN IV Group) → Certified RSPO
- Ajamu Estate (PTPN IV Group) → Certified RSPO
- Pulu Raja Estate (PTPN IV Group) → Certified RSPO

Indirect

- CV Kurnia Mitra Mandiri → Non-Certified RSPO
- PT Aidil Putra Perdana → Non-Certified RSPO

For Indirect suppliers, the company already has Geolocation information and Land Ownership Letters from Indirect FFB suppliers, for example as follows:

CV Kurnia Mitra Mandiri

- Kwok Ijun Ming with Coordinate Points N: 02' 13'33.7" E: 99' 41'49.1" and proof of land ownership in the form of Power of Attorney over land.

- Een Fajar Dolpa with coordinates N: 02' 17'10.4" E: 99' 45'19.1" and proof of land ownership in the form of a Land Certificate (SKT).
- Miski with Coordinate Points N: 02' 13'24.2" E: 99' 41'43.3" and proof of land ownership in the form of Power of Attorney over land.

PT Aidil Putra Perdana

- M. Suhar with Coordinate Points N: 02' 15'39.5" E: 99' 46'26.7" and proof of land ownership in the form of a Certificate of Compensation.
- Abdul Karim Pasaribu with coordinates N: 02' 14'16.7" E: 99' 42'10.7" and proof of land ownership in the form of a Certificate of Compensation.
- Tukimin with coordinates N: 02' 12'38.0" E: 99' 44'40.2" and proof of land ownership in the form of a Land Certificate (SKT).
- Company Registration Certificate issued by the Investment and Licensing Service Office of North Labuhanbatu Regency on October 11, 2017, which is valid until October 13, 2022.
- Small trading business license (SIUP) number 503/151/DMPPTSP-LS/SIUP/2017 dated 11 October 2017.

Based on document verification and verification of FFB quantities from FFB suppliers it is known that all indirect suppliers have been identified, and the total number of farms and farmers identified is reasonable compared to the average amount of FFB supplied to the Factory.

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 already has a 5-year production projection, which is contained in the 5-Year Long-Term Plan of PT Perkebunan Nusantara IV for the 2020–2024 Period (the projection is determined every 5 years). The Long-Term Plan contains projected area statements, FFB production, CPO production, nucleus, plantation costs, factory costs, oil prices, core prices, oil revenues and sales, and core sales, expenses, and profit and loss.

The company's annual report is available in the Minutes of Management Review Meeting, dated July 8, 2023, which informs the discussion on the achievement of annual performance from monthly estate production and others. Evaluation of the achievement of the current year's budget has been carried out at the end of each year as a material consideration in the preparation of the next year's budget.

3.1.2

Based on the results of document review and interviews with company representatives, it is known that the oldest planting year is 2000 planting year (23 years) and replanting will be carried out in 2025. In addition, the company also makes considerations in carrying out replanting, such as:

- The age of the plant has reached 25 years.
- Tree stands < 100 Trees/Ha.
- Production < 14 tons/ha.

3.1.3
Management Review

The company shows the minutes of the Management Review Meeting, which was held on July 8, 2023, with an agenda for discussing, among others:

- External audit plan
- Customer feedback
- Process performance, product conformity and environmental performance
- Achievement of quality and environmental objectives

- Concern for the implementation of QMS and EMS
- Status of corrective and preventive actions
- Follow up on past management
- Changes that may affect the QMS/SML
- Suggestions for improvement
- Evaluation of compliance with environmental regulations and other requirements
- Etc.

Internal Audit

The company has also conducted RSPO Internal Audit conducted on June 3 – 7, 2023 with 3 non-conformities resolved on July 8, 2023.

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 an updated system to improve existing practices. There is also a development guideline for farmers by providing systematic training aimed at continuous improvement.

Social and Environmental Aspect

- The company no longer uses pesticides with the active ingredient paraquat.
- The company has implemented biological pest control in this case by using host plants and barn owls to reduce the use of pesticides, especially insecticides and rodenticides.
- Management and monitoring of fires in company border areas that benefit the community.
- The use of renewable energy accordance to reduce the use of fossil fuels.
- Waste management and monitoring through WWTP pond management, testing the quality of the effluent and reporting it to the Environmental Agency.
- Air quality management and monitoring through several action like road maintenance, air quality testing, routine maintenance of vehicles and machines and vehicle upgrades.
- Management and monitoring of surface and groundwater through testing the quality standard.
- Green House Gas Management and using land clearing with mechanical and zero-burning policy.

Best Management Practice and OHS Aspect

- Carry out an inspection of the use of PPE to ensure that the PPE of employees has been used and in accordance with procedures.
- CH does not use chemicals with the active ingredient paraquat.

The company has carried out an internal RSPO audit conducted on 03-07 June 2023 which was carried out by the company's internal audit team. The results of the internal audit contained 3 discrepancies. All of these discrepancies have been corrected by the company.

The company has also conducted a management review which was conducted on July 8, 2023, with discussions such as follow-up on internal audit results, suggestions for improvement, customer satisfaction, programs and targets for 2023, and conclusions.

3.2.2

The company has shown the auditor regarding the RSPO metric template Version 2.1 period of 2022 that has been filled in according to the facts and data in the company's record documents, such as the number of workers, the area of production to the record of work accidents. Based on team auditor's review on, the information has been matched with others document, such as supply chain record, demographic workers, work accident, etc.

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

The company already has PTP Nusantara IV (*Persero*) Standard Operating Procedures (SPO) documents for Oil Palm Cultivation and Processing. The Management Unit explained that until the recertification assessment was carried out there had been no changes (revisions) to all of the SOPs, namely:

- Standard Operating Procedures (SPO) for Cultivation, including: Land Development (SPO 01), New Plant Planting and Replanting (SPO 02), Nursery Management (SPO 03), Management of Immature Crops (SPO 04), Management of Mature Crops (SPO 05), and Harvest and Transportation Management (SPO 06). In the procedure, there is a guide in the form of a table that explains information on fertilizing, harvesting and transporting maintenance activities.
- Standard Operating Procedures (SPO) for Palm Oil Processing, including: Weighbridge (SPO 01), Loading Ramp (SPO 02), Boiling Station (SPO 03), Threshing Station (SPO 04), Empty Bunches (SPO 05), Pressing Station (SPO 06), Oil Refining Station (SPO 07), Oil Storage Tank (Dispatch) (SPO 08), Quality of FFB, CPO, and Palm Kernel (SPO 10), Laboratory, Equipment, Chemicals and Sample Analysis (SPO 11), Care and Use of Analytical Balances (SOP 12).

Standard Operating Procedures are guidelines for the operations of plantation and mill units. Operational activities are recorded and documented by the company every day, then recapitulated in monthly and annual reports. Daily operational reports include FFB production, crop rotation, upkeep, pests, fertilization, processed FFB, CPO and kernel production, palm oil and kernel yield, daily production quality (FFA, manure), to palm oil shipments. These daily reports are made in summary in the Manager's Monthly Management Report with the addition of other operational variables such as finance, production costs, list of receivables, list of assets, and so on.

Based on field observations at mills and estates during the audit, it is known that procedures have been implemented and workers can explain and demonstrate their work according to procedures, referring to operational, safety and environmental best practices.

3.3.2 and 3.3.3

The company has a system that ensures consistent implementation of its SOPs by conducting internal audits of Estate and Mill operations and RSPO Internal Audits.

The certificate holder has conducted internal and external audits, as well as periodic evaluations related to the company's operational performance. Here, some of the documents shown:

- RSPO Internal Audit conducted on June 3 – 7, 2022 with 3 non-conformities resolved on July 8, 2023.
- Management review conducted on July 8, 2023, which has been discussed in indicator 3.1.3.

All inspection activities and corrective actions carried out by the company are recorded in the form of a report in accordance with the audit carried out. The results of the audit are scored which show the performance of the estate and are used as a reference for improvement in the next assessment. Estate will make efforts to improve performance based on the score obtained. The contractor's performance assessment has been verified in indicator 2.2.2.

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 company has relevant environment assessment as mentioned in 2.1.1. The reporting of Environment Management and Monitoring (*RKL-RPL*) PT Perkebunan Nusantara IV for second semester 2022 was submitted to Environment Agency of Labuhanbatu Utara No BER/X/55/IV/2023 on 28th April 2023 and Environment Ministry through environmental electronic reporting system (SIMPEL) with ID number 1688139372-2129.

The company has HCV assessment report in 2011. It was conducted by PT Surveyor Indonesia. The total area of HCV Kebun Berangir is 208.64 Ha consisting of HCV1.1, HCV 1.2, HCV 4.1, HCV 4.2, HCV 6. Identification of HCV by involving local

communities through public consultations held on 3 September 2011.

The company conducted the social impact assessment in July 2011 by PT Surveyor Indonesia. These components were assessed during SIA, namely: demographics, economic, social, local culture, perception (CSR), conflicts. Based on the SIA result, it could be concluded that PT Perkebunan Nusantara IV gave positive impact such as:

- Support the social and economic development in Labuhanbatu Utara in general and particularly in Sub District Na IX-X,
- Create local job vacancy for surrounding community to work in the company as permanent or temporary employee,
- Create the opportunity for business agreement with local people by partnership,
- Routinely conduct the CSR.

Data for SIA was gathered by these methods: guideline interview, open interview, guideline questionnaire, random direct interview with local people nearby Berangir, and observation. The villages involved in the assessment included Sungai Raja, Perkebunan Berangir, Pasang Lela, and Silumajang Village. The updated SIA monitoring program in 2022 involving the villagers, includes:

- Public facilities and social facilities.
Improve communication with village stakeholders to discuss participatory village development programs based on priority scales from the perspective of village residents.
- Employment Opportunity
Promote labor recruitment to villages around the estate, equal access for all job applicants and direct contractors to prioritize residents around the estate if they meet the qualifications needed as workers.
- Business opportunity.
Encourage the realization of partnership and community development programs according to village needs.
- Maintain good relationship with livestock farmer.
Good relationship between party is maintained to avoid conflict.

3.4.2

The implementation of environmental management is conducted in accordance with Environment Management and Monitoring (RKL-RPL) Report documents and Environmental Permits owned by the company. The environmental management report is carried out every semester and submitted to Environmental Agency of Labuhanbatu Utara Regency. The last report was carried out on 19th January 2023 for the RKL-RPL Report second semester 2022. Based on the report, it is known there is no negative impact caused by the company.

Based on document review, it can be concluded that all management and monitoring parameters requested in environmental documents have been implemented. For example, conducting the air pollution management in a preventive method, such as to operate the machine based on SOP, regular machine maintenance, install the filter, and oil changes based on the technical guides. Based on the evaluation of air quality, noise, and water quality results, it is known that all parameters still comply to the standard, and there is no indication of contamination.

The company has HCV management and monitoring program plan for 2023. It was conducted involving all relevant stakeholders on 30 June 2023, the program namely:

- Maintain forest/protected/HCV areas. The company maintains the HCV area by installing a signboard and publicizing information to the surrounding community about the presence of HCV in the company area (once a year in 2023).
- Socializing flora and fauna to the surrounding community. The company will conduct the socialization to surrounding community regarding the HCV area and the presence of flora and fauna in the company's area twice a year in 2023.
- Monitoring the flora and fauna twice a year in 2023.

The social impact monitoring and management plan has been managed and monitored through the SIA Management and Monitoring Plan for 2022 based on the results of the SIA study in 2011. These components were assessed during SIA, namely: demographics, economic, social, local culture, perception (CSR), conflicts.

SIA result describes in detail the conditions and characteristics of the community, strategic issues, employment issues and stakeholder relations, company impacts, social impact management, conclusions and recommendations. Participatory approach can be shown by the conclusion of development insight from participants and the presence of participants in attendance lists. The

participants are some people from nearby villages.

Based on documents review and interview with stakeholders (Pasang Lela and Perkebunan Berangir Village), it is known that SIA is conducted in participatory approach. The updated SIA program has identified the managed social impact, location, management plan, time plan, indicator of successful program, and person in charge. The social impact management and monitoring plan has been developed with the participation of widely affected stakeholders. These programs are structured according to the identification of the needs of the surrounding community.

Based on the document verification and interviews with relevant stakeholders, SIA program has done in participatory approach and suitable with the company operational activities.

3.4.3

The company has the Environmental Monitoring and Management Plan and report it to the Environmental Agency of Labuhanbatu Utara Regency on 19th January 2023 for the second semester of 2022. The implementation of Environmental Management and Monitoring is carried out in accordance with the direction as described in indicator 3.4.1. The effectiveness of environmental management and monitoring can be seen from the results of environmental management and monitoring analysis. It means the management and monitoring plans are in sync with the actual implementation.

The RKL-RPL document also shows that the company has managed all the recommended impacts. One of the evaluations carried out by the company is the compliance evaluation. Numerous things can be concluded from that evaluation, for instance: the company conducts the air pollution management in a preventive method, such as to operate the machine based on SOP, regular machine maintenance, install the filter, and oil changes based on the technical guides. Based on the evaluation of air quality, noise, and water quality results, it is known that all parameters still comply to the standard, and there is no indication of contamination.

Based on the field observations, it can be seen that the company has carried out environmental management in accordance with the RKL-RPL by installing warnings for conservation areas, prohibits hunting protected animals. Based on the results of interviews with Environmental Agency of Labuhanbatu Utara, the company has reported the RKL-RPL regularly.

The company has the evaluation of HCV management and monitoring program plan on 30 June 2023. This evaluation is for the implementation in 2022, the program namely:

- Maintain forest/protected/HCV areas. The company maintains the HCV area by installing a signboard and publicizing information to the surrounding community about the presence of HCV in the company area.
- Socializing flora and fauna to the surrounding community. The company conducted the outreach to surrounding community regarding the HCV area and the presence of flora and fauna in the company's area in May and November 2022. Based on the interview results with Pasang Lela Village, it was found that they are aware of the HCV area and the company's concern to protect flora and fauna.
- Monitoring the presence of wild wildlife species carried out in second semester of 2022 includes:
 - 22 Species of birds, such as *Burung Perenjak* (*Orthotomus atrogularis*), *Burung Terocok* (*Pycnonotus goiavier*), *Burung Raja udang* (*Halcyon cyanoventris*) dan *Burung Jalak* (*Sturnus contra*).
 - 10 Types of Mammals such as *Monyet Ekor Panjang* (*Macaca fascicularis*), *Babi hutan* (*Sus verucossus*), *Tupai* (*Tupaia javanica*), *Musang* (*Prionodon linsang*) dan *Kalong* (*Pteropus vampires*).
 - 12 types of reptiles and amphibians such as: *Tokek* (*Gecko gecko*), *Biawak* (*Varanus salvator*), *Kadal* (*Mabouia multifasciata*), *Katak* (*Bufo sp*), *Bunglon* (*Myrmeleon sp*).

SIA Management and Monitoring Plan describes monitoring indicator, monitoring method, PIC and time plan. The evaluation is stated in Evaluation of Social Impact Management Program 2022. The evaluated program such as communication with villages related to development activities with participatory approach, socialization on open recruitment in the company, financial aid for education and business opportunity nearby the community, maintain good relationship with local livestock farmers, and collaborate with community in covid prevention program. The evaluation describes the methods, goals, indicators, and evaluation result. From the evaluation remarks, it can be concluded that the programs are implemented as plan. The company can show the detail progress of each mentioned program in the report.

Status: Comply

3.5

A system for managing human resources is in place.

3.5.1

The company has procedures for recruitment, promotion, retirement and termination of employees which are contained in:

- SOP and Work Instructions for Recruitment and Appointment of IA-IID Group Employees Number 04.15.01A
- Circular Letter Number 04.07/SE/30/VIII/2022 concerning Acceptance of PTPN IV Executive Employees in 2022
- Circular Letter Number 04.11/SE/20/V/2019 concerning Requirements for Guidelines for the Selection of Prospective Harvester Employees
- Circular Letter Number 04.07/Kpts/R/01/II/2022 concerning Assessment of IA-IID Group Employee Performance
- Procedures for employee promotions, promotions, demotions and employee transfers are listed in CHAPTER II of the CLA for the 2022 – 2023 period.
- Procedures for employee pension was listed in CHAPTER XII of the CLA for the 2022 – 2023 period.
- Procedures for employee termination was listed in CHAPTER XII of the CLA for the 2022 – 2023 period.

Apart from that, the unit of certification has a Collective Labor Agreement the 2022 – 2023 period. This document explains all regulatory aspects related to employment, such as: requirements for recruitment, promotion, retirement, termination of employment, and other provisions. The company regulation document above is available in Indonesian.

Routine socialization regarding procedures and Collective Labor Agreement is given to workers. For example, socialization at the Berangir Estate unit, which was held on January 11th, 2023, and during morning assembly in each unit before starting work. Based on the results of interviews with workers in plantation units and factories as well as bipartite representatives, it is known that workers have understood the recruitment, selection, promotion and other employment procedures contained in company regulations and other procedures.

From this explanation it can be concluded that the unit of certification has procedures for recruitment, selection, acceptance, promotion, retirement and termination of employment.

3.5.2

The unit of certification has been always documented all labor procedures. The following are examples of employment procedures that have been implemented and well documented by the company, for example:

- Recruitment of workers, as an example in Berangir Estate unit, an employee with the initials ZDP sends a letter of application by attaching identity documents (copy of e-KTP, family card, last diploma/diploma, etc.). Then, the certification unit shows the work agreement letter number BER/S.Perj/25/II/2022 which explains that workers with the initials ZDP are accepted as harvesters with contract worker status. The term of the agreement is from February 1st – April 30th, 2022. At the recruitment stage, this workforce has been selected based on the applicable procedures, namely through the stages of administrative selection, medical examination, and interviews. Then, the unit of certification also shows supporting evidence in the form of a copy of the work agreement document given to the worker. This is indicated in the document proof of handover of a copy of the work agreement. Based on the results of interviews with workers, information was obtained that the certification unit does not retain personal documents and there is no fee at the time of recruitment.
- Promotional documents for workers listed in decree number 04.07/Kpts/R/19/III/2022 dated March 31st, 2022. The document explains that 377 workers in the plantation unit will be promoted by grade in 2022. As an example, a worker with the initials BND (harvesting foreman) was promoted from grade IIA/0 to IIA/1. The unit of certification also shows the results of the performance appraisal of employees with the initials BND with the evaluation criteria of discipline/attendance, job knowledge and expertise, speed, quality, productivity, teamwork, honesty and sincerity which are the basis for considering employee promotions.
- Workers' pension documents with the initials MDH listed in the Memo No. BER/04.07/eM-196/XII/2022 on December 1st, 2022, regarding Retirement Employee Names and Data for January 2023 period. The document explains that the worker has reached retirement age and is no longer registered as an employee in the Berangir Estate unit. The unit of certification shows the official report and documentation of severance pay, long service awards and compensation for workers' rights, the calculation of which has been adjusted according to the applicable laws and regulations.

The explanation above proves that the unit of certification has implemented proper and documented work procedures for each

worker.

Status: Comply

3.6

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

3.6.1

The company has a Plantation Management System Policy approved by the Manager in January 2023, which regulates, among other things, prioritizing OHS in all aspects of work in order to prevent and reduce accidents and occupational illness by implementing OHS Management System.

The company has HIRAC Documents for plantations, which were approved on June 6, 2023, and HIRAC Documents for factories, which were approved on July 23, 2022, which were prepared by the Risk Management Team and approved by the Estate/Mill Manager. In the HIRAC document, the company has not identified the hazards and risks of several activities, including but not limited to:

Estate

1. Harvest on a slope.
2. Harvest in lowland areas.
3. House rinse.
4. Housing.
5. Activities after sending FFB to Mill.

Mill

1. Receipt of FFB at postal security.
2. FFB Transport Contractor Driver Activities.
3. Activities in the Sorting Area.
4. WWTP installation management.
5. Activities at the CPO dispatch station.

Based on the explanation above, it is concluded that the company has not been able to show evidence that all operational activities in the field have been assessed for risk to identify OHS problems in accordance with its Plantation Management System Policy. So, This became **Nonconformity Number 2023.03 with major category**

3.6.2

Monitoring the effectiveness of the OHS plan in dealing with health & safety risks can be seen in the OHS committee report document. OHS committee reports have also been reported to relevant agencies, for example:

- **POM:** OHS Meeting held on June 5, 2023, the topics discussed are Fire Emergency Response Training, Calm vessels and Storage tanks, and Garbage Bin Training.
- **Estate:** OHS Meeting held on June 30, 2022 the topics discussed were the preparation plan for workplace inspections (Fire extinguisher, First Aid Kits, and Workplace Environment), Filling in OHS Management procedure forms, holding OHS Committee Meetings, holding RSPO Online Consultation Meetings (HCV), carrying out blood donation activities, carrying out socialization of new normal activities, carrying out mutual cooperation activities, and equipping firefighting equipment.

Based on an interview with the Labuhanbatu Utara Regency Manpower Office, it was found that work accidents have been reported periodically in the quarterly reports of the OHS Supervisory Committee, and there were no cases of death for 2022 period.

Regarding nonconformities at ASA-4, Based on verification on Recertification, the company shows the Berangir Estate Employee Inspection Report on June 21, 2023, with a total of 343 workers, Berangir PKS 109 workers, and for PKWT workers, as many as 48 workers carried out on July 4, 2023.

3.6.1 Status: Nonconformity no 2023.03 with major category

3.7

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

3.7.1

The unit of certification has identified and developed a training program related to aspects of the RSPO P&C for all staff, workers,

smallholders and local stakeholders in 2022 and 2023. The following are the results of the identification and training program plans listed in the Training Calendar year of 2022 and 2023, among others:

- Training on work techniques (harvest, spraying, manuring, pruning, etc), integrated pest control, pest census of caterpillars (UPDKS), OHS expert, HCV training and management, management of hazardous wastes and toxic and company policy for plantation workers.
- Training on operator work techniques, first aid, PPE, HIRAC, fire extinguisher, emergency response, and company policy for mill workers.
- Training and socialization of RSPO, ISPO, company policy and communication and consultation procedures for contractor workers, smallholders, stakeholders and communities around the company.

Based on the results of interviews with workers, contractors and village community representatives (Pasang Lela Village and Perkebunan Berangir Village), it is known that every year the company organizes training and outreach programs to all parties around the company. The resource persons also understood the results of the training activities, for example the workshop workers in Berangir Mill unit stated that all harvest workers had received training on how to repair a damaged machine or vehicle.

3.7.2

The unit of certification shows the minutes document for the realization of the 2022 and 2023 training program, here's an example:

- Pruning training which was held on June 17th, 2022.
- Integrated pest management training which was held on April 22nd, 2022.
- Caterpillars (UPDKS) pest census training which was held on November 11th, 2022.
- HCV training and management which was held on March 10th, 2023.
- Training on hazardous and toxic waste management which was held on July 1st, 2023.
- Sterilizer operator training which was held on March 7 – 10th, 2022.
- Welder operator training which was held on June 13 – 17th, 2022.
- Chemical analyst training which was held on May 11-13th, 2023.

Based on the results of interviews with workers, contractors/FFB supplier and village community representatives (Pasang Lela Village and Perkebunan Berangir Village), it is known that every year the company organizes training and outreach programs to all parties around the company. The resource persons also understood the results of the training activities. For example, the harvest workers in Block 00K of Berangir Estate unit stated that all harvesters had received training on how to harvest palm oil.

Based on the description above, the unit of certification has proven that there are training activities for all staff, workers, plasma smallholders and stakeholders. Records of training activities have been maintained in the minutes document.

3.7.3

The certification unit showed a recording of the socialization of sustainability policies and supply chain systems on 21 March 2023 and was attended by officers who handle certified and uncertified products such as fruit sourcing, administrative systems, to product handling. Based on the results of interviews with weighbridge officers, it is known that the officers have been able to explain well about the supply chain system and FFB traceability.

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1 & 3.8.2

Berangir POM is used SCC Module E (Mass Balance) its supply based on certified and non-certified FFB (Group plantation PTPN IV). Based on Recertification assessment, there's no changed information related to SCCS scheme module on Berangir POM (Mass Balance).

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-RC 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 (28 November 2022 – 19 September 2023) (MT)	Actual (July 2022 – June 2023) MT	Projected Certified Volume (MT)
FFB Certified (MT)	151,547	111,330.10	107,000
CSPO (MT)	32,230	27,559.98	22,470
CSPK (MT)	6,230	5,120.75	4,815

Based on the table above, it is known that there is no overproduction carried out by the Company.

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: Berangir Palm Oil Mill PT Perkebunan Nusantara IV
- License ID: CB140943
- Core Product: Palm Oil
- Member ID: RSPO_PO1000004134
- RSPO Membership Number: 1-0082-06-000-00
- 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

Based on onsite assessment, there's no changed information related to Supply Chain Procedures on No. document 04.03/UNIT/SUS/P/001 dated 1 Augustus 2018, revised 26 June 2023. The procedures established and covering all elements of the supply chain model requirements, records and reports of compliance with supply chain requirements including responsibilities of each key personnel involved, definition, the FFB reception process, weighing, checking quality, processing, monitoring refined products, mass balance calculations, delivery of the product. The procedure is according to latest RSPO SCCS (RSPO Supply Chain Certification Standard on 1 February 2020). This procedure includes delivery of certified FFB from the estate to receipt of certified FFB at Mill, delivery of certified CPO / PK from mill and others.

The procedure also describes each personnel in charge:

- Field assistant managed certified FFB in estate.
- Mill manager registered mill in RSPO IT platform and documented book keeping.
- Weighbridge operator recapitulated amount of FFB received from certified/non-certified area.
- Staff of planning and strategic department monitored a certification period and quota.

3.8.6

Based on onsite assessment, documents of supply chain procedures for Mass Balance models No. document 04.03/UNIT/SUS/P/001 dated 1 Augustus 2018, revised 1 March 2020 covering all audit for sustainable palm oil including SCCS. In the SOP mentioned that internal audit is done annually. Internal audit of SCCS conforms to the requirements in the RSPO SCCS and the RSPO market communications and claims documents and effectively implements and maintains the standard requirements.

During the assessment date, the last internal audit was held on 03 to 07 June 2023 for all business units and there were no discrepancies regarding supply chain indicators.

Based on the results of the verification of the recording of the management meeting review held on July 8, 2023, one of the

discussions is related to the implementation of SCCS, which will always be reviewed every month related to mass balance.

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 July 2022 – June 2023:

Period	FFB (Ton)		
	Certified	Non-Certified	Total
July 22	9,293.890	1,943.690	11,237.580
August 22	10,747.900	558.560	11,306.460
September 22	10,977.490	1,601.030	12,578.520
October 22	11,672.800	1,433.760	13,106.560
November 22	10,742.090	2,624.810	13,366.900
December 22	10,728.920	3,415.450	14,144.370
January 23	5,511.200	2,184.150	7,695.350
February 23	7,006.440	2,346.870	9,353.310
March 23	7,536.960	2,855.740	10,392.700
April 23	7,118.010	2,084.830	9,202.840
May 23	8,671.800	1,944.940	10,616.740
June 23	11,322.600	1,965.770	13,288.370
Total	111,330.100	24,959.600	136,289.700

Estimated certified product recorded in the last assessment report. The estimates of certified production for the next license period describe at RC 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 (28 November 2022 – 19 September 2023) (MT)	Actual (July 2022 – June 2023) MT
FFB Certified (MT)	151,547	111,330.10
CSPO (MT)	32,230	27,559.98
CSPK (MT)	6,230	5,120.75

Based on the table above, it is known that there is no overproduction carried out by the Company.

The unit of certification has basic guidance and work instruction of PTPN IV regarding Certified Palm Oil Product Handling (document number 04.03/KS/SUS/P/001 revised dated on June 26, 2023. This procedure has covered the implementation of certified and non-certified handling, personnel in charge, book keeping and announce and confirm trades in the RSPO IT platform etc.

Personnel in charge:

- Field assistant managed certified FFB in estate.
- Mill manager registered mill in RSPO IT platform and documented book keeping.
- Weighbridge operator recapitulated amount of FFB received from certified/non-certified area.
- Staff of planning and strategic department monitored a certification period and quota.

The procedures established and covering all elements of the supply chain model requirements, records and reports of compliance with supply chain requirements including responsibilities of each key personnel involved, handling of FFB certified, receiving FFB

certified at Mill, handling of CPO, CSPK, CSPO & CSPK delivery, monitoring stock of CSPO & CSPK, record keeping, control of CSPO, CSPK, CSPK & CSPO (Certified Products) not appropriate, RSPO IT Platform, traceability, market communication and claim.

3.8.8

Based on documents verifications, interview with management as well as verification through Palm Trace it was known during period July 2022 – June 2023 there are 7,000 MT CSPO; 1,057.37 MT CSPK, 17,257.94 MT CSPO sold under Conventional, and 3,697.43 MT CSPK Sold under Conventional. 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, CSPO certified delivery on 02 May 2023 with shipping announcement TR-ceb336d4-203c. The information provided on invoices are:

- The name and address of the buyer (PT Industri Nabati Lestari)
- The name and address of the seller (PT Perkebunan Nusantara IV – Berangir Mill)
- The loading or shipment / delivery date (01-13 February 2023);
- A description of the product supply chain model (MB)
- The date on which the documents were issued (17 February 2023);
- The quantity of the products delivered (500,000 Kg);
- Any related transport documentation (transport by PT Wahana Adidaya Pertiwi);
- A unique identification number (04.05/BER/MS/47/I/2023);
- RSPO certificate number (Mutu-RSPO/118);
- etc.

3.8.9; 3.8.10 & 3.8.11

Outsource for certified product handling has only for CPO and PK transportation activities, with agreements presented as follows:

- CPO transportation agreement with CV Wahana Adidaya Pertiwi through Agreement No. 04.05/S.Perj/02/III/2023 dated 15 March 2023 with a validity period of up to December 31, 2023. Clauses that mention contractor's commitment towards several regulation compliance which required by Indonesian Laws and/or Regulations, RSPO, SCCS, OSH and ISO system, as well as willingness to be audited by the Certificate Body appointed by PTPN IV are presented in Article 5.
- CPO transportation agreement with PT Kereta Api Indonesia through Agreement No. 04.05/S.Perj/Pem/03/III/2023 dated 13 March 2023 with a validity period of up to December 31, 2023. Clauses that mention contractor's commitment towards several regulation compliance which required by Indonesian Laws and/or Regulations, RSPO, SCCS, OSH and ISO system, as well as willingness to be audited by the Certificate Body appointed by PTPN IV are presented in Article 5.
- For PK transportation namely CV Karya Mandiri with agreement document No.: 04.05-Peng/S.Perj/02/III/2023 dated 10 March 2023 with a validity period of up to December 31, 2024. Based on the document verification, it informs that the contractor is willing to be audited at any time by an independent certification body.

To ensure the contractors complies with the RSPO Supply Chain, in the agreement, there were clauses that set obligations of the contractor to comply with the supply chain rules. For instance, the responsibility to deliver products only from Berangir Mill, as well as the willingness to observe by Certification Body and the company internal audit in order to verify the compliance. One of the mechanisms to ensure that the products delivered only from the Mill, in the vehicle is mounted on a seal that can only be opened at the buyer's location. During audit team auditor contacted local contractors (PT Wahana Adidaya Pertiwi) and the contractors can be reached as well as informed regarding clausal that ruled in work agreement).

Based on document verification and the results of interviews with Company representatives, it is known that there are no new contractors from the previous assessment.

3.8.12

The Mill has maintained accurate, complete, and up to date records related RSPO Supply Chain implementation that kept at least 2 years in accordance with Mill's procedure. The records cover FFB received from certified and uncertified sources, production of CPO and PK (certified, noncertified, total), products dispatch (as RSPO certified, sold in another certified scheme, sold as

noncertified, total sold), as well as balance/stock of certified products.

The Mill balancing the certified products and dispatch on a monthly basis. The summary of Mass Balance data 12 months previous the audit can be seen on the table below:

Period	CPO Production (ton)			CSPO Despatch (ton)			
	Certified	Non-Certified	Total	RSPO	Other scheme (ISCC)	Conventional	Total
Stock	2,856.362	0	2,856.362				
July 22	2,112.327	268.916	2,381.243	0	0	615.154	615.154
August 22	2,335.370	90.632	2,426.002	1,000	0	1,158.548	2,158.548
September 22	2,478.279	256.440	2,734.719	0	0	3,124.690	3,124.690
October 22	2,568.400	224.042	2,792.442	0	0	2,428.598	2,428.598
November 22	2,467.390	431.439	2,898.829	2,250	0	105.771	2,355.771
December 22	2,106.783	556.358	2,663.141	1,500	0	3,851.592	5,351.592
January 23	1,135.369	345.123	1,480.492	0	0	1,151.337	1,151.337
February 23	1,689.674	371.776	2,061.450	0	0	1,702.974	1,702.974
March 23	1,770.347	458.177	2,228.524	2,250	0	0	2,250.000
April 23	1,623.704	338.133	1,961.837	0	0	0	0
May 23	1,992.916	283.956	2,276.872	0	0	599.074	599.074
June 23	2,423.063	296.044	2,719.107	0	0	2,520.206	2,520.206
Total (July 2022 – June 2023)	24,703.622	3,921.036	28,624.658	7,000	0	17,257.944	24,257.944
Grand Total	27,559.984	3,921.036	28,624.658	7,000	0	17,257.944	24,257.944

Period	PK Production (ton)			PK Despatch (ton)			
	Certified	Non-Certified	Total	RSPO	Other scheme	Conventional	Total
Stock	309.801	0	309.801				
July 22	418.689	87.472	506.161	0	0	447.518	447.518
August 22	520.471	24.477	544.948	147.660	0	349.553	497.213
September 22	502.732	74.849	577.581	0	0	542.181	542.181
October 22	482.278	64.651	546.929	0	0	285.129	285.129
November 22	461.128	112.989	574.117	462.890	0	0	462.890
December 22	471.740	155.808	627.548	446.820	0	0	446.820
January 23	210.965	104.181	315.146	0	0	501.942	501.942
February 23	317.647	125.304	442.951	0	0	324.466	324.466

March 23	329.038	145.292	474.330	0	0	337.628	337.628
April 23	301.771	106.743	408.514	0	0	212.757	212.757
May 23	370.563	97.250	467.813	0	0	334.160	334.160
June 23	423.931	95.113	519.044	0	0	362.097	362.097
Total (July 2022 – June 2023)	4,810.953	1,194.129	6,005.082	1,057.370	0	3,697.431	4,754.801
Grand Total	5,120.754	1,194.129	6,314.883	1,057.370	0	3,697.431	4,754.801

3.8.13 & 3.8.14

Berangir POM has performed FFB processing to produce CPO and PK only. Conversion factors are based on total processing extraction, through average of all FFB processed, for example for the May 2023 period it is known that OER is 21.56% and KER 4.43%.

3.8.15

SCSS module used in Berangir 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 (July 2022 – June 2023) it was known the product sold under certified product and Conventional as described in table below:

	Dispatch period (MT)	
	July 2022 – June 2023	Total
CSPO sold under RSPO Scheme	7,000	7,000
CSPO sold under other scheme	-	-
CSPO sold as conventional	16,019.71	16,019.71
CSPK sold under RSPO Scheme	1,057.37	1,057.37
CSPK sold under other scheme	-	-
CSPK sold as conventional	3,697.43	3,697.43

RSPO IT Platform member registration number for Berangir POM is RSPO_PO1000004134. 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:

- CSPO sold to PT Industri Nabati Lestari dated 01 March 2023 for 500 MT and transaction creates in IT Palm Trace dated 02 May 2023 with Transaction ID TR-ceb336d4-203c.
- CSPO sold to PT Industri Nabati Lestari dated 01 March 2023 for 250 MT and transaction creates in IT Palm Trace dated 05 April 2023 with Transaction ID TR-cbc55e4f-a8ab.

Removing Stock & Credit Allocation

- Transaction ID ST-TR-55a63664-14cc dated 12 July 2023 CSPK Removing from certified stock for 2,000 MT.
- Transaction ID ST-TR-cc3be3d7-7965 dated 30 May 2023 CSPO Credit Allocation for 1,000 MT.
- Transaction ID ST-TR-dc3a94fc-d975 dated 12 July 2023 CSPO Credit Allocation for 1,000 MT.

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. Based on management representative interview and document review, the mill does not use trademark on its sales activities and communication.

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 unit of certification has made a policy to respect human rights as outlined in the Labor and Human Rights Policy Number 7 which has been in effect since January 2nd, 2015. The policy states the principles that the certification unit is committed to complying with laws and regulations in the field of employment and upholding human rights in the framework of developing sustainable oil palm plantations. This policy is available in Indonesian and has been communicated to all employees and local stakeholders. For example, the socialization of human rights policies on January 11th, 2023, at Berangir Estate unit. This policy has also been disseminated to external stakeholders, for example, when making or renewing a cooperation contract.

Based on the results of interviews with labor union representatives, gender committees, local contractors and representatives of the Pasang Lela Village and Perkebunan Berangir Village community, it is known that they understand the applicable human rights policies. The resource person stated that there were no incidents of human rights violations in the certification unit, no employees were intimidated and/or experienced violence by the certification unit and there was a prohibition on retaliation against Human Rights Defenders.

4.1.2

The unit of certification does not have records regarding the use of force/army/paramilitary in resolving conflicts/problems that exist between the unit of certification and relevant stakeholders (local communities, workers, or others). This has been stated in the Labor and Human Rights Policy Number 7 which has been in effect since January 2nd, 2015. The document explains that the unit of certification is committed not to commit any form of intimidation or extrajudicial violence against human rights defenders, including the use of military/security forces. In addition, the unit of certification will work with the labor unions to resolve existing problems.

Based on the results of interviews with representatives of labor union and representatives of the gender committee and external stakeholders, it is known that the unit of certification does not use paramilitaries or mercenaries in the company's operational areas. If there is a problem, it will be resolved by means of deliberation without resorting to violence. Resolution of conflicts/problems with deliberations is quite effective.

Status: Comply

4.2

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

4.2.1

The certification unit has:

- SOP of Internal Communication and Handling Employee Complaints Number SPO 19 Revision 2 which has been effect since January 2nd, 2021.
- SOP of Communication and Consultation with the Public Number SPO 03 Revision 3 which has been effect since January 2nd, 2017.

In each procedure explains that the steps for submitting complaints can be conveyed in writing and orally through staff appointed as communicators. Complaint response time is no later than 3 months after the information is received. The document also explains that if a complaint arises in the RSPo complaint process, the unit of certification through the relevant department will handle the complaint in accordance with the RSPo process. Then, the certification unit has recapitulated all complaints and conflicts submitted by all affected parties around the unit of certification in the Complaints and Responses Recording Book/Logbook. Based on the results of the document review, it is known that during 2022 – 2023 there were no conflicts reported to PTPN IV – Berangir Unit.

The results of interviews with daycare workers in each plantation unit, workshop staff at the mill unit, local contractors, representatives of the Pasang Lela Village and Perkebunan Berangir Village community and government agencies in Labuhanbatu Utara Regency, it is known that they understand how to communicate and consult with companies because procedures related to complaints and conflicts have been submitted periodically to all parties. For example, the socialization which was held on February

14th, 2023.

Based on the explanation above, it can be concluded that the unit of certification has a mutually agreed system, is open to all affected parties, can resolve disputes effectively, in a timely and appropriate manner.

4.2.2

The unit of certification has established a complaint handling system for all affected parties, which is documented in SOP of Internal Communication and Handling Employee Complaints Number SPO 19 Revision 2 which has been effect since January 2nd, 2021. In point 5.4 it is explained regarding the mechanism for handling complaints of employees who are Illiterate and blind. The certification unit also has a labor union and a gender committee which regularly hold meetings with workers, one of the agendas of which is to accommodate problems and complaints directed at the certification unit.

From the results of interviews with workers and representatives of the surrounding community, they already know about communication procedures and with people who serve as communicators between the company and workers/community so that those who cannot read/write can inform the relevant communicators.

From the description above, it can be concluded that the unit of certification already has procedures for conveying information and the system has been understood by affected parties, including those who cannot read and write.

4.2.3

Based on the results of a review of the Complaints Logbook/Logbook and Responses, no complaints were found from workers, internal stakeholder (such as labor union and gender committee) and external stakeholders (such as local government agencies, village communities, contractors/suppliers of FFB, etc).

Based on the results of interviews with workers in the estate and mill units, contractors (PT Wahana Adidaya Pertiwi), representatives of the Pasang Lela Village and Perkebunan Berangir Village community and government agencies in Labuhanbatu Utara Regency, information was obtained that they understand the flow of conveying information if there is a complaint to the certification unit and that the certification unit is also responsive in responding to complaints submitted. The source also added that the reporting party will be given information by management representatives regarding the complaint resolution process. Apart from that, the period for resolving complaints is in accordance with applicable procedures, namely no later than 3 months after the complaint is received.

From the description above, it can be concluded that all complaints have also been thoroughly resolved by the certification unit by showing proof of completion in the form of documentation and direct responses regarding complaints received from external and internal parties.

4.2.4

In the SOP of Communication and Consultation with the Public Number SPO 03 Revision 3 which has been effect since January 2nd, 2017, it is explained that the unit of certification is committed to actively giving freedom to the reporting party to obtain legal and technical assistance from an independent party.

Based on the results of the document review, it is known that during the last one there were no conflicts reported to PTPN IV – Berangir Unit. The results of interviews with all parties such as workers, contractors/FFB supplier, representatives of the Pasang Lela Village and Perkebunan Berangir Village community, state that the conflict resolution mechanism can use options to obtain legal and technical assistance from independent parties, where the reporting party has the freedom to choose the person or group that can support it and/ or act as an observer and the parties can choose the option of involving a mediator (third party).

Based on the explanation and description above, it can be concluded that the unit of certification has a conflict resolution mechanism/procedure that includes options for obtaining legal and technical assistance from independent parties.

Status: Comply

4.3

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

4.3.1

All PTPN IV units, in this case Berangir POM, have no control on CSR budget. Budget allocation for CSR in all PTPN IV is controlled by Director's Office in Medan. The CSR mechanism is implemented as described: Sungai Raja Village contacted the Head of Administration in Berangir Estate to discuss about CSR program. Afterwards, the village head submitted a proposal including Musrenbang (Meeting on Development Program) result in 2022. The meeting concerned on the proposed development program in Sungai Raja Village. The proposed development in 2022 for instance, the financial assistance in constructing Islamic Boarding School At-Toyibah Sungai Raja Village, Head of Administration in Berangir Estate forwarded the proposal to Director's Office in Medan. Sungai Raja Village accepted the financial assistance in constructing Islamic Boarding School At-Toyibah on 31st March 2023.

The company has Berangir CSR implementation program in 2023. It includes the monthly routine program such as groceries distribution for underprivileged community, the financial assistance in constructing Islamic Boarding School on 31st March 2023 for At-Toyibah Sungai Raja Village, financial aid for Simpang Marbau kindergarten construction on 1st July 2023, and providing qurban cattle for Eid Al-Adha on 27th June 2023. Based on the interview with Pasang Lela Village, some of the CSR programs and the distributed aid could be confirmed.

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 a HGU area of 4,583.67 Ha. As for the HGU, namely:

HGU Covering an area of 3,288.93 Ha

- Decree Head of BPN No. 17/HGU/BPN RI/2013 dated 28 February 2013 concerning the Granting of Extension of the Term of Cultivation Rights for Land located in North Labuhanbatu Regency, North Sumatra Province. This Decree decided to extend the period of HGU No 1/Berangir for 25 years from the end of December 31, 2009 to PT PN IV (persero), domiciled in Medan, on a plantation land area of 3,288.93 Ha located in Berangir Village, NA IX-X District, North Labuhanbatu Regency, North Sumatra Province, as described in the Land Sector Map dated 14 August 2009 with the identification number of plots (NIB) 02.12.00.00.00238, NIB 02.12.00.00.00239 and NIB 02.12.00.00.00240 issued by the regional office BPN of North Sumatra Province.
- HGU Certificate No. 48 dated 21 May 2013 an PT Perkebunan Nusantara IV in Berangir Plantation Village, NA District. IX-X, Labuha Batu Regency, North Sumatra Province with an area of 3,288.93 Ha. based on SK Head of BPN RI No. 17/HGU/BPN RI/2013 dated 28 February 2013. Valid until 30 December 2034.

HGU area of 1,294.74 Ha

- Decree Head of BPN No. 49-HGU-BPN RI-2008 dated 7 August 2008 concerning Granting of Cultivation Rights in the name of PT PN IV for Land located in Labuhanbatu Regency, North Sumatra Province. This decree decides to grant PT PN IV (persero) domiciled in Medan, HGU for 35 years over state land with details of plots as follows: area of plot A = 621.11 Ha, area of B = 35.38 Ha, area of C = 7.74 Ha, area D = 74.45 Ha, area E = 239.64 Ha, area F = 2.40 Ha, area G = 0.40 Ha and area H = 313.62 Ha, a total of 1,294.74 Ha located in Aek Village, Batu City, Perkebunan Berangir Village, and Sei Raja Village, NA IX-X District, Labuhabatu Regency, North Sumatra Province, as described in the land plot map No. 10/12/2007 dated 21 February 2007 issued by the Regional Office of BPN North Sumatra Province.
- HGU Certificate No. 22 s PT Perkebunan Nusantara IV in Sungai Raja Village, Aek Batu City, Berangir Plantation, NA District. IX-X, Labuhanbatu Regency, North Sumatra Province with an area of 1,294.74 Ha. based on SK Head of BPN RI No. 49-HGU-BPN RI-2008 dated 7 August 2008. Valid until 19 September 2043.

Plantation Business Licence (IUP)

PT Perkebunan Nusantara IV – Berangir Unit has Plantation Permit Business for Cultivation or “*Izin Usaha Perkebunan – Budidaya*” (IUP-B) as presented by Decree of Labuhanbatu Utara Regent No. 503/2159/TAPEM/2012 dated October 24th, 2012, which mentioned that permit is given for oil palm cultivation on **± 4,648.74 ha** area, located on Village of Perkebunan Berangir, Sub- Regency of NA IX-X, Regency of Labuhanbatu Utara, Province of Sumatera Utara.

4.4.2; 4.4.3; 4.4.4; 4.4.5; 4.4.6

During the recertification assessment, the company has no new land acquisition. The results of interviews with local communities revealed that there were no customary or customary rights. This fact is also in accordance with the explanation from related agencies such as the National Land Agency and the Plantation Agency.

In conclusion, the company is a nationalization program for foreign companies by the government that already had land rights before, there was no acquisition of land belonging to the surrounding community or other rights that used the FPIC process in their acquisition.

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

PTPN IV Berangir started operating since 1974 which was formerly owned by PT Wongso Rubber Coy which was a rubber company. Based on the results of the HCV and SIA assessments, it is known that there are no legal rights, usufructuary rights and customary rights. Furthermore, based on information from the representatives of Pasang Lela Village and Perkebunan Berangir Village, it was known that there is no new compensation and planting on local people's land. Furthermore, there is no customary right within estate operational areas.

Status: Comply

4.6

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

4.6.1; 4.6.2; 4.6.3; 4.6.4

The company has procedures for identifying legal rights, customary rights or usufructuary rights and identifying people who receive compensation in the document Standard Operational Procedures for Handling Land and Land Conflicts No. SPO 04 3rd Revision.

Based on the results of interviews with the North Labuhanbatu District Agriculture Office, it is known that there are no legal rights or customary rights in the operational area of PTPN IV Berangir. Land acquisition was completed in 1977 which was carried out directly to the land owner.

PTPN IV Berangir started operating since 1974 which was formerly owned by PT Wongso Rubber Coy which was a rubber company. Based on the results of the HCV and SIA assessments, it is known that there are no legal rights, usufructuary rights and customary rights. Furthermore, based on information from the representatives of Pasang Lela Village and Perkebunan Berangir Village, it was known that there is no new compensation and planting on local people's land. Furthermore, there is no customary right within estate operational areas.

Status: Comply

4.7

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

4.7.1; 4.7.2

The company has procedures for identifying legal rights, customary rights or usufructuary rights and identifying people who receive compensation in the document Standard Operational Procedures for Handling Land and Land Conflicts No. SPO 04 3rd Revision.

PTPN IV Berangir started operating since 1974 which was formerly owned by PT Wongso Rubber Coy which was a rubber company. Based on the results of the HCV and SIA assessments, it is known that there are no legal rights, usufructuary rights and customary rights. Furthermore, based on information from the representatives of Pasang Lela Village and Perkebunan Berangir Village, it was known that there is no new compensation and planting on local people's land. Furthermore, there is no customary right within estate operational areas.

4.7.3

Based on the results of interviews with the North Labuhanbatu District Agriculture Office, it is known that there are no legal rights or customary rights in the operational area of PTPN IV Berangir. Land acquisition was completed in 1977 which was carried out directly to the land owner.

Status: Comply

4.8

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

4.8.1; 4.8.2; 4.8.3; 4.8.4

Based on the area statement and interviews with representatives of Pasang Lela Village and Berangir Plantation, it is known that there are no disputes with the surrounding community. PTPN IV Berangir started operating since 1974 which was formerly owned by PT Wongso Rubber Coy which was a rubber company. Based on the results of the HCV and SIA assessments, it is known that there are no legal rights, usufructuary rights and customary rights. Furthermore, based on information from the representatives of Pasang Lela Village and Perkebunan Berangir Village, it was known that there is no new compensation and planting on local people's land. Furthermore, there is no customary right within estate operational areas.

Status: Comply

PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION

5.1

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

5.1.1

The company purchases FFB from 2 suppliers, as follows:

- CV Kurnia Mitra Mandiri: Purchase Agreement no: PKS BER/SP.01/VIII/2022 (13th August 2022 until 2nd August 2023).
- PT Aidil Putra Perdana: Purchase Agreement no: PKS BER/SP.02/VIII/2022 (19th August 2022 until 2nd August 2023).

The agreement explained the FFB criteria accepted by Berangir POM, legal responsibility of FFB sources, mechanism of FFB receipt, term of payment, agreement duration, supporting documents, and management of conflict.

Based on the interview with CV Kurnia Mitra Mandiri, there is no issue on FFB payment and the FFB price is updated regularly by the company via WhatsApp chat. CV Kurnia Mitra Mandiri also showed payment receipt for example on 7 July 2023 to 9 July 2023 for 39.970 kg FFB.

5.1.2

Based on the Purchase Agreement review no: PKS BER/SP.01/VIII/2022 between the company and CV Kurnia Mitra Mandiri, it stated that FFB price is updated to supplier every day. It can be confirmed by the interview with CV Kurnia Mitra Mandiri.

5.1.3

Based on the Purchase Agreement review no: PKS BER/SP.01/VIII/2022 between the company and CV Kurnia Mitra Mandiri, the FFB determination price is mentioned in clause 3. The company determines the price based on the Medan Head quarter's decision and conveys the information every day to CV Kurnia Mitra Mandiri. It can be confirmed by the interview with CV Kurnia Mitra Mandiri.

5.1.4

Currently the company does not have contracts with independent smallholders or plasma smallholders.

5.1.5

The company purchases FFB from 2 suppliers, as follows:

- CV Kurnia Mitra Mandiri: Purchase Agreement no: PKS BER/SP.01/VIII/2022 (13th August 2022 until 2nd August 2023)

- PT Aidil Putra Perdana: Purchase Agreement no: PKS BER/SP.02/VIII/2022 (19th August 2022 until 2nd August 2023)

The agreement explained the FFB criteria accepted by Berangir POM, legal responsibility of FFB sources, mechanism of FFB receipt, term of payment, agreement duration, supporting documents, and management of conflict. Both suppliers signed the agreement with PT Perkebunan Nusantara IV on August 2022.

5.1.6

Based on the Purchase Agreement review no: PKS BER/SP.01/VIII/2022 between the company and CV Kurnia Mitra Mandiri, the term of payment is mentioned in clause 3. The company determines the price based on Medan Head quarter's decision and conveys the information every day to CV Kurnia Mitra Mandiri. The FFB price is included the taxes charged. The payment is always completed on time. It can be confirmed by the interview with CV Kurnia Mitra Mandiri. In conclusion, there is no issue with the payment. The payment evidence, for example, the payment to FFB Supplier CV Kurnia Mitra Mandiri for FFB purchase on 5 - 6 July 2023. The payment was transferred on 10 July 2023 for 39.970 kg FFB with IDR 72.597.511.

5.1.7

The certification unit has calibrated the weighbridges by Department of Commerce and Industry UPTD Metrology Legal Rantauprapat on 8th November 2022 and valid until 8th November 2023, as details:

- Electric weighting bridge GSC, type GST 9700, serial number 1108115, max capacity 60.000 kg and min capacity 10 kg.
- Electric weighting bridge GSC, type GST 9700, serial number 1108214, max capacity 30.000 kg and min capacity 10 kg.

The third party stated the test results is legalized based on the law of Republic Indonesia No 2 in 1981 on Legal Metrology.

5.1.8

Currently the company does not have contracts with independent smallholders or plasma smallholders.

5.1.9

The company does not have contract with independent smallholders or plasma smallholders. However, the grievance mechanism for external stakeholder, including for smallholder is stated in procedure No. 13 Rev. 01 on 2nd January 2015. Based on document review, there is no complaint from independent supplier.

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, 5.2.5

The company has conducted socialization regarding to RSPO to all stakeholders on 11th Jan 2023. In order to support RSPO certification, the company also has some related policies. In the event, the policies are conveyed to the attended participants, such as the Environmental Policy, Plantation System Policy in 2022, and also the Biodiversity Policy. Currently the company has no contract with any smallholders.

5.2.4

The company has conducted training activities for several farmer groups around the company, for example in the recording of best plantation practice training activities for independent smallholders on January 31, 2022. In these activities, the company provides training related to oil palm cultivation starting from seeding, plant maintenance, use of chemicals (including pesticides), harvesting to the legality of land ownership.

The company has an annual report that is posted on the PTPN4 website, where the report contains complete information related to the company's business development and other information, such as support from plasma farmers and third party FFB suppliers.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1

Any form of discrimination is prohibited.

6.1.1

The unit of certification already has a non-discrimination and equal opportunity policy as indicated in the Equal Employment Opportunity Policy Number 4 which has been effect since January 2nd, 2015. It is stated that the unit of certification eliminates all forms of racial discrimination practices, religion, race, gender, age, disability at work, mass control and between groups in all business processes of the company. This policy has been socialized in Estate and Mill unit to workers, for example, the socialization on January 11th, 2023, at Berangir Estate unit. This policy has also been disseminated to all stakeholders, for example, when making or renewing a cooperation contract.

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

- Composition of workers consisting of various ethnic groups, religions, genders, and workers' origins.
- Recruitment of workers based on the results of selection, performance appraisal, ability and expertise of workers.
- Placement and training of workers is carried out according to their expertise/type of work, such as prospective harvest workers are placed as harvest workers and receive routine harvest training.
- Women workers are given reproductive leave rights, wages and the same opportunities for promotion as male workers in the same type of work.

The results of interviews with workers, labor union and gender committee representatives, information was obtained that there was no indication of discrimination against religion, ethnicity, gender, and regional origin in the process of accepting a job. So, it can be concluded that the unit of certification has treated all workers fairly without discrimination.

6.1.2

Based on the results of verification of worker recruitment documents, it is known that worker recruitment is based on expertise, ability and records of medical examination results. The unit of certification has a non-discrimination and equal opportunity policy as indicated in the Equal Employment Opportunity Policy Number 4 which has been effect since January 2nd, 2015. The unit of certification also shows a workforce register document for the June 2023 period which contains demographic information for all workers at Berangir Mill and Estate unit, namely workers who come from various regions, religions, ages, etc. Then from the results of interviews with harvest workers at Block 00K Berangir Estate and WTP operator at the Berangir Mill, it was stated that there is no fee to be charged and no retention of personal identification documents during the recruitment process.

Based on the results of interviews with workers, labor union and gender committee representatives, information was obtained that there were no issues related to discrimination. PTPN IV – Berangir unit workers come from various regions. Both local and migrant workers are given the same opportunity to get a job and promotion as well. The unit of certification also does not retain identity documents during the worker recruitment process.

6.1.3

The unit of certification does not discriminate against selection, recruitment, training and promotion. This is based on the skills, abilities, quality and medical eligibility of the workers. In terms of worker promotion, the certification unit conducts a performance appraisal/evaluation before promoting workers to the newest status/position/class. For example, promotional documents for workers listed in decree number 04.07/Kpts/R/19/III/2022 dated March 31st, 2022. The document explains that 377 workers in the plantation unit will be promoted by grade in 2022. As an example, a worker with the initials BND (harvesting foreman) was promoted from grade IIA/0 to IIA/1. The unit of certification also shows the results of the performance appraisal of employees with the initials BND with the evaluation criteria of discipline/attendance, job knowledge and expertise, speed, quality, productivity, teamwork, honesty and sincerity which are the basis for considering employee promotions.

Based on the results of interviews with management representative, information was obtained that the recruitment process for all employees was carried out through the same process where prospective employees must meet requirements in the form of administrative selection (application letter, graduation letter, photocopy of personal and family identity), psychological test (for certain positions), interviews and results of medical examinations. To increase the career path, responsibility, authority and scope

of an employee, the certification unit provides promotions based on skills, abilities, leadership, honesty, discipline, loyalty, attendance, etc. Employee performance appraisal is carried out through the stages of performance evaluation.

6.1.4

Pregnancy tests for workers are carried out only to ensure that pregnant workers are not allowed to work with chemicals, not as a basis for discriminating against these workers. If declared pregnant, the worker will be transferred to a job that is safer but remains the same in terms of wages and other benefits, so there is no discriminatory action. For example, pregnant workers will be transferred to lighter jobs such as cleaning workers in offices. based on the results of interviews with female workers and representatives of the gender committee, it is known that female workers are required to carry out monthly pregnancy tests at the clinic to ensure that no pregnant/breastfeeding female workers are exposed to chemicals. the informant also added information that for the last two years there were no workers who were pregnant/had just given birth because almost all female workers in the unit of certification had entered old age.

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

6.1.5

The unit of certification has established a gender committee which has functions including gender equality, protection of women's rights, protection from incidents of harassment, and others. Furthermore, the certification unit shows documents establishing the Organizational Structure of the Gender Committee for the 2023 period consisting of representatives of each gender, namely men and women. The organizational structure consists of a Protector/Advisor/Counsellor, Chairperson, Deputy Chairperson, Head of Division (education, social culture and economy) and members.

Gender committee work program in 2023 for Berangir Estate and Mill unit at PTPN IV, including regular meetings of the gender committee management, socialization of labor and human right policy, socialization of gender equality, socialization regarding the flow of complaint, socialization and recording of sexual harassment/violence as well as increased awareness of environmental hygiene in employee housing area.

The unit of certification shows the realization of the program and the results of the gender committee meeting listed in the work program document and the realization of the gender committee in 2023, for example, Minutes of Meeting gender committee which was held on January 19th, 2023. The agenda discussed the flow of complaints in the event of sexual deviation/violence and environmental hygiene awareness in employee housing area.

Based on interviews with women workers, it is known that they know the function, work program, and mechanism for submitting complaints through the gender committee. Then, based on the results of interviews with representatives of the gender committee it is known that until now the work program of the gender committee has prioritized women workers. However, it is possible that cases of sexual harassment or violence against male workers can also be submitted through the gender committee.

6.1.6

Payment of fair wages has been properly carried out by the unit of certification, taking into account ability, performance, expertise, length of service, and other factors as the basis for remuneration. So that the payment of wages given is in accordance with the burden, duties and type of work of each. This is stated in Decree Number 04.07/Kpts/15/III/2022 concerning of Basic Salary and Special Allowances for Grade IA - IVD Employees in 2022 which was issued on March 31st, 2022. That document also explained about the wage scale structure that applies to permanent workers status starting from the lowest grade IA/0 to the highest grade IVD-6.

Based on the results of interviews with estate workers such as harvesters with contract worker (*PKWT*) status, it is known that the basic wages and benefits they receive are of the same value. Employees also receive an attendance premium based on performance appraisal. However, it is different from the sorting officer in Berangir Mill units with permanent worker status who state that the basic wage they receive is different in value because it is based on the prevailing wage scale structure.

From the description above, it can be concluded that the company already has proof of payment of equal wages for the same scope of work.

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 unit of certification has documented procedures/policies related to wages and work requirements in accordance with employment provisions that have been published in the national language (Indonesian) listed in several documents, namely:

- Collective Labor Agreement document for the period 2022 – 2023 which was ratified on January 19th, 2022, by the Head of Manpower Office of North Sumatera Province. The document informs about all work requirements in accordance with the applicable labor regulations in Indonesia.
- Decree of the Governor of North Sumatera Number 188.44/746/KPTS/2021 which took effect on January 1st, 2022, concerning the 2022 North Sumatera Province Minimum Wage of IDR 2,522,609. This wage determination applies to permanent workers.
- Decree of the Governor of North Sumatera Number 188.44/1014/KPTS/2022 which took effect on January 1st, 2023, concerning the 2023 Labuhanbatu Utara District Minimum Wage of IDR 3,081,813. This wage determination applies to contract workers.
- Decree Number 04.07/Kpts/15/III/2022 concerning of Basic Salary and Special Allowances for Grade IA - IVD Employees in 2022 which was issued on March 31st, 2022. That document also explained about the wage scale structure that applies to permanent workers status starting from the lowest grade IA/0 to the highest grade IVD-6.

The unit of certification can show documentation of payment of wages for all workers shown in the payroll and payslips which include components such as basic wages, premiums, overtime, benefits (*BPJS*, electricity subsidies, etc.), and deductions (*BPJS*, loans, *SPSI*, cooperatives, etc.). Based on the results of the interviews, workers can explain their basic wages and allowances as well as the deductions they receive each month. Following are some examples of wage documents for workers during June 2023, including:

- Harvesters with the initials MY (contract workers) receive a basic wage in June 2023 of IDR 3,081,813.
- Administration officer with the initials NCS (permanent worker) received a salary in June 2023 of IDR 6,527,350 consisting of a basic salary component of IDR 2,530,251, a fixed allowance of IDR 632,563, an electricity allowance of IDR 173,849 and a rice allowance of IDR 137,500.

Based on the description above, it can be concluded that the unit of certification already has documentation of wages and work conditions in accordance with the labor regulations that apply to workers in the national language, along with an explanation for workers in a language they understand.

6.2.2

The unit of certification can show examples of work agreement documents, for example as follows, Peak-Crop Harvest Work Agreement Letter Number BER/S.Perj/55/II/2022 with the initials SHRY. The work agreement letter, among other things, explains that the first party intends to employ the second party as *PKWT* workers with the type of harvesting work. The term of the agreement is from February 1st – April 30th, 2022.

As for the work agreement/decreed document shown, it contains information including the name acting as management representative and company address, employee information in the form of name and other personal information, employee position, employee work location, reporting, work duties and responsibilities, work agreement period, probationary period, salary and other benefits. The work agreement/decreed document has been signed by representatives of management and workers.

As a form of implementation of the work agreement letter, the unit of certification shows payroll documents for May 2023. For example, a harvest worker with the initials BD received a basic wage of IDR 2,792,876 and a harvest premium of IDR 3,853,982 in May 2023.

The unit of certification shows Circular Letter Number BER/SE/43/VII/2023 issued on July 13, 2023, concerning the Inspection Mechanism for the Use of Uncommitted Labor. The document explains, among other things:

- All workers including vendor workers are required to have a work agreement with the vendor.
- The main foreman supervises the use of labor without a work agreement (family cup) every day and for the supervision of work agreements for vendor workers is carried out every 3 (three) months by carrying out direct inspections in the field.
- If there are still employees who still use labor without an agreement (family cup), the worker will be given a letter of warning and the assisting staff they use must be sent home and if after being given a letter of reprimand the worker still uses auxiliary workers, the worker will be told to go home and not be hired until the worker makes a written commitment not to reuse auxiliary workers who do not have work ties with the company or vendor.

Based on the results of interviews and field visits to Block 00K, Afdeling I, it was obtained information that the harvester with the initials AGH was carrying out harvesting work and was assisted by his wife with the initials RES in pick-up loose fruit. However, the worker's wife is not a worker in the company.

Based on the results of interviews with management representatives, it is known that the unit of certification routinely conducts socialization regarding the prohibition of pick-up loose fruit/family cup workers to harvest workers. But the evidence of socialization has also not been shown.

Government Regulation No. 35 of 2021 concerning *PKWT*, Outsourcing, Working Time and Rest Time and Termination of Employment, among other things, explains that:

- Article 2 paragraph 1 states that the employment relationship occurs because of an employment agreement between the entrepreneur and the worker/labourer.
- Article 2 paragraph 4 states that work agreements are made for a specified or unspecified time.

Based on the above evidence, it can be concluded that there are still workers who carry out company operational activities without having an agreed work relationship/agreement and this is not in accordance with the applicable laws and regulations. This has been **Nonconformity Number 2023.04 with major category**

6.2.3

The unit of certification shows evidence of legal compliance regarding the fulfilment of labor rights to workers, for example:

- Overtime payment in June 2023 that has been accordance with applicable laws for press operator (initial AG Grade IIA/00), boiler operator (initial SB, Grade ID/01) and security (initials AS, Grade ID/03).
- Unit certification has provisions related to deduction/penalty which have been stated in the Collective Labour Agreement period of 2022 – 2023 and further explanation is set out in an internal memo.
- In the payroll document, there is information that states the results of the worker's wages in one month according to the work performance of each worker. Payroll has also been accurate for each worker, for example the number of days worked in a month, premium payments, fines, deductions from workers' wages and other information that is in accordance with facts in the field.
- Every worker also has the right to annual leave of 12 days in one year. Here's an example, an employee with the initial PRYT who applied for 2 days annual leave from May 9th – 10th, 2023. This request has been approved by the personnel assistant of Berangir Estate.
- Specifically for female workers, the unit of certification grants the right to 2 days of menstrual leave and 1.5 month of maternity leave before and after giving birth. Based on the results of a review of the documents on the list of pregnant/new mother workers, menstruation leave permits and maternity leave permits, it is known that for the past 2 years there have been no female workers who are pregnant/has just given birth. This is because all female workers who work as pesticide applicators and upkeep workers have entered old age and are not in their productive period (menopause).

It can be concluded that the implementation of working hours, minimum wages, overtime wages, leave entitlements, and others is in accordance with the provisions of applicable labor laws.

6.2.4

The certification unit has a list of facilities and infrastructure documents for the 2023 period, which consist of employee housing, daycare, mess, houses of worship, sports fields, schools, employee halls, clinics, electricity in the form of *PLN* and generators, clean water, etc.

Based on interviews with the occupants of the houses and the results of field visits to the employee housing complex of Berangir estate and Berangir mill unit, it is known that there are several workers' houses that are damaged and unfit for use. For example, a house with a leaky roof, broken ceilings, eroded floors and other damage. So that the condition of the house is considered unfit and uncomfortable for residents to live in.

Then, based on interviews with management representatives, it was discovered that the unit of certification has a plan for renovating damaged houses and a plan for the construction of permanent housing for employees. This is in line with the results of a review of the Company's Budget Work Plan (*RKAP*) document for the 2023 period. In addition, based on the results of field visits to Afdeling VI, it is known that the Certification Unit has made progress in the construction of permanent type employee houses.

From the description above, it can be concluded that the unit of certification has the opportunity to ensure that the realization of renovations, repairs to employees' homes and construction of permanent houses for the welfare of workers can proceed according to the plan and budget that has been set. **OFI**.

6.2.5

Based on the results of field visits to the company's operational areas, it is known that the location of the certification unit is very close to traditional markets and village, so that access to food and daily needs is very easy for workers and their families to obtain food sources.

Then from the results of interviews with workers in plantation units and factories as well as residents of houses in employee housing, it is known that they do not experience difficulties in obtaining food sources because they can shop in the village area which is less than 1 Km away.

6.2.6

Currently the company uses wage calculations based on the 2023 North Sumatera Minimum Wage in accordance with the Decree of the Governor of North Sumatera Number 188.44/1014/KPTS/2022 which took effect on January 1st, 2023, which is IDR 3,081,813. This decree of minimum wage also included in DLW calculation established by the company. The DLW calculation is refers to the actual and rational price around the certification unit location.

The calculation of applicable wages & in-kind benefits independently is shown in the Salary Scale Purpose of Employees 2023 period for Grade IA to IID at PTPN-IV. Wages apply as basic wages; allowances such as fixed allowance, rice, house rent, electricity, water and transportation; in kind benefit such as school facilities, daycare, extra fooding and work clothes. The applicable calculation of wages & benefits varies depending on the type of work and worker status (*PKWT* and permanent worker).

6.2.7

Based on the results of a review of the labor list document for the period June 2023, it is known that currently the certification unit still has 49 workers with *PKWT* status (the number of workers has increased from the previous audit activity [ASA-4] with a total of 44 people).

The unit of certification shows the 2023 period manpower requirement documents listed in Letter Number DSDM/N.IV/1730/2023 dated June 12th, 2023, concerning Responses to the Proposed Request for Employee Recruitment 2023 period. The document explains that Kebun Berangir - PTPN IV has a need for harvesters of 219 people with actual workers 181 people with *KS* status (permanent worker) and 49 people with *PKWT* status (contract worker) so there is a shortage of 38 people.

The unit of certification shows a Specific Time Work Agreement, for example:

- Peak-Crop Harvest Work Agreement Letter Number BER/S.Perj/25/II/2022 with the initials ZDP. The work agreement letter, among other things, explains that the first party intends to employ the second party as *PKWT* workers with the type of harvesting work. The term of the agreement is from February 1st – April 30th, 2022.

- Peak-Crop Harvest Work Agreement Letter Number BER/S.Perj/97/IV/2023 with the initials JR. The work agreement letter, among other things, explains that the first party intends to employ the second party as *PKWT* workers with the type of harvesting work. The term of the agreement starts April 1st – June 30th, 2023. The worker renews the work contract from the previous year, namely Peak-Crop Harvest Work Agreement Letter Number BER/S.Perj/26/II/2022 with a period of February 1st – April 30th, 2022.

The results of interviews with the management and labor union (*SPBUM*) representatives, obtained information that the certification unit already has an appointment program for *PKWT* harvest workers. This is in line with Letter Number DSDM/N.IV/1730/2023 dated June 12th, 2023, regarding Responses to the Proposed Request for Employee Recruitment 2023 period. It is known that the appointment program for 38 *PKWT* harvest workers will be carried out until 2025 with the following details:

- 18 people in 2023. However, the certification unit has not been able to show proof of appointment of the 18 people.
- 10 people in 2024.
- 10 people in 2025.

Until the RC assessment is carried out, the certification unit has not been able to show sufficient basic evidence that the use of *PKWT* for harvesting workers complies with the requirements of the applicable laws and regulations. **Thus, the nonconformity on this indicator has not been fulfilled and the status becomes Major**

6.2.2 Status: Nonconformity Number 2023.04 with major category

6.2.7 Status: Nonconformity Number 2022.02 (Minor Raise to Major)

6.3

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

6.3.1

The unit of certification has a policy on freedom of association listed in the Plantation Management System Policy document which has been effect since January 22nd, 2022, and has been signed by the Director. The policy explains the unit's commitment to giving freedom to workers to form collective bargaining and join labor unions. In addition, the certification unit has a CLA for the period of 2022 – 2023 which states that employees have the right to establish labor unions and become members/leaders of labor unions in accordance with applicable regulations.

As a form of implementation of this policy, the certification unit has a labor union (Plantation Labor Union – *SPBUM*) as a forum for workers to convey their complaints or aspirations to the certification unit. The following is a document ratifying the organizational structure of the labor unions listed in the Decree Number 14/Kpts/SP.BUN-PTPN-IV/VII/2019 concerning Confirmation of the Composition of the Management of *SPBUN*PTPN IV Berangir Unit Base Service Period 2019 – 2024 to the Ministry of Labor and Industry of Labuhanbatu Utara Regency.

6.3.2

The unit of certification also has records of labor union meetings. Here is an example of meeting notes held by labor union in 2022, namely Minutes of Meeting SP.BUN which was held on April 3rd, 2023, and was attended by 15 participants. The meeting discussed several topics such as compliance with the use of PPE when carrying out work.

Based on the results of interviews with representatives of labor unions and their members who are workers in each plantation and factory unit, it is known that the unions hold meetings every month or when there are issues that need to be discussed with the unit of certification. The chairman of the labor union representing all workers in the Berangir unit stated that the company should speed up the renovation of employee housing complex and carry out the appointment of harvest workers with contract (*PKWT*) status to become permanent workers.

6.3.3

Based on the verification of the organizational structure of the labor unions in each Berangir unit, it is known that the labor union officials are not representatives of management/company staff. Then, based on the results of interviews with labor union representatives and members of labor union, it is known that there is no intervention from the unit of certification in selecting or

organizing labor union activities.

Based on the results of interviews with workers, it is known that the company has given them the freedom to form and join labor unions. Then, union membership is voluntary without coercion. Of the several workers interviewed, some were members of a labor union, and some were not members of a labor union.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1

The unit of certification has a policy prohibiting the employment of minors as stated in the Child Labor Policy Number 3 Revision 2 which has been effect since January 2nd, 2015. As this policy is known, the company prohibits the employment of children and will take action to prevent the use of child labor in all line of operations activities. This policy also applies and is required to be obeyed by plasma farmers, contractors and other stakeholders who have partnership relationships or active in operations and transactions within the company. The policies related to the prohibition of child labor as stated in the work agreement between the plasma smallholders/contractors and the company. In addition, the company also conducts socialization on a regular basis.

Based on the employee list for the June 2023 period, it is known that none of the employees were younger than 18 years old when they first started working. Based on the results of field visits and interviews with workshop workers in the Berangir Mill unit, it is also known that there are no workers under 18 years of age. The youngest worker is 20 years old.

Based on the results of interviews with workers in each estate and mill unit, representatives of the labor union and PT Karyawan Nusantara Jaya contractors, information was obtained that there had never been any issues regarding child labor. In addition, around the company area there are warnings informing the prohibition for children to be in the work location.

6.4.2

The unit of certification shows the employee list documents period June 2023 for estate and mill units of Berangir Unit – PTPN IV where there are no children under the age of 18 who are employed. In addition, the company has also shown document SOP and Work Instructions for Recruitment and Appointment of IA-IID Group Employees Number 04.15.01A which explains the guidelines for the recruitment of plantation workers. The SOP explains that in the labor recruitment process, the unit of certification does not accept prospective workers who are under 18 years of age. This is in line with job vacancy information documents which states the requirements for prospective workers who must be ≥ 18 years old.

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

6.4.3

Based on a review of the employee list document, the list of students who took part in field work practices and the results of interviews with management representatives, information was obtained that there were no young workers and students doing field work practices/ apprenticeships in the company's operational areas.

Based on the results of interviews with union representatives and management representatives, it is known that if there are students who do practical work in the field, they will be placed in non-hazardous jobs or as observers of plantation and factory activities. Because the goal is only to meet the needs of fulfilling the learning curriculum.

6.4.4

Socialization regarding child protection policies and the prohibition of child labor has been carried out in each estate and mill unit. For example, socialization at the Berangir Estate unit on January 11th, 2023. As proof of implementation, when the auditors conducted interviews and field visits to all workers in the estate and mill unit, they already understood the Child Labor Policy that apply in the certification unit. This socialization has also been carried out to external stakeholders, for example when

making/renewing/signing work contracts.

Based on the results of field observations in the plantation and mill areas, it is known that the company has a warning regarding the prohibition of child labor and the prohibition of children being in the company's operational areas.

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, persecution as stated in Sexual Harassment Policy Number 6 Revision 2 which has been effect on January 2nd, 2015. To ensure that this policy is implemented, the company has a reporting mechanism in place when workplace harassment occurs. This policy also applies and must be complied with by smallholders, contractors and other stakeholders who have partnership relationships or are active in operations and transactions within the company. Then, the company routinely conducts socialization to workers and other stakeholders, for example on January 11th, 2023, at Berangir Estate unit. This is in line with the results of interviews with workers, representative of gender committee, and external stakeholder, who already know the flow of complaints if they do experience incidents of harassment at work.

Based on the results of interviews with workers and gender committee representative, information was obtained that workers can submit complaints through their direct superiors or through the gender committee. In addition, during the past year there were no cases of sexual harassment. This is supported by the absence of complaints regarding sexual harassment in the minutes of gender committee meetings in all plantation and factory units during 2022 – 2023.

6.5.2

The company has a policy related to the protection of reproductive rights in female workers such as menstruation or pregnant/new mothers listed in Plantation Management System Policy document which has been effect since January 22nd, 2022, and has been signed by the Director. The document explains the policy on women's reproductive rights which refers to the provisions of the Labor Law number 13 of 2003, namely if there are female workers who are menstruating, feel sick and based on a doctor's examination, they are not obliged to work on the first and second days of menstruation. Then, if there are workers who give birth, these workers will get leave for 90 days before and after giving birth. Based on the results of a review of the documents on the list of pregnant/new mother workers, menstruation leave permits and maternity leave permits, it is known that for the past 2 years there have been no female workers who are pregnant/has just given birth. This is because all female workers who work as pesticide applicators and upkeep workers have entered old age and are not in their productive period (menopause).

Based on the results of interviews with the management of the gender committee, information was obtained that female workers have the right to leave for menstruation and maternity leave. The mechanism for granting menstruation leave is carried out by means of a preliminary examination at the clinic by the company doctor. In addition, the source also stated that pregnant and newborn women workers should not do spraying work or other work that is directly related to chemical management.

6.5.3

The unit of certification has identified and carried out activities related to assessing the needs of new mothers which are carried out based on an assessment of each female worker and/or the wife of the worker. The last assessment is in January 2022 and there are no pregnant woman/new mothers (mothers who have just given birth to their first child). That because all female workers who work as pesticide applicators and upkeep workers are over 40 years old and not in their productive period (menopause), however the company still provides several facilities related to the needs of new mothers such as:

- Providing menstrual leave
- Babysitting facilities
- Integrated Healthcare Center
- Health checks for pregnant women
- Providing time for breastfeeding children
- Special room for breastfeeding
- Counselling for women who have experienced acts of violence

6.5.4

The unit of certification has SOP of Internal Communication and Handling Employee Complaints Number SPO 19 Revision 2 which has been effect since January 2nd, 2021. The documents explained that the unit of certification guarantees the anonymity of the reporter with the aim of protecting human rights defenders. The procedure explains that the steps for submitting complaints verbally and/or in writing are addressed to the management leadership (such as labor union [SP.BUM], heads of departments, managers, etc).

These procedures and policies have been socialized in each estate and mill unit, for example socialization at the Berangir Estate unit on January 11th, 2023. In addition, based on the results of interviews with warehouse officer, it was stated that complaints could be submitted to the direct supervisor, labor union or the gender committee (specific complaints on women's issues) and the identity of the complainant would be kept confidential. This aims to provide space for all workers or stakeholders to be able to submit complaints comfortably if there are practices that are not in accordance with the ethical practice policy.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1 and 6.6.2

The company shows the Labor and Human Rights Policy Number 7 which has been in effect since January 2nd, 2015. The document states that the company is committed to preventing the practice of forced labor or slavery and not using workers who are the result of human trafficking in all operational activities. This policy has been socialized to workers in each plantation and mill unit, for example, socialization at the Berangir Estate unit on January 11th, 2023. This policy also applies and is required to be obeyed by plasma farmers, contractors and other stakeholders who have partnership relationships or active in operations and transactions within the company.

Then, based on the results of the study of employment documents and the results of interviews with workers in plantation units and factories as well as representatives of labor union, the following information was obtained:

- There is no validation of identity documents and payment of fees during the worker recruitment process.
- There is no act of forced labor carried out by the company. In one day, workers work for 7 hours. The unit of certification sets work targets that can be obtained in less than 7 working hours. If the worker works more than 7 hours or gets the work target exceeded, the company will pay the ox/premium wages in excess of the work target.
- Overtime work is carried out based on the agreement of both parties, both workers and company management representatives. If workers carry out overtime work, workers always sign an overtime order.
- Workers have rights and freedoms if they want to resign from the company. Payment of wages to workers is never late. Salary is given at the beginning of the month.

Based on the results of a review of the employee list document for the period June 2023, it is known that there is no use of foreign workers at Berangir POM and Estate of PTPN IV. The workforce in the company includes permanent workers (KS) and contract workers (PKWT) who come from Indonesia. Then from the results of interviews with representatives of the labor union and company representatives, it is known that there are no foreign workers in the company. The resource person also added information that all procedures related to human resource management have been implemented in the company's operational areas. Each worker has a work agreement that describes a specific job description and there is no replacement of the contract without prior consultation and approval of the worker.

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 already has an OHS Committee structure for the Estate and Mill units, with the person in charge of occupational safety and health (OHS) as the chairperson. The company can show the arrangement of the OHS Committee structure for the Mill and Estate units, namely:

Mill

The OHS Committee structure of the Berangir Mill unit has been ratified in accordance with the Decree of the Head of Manpower

Agency of the North Sumatra Province, Number 566/264-7/DTK/SU/VII/2022, on July 29, 2022. The OHS Committee structure consists of the General Chair, Chair I, Chair II, Secretary, Deputy Secretary, Fire Chief, and other sections. The OHS Committee secretary for the estate unit is A.R.L. (initial), who is a General OHS Expert. The company can show the OHS Expert Authority card, certificate, and Letter of Appointment of General Occupational Safety and Health Expert with Number 5/16012/AS.02.04/XII/2021 on December 10, 2021, with a validity period of 3 years. The results of the document review revealed that the authority card, certificate, and General OHS Expert appointment certificate of the OHS Committee secretary are valid until December 10, 2024.

Estate

The OHS Committee structure of the Berangir Estate unit has been changed due to changes in the organizational structure. The company showed a letter of change in the composition of the OHS Committee management with number BER/X/74/VII/2023 dated July 3, 2023, to integrated service unit Labor Inspection Region IV Department of Manpower Sumatera Utara Province regarding the approval of OHS Committee management. The OHS Committee secretary for the estate unit, namely R.S.E. (initial), who is a General OHS Expert, regarding the appointment letter as AK3U and the company's General K3 Expert, shows a Certificate from OHS service Company namely PT Safindo Raya stating that on behalf of R.S.E. (initial), has followed training on July 5–17, 2023, but for Licensing, the OHS Expert appointment certificate (SKP) and General K3 Expert Certificate are in the process of being issued from the Ministry of Manpower of the Republic of Indonesia. This creates an opportunity for improvement for the company to ensure that changes to the Composition of the OHS Committee Management have been approved by the Sumatera Utara Provincial Manpower Office and the General OHS Expert as OHS Committee Secretary has obtained a License, an OHS Expert appointment certificate, and a General OHS Expert Certificate. **(OFI)**

Companies can show records of OHS Committee meetings with workers, for example:

- **POM:** OHS Meeting held on June 5, 2023, the topics discussed are Fire Emergency Response Training, Calm vessels and Storage tanks, and Garbage Bin Training.
- **Estate:** OHS Meeting held on June 30, 2022, the topics discussed were the preparation plan for workplace inspections (Fire extinguisher, First Aid Kits, and Workplace Environment), Filling in OHS Management procedure forms, holding OHS Committee Meetings, holding RSPO Online Consultation Meetings (HCV), carrying out blood donation activities, carrying out socialization of new normal activities, carrying out mutual cooperation activities, and equipping firefighting equipment.

6.7.2

The company has an OHS Policy issued at the Berangir Estate on January 20, 2023, at PTPN IV, which has been signed by SP Bun and the Estate Manager, explaining one of the points as follows: No. 5: Ensuring that the Occupational Safety and Health Management System is complied with and implemented in accordance with established policies and procedures as well as work instructions.

There are workers assigned to the field and other work locations and have received First Aid Training (P3K), for example:

- MSD (initial): Ser.566.17/PK3/DTK/SU/2021 on August 25, 2021 valid to August 25, 2024.
- G.M.T (initial): Ser.566.16/PK3/DTK/SU/2021 on August 25, 2021 valid to August 25, 2024.
- J.S.B (initial): Ser.566.15/PK3/DTK/SU/2021 on August 25, 2021 valid to August 25, 2024.
- SLT (initial): Ser.566.14/PK3/DTK/SU/2021 on August 25, 2021 valid to August 25, 2024.

Moreover, the company has SOP for Management and Storage of Chemicals No SPO 23 revision 02 dated January 2, 2018, in the procedure in point 6.3.3 K3 facilities and emergency handling must be prepared in accordance with hazard identification, risk assessment, and control measures (HIRAC) and used accordingly (safety equipment/PPE, tools and materials to handle spills and spills, fire extinguisher, first aid, hand washing and eye wash facilities).

Furthermore, A statement letter from PT Prima Medica Nusantara Pabatu Hospital Unit on July 4, 2023, which explains that the recommendation for the contents of the first aid kit in the building refers to *Permenakertran* regulation No. 15 of 2008 and for the provision of activities in the field is 15 items (Betadine, 70% alcohol, scissors, plaster, safety pins, distilled water, bandages, gauze, cotton, tweezers, and eye drops). Also informed was a letter from the *Polibun* regarding the contents of the first aid kit in engineering and processing work, referring to *Permenakertran* number 15 of 2008, totalling 21 items.

Based on field observations at Mill and Estate, it is known that:

- There is water injection and eucalyptus oil in the first aid kit, which are not included in the contents of the first aid kit according to the *Polibun* Letter for the contents of the first aid kit at the machine station, referring to *Permenakertran* number 15 of 2008.
- Hazardous Waste Storage has a first aid kit, but the equipment is not in accordance with *Permenakertran* number 15 of 2008; there are as many as 21 items, and there is no record of their use.
- The contents of the first aid bag in the Block 05X Afdeling III harvest area were incomplete (only 4 quick plasters), and there was a water injection that was not in accordance with *Permenakertran* number 15 of 2008, and there was no record of its use.
- In Warehouse Hazardous Material, there are eye showers and body showers, but they don't work as they should. In the Fertilize Warehouse area, there is an APAR tube placement that is obstructed by piles of fertilizer, and there are no eye showers or body showers in the Fertilize Warehouse area.
- The results of the interview revealed that the officers carrying the first aid kit did not understand the contents and functions of the first aid kit they were carrying.

The company has not been able to prove that the emergency response facilities and the provision of first aid facilities in the work area are not in accordance with the applicable policies, procedures, and regulations and that the contents of the first aid kit are not all in accordance with *Permenakertran* number 15 of 2008. This became **Nonconformity Number 2023.05 with minor category**.

6.7.3

The company has a Plantation Management System Policy, which was approved by the Main Director in January 2022 and regulates, among other things, prioritizing OSH in all aspects of work in order to prevent and reduce accidents and PAK by implementing SMK3. It has also been arranged for the provision of the necessary resources for preparation, implementation, and continuous improvement.

SOP for Management and Storage of Chemicals No. SPO 23 Revision 02 dated January 2, 2018, in the procedure in point 6.3.4. Any unauthorized worker is prohibited from entering the warehouse for storing chemicals or pesticides, and every worker who enters the warehouse must wear the required PPE and SOP of PTPN IV: Basic Guidelines and Work Instructions Number 04.04/KS/TAN/P/007 revision 1 dated February 24, 2020, at point 5.2.5, it is explained that for Harvesting activities, PPE Boots, Helmets, T-shirts, gloves, goggles, *dodos* sarongs, and *egrek* sheaths are required and the 2023 PPE Matrix for Estate, Factories and Districts in the Position of PPE Harvesters include: Gloves T-shirt No.4, Helmet Safety Face Shield, *Egrek* Sarongs, Ax Gloves and Boots. The PTPN IV PPE matrix for the Berangir plantation determined by the management found that the types of boots used were safety boots (with iron protectors) and safety shoes for workers at Mill and safety boots for work in the plantations.

HIRAC Documents for estates approved on June 6, 2023, and HIRAC Documents for mills approved on July 23, 2022, prepared by the Risk Management Team and approved by the Estate/Factory Manager. The HIRAC document describes the PPE standards for each station or activity.

Based on field observations and interviews at Berangir POM, it is known that:

- There were five drivers from the FFB Transport Contractor who did not wear safety shoes while in the Mill operational area. (Weighing area).
- There are workers from building contractors who do not use helmets when carrying out work in the Mill operational area. (Area near the Security Post).
- There are Wheel Loader operators who do not use Helmet PPE when operating heavy equipment at the Mill.
- The unsaved action when unloading FFB in the sorting area does not use safety helmet PPE and is worn by the FFB Transport Driver.

Observations and interviews with workers at the Berangir Plantation show that:

- There is 1 harvester in Block 00K. Wearing a helmet but not using eye protection PPE (face shield).
- There are 3 harvesters in Block 05X Afdeling III wearing helmets but not using eye protection PPE (face shield).
- There is 1 harvester in Block 05BT Afdeling V not wearing a helmet.
- There were 3 FFB loading workers from the FFB transport contractor in Block 04A Afdeling. Not use PPE of helmets and shoes when carrying out the work of loading FFB.
- In the Hazardous Warehouse, for activities in the Hazardous Warehouse, officers do not use the appropriate PPE.

Based on this, it is known that there are still workers who use PPE that are not in accordance with the PPE matrix and established procedures. So, This became **Nonconformity Number 2023.06 with major category**.

6.7.4

The certification unit already has a list of workers which also includes *BPJS Ketenagakerjaan* and *BPJS Kesehatan* participant numbers for all workers in each estate and mill unit. As one example, based on a review of the June 2023 employee list document and proof of payment for *BPJS* for the same period, it is known that companies have registered and paid their workers in the *BPJS Kesehatan* and *BPJS Ketenagakerjaan* program, which consists of work accident insurance, death benefit, old age benefit and pension benefit via bank transfer with details as follows:

- Berangir Mill unit
 - The list of workers in the Berangir Mill unit for the period of June 2023 is 109 workers.
 - Proof of payment for *BPJS Ketenagakerjaan* for the June 2023 period for a total of 109 workers on June 26th, 2023.
 - Proof of payment for *BPJS Kesehatan* for the May June period for a total of 109 workers on June 21st, 2023.
- Berangir Estate unit
 - The list of workers in the Berangir Estate unit for the period of June 2023 is 343 permanent workers and 49 contract (*PKWT*) workers.
 - Proof of payment for *BPJS Ketenagakerjaan* for the June 2023 period for a total of 343 permanent workers and 49 contract (*PKWT*) workers on June 26th, 2023.
 - Proof of payment for *BPJS Kesehatan* for the June 2023 period for a total of 343 permanent workers and 49 contract (*PKWT*) workers on June 21st, 2023.

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

From the description above, it can be concluded that the company has provided health services and protected all its workers with work accident insurance (*BPJS Ketenagakerjaan*) and health insurance (*BPJS Kesehatan*).

6.7.5

Work accidents are recorded using the Lost Time Accident (LTA) listed in the Accident Statistic Period 2022 document for January – December 2022, which among others explains the number of accident cases, the number of days lost, Frequency Rate (FR) and Severity Rate (SR), among others as follows: following:

UNIT	TOTAL WORKER	CASE	FR	SR
Estate	366	19 with lost working days 77	23.31	94,12
Mill	116	Zero Accident	0.0	0.0

From the document above, the company has also carried out an investigation into work accidents that occurred as well as processing claims.

6.7.2 Status: Nonconformity no 2023.05 with minor category

6.7.3 Status: Nonconformity no 2023.06 with major category

PRINCIPLE #7 PROTECT, CONSERVE AND ENHANCE ECOSYSTEMS AND THE ENVIRONMENT
7.1

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

7.1.1

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

- Carry out periodic detection, census, and monitoring of attacks by rats, termites, and leaf-eating caterpillars in accordance with procedures.
- Conducting biological pest control, namely using owls to control rat pest populations and planting beneficial plants as predators for leaf-eating caterpillars.

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

- Based on the caterpillars that eat palm leaves pest detection summary document for January–June 2023, it is known that there are no symptoms of a caterpillars that eat palm leaves attack on all divisions in the Berangir estate.
- Based on the rat census summary document for January–June 2023, it is known that the level of attack is still below the threshold.

The company did not develop the owl population by installing owl nests because the owl population in and around the plantation was quite high, so Berangir management decided not to install owl nests. This is evidenced by the low rat attack based on the observations made.

The company also controls the caterpillars that eat palm leaves pests by planting and maintaining host plants for natural enemies of caterpillars that eat palm leaves pests, such as *Turnera subulata*. Based on a review of maintenance documents in 2023, it was found that the planting of host plants was carried out along the CR and MR roads and that the *Turnera subulata* plant had indeed developed well. Records of the progress of planting host plants for natural enemies of pests such as *Turnera* and *Antigonon* are also shown.

During the onsite audit, the unit of certification showed documentation of integrated pest control for the period January to June 2023 as follows No the caterpillars that eat palm leaves attack and No rat attacks

Based on document review and field observation, several IPM program with biological approach that has been implemented such as nettle eater caterpillar by planting beneficial plant such as *Turnera subulata* and *Antigonon leptopus*. Moreover, the company has also conducted early detection routinely listed in the monthly report of early warning system.

7.1.2

Based on document review and field observations, the Certification Unit applies several biological control practices to suppress pests and diseases such as owls (*Tyto alba*) and manage them properly. The company also has *Turnera ulmivolia* in well-maintained condition. This plant as a predatory host plant for leaf-eating caterpillars, which is an invasive species, refers to LHK Ministerial Regulation No.P.94/MENLHK/SEKJEN/KUM.1/12/2016. The company also shows a plan and monitors its spread by carrying out regular maintenance of beneficial plants on monitoring beneficial document so that the spread can be controlled, such as during a field visit to block 2001D Afdeling 4 Berangir Estate.

7.1.3

Based on the results of interviews with company management, it is known that the company has never used fire to control pests and diseases. Pest and disease control in the company only uses biological and chemical if it is above the set threshold. Therefore, based on field observation to the Berangir Estate sighted that there is no indication of the use of fire for pest control and there is no pest infestation outbreak.

Status: Comply

7.2

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

7.2.1

Based on document review, interviews, and field observations during the onsite audit, it is known that the certification unit already has justification for the application of pesticides in the Berangir Estate Pesticide List document. The document provides information including active ingredients, pesticide class according to WHO, registration number and distribution permit, LD50 content, and specific weeds to be targeted. For example, the herbicide Metsulindo 20 wp, with the active ingredient metil metsulfuron 20% with the WHO class U classification category, with register number RI. 0130119991484, the permit period is until, 2024, specific for broad and narrow leaf weeds.

The company has a Memo from the Plant Division of PTPN IV (No: 04.04 / District-Kebun / M.1238 / XII / 2018, dated 19 December 2018) signed by the Head of the Plant Division of PTPN IV regarding the Use of Chemicals With Active Paraquat Dichloride Materials) which explains that herbicides with active ingredients of paraquat dichloride should not be used except for special conditions (borders), for which the use of these chemicals can be used only for the control of pteridophyta broadleaf weeds (ferns). Based on document review and field observation, several IPM program with biological approach that has been implemented such as nettle eater caterpillar by planting beneficial plant such as *Turnera subulata* and *Antigonon leptopus*. Moreover, the company has also conducted early detection routinely listed in the monthly report of early warning system.

7.2.2

The company has documented records of pesticide toxicity in the document of List of Pesticide 2022. The document is recorded product name, active ingredients, LD50, percentage of active ingredients, total application, and total active ingredients. This document is constantly recorded and updated by warehouse officer each month. For example, the use of Metsulindo pesticides with the active ingredient *metil metsulfuron* dermal LD50 > 2,000 mg/Kg, the total use period January - December 2022 is 210.21 Kg with a use area of 16,888 ha and usage/ha is 0.012 Kg/ha on Berangir Estate.

The company has a Memo from the Plant Division of PTPN IV (No: 04.04 / District-Kebun / M.1238 / XII / 2018, dated 19 December 2018) signed by the Head of the Plant Division of PTPN IV regarding the Use of Chemicals With Active Paraquat Dichloride Materials) which explains that herbicides with active ingredients of paraquat dichloride should not be used except for special conditions (borders), for which the use of these chemicals can be used only for the control of pteridophyta broadleaf weeds (ferns / ferns). Based on document review and field observation, several IPM program with biological approach that has been implemented such as nettle eater caterpillar by planting beneficial plant such as *Turnera subulata* and *Antigonon leptopus*. Moreover, the company has also conducted early detection routinely listed in the monthly report of early warning system.

7.2.3

The company also shows records of herbicide use, among others as follows:

Active Ingredients	Unit	2021	2022	Merk
<i>Metil Metsulfuron</i>	Liter	91.17	210.21	Metsulindo 20 wp
<i>Isopropil amina gliposate</i>	Liter	2,591.10	1,2016.70	Elang 480 SL
<i>fluroksipir</i>	Kg	1,289.74	-	Strane 290 EC

Based on the review of pesticide use documents, it is known that there has been a reduction in the use of pesticides such as *Isopropil amina gliposate* and *fluroksipir*.

Based on the results of a review of pesticide use documents and a field visit to Block 00K Afdeling 1 Berangir Estate, it is known that the company has utilized beneficial plants and natural enemies of pests as a method of reducing pesticide use.

Based on the census of rats document, ganoderma, and leaf-eating caterpillars in Berangir Estate in June 2023, it was found that there were no attacks that exceeded the threshold.

Based on the explanation above, it can be concluded that the company already has records of pesticide use and its reduction to a certain extent by substituting environmentally friendly materials/using biological agents for plant maintenance.

7.2.4

Based on the review of pesticide use documents, interviews with company management and results of field visits. It is known that the company does not use pesticides preventively to prevent pests and diseases. Pest and disease control is only carried out based on census results. If it is known that the census results exceed the threshold, then control is carried out.

7.2.5

The certification unit was showing Director Letter number 04.04/SE/18/X/2016 dated 14 October 2016 about: prohibited active pesticide (Category WHO 1A&1B, paraquat). That letter was addressed to the group manager District I-IV) and all manager's cc: Director, Internal Superintendent, and Planning Division. Based on field observation to the chemical warehouse and document use of pesticide for 2022, sighted that there are no using chemical with categories WHO 1A, WHO 1B and Paraquat since 2016.

7.2.6

The company has Safety Procedures for the Use and Storage of Chemicals on SOP for Management and Storage of Chemicals No. SPO 23 dated July 1, 2013. The SOP describes the mechanism for storing pesticides in special warehouses, including places for mixing pesticides to be used in the field in special isolated places so that there is no potential for chemical exposure to occur outside the warehouse. Regarding the storage of Chemicals, the procedure regulates as follows: on point 6.7 field application.

- Mill and estate workers are allowed to work using chemicals or pesticides is what workers have earned training on how to apply chemicals or pesticides, knowledge about the dangers of pesticides and their prevention as well first aid, in case of chemical poisoning or pesticide.
- Spray workers in the field must pay attention to time and direction wind and weather in doing the spraying application in field and stop the spray job, if the wind direction and weather that can harm workers.
- Etc.

The company shows the pesticide training record. The training was carried out with the title "Pesticide Handling Training" for Berangir Estate on June 7, 2022, the training materials include presentations on Spray Application, Types of Hazards/Risk of Work Accidents and Chemical Hazards entering the human body through breathing, food and contact with the skin. Based on interview with spray worker, they also can explain about the spraying procedure, the routinely training were conducted every month by assistant.

The unit of certification has provided a special mixing tank to carry pesticides. In addition, based on a review of documents and pesticide application records, the company also provides clean water, soap and a first aid kit to support the sanitation and OHS aspects required by the spraying team.

Based on the results of interviews with pesticide storage officer, it is known that the company has provided a special mixing tank for transporting pesticides. In addition, based on the review of documents and records of pesticide application, the company also provides clean water, soap and a first aid kit to support the sanitation and OHS aspects required by the spraying team. Therefore, based on field observation in the mixing area of Berangir Estate, it is known that there is a warehouse to store all PPE and spraying equipment after use.

7.2.7

The company has Safety Procedures for the Use and Storage of Chemicals on SOP for Management and Storage of Chemicals No. SPO 23 dated July 1, 2013. The SOP describes the mechanism for storing pesticides in special warehouses, including places for mixing pesticides to be used in the field in special isolated places so that there is no potential for chemical exposure to occur outside the warehouse. Regarding the storage of Chemicals, the procedure regulates as follows: on point 6.9 Chemical or Pesticide Storage Warehouse

- Chemical or pesticide warehouse is a building that is made with special specifications for storage and mixing pesticides, as well as a place to store other related equipment with pesticide application Only authorized persons enter the Warehouse.
- Chemical or pesticide warehouses must have proper ventilation adequate, minimum watertight walls on adjacent walls floor, easy to clean, the warehouse floor is made of concrete floor watertight, so it does not absorb spilled liquids, floors divided

according to needs by being given a partition which also becomes second containment (second shelter).

- Chemical or pesticide warehouses must have clean water facilities always running (water available, if needed), special place and equipment for mixing pesticides, safety showers, bath soap, detergent, towels, and appropriate PPE.
- Chemical or pesticide warehouses must have response facilities emergencies such as absorbents to absorb spilled pesticides/ leaks, fire extinguishers, and spill/spill storage containers pesticide.
- For the storage of pesticides, a shelf/cabinet is made non-absorbent or non-absorbent materials, and special storage space.
- The warehouse door must always be locked, when there is no activity, and given Toxic and hazardous materials warning signs and symbols use of appropriate PPE.

Based on field observations at the pesticide warehouse, it is known that pesticides are stored neatly apart from other ingredients. The warehouse has been equipped with SDS, emergency response facilities, adequate ventilation, and is locked due to its limited area.

7.2.8

The company has SOP for the Management of hazardous and toxic waste No. SPO 02 No. revision 02 on 2nd January 2015. The procedure explained that all hazardous and toxic waste and the hazardous and toxic waste packaging or container, cannot be reused for other purposes and must be immediately stored to the licensed temporary storage of hazardous and toxic waste.

Based on the field observation results to landfill, Berangir mill employee housing, and Berangir estate employee housing, it was found that there was no pesticide containers or packaging discarded to landfills. Besides that, there was no reuse of pesticide containers as flowerpots nor as water storage. The results of the field visit to the hazardous and toxic waste temporary storage in Berangir Mill revealed that the chemical packaging waste was stored at the temporary storage and would be handed over to a licensed hazardous and toxic waste collector.

7.2.9

Based on field observations and interviews with company representatives, it is known that pesticide application is not carried out by air. Pesticide application using a sprayer, according to the results of the pest and disease census.

7.2.10

The last medical examination carried out for pesticide and chemical handlers was carried out on December 8-9, 2022, by doctors from Pabatu Hospital to 36 workers related to chemicals in the Berangir Business Unit (Estate). All worker's spray has examined health through inspection types of *cholinesterase* and *spirometry*, to ascertain the condition of workers in good health/normal.

From the results of the examination, there is a recommendation to control the company doctor. In this regard, the auditor can show evidence of follow-up actions on the recommendation of the audit results.

7.2.11

Based on employee document and interview with gender committee known that there was no worker age under 18 years old that worked in chemical activity. The pregnant and breastfeeding women prohibited to work in chemical. The monitoring conducted through monthly pregnancy test. If founded expectant mother, she will be transferred to light non chemical activity.

Status: Comply

7.3

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

7.3.1

The company has a waste management plan consisting of:

Solid Waste (Fiber, Shell and EFB)

The company utilizes fiber and shells as boiler fuel, while EFB is applied to plantation land as fertilizer for oil palm plants. Further explanation on indicator 7.9.1.

POME

The waste water treatment of palm oil mill effluent is processed by WWTP pond system. Before distributed to plantation land, all wastewater is treated in WWTP pond until it reaches the permissible quality standards for wastewater utilization with pH 6-9 and BOD \leq 5000 mg/l. Berangir POM has permit to utilize palm oil industrial wastewater on the ground (Land Application) with letter no 660/324/DLH-02/2022 from Environment Agency of Labuhanbatu Utara on 8th August 2022 regarding the Technical Approval for Waste Water Quality Standard Compliance at PT Perkebunan Nusantara IV Berangir Mill and Estate.

Domestic Waste

The company has SOP for household domestic waste management document No. SPO-20, second revision on 2nd January 2015. Section 5.4 on Waste Management: Each employee collects his waste in the bins provided and cleans the yard around the housing. Garbage disposal by sorting organic and inorganic waste. The procedure describes the waste management from offices and housing, provision of trash bins (trash cans) in offices and housing, making temporary garbage dumps, making a landfill with a size of 1.5 x 2 x 9 meters and a minimum distance of 1 KM from the housing.

Hazardous and Toxic Waste

The company has SOP of hazardous and toxic waste management No. SPO 02, revision 3, on 2nd January 2017, which describes the management of hazardous and toxic waste from the time it is produced until it is submitted to the waste carrier. The company also has a temporary hazardous waste storage permit based on the Letter No. 660/260/DLH-02/2022 on 16th June 2022 related to Temporary Storage for Hazardous and Toxic Waste Technical Detail for Berangir Unit. The coordinate of temporary storage is 02°13'27,0" N and 99°45'40,1"E.

The company has agreement letter for hazardous waste transporting with PT Veronica Tannaga Number 04.03/S-Perj/37/VI/2022 on 19th December 2022 valid until 18th June 2023. The waste balance report is empty for the second trimester in 2023. Meanwhile, the last transporting of the hazardous waste on 13th March 2023 from Berangir POM namely:

- Manifest number KLHK-1683418456 is resin 2.0375 ton
- Manifest number KLHK-1684878636 is hand sprayer 4pcs
- Manifest number KLHK-1684678636 is drum 12 pcs
- Manifest number KLHK-1684619900 is jerrycan 36 pcs

Based on field observation:

Domestic waste

- Observations to Berangir POM employee housing, there was burnt waste beside the employee's house and the other employee was burning the trash.
- Observation to Berangir Estate employee housing in Afdeling V, domestic waste is not stored to the provided bin, they burn the trash instead.
- Observation to EBA in Berangir POM, domestic waste is mixed up with the empty bunch.

Palm Oil Mill Waste

- SPO Utilization of Palm Oil Mill Waste No. SPO 17 No. revision 02 on 2nd January 2015 Section 5.1 Empty fruit bunches produced from palm oil mills must be managed properly to protect the surrounding environment.
- From the results of field observations at the Berangir POM, it was found leachate in a few spots around EBA which is not managed properly.

Based on that explanation The company has not been able to show evidence that the waste management carried out is in accordance with their SOP. This became **Nonconformity Number 2023.07 with minor category**

7.3.2

The company has SOP documents related to waste disposal management as follows:

- SOP of Hazardous and Toxic Waste Management, Chemical Container and Waste Water from Equipment Cleaning No SPO 02 revision 03 on 30 December 2021.
- SOP of POM Waste Utilization no SPO 17 revision 02 on 2nd January 2015.

Based on interviews with employees in Berangir Estate, it was found that they had an understanding in handling the waste disposal, especially hazardous waste and its management as regulated in procedures. The temporary storage for hazardous waste staff can explain the technicalities related to waste management, such as the treatment of incoming and outgoing waste, recording and reporting, transportation period, handling in the event of work accident and other relevant actions regulated in the procedures. Result of verification of the Hazardous Waste Logbook document also show that all incoming and outgoing waste has been properly documented and in accordance with its actual conditions.

7.3.3

Detail explanation has mentioned in 7.3.1. regarding the document review and observation result. Observations to Berangir POM employee housing, there was burnt waste beside the employee's house and the other employee was burning the trash. The company has SOP for household domestic waste management document No. SPO-20, second revision on 2nd January 2015. Section 5.4 on Waste Management: Each employee collects his waste in the bins provided and cleans the yard around the housing. Garbage disposal by sorting organic and inorganic waste. The procedure describes the waste management from offices and housing, provision of trash bins (trash cans) in offices and housing, making temporary garbage dumps, making a landfill with a size of 1.5 x 2 x 9 meters and minimum distance of 1 KM from the housing. This became nonconformity on Indicator 7.3.1

7.3.1 Status: Nonconformity NC.2023.07 with minor category

7.4

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

7.4.1

The unit of certification shows procedures related to the management of soil fertility so that yields are optimal and have minimal impact on the environment, which among others are listed in the document:

- Fertilization procedure in the immature area, document number 04.1, Revision 00, August 1, 2007. This procedure briefly describes the application of fertilizers based on plant age, frequency of fertilizer application per type of fertilizer and per type of soil.
- Leaf and Soil Sample Analysis Procedure, document number 05.4, Revision 00, dated August 1, 2007, which briefly describes soil analysis carried out every 3 – 5 years and leaf analysis every 1 year.
- Fertilization Procedure in mature area, document number 05.2, Revision 00, dated August 1, 2007
- Fertilization Organization Procedure, document number 05.3, Revision 00, dated August 1, 2007, which among others explains the provision of organic fertilizers (factory waste)

The certification unit shows records of implementation of practices according to established procedures, including:

- Compilation of recommendations for fertilization of the Berangir Estate based on plant leaf nutrient content in 2022, production in 2016-2021, realization of fertilization in 2018-2022, rainfall in 2016-2021 and results of field observations covering plant growth and area conditions, symptoms of nutrient deficiency in plants, the application of technical culture and the implementation of the harvest and other factors related to the effectiveness and efficiency of fertilization. This can be seen in the 2022 PT PN IV Fertilization Recommendation Report published by PPKS Medan.
- Provision of organic fertilizers (factory waste) such as empty fruit bunch and solid.
- The results of the analysis of oil palm leaves in 2022 for the preparation of fertilization recommendations for 2023 issued by PPKS Medan.
- Documentation of fertilization recommendations and realization in 2020-2022.

7.4.2

To find out the soil fertility, the company conducting of soil and leaf analysis periodically as follows:

- **Soil Analysis Activities** - Laboratory analysis about the condition and soil nutrient content in the soil samples to determine the fertilizer recommendation in maintaining and improving the balance of nutrients in the soil. Parameters measured among others: Texture, acidity (pH), content of C, N, P, K, Mg, Ca, Na, BS, CEC, Al and H. In accordance with the established procedure, soil sample analysis is carried out every 3-5 years. The last soil sample analysis was carried out by PPKS Medan on September 8, 2020.
- **Leaf Analysis Activities** - The results of leaf analysis annually published the recommendations of fertilizer dosage to produce the optimal palm fruit. The principle of fertilization is the provision of treatment on the soil to produce the nutrients required by the palm oil with optimum results. Indicator Major elements namely N, P, K, Ca and Mg and Indicator Minor elements namely

B. The last leaf sample analysis was carried out by PPKS Medan August 15, 2022, for 206 sample.

- **Visual Analysis Activities** - Visual observations performed every year at the time of leaf analysis activities. Visual observation is a consideration in determining the fertilizer recommendations, deficiency of nutrients and analyze the potential of disease which is likely to become endemic of a particular disease.

7.4.3

Companies that utilize waste as evidenced by documents utilizing renewable Mill waste for the 2022 period. Data on the recapitulation of solid waste utilization for fertilizer for the period January - December are as follows:

- FFB Processed 110,783 Tons
- Empty fruit bunch utilized 29,803 Tons
- Solid waste utilized 1,167 Tons
- The liquid waste used is 100,614 M3

Based on the results of interviews and document verification, it shows that the empty fruit bunches are used to substitute fertilizer by applying it to the land. The company also utilizes liquid waste which is used to substitute fertilizer into the land through Land Application. All of the waste is utilized and data on its use is recorded in detail and traceable.

The results of visits to the application site for empty fruit bunches during the audit process and liquid waste from the Land Application in block 00F Afdeling 1 Berangir Estate are used as liquid fertilizer.

Based on information from interviews and document reviews, there are already available nutrient recycling strategies, which can include recycling empty fruit bunches, PKS liquid waste, palm oil residue, as well as optimizing non-organic fertilizers.

7.4.4

The company has shown documents related to the fertilization plan and realization for each estate. The examples are as follows:

Report on Recommendations and Realization of Fertilization for the period January - December 2022 at the Berangir Estate

Estate	Type of Fertilizer	Recommendation (Kg)	Actual (Kg)
Berangir	Urea	876,605	869,818.25
	NPK 12,12,17,2	2,123,690.50	2,099,641
	MOP	1,031,696.25	1,024,584.75
	Dolomite	1,150,989.75	1,143,850.75

Overall, the company has made efforts to maintain and improve soil fertility. Based on verification document of fertilizer's realization, it was known that in general the company has carried out fertilization applications based on recommendations. Visually, there are no symptoms of nutritional deficiencies in the blocks that have been visited.

Status: Comply

7.5

Practices minimize and control erosion and degradation of soils.

7.5.1, 7.5.2 and 7.5.3

Based on a Result of Identification of High Conservation Value Areas for the 2011 period in Berangir Estate in PT Perkebunan Nusantara IV, it was informed that the company's soil classifications, namely Brown Podzolic, Andosol, and Red Yellow Podzolic so that no peat soil classification was found.

The topographic conditions at Berangir Plantation in PT Perkebunan Nusantara IV based on map of the slope class of Berangir Estate in PT Perkebunan Nusantara IV's oil palm plantation. The information as follows: the relative elevation of the Berangir Estate varies in the range of 50 – 150 meters above sea level. Land with an elevation of 100 – 150 m is in Afdeling III, IV and V while Afdeling I, II and VI are relatively low (below 100 m). The slope of the slopes in the Berangir Estate area has an average slope of 2 – 15%, so that topographically some areas are flat to undulating. Hilly areas are found in Afdeling III, IV and V.

Based on field observations in the undulating area of Block 05X Afdeling III Berangir Estate, it is known that erosion mitigation efforts are carried out by arranging the transverse midrib and neprolepis at the crossroads. Based on field observations, no oil palm plantations were found on steep slopes.

The company has topographic maps and land surveys in the management of planting areas. This information is used by the company in planning for oil palm plantation development such as the construction of roads, bridges, ditches and other infrastructure.

Based on document verification sighted that the oldest oil palm planted year is year of 2000. Therefore, interview result sighted that the replanting activity will be conducted in 2025. Based on field observation and interview with stakeholders sighted that there is no new development during period of 2020 to 2023.

Status: Comply

7.6

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

7.6.1 - 7.6.3

Based on a Result of Identification of High Conservation Value Areas for the 2011 period in Berangir Estate in PT Perkebunan Nusantara IV, it was informed that the company's soil classifications, namely Brown Podsol, Andosol, and Red Yellow Podzolic so that no peat soil classification was found.

The topographic conditions at Berangir Plantation in PT Perkebunan Nusantara IV based on map of the slope class of Berangir Estate in PT Perkebunan Nusantara IV's oil palm plantation. The information as follows: the relative elevation of the Berangir Estate varies in the range of 50 – 150 meters above sea level. Land with an elevation of 100 – 150 m is in Afdeling III, IV and V while Afdeling I, II and VI are relatively low (below 100 m). The slope of the slopes in the Berangir Estate area has an average slope of 2 – 15%, so that topographically some areas are flat to undulating. Hilly areas are found in Afdeling III, IV and V.

Based on field observations in the undulating area of Block 05X Afdeling III Berangir Estate, it is known that erosion mitigation efforts are carried out by arranging the transverse midrib and neprolepis at the crossroads. Based on field observations, no oil palm plantations were found on steep slopes.

The company has topographic maps and land surveys in the management of planting areas. This information is used by the company in planning for oil palm plantation development such as the construction of roads, bridges, ditches and other infrastructure.

Based on document verification sighted that the oldest oil palm planted year is year of 2000. Therefore, interview result sighted that the replanting activity will be conducted on 2025. Based on field observation and interview with stakeholders sighted that there is no new development during period of 2020 to 2023.

Status: Comply

7.7

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

7.7.1 – 7.7.7

Based on a Result of Identification of High Conservation Value Areas for the 2011 period in Berangir Estate in PT Perkebunan Nusantara IV, it was informed that the company's soil classifications, namely Brown Podsol, Andosol, and Red Yellow Podzolic so that no peat soil classification was found.

Status: Comply

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

The company has a memo no 04.03/KOL/eM-358/XII/2021 on 17th December 2021 regarding the Management and Monitoring of HCV areal in riparian, water spring, and wetlands. It is stated that the company identify all water ecosystem in Afdeling, particularly the one that flows to the river, including the HCV area. The identification result is socialized to employees and other stakeholders. There is no chemical use nearby the HCV areal for the management and maintaining program. There are also signs in the palm tree 50 meters from the river's left and right. The enrichment of pioneer plants such as banyan, sengon, and meranti. Based on the interview result, the employee gain access to clean water from the well/boreholes.

The company also conduct water quality testing every semester and stated the result in RKL-RPL report. The water quality testing was held on 21st - 28th December 2022 by Sucofindo. Sample taken from:

- Afdeling 1 and 3 Pandan River,
- Afdeling 5, and 3 Pasang Lela River,
- Afdeling 6 Aek Rera River,
- Afdeling 6 Batu Mama River,
- Afdeling 4 Berangir River,
- Afdeling 3 Titi Gamba River,
- Afdeling 6 Aek Merah River.

Based on the testing result, it can be concluded that the company's operational activities do not cause negative impact to the environment.

7.8.2

The company has procedures related to maintaining and restoration in riparian and buffer zone, as follows:

- Mechanism on Riparian Management No SPO 05 revision 04 on 27th August 2018.
- Memo no 04.03/KOL/eM-358/XII/2021 on 17th December 2021 regarding the Management and Monitoring of HCV areal in riparian, water spring, and wetlands.

The general action of riparian management is mentioned in the memo, while the technical detail is stated in the procedure. It is specified that the company identify all water ecosystem in Afdeling, particularly the one that flows to the river, including the HCV area. The identification result is socialized to employees and other stakeholders. There is no chemical use nearby the HCV areal for the management and maintaining program. There are also signs in the palm tree 50 meters from the river's left and right. The enrichment of pioneer plants such as banyan, sengon, and meranti. Based on the observation to the Riparian Aek Merah in Afdeling V, the areal is properly managed.

7.8.3

Waste water quality testing document shown from January to May 2023. The parameters result complies to the standards quality. BOD on May 2023 is 588 mg/l with threshold 5000 mg/l and pH 7.76 with threshold 6-9. All of waste water management and monitoring has been reported to related institutions regularly every 3 months and the quality testing still complies with KepmenLH number 5 2021.

Berangir POM has permit to utilize palm oil industrial wastewater on the ground (Land Application) with letter no 660/324/DLH-02/2022 from Environment Agency of Labuhanbatu Utara on 8th August 2022 regarding the Technical Approval for Waste Water Quality Standard Compliance at PT Perkebunan Nusantara IV Berangir Mill and Estate.

Based on the observation results to WWTP and LA, it is confirmed that there is no pollution to the environment such as leaks or flooding. Therefore, the implementation of LA in Berangir POM does not cause a significant negative impact to surrounding environment. Based on the interviews with WWTP officers, it is stated that every liquid waste that flows into LA is always recorded. The flowmeter used is functioning properly and there has never been a leak or flood in the WWTP area.

7.8.4

The procedure of water usage monitoring in mill available in the document Procedure of Water Treatment Plant. Water consumption monitored by using flowmeters installed in the piping system of WTP. Based on the results of the document review, the company has shown the document of water usage in 2023. It can be concluded that the water used for processing in mill in January-June

2023 is 1.52 m³/ton FFB with total FFB processed 59,916,870 kg and total water usage is 90.879 m³. Unit of certification has permit of water utilization for POM based on document of Decree of Sumatera Utara Governor No. 610/1477 which is valid until 21st October 2023.

Status: Comply

7.9

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

7.9.1

The certification unit utilizes shells and fiber as boiler fuel to generate turbine power. It reduces the use of fossil fuels and optimizes the renewable energy. The confirmation record shown as follow:

2022	FFB Processed (Kg)	Shell Used (Kg)	Fiber Used (Kg)	Kwh Turbine	Kwh Genset
January	9,519,850	1,332,779	675,301	179,994	127
February	11,291,700	1,580,838	797,173	225,470	486
March	10,450,820	1,463,115	706,057	229,620	-
April	8,706,200	1,218,868	556,958	201,960	-
May	13,268,150	1,857,541	986,349	296,382	-
June	13,252,040	1,855,286	858,173	298,152	1,983
July	11,331,590	1,586,423	828,812	262,360	1,255
August	11,207,600	1,569,064	699,918	244,049	524
September	12,915,500	1,808,170	842,498	293,110	1,496
October	12,600,970	1,764,136	829,256	286,400	1,266
November	14,090,630	1,972,688	915,469	670,810	798
December	14,384,780	2,013,869	946,367	646,589	-
Total	143,019,830	20,022,777	9,642,331	3,834,896	7,935

It can be concluded that shell efficiency used in 2022 is 0.4 per ton FFB and fiber efficiency used is 0.06 per ton FFB.

Status: Comply

7.10

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

7.10.1

The company has carried out an inventory of GHG contained in Identification of Pollution and Emission in 2023. Based on document analysis, the company has identified all source of GHG produced by its operational activity. Identification of significant sources of GHG emissions are identified and mitigation plans have been developed by the company covering mill and plantations. Significant GHG emissions include land use change, POME processing, use of fertilizers and pesticides, use of fossil fuels for

operations and transportation. The mitigation plans include, among other things, the correct dosage and application of fertilizers as recommended, reducing reuse and recycling, limiting the use of electricity, transportation, and machine maintenance, as well as periodic air quality tests. The company has reported the results of the GHG calculation to the public which was submitted to the RSPO GHG website.

Reduction of fossil fuels in the company has been carried out by using fiber and shells for fuel substitution. POME applied to land with test results from monitoring in January-June 2023 which show that all wastewater testing parameters have met the applicable quality standards. Based on the documents review for example: monitoring of pesticide use, monitoring of diesel fuel, identification of HCVs and others it was found that accurate data has been entered into the RSPO GHG. Calculation of GHG and its monitoring has conducted by sustainable department. GHG emission calculated using RSPO palm GHG calculator 4.0 Summary of GHG emission for Berangir POM and its supply base are listed as follows:

Summary of Net GHG Emissions

Emissions per product	tCO ₂ e/tProduct
CPO	9.32
PK	9.32

Production	t/yr
FFB processed	143,019.83
CPO produced	28893,72
PK produced	6284,61

Extraction	%
OER	20.20
KER	4.39

Land use	Ha
Planted area on mineral	8527.63
Planted on peat	4390.73
Total area planted	12918.36
Conservation Area (Forested)	0
Conservation Area (Non-Forested)	209.06
FFB Production per hectare	11.07

Summary of field emission and Sinks

Description	Own		Group		3 rd Party		Total
	tCO2e	tCO2e/ tFFB	tCO2e	tCO2e/ tFFB	tCO2e	tCO2e/ tFFB	
Emissions							
Sources							
Land conversion	39638.47	0.38	87951.38	18.92	0.00	0.00	127589.84
CO2 emissions from fertilizer	5924.77	0.06	18534.78	3.99	0.00	0.00	24459.55
NO2 emissions from peat	0.00	0.00	32867.88	7.07	0.00	0.00	32867.88
NO2 from Fertilizer	4042.30	0.04	5535.60	1.19	0.00	0.00	9577.90
Fuel consumption	78.47	0.00	708.36	0.15	0.00	0.00	786.83
Peat oxidation	0.00	0.00	239733.31	51.58	0.00	0.00	239733.31
Sinks					0.00	0.00	

Crop sequestration	-37572.00	-0.36	-80501.57	-17.32	0.00	0.00	-118073.57
Sequestration in Conservation area	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	12112.01	0.12	304829.74	65.58	0.00	0.00	319710.39

Summary Oil Mill Emissions and Credits

Remarks	tCO₂e	tCO₂e/t FFB
Emissions sources		
POME	7782.70	0.05
Fuel consumption	140.99	0.00
Grid electricity	0.00	0.00
Credits	0.00	0.00
Export of grid electricity	0.00	0.00
Sales of EFB	0.00	0.00
Total	7923.69	0.05

Palm Oil Mill Effluent (POME) Treatment

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

POME Divert to Anaerobic Digestion

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

There is no peat area in this UoC. Peat area stated in GHG calculation is based on peat area in Meranti Paham Estate as one of the FFB sources to Berangir POM.

HCV area in GHG calculation is also including HCV area in other FFB sources, apart from Berangir Estate. HCV area in 1.5.2 is 208.64, meanwhile in GHG calculation is 209.06. The difference 0.42 is HCV area in Ajamu Estate. As submitted in detail conservation area in GHG website.

The planted area in 7.10.1 is the total of planted area in all FFB sources area. Meanwhile in 1.5.2 is only for Berangir Estate.

From the GHG Calculator data, it can be seen that the value of CPO and PK has increased slightly from ASA 4 where in 2022 the value is 9.32 tCO₂e/tProduct, while for 2021 the value is 10.74 tCO₂e /tProduct.

7.10.2

PTPN IV Berangir Unit did not clear any new land after January 1, 2015. Based on interviews with management and document review, it is known that the operational area of Berangir Unit has been managed since 1974 and is currently entering its second planting cycle.

7.10.3

The company has identified pollutions and emissions sources of Berangir POM in 2022, such as CO₂ (boiler, generator, transportation), CH₄ (POME), hazardous waste (WTP and chemical storage), noise (machinery). The sources of pollution and emissions from estate are listed on the identification documents and management plans for pollution sources for 2022, such as emissions (CO₂, CO), noise, chemical waste, organic and inorganic waste, and infectious waste. Based on the monitoring result and also reported in RKL-RPL second semester 2022, all emissions are still complied with the regulation.

Plans to reduce or minimize have been implemented and monitored as explained in RKL-RPL second semester 2022. Fossil fuel reduction on Berangir POM has been implemented by fiber and shell usage for the boiler.

Status: Comply

7.11

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

7.11.1

Company has zero burning policy which is contained in the New Planting/ Replanting SOP SPO No. 02 dated August 1, 2007, which among others states that land clearing is carried out using zero-burning method. Company also has a fire prevention and control policy which is contained in Letter No. 04.07/SE/56/VI/2020 dated June 24, 2020, which contains fire prevention and control activities determined by the company including formation of firefighting teams, installation of fire extinguishers and hydrants, building fire monitoring towers, providing firefighting facilities and infrastructure, and perform fire prevention behavior. Based on field visits in replanting area, it was found that the company did not open land by burning in company's operational areal.

Based on the results of field visits to operational area, known that there are no burning activities and based on result visit also known that there has also been a warning about the prohibition and appeal not to burn land.

7.11.2

The company already has fire prevention and control measures, for example:

- Have procedures for handle of land fires No. SPO 01 revision 02 dated January 2, 2015.
- Monitoring fire facilities and infrastructure owned every month. In addition, based on the results of land fire monitoring, it is known that there have been no incidents of land fires in the company's operational area in the last 1 year.
- Has an emergency response team structure that has been trained to deal with fires.
- Conduct training simulations on a regular basis. For example, company showed minutes of Socialization emergency response of forest and land fires which were carried out on December 8, 2022.
- Monitoring and control of land fires for semester II 2022 was submitted to related Agency of Labuhanbatu Utara Regency on January 5, 2023.

The company can show a list of emergency response preparedness equipment along with a recording of its condition monitoring, which is carried out every month, as for the list of emergency preparedness equipment owned by the company as of December 2022 such as:

- Water tank
- Water pump
- Hose
- Nozzle
- Light fire extinguisher
- Hydrants
- First Aid
- Etc.

The results of an interview with the related Agency of Labuhanbatu Utara Regency and communities around known that there is no history of fires or the appearance of hotspots in the company area within the last 2 years.

Based on field observations in each estate and mill, there is no evidence of burning in operational area of the company. Based on interview with management, they opened land using heavy equipment.

7.11.3

Company has involved stakeholders on locations border operational areas as an effort to prevent and control fires through firefighting simulation and socialization which was participated by surrounding community and several agencies around the company. Company has shown stakeholders involvement evidence in prevent and control fires as shown in Report of Firefighting Simulation on December 8, 2022, which has been involved workers and surrounding community's representatives as many as 33

participants.
Status: Comply
<p>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.</p>
<p>7.12.1 PTPN IV Berangir did not clear any new land after November 2005. Based on interviews with management and document review it was found that the operational area of the Berangir business unit had been managed since 1974 and is currently entering its second planting cycle. The disclosure was sent to the RSPO on 2 August 2018.</p>
<p>7.12.2 The company did not clear any new land after 15th November 2018, therefore the HCV assessment carried out in 2011 is still valid. The company already has documents on the results of the identification of high conservation value areas carried out by PT Surveyor Indonesia in 2011. The scope of this is the PTPN IV Berangir plantation with an area of 4,648.7 ha. The total area of HCV Kebun Berangir is 208.64 Ha consisting of HCV1.1, HCV 1.2, HCV 4.1, HCV 4.2, HCV 6. Identification of HCV by involving local communities through public consultations held on 3 September 2011. Based on the study of the HCV identification document, it is known that there are several wild animals, for example:</p> <p>Aves</p> <ul style="list-style-type: none"> • <i>Burung alap-alap</i> (Accipter trivirgatus) • <i>Ruak-ruak</i> (Gallicrex sp.) • <i>Burung jalak</i> (Sturnus contra) • <i>Burung elang bondol</i> (Haliastur indus) <p>Mammals</p> <ul style="list-style-type: none"> • <i>Kukang</i> (Nycticebus coucang) • <i>Berang-berang</i> (Prionailurus bengalensis) • <i>Tupai</i> (Tupaia javanica) • <i>Musang</i> (Prionodon linsang) • <i>Landak</i> (Hystrix brachyurum) <p>Reptiles</p> <ul style="list-style-type: none"> • <i>Tokek</i> (Gecko gecko)
<p>7.12.3 Indonesia, especially the part of Sumatera Utara, is not a High Forest Cover Landscape (HFCL), so this indicator is not applicable.</p>
<p>7.12.4 The company has the evaluation of HCV management and monitoring program plan on 30th June 2023. The evaluation is for the implementation in 2022, the program namely:</p> <ul style="list-style-type: none"> • Maintain forest/protected/HCV areas. The company maintains the HCV area by installing a signboard and publicizing information to the surrounding community about the presence of HCV in the company area (once a year). • Socializing flora and fauna to the surrounding community. The company will conduct the outreach to surrounding community regarding the HCV area and the presence of flora and fauna in the company's area twice a year in 2022. Based on the results of interviews with Pasang Lela Village, it was found that they are aware of the HCV area and the company's concern to protect flora and fauna. • Monitoring the presence of wild wildlife species carried out in second semester of 2022 includes: <ul style="list-style-type: none"> - 22 Species of birds, such as <i>Burung Perenjak</i> (Orthotomus atrogularis), <i>Burung Terocok</i> (Pycnonotus goiavier), <i>Burung Raja udang</i> (Halcyon cyanoventris) dan <i>Burung Jalak</i> (Sturnus contra). - 10 Types of Mammals such as <i>Monyet Ekor Panjang</i> (Macaca fascicularis), <i>Babi hutan</i> (Sus verucossus), <i>Tupai</i> (Tupaia javanica), <i>Musang</i> (Prionodon linsang) dan <i>Kalong</i> (Pteropus vampires).

- 12 types of reptiles and amphibians such as: *Tokek* (Gecko gecko), *Biawak* (Varanus salvator), *Kadal* (Mabouia multifasciata), *Katak* (Bufo sp), *Bunglon* (Myrmeleon sp).

7.12.5

Based on previous assessments, field visits, and interview with stakeholders, it was found that within the company's operational areas there were no HCV areas that conflicted with the rights of local communities.

7.12.6

The company has a procedure for identification and protection of flora and fauna No. SPO 09 revision 02 on 1st August 2017. The procedure stated that poaching to protected or unprotected animals is not allowed, as well as to trade wild animals. The company conducts monitoring for this particular issue once a year. Violation of the regulation will be reported to the authority.

Company has monitored the biodiversity of flora and fauna for the second semester in 2022. Based on the monitoring results, several types were found, namely:

- 22 Species of birds, such as *Burung Perenjak* (Orthotomus atrogularis), *Burung Terocok* (Pycnonotus goiavier), *Burung Raja udang* (Halcyon cyanoventris) dan *Burung Jalak* (Sturnus contra).
- 10 Types of Mammals such as *Monyet Ekor Panjang* (Macaca fascicularis), *Babi hutan* (Sus verucossus), *Tupai* (Tupaia javanica), *Musang* (Prionodon linsang) dan *Kalong* (Pteropus vampires).
- 12 types of reptiles and amphibians such as: *Tokek* (Gecko gecko), *Biawak* (Varanus salvator), *Kadal* (Mabouia multifasciata), *Katak* (Bufo sp), *Bunglon* (Myrmeleon sp).

In addition, the company has conducted monitoring of HCV areas. Based on the monitoring of the HCV area for the second semester in 2022, it was found that there were no indications of fire, no hunting of animals, and no animal traps. The company has also installed a signboard to prohibit hunting, fish poison, and a ban on destroying HCV areas. Besides, company has conducted socialization related to HCV and protected species on 11th January 2023 to workers, contractors and surrounding community which was attended by 17 participants. The company also put some signboards as a reminder to all stakeholders.

Based on the interviews result with employees, housing residents, and representatives of surrounding community, it can be concluded that they understood the prohibition to hunt animals.

7.12.7

The company has HCV management activities in 2022. It is documented and reported. The monitoring outcome in 2022 is used for management plan in HCV management activities in 2023 as confirmed in the HCV Monitoring Report 2022.

The company has the evaluation of HCV management and monitoring program plan on 30th June 2023. The evaluation is for the implementation in 2022, the program namely:

- Maintain forest/protected/HCV areas. The company maintains the HCV area by installing a signboard and publicizing information to the surrounding community about the presence of HCV in the company area (once a year).
- Socializing flora and fauna to the surrounding community. The company will conduct the outreach to surrounding community regarding the HCV area and the presence of flora and fauna in the company's area twice a year in 2022. Based on the results of interviews with Pasang Lela Village, it was found that they are aware of the HCV area and the company's concern to protect flora and fauna.
- Monitoring the presence of wild wildlife species carried out in second semester of 2022 includes:
 - 22 Species of birds, such as *Burung Perenjak* (Orthotomus atrogularis), *Burung Terocok* (Pycnonotus goiavier), *Burung Raja udang* (Halcyon cyanoventris) dan *Burung Jalak* (Sturnus contra).
 - 10 Types of Mammals such as *Monyet Ekor Panjang* (Macaca fascicularis), *Babi hutan* (Sus verucossus), *Tupai* (Tupaia javanica), *Musang* (Prionodon linsang) dan *Kalong* (Pteropus vampires).
 - 12 types of reptiles and amphibians such as: *Tokek* (Gecko gecko), *Biawak* (Varanus salvator), *Kadal* (Mabouia multifasciata), *Katak* (Bufo sp), *Bunglon* (Myrmeleon sp).

The HCV monitoring result is reported every semester to the Conservation and Natural Resources Agency Labuhanbatu Utara Regency. Based on the letter and report sent to the Conservation and Natural Resources Agency Labuhanbatu Utara Regency,

the HCV monitoring report for first semester was sent on 30 June 2023.

7.12.8

PTPN IV Berangir has no land clearing after November 2005. Based on interviews with management and document review, it was found that the operational area of the Berangir business unit had been managed since 1974 and is currently in its second planting cycle. The disclosure was sent to the RSPO on 2nd August 2018.

Status: Comply

3.2 Conformity Checklist of Certificate and Trademark Use

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

3.3 Summary of RSPO Partial Certification.

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

PT Perkebunan Nusantara III Time Bound Plan (TBP) is explained in point 1.10. PT Perkebunan Nusantara (PTPN) III has informed the TBP progress, MUTU has considered that PTPN IV is complied with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by PTPN IV on November 2022.

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

MUTU Auditor has verified company partial certification and concludes that:

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

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	PT Perkebunan Nusantara III has carried out self-assessment (i.e internal audit) against uncertified management units dated on 1 December 2020 by PT Perkebunan Nusantara III, PT Perkebunan Nusantara III has submitted some self-assessment reports year 2021 on behalf PTPN III, PTPN V, PTPN VI, and PTPN VIII. It has support- ed evidence of the self-assessment against each requirement such as self-assessment reports
2.1.2	No replacement after dates defined in NIs Criterion 7.3 of: <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<p>PTPN III</p> <p>Based on document verification sighted that all uncertified unit has conducted LUCA and submitted to the RSPO:</p> <ul style="list-style-type: none"> - KRBTN dated 20 August 2021, there are raw non-compliant land clearance with area 489.83 Ha. - KBDY dated 20 August 2021, there are raw non-compliant land clearance with area 116.20 Ha. - KKINO dated 18 August 2021, there are raw non-compliant land clearance with area 477.85 Ha. - KJLRS dated 18 August 2021, there are raw non-compliant land clearance with area 3,823.91 Ha. <p>The KBDY and KRBTN has conducted HCV-HCS assessment by CV Greenera dated 19 to 23 October 2021. While the KNINO and KJLRS will be assessed on June 2022 by ALS- HCV. The company to be consider to realization this plan on June 2022.</p>

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

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>assessment such as :</p> <ul style="list-style-type: none"> Unit of Batanghari Business (Batanghari Estate), Unit of Bunut business (Bunut Estate & POM), Unit of Tanjung Lebar business (Tanjung Lebar Estate & POM) & Unit of Durian Luncuk (Aur Gading POM & Durian Luncuk Estate) : Date on 1 January to 11 November 2018 by Samsul Ulum (license : ALS15013US) as lead assessor and some assessor members i.e R.Sukasmianto, Moh.Yasin, Bahrun, Pemi Aprilis, Devis Rachman, Ihwan Rafina, Roland Sinulingga and Endra Gunawan on behalf PT Fodec Khatulistiwa. It has carried out public consultation dated on 20 February 2018 (initial public consultation) & 4 June 2018 (public consultation for the result of HCV assessment). There are some evidences that public consultations has involved stakeholders. Current condition that HCV assessment report has been satisfactory category on 23 March 2021. During audit, other the uncertified management units has not been carried out HCV assessment such as Unit of Ophir business (Ophir POM & estate), Unit of Pangkalan 50 Kota business (Pangkalan 50 Kota estate), Unit of Solok Selatan business (Solok Selatan POM & estate), Bukit Cermin Estate, PT Bukit Kausar & PT MAJI but PTPN VI have budget & the allocation activity plan year 2020 for HCV assessment in Unit of Ophir business, Unit of Pangkalan 50 Kota business and Unit of Solok Selatan business. Allocation Activity Plan year 2020 is postpone because any reduction operational cost in pandemic covid-19. PTPN VI have action plan and estimating cost for HCV assessment include of the review by HCV RN, HCS, LUCA & SIA. Bunut estate & POM, Batang Hari estate and Tanjung Lebar estate have estimate for finalization of HCV RN and LUCA document in year 2021. Whereas, the remain of uncertified management unit is Triwulan I and IV year 2022. Before HCV assessment will doing by RSPO ALS assessor and has review by HCV-RN so uncertified management units has carried out assessment of protected areas refer to Indonesian regulation by internal assessor. <p>Batanghari Business Unit (Batanghari Estate) & Bunut Business Unit (Bunut Estate & POM) has submitted disclosure liability, LUCA & shp file to RSPO and RSPO has responded email from auditee on 29 January 2020 where RSPO is requesting some clarifications and auditee has not</p>

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

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>Liability of Batang Hari Business Unit has approved by RSPO secretariat with Zero Liability dated 20 June 2020; the audit planned on 22 December 2021. Therefore the Disclosure & Liability of Bunut Business Unit is still on process, the latest email from Indrawan Suryadi (RSPO Secretariat) dated 23 November 2021. For the Bunut Business Unit certification plan is on schedule (December 2021).</p> <p>There are also letter for SEVP Operation from Head of Planning & Sustainability with number: ND-312/06.08/XI/2021 dated 25 November 2021 about RSPO certification preparation in Bunut & Batang Hari Business units and also awareness criteria 7.12 RSPO P&C and Risk Analysis for six business units (Ophir, PLK, Solse, BKC, B. Kausar, and MAI) by Consultant Inovasi Sejahtera Berkelanjutan.</p> <p>PTPN VII Bentayan Estate, Sungai Lengi Estate, Sinabing Estate and Talopino Estate were not conducted new planting after November 2005. However the HCV identification document was not available. The HCV assessment will conducted by consultant (Bentayan Estate: 2026; Sungai Lengi Estate: 2022; Senabing Estate: 2025 and Talopino Estate: 2024).</p> <p>Senabing Estate was conducted Conversion from year of 2005 to 2010 with area 408 Ha. The LUCA assessment will be conducted by Consultant in the year of 2025.</p>
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>PTPN III PTPN III's development of a new planting area (Muara Upu at South Tapanuli – Hapesong Estate) and there is a conversion area from crumb rubber to oil palm at Batang Toru Estate, Hapesong Estate, Rambutan Estate dan Bandar Betsy Estate.</p> <p>For the new planting at Muara Upu – Hapesong Estate, the company has carried out applying NPP in accordance with this clause and the progress under reviewing of Compensation Task Force. Based on communication with PT PN III. The company still waiting for Head of District decision response, for land exchanged process since the land was included on peat moratorium area according to President of Republic of Indonesia decree letter no. 6 year 2013.</p> <p>While for a conversion area, the company has arranged the plan for conducting the NPP. The objective evidenced as follow:</p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>c. Internal Memo from Head of Management System for approval a purpose of NPP project for 4 (four) estates (Ba- tang Toru Estate, Hapesong Estate, Rambutan Estate dan Bandar Betsy Estate) dated January 25, 2018. This internal memo issued based on the initial gap assessment has conducted in January 2018.</p> <p>d. Form of Request Budget (No. 3.16/PPAB/07/2018) dated January 29, 2018.</p> <p>PTPN V</p> <p>Auditee has been submitted reporting template for disclosure of areas cleared without prior HCV assessment since Nov 2005 file on behalf other uncertified management units i.e Unit of Tanjung Lebar Business (Tanjung Lebar estate & POM), Unit of Durian Luncuk Business (Aur Gading POM & Durian Luncuk Estate), Unit of Ophir Business (Ophir Estate & POM), Unit of Pangkalan 50 Kota Business (Pangkalan 50 Kota estate), Bukit Cermin estate, PT Bukit Kautsar & PT MAJI.</p> <p>Some management units has carried out land clearing activities (replanting or conversion activities) since November 2005 without processed by HCV identification/assessment. Based on RaCP tracker (per November 2019) in RSPO website and the result of correspondence with RSPO compensation panel that the management units under PT Perkebunan Nusantara VI have 0 management unit with potential liability because information inside of disclosure liability form & LUCA still revised by auditee on behalf Unit of Batanghari Business and Unit of Bunut Business and other uncertified management units has not been submitted disclosure liability. LUCA and shp file.</p> <p>Following up one of resolution from 35th BHCVWG meeting year 2017 are pushing certified management unit to submit annex 7 & 8 (compensation concept note & compensation plan) to RSPO compensation panel in annual surveillance audit by each certification body according time frame which has decided in meeting. The progress of the concept note approval can be saw in indicator of 7.12</p> <p>There are some land clearing areas above year 2010 until 18 October 2016 (auditee join with RSPO) under PT Perkebunan Nusantara VI areas but New Planting Procedure (NPP) was not implemented. Based on information of NPP document that it will ensuring compliance with new planting requirement at the time of certification. After join to RSPO, there is conversion of plant type (from rubber to oil palm) year 2017 in Pangkalan 50 Kota estate and it have potential as sanction areas.</p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>PTPN VII Bentayan Estate, Sungai Lengi Estate, Sinabing Estate and Talopino Estate were not conducted new planting after November 2005. However the HCV identification document was not available. The HCV assessment will conducted by consultant (Bentayan Estate: 2026; Sungai Lengi Estate: 2022; Senabing Estate: 2025 and Talopino Estate: 2024). Senabing Estate was conducted Conversion from year of 2005 to 2010 with area 408 Ha. The LUCA assessment will be conducted by Consultant in the year of 2025.</p>
2.1.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>PTPN III KRBTN There are several area in Afdeling VII were occupied by communities and overlap with PT KAI. The unit management have made persuasive efforts to resolve it, however no agreement has been found. Currently was nothing significant land conflict.</p> <p>PTPN V There was land conflict between PT PN V with community in Senama Nenek village, located in Sei Kencana Estate and Terantam Estate for approximately $\pm 2,800$ Ha (± 550 Ha under Terantam Estate and $\pm 2,250$ Ha under Sei Kencana Estate). During this initial audit, this area has been released in accordance with a court decision.</p> <p>PTPN VI PT Perkebunan Nusantara VI have SOP of implementing FPIC, SOP of communication and consultation with community, SOP of handling land conflict including procedure of calculation and compensation.</p> <p>Land compensation process has done a few time ago for some areas in uncertified management units (Unit of Bunut Business, Unit of Tanjung Lebar Business, Unit of Batanghari Business, Unit of Durian Luncuk Business, Unit of Ophir Business). The record and document of land compensation on behalf PT Bukit Kautsar has provided by auditee as example photograph of hand over land compensation payment, land compensation letter date on 21 October 2009, letter date on 21 October 2009 from head of village, statement letter date on 21 October 2009 that land owners has agreed land to acquired, measure note date on 21 October 2009, receipt note of land compensation payment, ID card and land owner letter from head of village. Whereas, PT MAJI and Unit of Bukit Cermin Business has provided sample of land compensation i.e payment receipt,</p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>photograph of land compensation activity, copy ID card, agreement of payment, statement letter of hand over and legal land.</p> <p>Community who lose access and land right for plantation areas has given the opportunity to benefit (direct and indirect) from plantation development as sample in form of scheme smallholder areas, as employee, as contractor (transportation, supplier for daily food, etc), as FFB supplier, etc.</p> <p>Refer to case tracker or status of complaints under PT Perkebunan Nusantara VI period of February 2011 to during audit that any 1 cases and it has closed based complaint panel decision (since year 2019). Further details on this case are available here: http://www.rspo.org/members/complaints/status-of-complaints/view/26. Unit of Bukit Cermin Business has provided some evidences relate of land compensation record and document from dispute/conflict areas.</p> <p>2nd partial audit was conducted on 24-25 November 2021</p> <p>Based on document log book of external letter verification on the uncertified units sighted that there were no land dispute claim from the communities during period January to October 2021.</p> <p>PTPN VII</p> <p>The Senabing Estate has not been able the land use historical for the area 2,355.72 Ha. Currently also the Senabing Estate not obtained HGU from the related Agency. There are land conflict resolution in Senabing Estate (Lahat District), the land dispute was started on 14 August 1986. It has resolved dated 9 June 2011 by Minute of Land Measurement number SENA/BA382/2001 in Tanjung Makmur Village for area 1.25 Ha.</p>
2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>PTPN III</p> <p>Based on self-assessment in KRBTN, KBDSY, KKINO and KJLRS and desk study on internet sighted that there are no labour dispute issues, since last year period until the partial audit conducted on 8-9 November 2021.</p> <p>PTPN V</p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>There is no labour issue/dispute found during this initial certification audit.</p> <p>PTPN VI</p> <p>There is a mechanism of resolving grievance and compliant from employee and industrial action. It has covered in the collective labour agreement between PT Perkebunan Nusantara VI and SP- BUN PTPN VI (labour union) period of 2020 to 2021 (article 76 – sub section XIV) and SOP of internal communication and handling employee complaint. Scope of collective labour agreement is all company employees and as a normative reference for subsidiaries. Collective labour agreement has signed by both parties and any evidence of registration about collective labour agreement from Ministry of Man Power has been shown by auditee.</p> <p>Based on self-assessment against uncertified management units, there is no identified labor disputes ongoing at subsidiary companies of PT Perkebunan Nusantara VI. Based on website date on 3 October 2017 that any labour dispute between Mr M.Dasuky Hajar Nasution and PT MAJI. Based on communication with representative of PTPN VI that it has followed up both parties. SP-Bun (labour union) have vital position because based on SOP of internal communication and handling employee complaint that employee's grievance & complaint can be informing to labour union (SP-BUN) and organization will try to resolve complaints at the labour union level and any mechanism solving grievance and compliance from employee on collective labor agreement (PKB)</p> <p>2nd partial audit was conducted on 24-25 November 2021</p> <p>The renewable of collective labor agreement period of 2022-2023 is still on process, that the final meeting in Yellow Hotel will be conducted on 25 to 26 November 2021.</p> <p>PTPN VII</p> <p>There are no labour dispute during internal audit assessment, the company will be follow up the regulation of PP 50 of 2012, PP 38 of 2011, PP 101 of 2014, and Permenaker 19 of 2012.</p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>PTPN III</p> <p>KRBTN</p> <p>Letter from Sumatera Utara Governor with number 520.33/145/DISPMPPTSP/5/I.5/I/2018 dated 25 January 2018 about Revision of commodity from rubber to oil palm plantation in Rambutan Estate. Revision from Rubber: 2,253.35 Ha & Oil Palm 546.41 Ha to Rubber: 1,156.95 Ha and Oil Pal 5,158.33 Ha.</p> <p>There are several HGU certificate with HGU number 1 year of 1996 in Sei Bamban Village (569.32 Ha), Sei Priok Village (780.45 Ha), Paya Bagas Village (4,373.78 Ha); and also Sei Simujur Village (1) number 18 year of 2009 with area 793.15 Ha.</p> <p>KBDBY</p> <p><i>Surat Pendaftaran Usaha Perkebunan</i> with number HK.350/530/Dj.Bun.5/VII/2001 Bandar Betsy Estate with area 5,348.90 Ha with commodity rubber. Therefore conversion license from rubber to oil palm with number 503.35/271/17.42018 dated 12 February 2018 with area 116.2 Ha.</p> <p>HGU on process, the latest process are Nota Dinas number 419/ND-300.HP.03.01/VII/2021 from KANWIL BPN Sumatera Utara Province dated 1 July 2021 about Renewal of HGU Bandar Betsy with area 5,348.90 Ha dated 2 July 2021.</p> <p>KJLRS</p> <p>IUP on process due to revision of AMDAL document. However there are HGU number 03 year of 1994 with area 2,318.87 Ha.</p> <p>KKINO</p> <p>IUP on process due to revision of AMDAL document. However there are HGU number 122 year of 1999 with area 4,632.60 Ha.</p> <p>Based on Self-assessment there are some conditions not yet compliance with RSPO criteria 2.1 such as:</p> <ol style="list-style-type: none"> 1. HGU on process (Sei Simujur-2, KRBTN): There are letter from Senior Executive Vice President PTPN III dated 22 September 2020 with number BUMU/X/44/2020 to the BPN of Asahan District for Cadastral process. During the audit, the progress of this matter still opened. 2. There is a land conflict (Batang Toru Estate) not yet resolved. <p>PTPN V</p>

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

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>6. Unit of Tanjung Lebar Business, Unit of Bunut Business, Unit of Batanghari Business and Unit of Durian Luncuk Business have permit of release for forest areas from government (Minister of Forestry Decree no.260/KPTS-VII/1988 and no.418/KPTS-II/1990). Whereas, PT Bukit Kautsar have permit of release for forest areas from government too (Minister of Forestry Decree no.69/Kpts-II/1997 & no.443/Kpts-II/1999 and letter from Head of Forestry Agency in Jambi Province no. S.6.802/Dishut/BIPH.1.2/XII/2015). PT Mendahara Agro Jaya Industri have permit of release for forest areas from government too (Minister of Forestry Decree no.954/Kpts- II/1999).</p> <p>7. Plantation Business Permit (Izin Usaha Perkebunan) on behalf PT MAJI (Head of Tanjung Jabung Timur decree No.30 year 2005) and PT Bukit Kautsar - Pengabuan POM (Governor of Jambi decree No.564/KEP.Gub/Disbun/2011).</p> <p>8. Environment Document on behalf Ophir Estate & POM (letter no.213/II/DAR-3/1999), Solok Selatan Estate (head of Solok Selatan District decree No.660/152/KLH-2011), Pangkalan 50 Kota Estate (head of capital investment and integration service decree no.007/IL/DPMTSP-LK/I/2020), Aur Gading POM & Durian Luncuk estate (Governor of Jambi Province decree No.171/Kep.Gub/BLHD/2009), Bukit Cermin Estate (approved by No.100.A year 2011 on 3 October 2011) and PT MAJI (approved by No.76 year 2007 on 23 March 2007) was available.</p> <p>A documented system relate of law requirements and mechanism to ensuring compliance with legal compliance and a system to tracking changes to the law and regulation has covered in procedure of updating law and regulation and evaluation of compliance. All uncertified management units has provided the list of relevant law and regulation and the status of compliance because the mechanism to ensuring compliance with legal compliance has been implemented.</p> <p>Auditee has provided a legal land, map of legal land and a procedure of boundary monitoring where boundary monitoring shall be conducting every month and reporting in report of boundary monitoring result. Uncertified management units has provided the report of boundary monitoring result such as Unit of Tanjung Lebar business, Unit of Batanghari business, Unit of Solok Selatan business, Unit of Pangkalan 50 Kota business, Unit of Ophir business, PT MAJI, Unit of Durian Luncuk business, Unit of Bunut business, Unit of Bukit Cermin business and PT Bukit Kautsar.</p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>PTPN VII</p> <p>The company will be follow up the regulation of PP 50 of 2012, PP 38 of 2011, PP 101 of 2014, and Permenaker 19 of 2012. The Senabing Estate has not been able the land use historical for the area 2,355.72 Ha. Currently also the Senabing Estate not obtained HGU from the related Agency. There are land conflict resolution in Senabing Estate (Lahat District), the land dispute was started on 14 August 1986. It has resolved dated 9 June 2011 by Minute of Land Measurement number SENA/BA382/2001 in Tanjung Makmur Village for area 1.25 Ha.</p>

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

3.4.1 Identification of Findings, Corrective Actions and Observations at ASA-3 & ASA-4 (onsite) Assessment

NCR No.	:	2022.01	Issued by	:	Briyogi Shadiwa
Date Issued	:	9 August 2022	Time Limit	:	7 November 2022
NC Grade	:	Major	Date of Closing	:	7 November 2022
Standard Ref. & Requirement	:	3.6.2 Monitored the effectiveness of OSH plans to address OSH risks to people.			
Evidence observed (filled by auditor)					
<ul style="list-style-type: none">Based on the verification of the P2K3 Work Program Document for the 2021 period, it is known that point 9 related to health checks has been realized by the company in November 2021.Until the time the audit was carried out, the company had not been able to provide documentation of general medical examination activities for all employees.					
Reference:					
Permenaker 2 of 1980 concerning Health Examination, Article 3 paragraph 2 explains that periodic medical examinations are mandatory at least once a year unless otherwise determined by the Director General of Labor Relations Development and Worker Protection.					
Non-Conformance Description (filled by auditor):					
The company has not been able to show sufficient evidence that the effectiveness of the K3 plan has been monitored, particularly with regard to the realization of general health checks in accordance with the established program.					
Root Cause Analysis (filled by organization audited):					
<ul style="list-style-type: none">The effectiveness of the OHS plan that has been prepared and evaluated has not been monitored.Limited understanding of the PIC in showing evidence of general health examination results during audit activities.					
Correction (filled by organization audited):					
<ul style="list-style-type: none">Shows the results of the general health examination contained in document No. POLK/BER/32/IV/2022 dated 12 April 2022. The document informs that 378 workers have received the "HEALTHY" status.Showing the evaluation results of the 2021 P2K3 plan.					
Corrective Action (filled by organization audited):					
<ul style="list-style-type: none">The company has established a health check mechanism as stated in the document Letter No. BER/SE/42VIII/2022 concerning the Mechanism of Health Examination of Employees/I Berangir Estate and the Appointment of Health Monitoring Officers, Letter No. Ber/Kpts/.../VIII/2022 dated 30 August 2022.The company has appointed a PIC along with their duties and responsibilities.The company plans a time frame for evaluating the P2K3 plan for the following year.					
Assessor Evaluation and Conclusion (filled by auditor):					
Verification on October 21, 2022					
Companies can show documents:					
<ul style="list-style-type: none">Internal Memo of Planning and Sustainability No. 04.03/KOL/eM-583/VIII/2022 dated 4 August 2022 concerning					

Measurement of Occupational Health and Safety in 2022 which will be carried out on 9-24 August 2022 by PT Prima Medica Nusantara.

- Letter No. BER/SE/70/VIII/2022 dated 10 August 2022 regarding Advanced Health Examination of Berangir Estate. Based on document verification, it was found that there were instructions to bring 51 employees to carry out further health checks related to cholinesterase, spirometry and audiometry.
- Health check results:
 - cholinesterase: laboratory analysis results based on sample testing dated 12 October 2022 issued on 22 August 2022 informed that 2 out of 24 workers had mild intoxication.
 - spirometry: results of laboratory analysis based on sample testing dated 12 October 2022 issued on 10 September 2022 informed that 2 out of 3 workers experienced "RR".
 - Audiometry: results of laboratory analysis based on sample testing dated October 12, 2022 issued on September 10, 2022 for 3 workers with normal status.
- Letter No. BER/X/29/VIII/2022 on 15 August 2022 regarding Follow-Up of Health Examination Results. The letter informed the results of an examination from Pabatu Hospital on October 12, 2022 that 2 workers experienced severe intoxication during the cholinesterase examination and 2 workers experienced "RR" during the spirometry examination.
- Letter No. BER/X/32/VIII/2022 on 26 August 2022 addressed to PT Prima Medica Nusantara. The information contained in the letter contains directions for the implementation of general health checks for 310 workers in Berangir Estate.
- Document Schedule for Routine General Health Checkups for Berangir Plantation Unit employees/i made by the Plantation Personnel Asst and POM Administrative and Personnel Asst on August 29, 2022. Based on the results of document verification it is known that the management unit has scheduled the implementation of health checks in stages over the period September 2022 – September 2023.

Based on the results of document verification, it is known that there is information on the implementation date of the implementation of the health check which is not continuous and the management unit has not been able to inform the results of the implementation of the general health check. Furthermore, there is still the auditor's response to the description of root cause identification, correction and corrective action.

Based on the description above, it can be concluded that the discrepancy in this indicator has not been fulfilled.

Verification on November 7, 2022

Companies can show documents:

- The results of the general health examination contained in document No. POLK/BER/32/IV/2022 dated 12 April 2022. The document informs that 378 workers have received the "HEALTHY" status.
- Document Letter No. BER/SE/42/VIII/2022 concerning Mechanism of Health Examination for Employees/I of Berangir Estate dated 30 August 2022.
- Appointment of Health Monitoring Officer, Letter No. Ber/Kpts/.../VIII/2022 dated 30 August 2022
- Monitoring document for the implementation of medical examinations in 2023, in which the company has planned clearly related to the implementation of monitoring of health examinations in 2023 which is prepared in order to ensure that the health examination activities can run as they should.
- Monitoring document for the 2022 P2K3 work program and planning for its evaluation in 2023 to see its effectiveness.
- P2K3 program documents for 2021 and evaluation results in 2022 along with evaluation results so that periodic health checks that cannot be carried out in 2021 will be carried out in 2022.

Based on the verification results mentioned above, to ensure non-conformities do not recur, the management unit establishes a monitoring system that aims to monitor the effectiveness of health inspection activities. Therefore, it can be concluded that the discrepancy in this indicator has been fulfilled and will be observed in the next audit activity.

Follow up on next audit *(filled by auditor):*

Auditor Recertification Verification

Based on verification on Recertification, the company shows the Berangir Estate Employee Inspection Report on June 21, 2023 with a total of 343 workers and Berangir PKS 109 workers and for *PKWT* workers as many as 48 workers carried out on July 4, 2023.

Verified by : Briyogi Shadiwa / Rizki Tanaya

NCR No.	:	2022.2	Issued by	:	Rindu Galih Rezza Rachmansyah/ Afiffudin
Date Issued	:	9 August 2022	Time Limit	:	Recertification/11 October 2023 (Recommends 19 September 2023)
NC Grade	:	Minor to raise Major	Date of Closing	:	4 October 2023
Standard Ref. & Requirement	:	6.2.7 Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.			
Evidence observed (filled by auditor)					
<ul style="list-style-type: none">Based on the results of field observations and interviews with harvesters at Block 03AB Afdeling 4 and Block 13CC Afdeling 6, it was found that there are still 3 harvesters who are still contract workers (<i>PKWT</i>) in Afdeling 4 and 3 people in Afdeling 6 who have been working since 2021/2022.Based on the results of the review of the labor list document for the period of July 2022, it is known that currently the company still has 44 workers with contract workers (<i>PKWT</i>) status who work in Afdeling 1-6 and have been working since July 2021 and February 2022.The company can also show a work agreement between contract workers (<i>PKWT</i>) and the company for 3 people in Afdeling 4 and 3 people in Afdeling 6. For example work agreement no. BER/S.Perj/41/VIII/2022 and No. BER/S.Perj/40/VIII/2022 dated 02 August 2022 which is valid for 3 months (31 October 2022).The company has a Board of Directors Regulation of PT Perkebunan Nusantara III (Parent Company of PT Perkebunan Nusantara IV) No. HES/PER/05/2019 dated March 22, 2019 regarding Guidelines for Recruitment of Employees at PT Perkebunan Nusantara III and its Subsidiaries, where in Chapter IV concerning the Implementation of Acceptance of contract workers (<i>PKWT</i>) in article 15 it is explained that this contract workers (<i>PKWT</i>) is made for certain jobs according to the type and nature or activity the work will be completed in a certain time such as:<ul style="list-style-type: none">❖ Jobs that are once completed or temporary in nature.❖ Seasonal work.❖ Work related to new products/activities or additional products.❖ Work that is expected to be completed in a not too long time.Harvesting work is a permanent job, this is because the criteria for harvesting work are included in the explanation of permanent work in Law no. 13 of 2003 (explanation of article 59 paragraph 2) where it reads <i>"pekerjaan yang sifatnya terus menerus, tidak terputus-putus, tidak dibatasi waktu dan merupakan bagian dari suatu proses produksi dalam satu perusahaan atau pekerjaan yang bukan musiman."</i>In Government Regulation No. 35 of 2021 on the contract workers (<i>PKWT</i>) section explains that contract workers (<i>PKWT</i>) cannot be held for work that is permanent and contract workers (<i>PKWT</i>) can be held based on a period of time (work that is not completed for too long, seasonal work, work related to new products) or the completion of a particular job (work that once completed and temporary work).					
Non-Conformance Description (filled by auditor):					
The company has not been able to prove that the application of the use of workers (<i>PKWT</i>) is in accordance with company procedures and government regulations related to the types of work that can use <i>PKWT</i> (seasonal or temporary work).					

Root Cause Analysis (filled by organization audited):

There has been no approval for the appointment of employees by the *perkebunan nusantara* holding in June 2023, while PTPN IV wrote to the holding department in March 2023, the approval letter was received by PTPN IV on June 12 2023, so that during the approval process PTPN IV uses *PKWT* to meet needs.

Correction (filled by organization audited):

Write to the HR Department by the planning and sustainability department regarding the follow-up to the DSDM letter /N.IV/1730/2023 dated 12 June 2023.

Corrective Action (filled by organization audited):

- Sending Recruitment Schedule from Follow-up letter DSDM.N.IV /1730/2023 dated June 12 from the HR department
- Sending the Contract to the Permanent Employee recruitment implementation committee

Assessor Evaluation and Conclusion (filled by auditor):

-

Follow up on next audit (filled by auditor):
Auditor Verification on 13 July 2023

- Based on the results of a review of the labor list documents for the period June 2023, it is known that currently the certification unit still has 49 workers with *PKWT* status (the number of workers has increased from the previous audit activity [ASA-4] with a total of 44 people).
- The certification unit shows a document on labor requirements for the 2023 period as stated in Letter Number DSDM/N.IV/1730/2023 dated 12 June 2023 regarding Response to the Proposed Application for Recruitment of Implementing Employees for 2023. This document explains that Berangir Estate - PTPN IV has a need for harvesters as many as 219 people with actual workers of 181 people with *KS* status (Self Employees/Permanent Employees) and 49 people with *PKWT* status so there is a shortage of 38 people.
- The unit of certification shows a Specific Time Employment Agreement, for example:
 - Work agreement letter for peak harvest number BER/S.Perj/25/II/2022 with the initials ZDP. The work agreement letter explains, among other things, that the first party intends to employ the second party as *PKWT* workers with the type of harvest work. The term of the agreement is from 1 February – 30 April 2022.
 - Work agreement letter for peak harvest number BER/S.Perj/97/IV/2023 with the initials JR. The work agreement letter explains, among other things, that the first party intends to employ the second party as *PKWT* workers with the type of harvest work. The term of the agreement is from 1 April – 30 June 2023. The worker renews his work contract from the previous year, namely work agreement letter for peak harvest number BER/S.Perj/26/II/2022 with a period of 1 February – 30 April 2022.
- As a result of interviews with management and SPBUN representatives, information was obtained that the certification unit already had an appointment program for *PKWT* harvest workers. This is in line with Letter Number DSDM/N.IV/1730/2023 dated 12 June 2023 regarding Response to the Proposal for Recruitment of Implementing Employees for 2023. It is known that the appointment program for 38 harvest *PKWT* people will be implemented until 2025 with the following details:
 - 18 people in 2023. However, the company has not been able to show proof of the appointment of these 18 people.
 - 10 people in 2024.

- 10 people by 2025.

Until the RC assessment is carried out, the certification unit cannot show sufficient basic evidence that the use of *PKWT* for harvest labor is in accordance with the requirements of applicable laws and regulations. Apart from that, the root of the problem, correction and corrective action to fulfill non-conformities are also not acceptable. Thus, the discrepancy in this indicator **has not been met and its status has become Major**.

Auditor Verification on 5 September 2023:

The company has filled in the root cause analysis, correction and corrective action but no evidence of improvement has been shown. So the discrepancy in indicator 6.2.7 **has not been met**.

Auditor Verification 4 October 2023:

The company has shown evidence of improvement in the form of:

- Letter Number 04.03/04.07/eM-808/IX/2023 dated 11 September 2023 regarding the Process for Appointing *PKWT* Employees to Permanent Employees in 2023. The letter explains that company representatives (planning and sustainability section) have written to the head of HR to request related information progress of appointing *PKWT* to permanent employees.
- Letter number 04.07/KOL/eM-2698/IX/2023 dated 14 September 2023 regarding the Implementation of Employee Recruitment for the Position of Harvester. The letter is a response from the HR department to company representatives (Director, SEVP Business Support, SEVP Operation II and SEVP Operation I) explaining that the total quota for permanent employee recruitment for harvester positions in 2023 is 604 people, consisting of a quota for 2023 of 580 people and The remaining quota for 2022 is 24 people. The recruitment and selection process for permanent employees will be carried out by an independent professional institution. The attachment to the letter also explains that the Berangir unit is included in the quota of 580 people. This letter was also approved by the Director, SEVP Op 1, SEVP Op 2, and SEVP BS.
- Based on the results of interviews with management representatives, information was obtained that recruitment of permanent employees for harvester positions with a total quota of 604 people is a requirement for all PTPN IV units, where the quota for permanent employees for harvester positions in the Berangir plantation unit is 38 people. The source also stated that the company would prioritize *PKWT* harvest workers in the Berangir plantation unit to take part in the permanent employee recruitment process.

Based on the evidence of improvement that has been shown, the discrepancy in **this indicator is declared as complied and will be observed again regarding the use of *PKWT* harvest labor in the next assessment**.

Verified by	:	Affudin
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3.4.2 Identification of Non-conformity at Recertification

NCR No.	: 2023.01	Issued by	: Afiffudin
Date Issued	: 13 July 2023	Time Limit	: ASA 1.1
NC Grade	: Minor	Date of Closing	: 5 September 2023
Standard Ref. & Requirement	1.1.2 Information is provided in appropriate languages and accessible to relevant stakeholders		
Evidence observed (filled by auditor): <ul style="list-style-type: none">• The results of interviews with the Department of Labor and Industry of North Labuhanbatu Regency obtained information that the unit of certification had never reported the use of <i>PKWT</i> workers during 2022 and 2023.• Based on the results of the document review, it is known that:<ul style="list-style-type: none">- In the manpower document for the June 2023 period, there are 49 <i>PKWT</i> harvest workers. Then, the unit of certification shows a Specific Time Work Agreement, for example:<ul style="list-style-type: none">▪ Peak-Crop Harvest Work Agreement Letter Number BER/S.Perj/45/II/2022 with the initials PI who was accepted to work from 1 February – 30 April 2022.▪ Peak-Crop Harvest Work Agreement Letter Number BER/S.Perj/97/IV/2023 with the initials JR who was accepted to work starting April 1 – June 30 2023. The worker renews the work contract from the previous year, namely Peak-Crop Harvest Work Agreement Letter Number BER/S.Perj/ 26/II/2022 with a period of 1 February – 30 April 2022.- Reporting on the use of <i>PKWT</i> workers to UPT Labor Inspection Region IV of the North Sumatra Province Manpower Office for the period May 2021, it is known that 11 non-harvest <i>PKWT</i> workers were reported.- In Article 14 of Government Regulation no. 35 of 2021 explains that:<ol style="list-style-type: none">1) The <i>PKWT</i> must be registered by the entrepreneur at the ministry that administers government affairs in the field of manpower online no later than 3 (three) days after signing the <i>PKWT</i>.2) In the event that <i>PKWT</i> registration online is not yet available, the <i>PKWT</i> registration shall be carried out by the entrepreneur in writing at the agency that administers government affairs in the district/city manpower sector, no later than 7 (seven) days from the signing of the <i>PKWT</i>.			
However, the unit of certification has not been able to show <i>PKWT</i> workforce reporting for the latest periods in 2022 and 2023.			
Non-Conformance Description (filled by auditor): <p>The unit of certification has not been able to show evidence of information related to <i>PKWT</i> workforce reporting for the latest periods in 2022 and 2023 to the Department of Manpower.</p>			
Root Cause Analysis (filled by organization audited): <p>A PIC already exists, namely the Human Resources/Estate Personnel Assistant section, but the implementation of reports is not routinely monitored.</p>			
Correction (filled by organization audited): <p>Send proof of reporting and receipt from the Labuhan Batu Utara district employment and industry office.</p>			
Corrective Action (filled by organization audited): <p>Create a reporting monitoring timeline to the department.</p>			

Assessor Evaluation and Conclusion <i>(filled by auditor):</i>	
Auditor Verification 5 September 2023: The company shows some evidence of improvement, including:: <ul style="list-style-type: none"> • Letter Number Ber / PKWT harvests and 11 outsourced employees (non-harvest). • Cover Letter Number BER/04/07/SPS/VII/2023 which explains that the recording of the use of PKWT workers has been received by the Regional IV Labor Inspection UPT Disnaker North Sumatra Province on August 2nd, 2023. • Monitoring Reports to Local Services related to RSPO and ISPO for plantation units and Berangir Mill in 2023 which were approved by the plantation personnel assistant on 24 July 2023. The document explains the timeline for monitoring reporting to local agencies, for example reporting PKWT records and other reporting. <p>Based on the description above, it can be concluded that the nonconformity is states complied and will be observed again in the next assessment.</p>	
Follow up on next audit <i>(filled by auditor):</i>	
Verified by	: Afiffudin

NCR No.	: 2023.02	Issued by	: Rahmat Abdiansyah
Date Issued	: 13 July 2023	Time Limit	: ASA 1.1
NC Grade	: Minor	Date of Closing	: 16 September 2023
Standard Ref. & Requirement	2.1.3 Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries		
Evidence observed <i>(filled by auditor):</i> <ul style="list-style-type: none"> • The SOP for Maintenance of HGU Boundary Markings SPO Number 12 dated 02 January 2015 No. Revision 03 explains that one of the management of the boundary stakes is to carry out maintenance of the boundary markers and the surrounding area so that the boundary markers can be seen clearly, and the position of the stakes must be in accordance with the HGU Map and Every six months the Afdeling Assistant monitors the boundary markers by checking the physical condition or state of the markers. • Based on the results of a field visit to Boundary Stakes No. 142, 143 and 144 in Block 05 BG Afdeling V it is known that the condition of the stakes does not have a stake number. • In the previous assessment (ASA 4) it was found that the number of stakes had become an Opportunity for Improvement (OFI) and the company had planned to improve the condition of several stakes based on a letter from the Berangir unit manager No.: BER/04.01/eM-145/VIII/2022. However, the OFI is still found in the Recertification assessment. 			
Non-Conformance Description <i>(filled by auditor):</i> The Company has not been able to show evidence that the HGU Stake Treatment/Maintenance is in accordance with the letter from the Berangir unit manager No.: BER/04.01/eM-145/VIII/2022 and its SOP.			
Root Cause Analysis <i>(filled by organization audited):</i> The personnel in the field do not yet understand SPO 12 dated 2 January 2015 rev 03 regarding monitoring			

boundary benchmarks.	
Correction <i>(filled by organization audited):</i>	
<ul style="list-style-type: none"> • Send inspection documentation and numbering of boundary benchmarks for all divisions • Write a letter to the legal assets department regarding repairs to boundary markers that are damaged or missing 	
Corrective Action <i>(filled by organization audited):</i>	
<ul style="list-style-type: none"> • Send monitoring/timeline for boundary benchmark improvements • Providing training to officers/PICs, especially assistants, regarding boundary benchmark monitoring procedures 	
Assessor Evaluation and Conclusion <i>(filled by auditor):</i>	
<p>Auditor Verification on September 3, 2023 The company has sent proof of improvement in the form of root cause analysis, correction and corrective action. However, there are still several improvements that the company must prove in accordance with the auditor's comments. Thus, the non-conformity in this indicator is declared Not Fulfilled.</p> <p>Auditor Verification Date September 16, 2023 The company has sent proof of improvements in the form of:</p> <ul style="list-style-type: none"> • Letter from the Manager with Number BER/04.01/31/IX/2023 to the Asset Legal section regarding improvements to the HGU boundary benchmarks. • Documentation of improvements to HGU stakes, for example Numbers 141, 142, 143, 144 which were carried out on 30 August 2023. • The timeline for monitoring and repairing HGU boundary benchmarks is set on August 30 2023. From this timeline it is known that activities for repairing HGU boundary benchmarks will be carried out in September 2023 – February 2024. • Minutes of monitoring results and identification of HGU boundary markers on 06 September 2023 with details of 189 HGU boundary markers missing/damaged. • Minutes of training and socialization on the maintenance of HGU boundary markers which was held on September 5 2023, which was attended by 15 participants from Field Assistants and general staff. <p>Based on evidence of improvement provided by the company, the discrepancy in this indicator is declared to be fulfilled and will be re-observed in the next assessment.</p>	
Follow up on next audit <i>(filled by auditor):</i>	
Verified by	: Rahmat Abdiansyah

NCR No.	: 2023.03	Issued by	: Rizki Tanaya
Date Issued	: 13 July 2023	Time Limit	: 11 October 2023
NC Grade	: Major	Date of Closing	: 14 September 2023
Standard Ref. & Requirement	3.6.1 All operational activities are assessed for risk to identify OHS problems. Mitigation plans and procedures are documented and implemented.		
Evidence observed (filled by auditor): The company has a Plantation Management System Policy approved by the Manager in January 2023, which			

regulates, among other things, prioritizing OSH in all aspects of work in order to prevent and reduce accidents and occupational illness by implementing OHS Management System.

The company has HIRAC Documents for plantations which were approved on 06 June 2023 and HIRAC Documents for factories which were approved on 23 July 2022 which were prepared by the Risk Management Team and approved by the Estate/Mill Manager. In the HIRAC document, the company has not identified the hazards and risks of several activities (but not limited to) as follows:

Estate

1. Harvest on a slope
2. Harvest in lowly areas
3. House rinse
4. Housing
5. Activities after sending FFB to Mill.

Mill

1. Receipt of FFB at postal security
2. FFB Transport Contractor Driver Activities
3. Activities in the Sorting area
4. WWTP installation management
5. Activities at the CPO Despatch station.

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

Based on the explanation above, it is concluded that the company has not been able to show evidence that all operational activities in the field have been assessed for risk to identify K3 problems in accordance with the Plantation Management System Policy they have.

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

The understanding of new PIC or General OHS Expert does not yet understand the implementation of HIRAC which is carried out comprehensively in every aspect of activities

Correction *(filled by organization audited):*

Due to the understanding of new PIC or General OHS Expert, Retraining is carried out and supporting Correction documents are sent:

1. Evaluation of New General OHS Expert Training
2. Monitoring the OHS Program which includes HIRAC evaluations every month

Corrective Action *(filled by organization audited):*

There will be HIRAC Training and Evaluation in 2023 for the irrigated Estate which are contained in the BER document - 3.6.1 RSPO follow-up 36120230914_11305677

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

Auditor Verification August 30, 2023

The company shows evidence of improvement, including:

1. Occupational Safety and Health Risk Management Form HIRAC Form with review date 31 July 2023.
2. Minutes of K3 Socialization and Consultation dated 24 July 2023 regarding the HIRAC Training agenda with 3 participants.
3. HIRAC Evaluation for 2023 Berangir POM

Auditor Verification September 14, 2023

The company shows evidence of improvement, including:

1. Occupational Safety and Health Risk Management Form HIRAC Form with review date 14 August 2023
2. Minutes of K3 Socialization and Consultation dated 02 August 2023 regarding the HIRAC Training agenda with 14 participants.
3. 2023 HIRAC Evaluation of Berangir Estate

Conclusion September 14, 2023

Based on the comments above, it is concluded that the nonconformity is stated to be met and will be verified again during the next assessment.

Follow up on next audit (filled by auditor):

Verified by : Rizki Tanaya

NCR No.	: 2023.04	Issued by	: Afiffudin
Date Issued	: 13 July 2023	Time Limit	: 11 October 2023
NC Grade	: Major	Date of Closing	: 19 September 2023
Standard Ref. & Requirement	6.2.2 Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed		
Evidence observed (filled by auditor): <ul style="list-style-type: none">The unit of certification shows Circular Letter Number BER/SE/43/VII/2023 issued on 13 July 2023 concerning the Inspection Mechanism for the Use of Uncommitted Labor. The document explains, among other things:<ul style="list-style-type: none">All workers including vendor workers are required to have a work agreement with the vendor.The main foreman supervises the use of labor without a work agreement (familycup) every day and for the supervision of work agreements for vendor workers is carried out every 3 (three) months by carrying out direct inspections in the field.If there are still employees who still use labor without an agreement (family cup), the worker will be given a letter of warning and the assisting staff they use must be sent home and if after being given a warning letter the worker still uses auxiliary workers, the worker will be told to go home and not be hired until the worker makes a written commitment not to reuse auxiliary workers who do not have work ties with the company or vendor.Based on the results of interviews and field visits to Block 00K, Afdeling I, it was obtained information that the harvester with the initials AGH was carrying out harvesting work and was assisted by his wife with the initials RES for the locomotion work. However, the worker's wife is not a worker in the company.Based on the results of interviews with management representatives, it is known that the unit of certification routinely conducts outreach regarding the prohibition of quoting brondol/family helper workers to harvest workers. But the evidence of socialization has also not been shown.Government Regulation No. 35 of 2021 concerning PKWT, Outsourcing, Working Time and Rest Time and Termination of Employment, among other things, explains that:<ul style="list-style-type: none">Article 2 paragraph 1 states that the employment relationship occurs because of an employment agreement between the entrepreneur and the worker/labourer.Article 2 paragraph 4 states that work agreements are made for a specified or unspecified time.			
Non-Conformance Description (filled by auditor): <p>Based on the above evidence, it can be concluded that there are still workers who carry out company operational activities without having an agreed work relationship/agreement and this is not in accordance with the applicable laws and regulations.</p>			
Root Cause Analysis (filled by organization audited):			

Inconsistent checks by the foreman/field administration in monitoring the family cup.

Correction *(filled by organization audited):*

1. Carry out daily monitoring of workers regarding labor aspects
2. Send proof of socialization to employees, their wives and spiritual partners in all divisions
3. Send a warning letter to workers who use family cup power.

Corrective Action *(filled by organization audited):*

1. Providing understanding back to the foreman and field administration by division assistants to supervise workers regarding work contracts for vendor and family cup workers.
2. Issue special policies issued by managers.

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

Auditor Verification on 5 September 2023:

The company has filled in the root of the problem, corrections and corrective actions but no evidence of improvement has been shown. So the discrepancy in indicator 6.2.2 **has not been closed**.

Verification Auditor on 19 September 2023:

The company shows evidence of improvement, namely as follows:

- Memo number BER/M-87/VIII/2023 dated 2 August 2023 addressed to the division assistant regarding compliance with company policies, SOPs and government regulations for employees and vendors at Berangir Estate. In the document, it is explained that the afdeling assistant carries out supervision regarding compliance with policies, SOPs and regulations for workers, such as the use of labor without a work agreement (family cup) which is carried out every day and supervision of vendor workers is carried out every 3 months by conducting direct inspections in the field.
- Socialization of the mechanism for using labor without work bonds which was carried out on March 15th, April 17th, May 16th, July 12th and July 27th, 2023, and was attended by 163 workers consisting of managers, assistant principals, personnel and KTU assistants, department assistants, workers and vendor representative.
- Minutes of the socialization of the mechanism for the use of labor without work contracts on 13 July 2023, one of which notes the supervision of the use of labor without work agreements (family cup). If there are still workers who use auxiliary workers (familycup), then the workers will be given a warning letter and the auxiliary workers they use must be sent home. If, after being given a warning letter, the worker still uses auxiliary personnel, the worker is sent home and not employed until a written commitment is made not to use auxiliary personnel again without a work agreement with the company or vendor.
- Letter number Afd I/P/01/VII/2023 dated 11 July 2023 which explains the warning and dismissal (suspension) of workers for violating company regulations, namely bringing family members (familycup) to help with work picking up loose nuts.
- Statement letter from the harvester with the initials AGH dated July 11th, 2023, stating the worker's commitment not to bring family members (family cup) when working/carrying out harvest activities. Apart from that, workers are also willing to be given firm action by the company, namely being absent (suspension).
- The results of monitoring/supervision carried out by divisional assistants during July 2023 show that there were no workers who brought family members (family cup) to help with their work.

Based on the explanation above, the discrepancies in this indicator is **declared as complied and will be observed**

again regarding the use of assisted labor (family cup) in the next assessment.

Follow up on next audit *(filled by auditor)*:

Verified by : Afiffudin

NCR No.	: 2023.05	Issued by	: Rizki Tanaya
Date Issued	: 07 July 2023	Time Limit	: ASA 1.1
NC Grade	: Minor	Date of Closing	: 14 September 2023
Standard Ref. & Requirement	6.7.2 Emergency response and work accident procedures are available in Indonesian which are clearly understood by all workers. There are workers assigned to the field and other work locations and have received First Aid (P3K) training. A first aid kit is available at the workplace. Records of all work accidents are kept and periodically reviewed.		
Evidence observed (filled by auditor):			
<ul style="list-style-type: none">Permenakertrans No. 15 of 2008 concerning first aid, among other things, regulates the contents of first aid kits, the need for first aid kits compared to the number of workers, and the number of first aid kits based on distance. In article 10 paragraph c Placement of first aid kits point 3 "in the case of a workplace with a work unit 500 meters or more away each work unit must provide a first aid kit according to the number of workers/laborers and in Appendix II it is explained that for 100 workers or less with contents First aid kits include: wrapped sterile gauze, bandages (5cm wide), bandages (10cm wide), plaster (1.25cm wide), quick tape, cotton, triangular/mittela cloth, scissors, safety pins, disposable gloves, masks, tweezers, flashlight, eye wash cup, clean plastic bag, Aquades (100 ml saline sol), Providon Iodine, 70% alcohol, first aid manual at work and note book listing the contents of the box.The company has an OHS Policy issued at the Berangir Estate on January 2023 at PTPN IV which has been signed by SP Bun and the Estate Manager explaining one of the points as follows: No.5 Ensuring that the Occupational Safety and Health Management System is complied with and implemented in accordance with established policies and procedures as well as work instructions.SOP for Management and Storage of Chemicals No SPO 23 revision 02 dated 02 January 2018, in the procedure in point 6.3.3 K3 facilities and emergency handling must be prepared in accordance with hazard identification, risk assessment and control measures (HIRAC) and used accordingly (safety equipment/PPE, tools and materials to handle spills and spills, fire exthinguisher, first aid, hand washing and eye wash facilities) and point 6.3.4 Any unauthorized worker is prohibited from entering the chemical or pesticide storage warehouse and any worker who enters the warehouse must wear the required PPE.Statement letter from PT Prima Medica Nusantara Pabatu Hospital Unit on July 4 2023 which explains that the recommendation for the contents of the first aid kit in the building refers to Permenaker regulation No. 15 of 2008 and for the provision of activities in the field is 15 items (Betadine, alcohol 70 %, scissors, plaster, safety pins, distilled water, bandages, gauze, cotton, tweezers and eye drops). Also informed was a letter from the Polibun regarding the contents of the first aid kit in engineering and processing work referring to Permenakertran number 15 of 2008, totaling 21 items.			
Based on field observations at POM, it is known that:			
<ul style="list-style-type: none">There is water injection and eucalyptus oil in the first aid kit, which is not included in the contents of the first aid kit according to the Polybund Letter for the contents of the first aid kit at the machine station referring to Permenaker number 15 of 2008.			

- The results of the interviews revealed that the workers in the first aid box area did not understand the contents and functions of the first aid they brought
- TPS LB3 has a first aid kit, but the equipment is not in accordance with Permenakertran number 15 of 2008, as many as 21 items and there is no record of their use.

The results of field observations at the Berangir Estate show that:

- The contents of the first aid bag in the Block 05X Afdeling III harvest area were incomplete (only 4 quick plasters) and there was water injection that was not in accordance with Permenakertran number 15 of 2008 and there was no record of its use.
- In Warehouse chemical, there are eye showers and body showers but they don't work as they should,
- In the manuring Warehouse area, there is a fire exthinguisher tube placement which is obstructed by piles of fertilizer and there are no eye showers and body showers in the manuring Warehouse area.
- The results of the interview revealed that the officers carrying the first aid kit did not understand the contents and functions of the first aid kit they were carrying.

Non-Conformance Description (filled by auditor):

The company has not been able to prove that the emergency response facilities and the provision of first aid facilities in the work area are not in accordance with the applicable policies, procedures and regulations and that the contents of the first aid kit are not all in accordance with Permenakertran number 15 of 2008.

Root Cause Analysis (filled by organization audited):

- Sending proof that the first aid kit is in accordance with *Permenakertrans* No. 15 of 2008 and complete first aid bags for field workers in accordance with regulations.
- Providing eye shower and body shower facilities in the Hazardous Material (Chemicals) warehouse.
- Providing eye shower and body shower facilities and improving the position of fire extinguishers in the fertilizer warehouse.

Correction (filled by organization audited):

- Sending proof that the first aid kit is in accordance with *Permenakertrans* No. 15 of 2008 and complete first aid bags for field workers in accordance with regulations.
- Providing eye shower and body shower facilities in the Hazardous Material (Chemicals) warehouse.
- Providing eye shower and body shower facilities and improving the position of fire extinguishers in the fertilizer warehouse.

Corrective Action (filled by organization audited):

- Send proof of training to *P2K3* Officers in the field by General OHS experts regarding the contents and functions of first aid kit.
- Monitor the completeness of the contents of waist bags and first aid kits by *P2K3* officers.

Assessor Evaluation and Conclusion (filled by auditor):

Auditor Verification August 30, 2023

The company shows evidence of improvement, including:

1. Complete list of contents of the first aid box at Hazardous Waste Storage and machine room, updated on July 25 2023.
2. Minutes of OHS Consultation dated 22 August 2023 regarding the First Aid training agenda with 9 participants from Berangir POM
3. Monthly First Aid Medicine Inspection Form for 2023 Berangir POM.

Auditor Verification September 14, 2023

The company shows evidence of improvement, including:

1. Complete First Aid Waist Bag on September 12 2023.
2. Completeness of the Table of Contents of First Aid Boxes in the Hazardous Material Warehouse and Fertilizer Warehouse, updated on September 12 2023.
3. Recommended contents of the first aid kit and waist bag from PT Prima Medica Nusantara Pabatu Hospital unit on 04 July 2023.

4. First aid socialization on 28 July 2023 with 7 participants from Berangir Estate.
5. 2023 Monthly First Aid Medicine Inspection Form for the Berangir Estate unit.
6. Documentation of Eye Showers and Body Showers in the Hazardous Material Warehouse and Documentation of Eye Showers, Body Showers and Fire Extinguisher in the Berangir Estate Fertilizer Warehouse.

Conclusion September 14, 2023

Based on the comments above, it is concluded that the nonconformity is stated to be met and will be verified again during the next assessment.

Follow up on next audit *(filled by auditor):*

Verified by : Rizki Tanaya

NCR No.	: 2023.06	Issued by	: Rizki Tanaya
Date Issued	: 13 July 2023	Time Limit	: 11 October 2023
NC Grade	: Major	Date of Closing	: 14 September 2023
Standard Ref. & Requirement	6.7.3 Workers use appropriate Personal Protective Equipment (PPE), which is provided free of charge to all workers at the workplace, as protection in all potentially hazardous operations, such as pesticide application, machine operation, land preparation and harvesting. Sanitation facilities are available for workers who use pesticides so that workers can remove PPE, clean themselves and put on their personal clothes.		
Evidence observed (filled by auditor): <ul style="list-style-type: none">The company has a Plantation Management System Policy which was approved by the Main Director in January 2022, which regulates, among other things, prioritizing OSH in all aspects of work in order to prevent and reduce accidents and occupational illness by implementing OHS Management System. It has also been arranged for the provision of the necessary resources in the preparation, implementation and continuous improvement.SOP for Management and Storage of Chemicals No. SPO 23 revision 02 dated 02 January 2018, in the procedure in point 6.3.4. Any unauthorized worker is prohibited from entering the warehouse for storing chemicals or pesticides and every worker who enters the warehouse must wear the required PPE.SOP of PTPN IV Basic Guidelines and Work Instructions Number 04.04/KS/TAN/P/007 revision 1 dated 24 February 2020 at point 5.2.5 it is explained that for Harvesting activities are PPE Boots, Helmets, T-shirt Gloves, Goggles, <i>dodos</i> sarongs and egrek sheathThe 2023 PPE Matrix for Estate, Factories and Districts in the Position of PPE Harvesters include: Gloves T-shirt No.4, Helmet Safety Face Shield, Egrek Sarongs, Ax Gloves and BootsHIRAC Documents for estates approved on 06 June 2023 and HIRAC Documents for mills approved on 23 July 2022 prepared by the Risk Management Team and approved by the Estate/Factory Manager. The HIRAC document describes the PPE standards for each station or activity.The PTPN IV PPE matrix for the Berangir plantation determined by the management found that the types of boots used were safety boots (with iron protectors) and safety shoes for workers at mill and safety boots for work in the plantations.			
Based on field observations and interviews at Berangir Mill, it is known that: <ul style="list-style-type: none">There were 5 drivers from the FFB Transport Contractor who did not wear safety shoes while in the mill operational area. (weighing area)There are workers from building contractors who do not use helmets when carrying out work in the PKS operational area. (area near the Security Post)			

- There are Wheel Loader operators who do not use Helmet PPE when operating heavy equipment at the PKS.
- The unsafe action when unloading FFB in the sorting area does not use safety helmet PPE and wear sandals by the FFB Transport Driver.

Observations and interviews with workers at the Berangir Plantation show that:

- There is 1 harvester in Block 00K Afdeling I wearing a helmet but not using eye protection PPE. (face shield)
- There are 3 harvesters in Block 05X Afdeling III wearing helmets but not using eye protection PPE. (face shield)
- There is 1 harvester in Block 05BT Afdeling V not wearing a helmet.
- There were 3 FFB loading workers from the FFB transport contractor in Block 04A Afdeling I did not use PPE helmets and shoes when carrying out the work of loading FFB.
- In the Hazardous Warehouse, activities in the Hazardous Warehouse do not use the appropriate PPE.

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

Based on this, it is known that there are still workers who use PPE that are not in accordance with the PPE matrix and are not provided free of charge by the company.

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

Lack of understanding and consistency of workers regarding the mechanism for using PPE

Correction *(filled by organization audited):*

- Documentation of the provision of PPE by the Vendor to the FFB transport truck driver
- Sending documentation of POM checking by POM security guards to workers, especially FFB truck drivers when entering FFB
- Send documentation and PPE checking forms to building contractor workers working near security posts
- Documentation of PPE usage for Wheel Loader officers
- Send proof of use of PPE for harvesters in divisions I and 3, especially the use of helmets with safety face shields
- Documentation of PPE for Contractor FFB loaders
- Documentation of the provision of PPE for Warehouse Officers

Corrective Action *(filled by organization audited):*

- Provide socialization of the mechanism for using PPE to plantation contractor workers, especially to FFB drivers and loaders, harvester employees and fertilizer warehouse officers
- Providing socialization on the mechanism for using PPE to POM contractor workers and POM workers, especially Hazardous Material Warehouse officers, Hazardous Waste Storage.
- Send monitoring of POM and plantation workers' use of PPE
- Issue a policy letter regarding PPE monitoring officers as well as sanctions for workers who do not wear PPE for plantations and POM

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

Auditor Verification August 30, 2023

The company shows evidence of improvement, including:

1. Documentation of FFB Truck Driver PPE Inspection at POM Berangir Security Post on July 26 2023
2. Monitoring the use of PPE Berangir POM Unit in August 2023
3. Documentation of Berangir POM Building Contractor's use of PPE on August 18 2023
4. Documentation for the Berangir POM Wheel Loader Operator dated July 24 2023
5. Documentation of Provision of PPE to Hazardous Material Warehouse and Hazardous Waste Storage Officers on 18 August 2023
6. Minutes of K3 Socialization and Consultation dated 25 August 2023 with the agenda of the PPE Use Mechanism.
7. Documentation of PPE Socialization to Berangir POM Contractors/Vendors 25 August 2023.
8. Minutes of K3 Socialization and Consultation dated 18 August 2023 with the agenda of Mechanisms for the Use of PPE

9. Decree of the Berangir POM Manager Number PKS.BER/M/Kpts/01/VIII/2023 concerning Field Officers in Monitoring the Use of Berangir POM PPE dated 21 August 2023.
10. Letter from the Manager of Berangir POM Number PKS.BER/SE/01/VII/2023 dated 24 July 2023 regarding Sanctions for Employees Not Wearing PPE which will take effect at the beginning of August 2023.

Auditor Verification September 14, 2023
The company shows evidence of improvement, including:

1. Policy for Fulfillment of Law Regulations and SOPs for Berangir Estate Vendors/Contractors Number BER/SE/71/VIII/2023 dated 07 August 2023
2. Minutes of Socialization on the Use of Personal Protective Equipment on 07 August 2023 in Afdeling 1 to VI and Warehouse
3. Berangir Estate Manager Memo Number BER/M-87/VIII/2023 dated 02 August 2023 regarding Compliance with Company Policies, SOPs and Government Regulations for Berangir Estate employees and vendors.
4. Mechanism for Replacing and Using Personal Protective Equipment for Workers Number BER/SE/41/VII/2023 dated 27 July 2023.
5. Monitoring the use of personal protective equipment in the Afdeling Berangir Estate Unit from 1 to 6 for the period August 2023.

Conclusion September 14, 2023

Based on the comments above, it is concluded that the nonconformity is stated to be met and will be verified again during the next assessment.

Follow up on next audit *(filled by auditor):*

Verified by : Rizki Tanaya

NCR No.	: 2023.07	Issued by	: Rahmat Abdiansyah/Dinda Febrima Napitupulu
Date Issued	: 13 July 2023	Time Limit	: ASA 1.1
NC Grade	: Minor	Date of Closing	: 30 August 2023
Standard Ref. & Requirement	: 7.3.1 Waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.		
Evidence observed (filled by auditor):			
<u>Domestic waste:</u>			
<ul style="list-style-type: none">SOP for Household Domestic Waste Management No. SPO 20 dated 02 January 2015 No. revision 02 section 5.4 Waste Management: Each employee collects his waste in the bins provided and cleans the yard around the housing. Garbage disposal by sorting organic and inorganic waste.Observations to Berangir POM employee housing, there was burnt waste beside the employee's house and the other employee was burning the trash.Observation to Berangir Estate employee housing in Afdeling V, domestic waste is not stored to the provided bin, they burn the trash instead.Observation to EBA in Berangir POM, domestic waste is mixed up with the empty bunch.			
<u>Palm Oil Mill Waste:</u>			
<ul style="list-style-type: none">SPO Utilization of Palm Oil Mill Waste No. SPO 17 No. revision 02 on 2nd January 2015 Section 5.1 Empty fruit bunches produced from palm oil mills must be managed properly to protect the surrounding environment.Based on the results of field observations at the Berangir POM, it was found leachate in a few spots around EBA which is not managed properly.			

Non-Conformance Description (filled by auditor):

The company has not been able to show evidence that the waste management carried out is in accordance with their SOP.

Root Cause Analysis (filled by organization audited):

There is no PIC for monitoring the implementation of domestic waste management in estate and POM.

Correction (filled by organization audited):

- Create a schedule for cleaning and managing domestic waste in estate and POM
- Clean the EBA which has domestic waste around the empty bunch and leachate

Corrective Action (filled by organization audited):

- Conduct socialization to employee in estate and POM regarding domestic waste management
- Appoint the PIC for monitoring domestic waste in estate and POM

Assessor Evaluation and Conclusion (filled by auditor):
Verification on 30 August 2023:

The company has identified the root cause analysis, correction, and corrective action for the NC description. The company also send NC evidence such as:

- The decree of Appointed PIC for Domestic Waste Management and Monitoring.
- Documentation of domestic waste cleaning in employee housing.
- Domestic waste cleaning schedule.
- Minutes of Meeting of the socialization on domestic waste to the employee.

Based on the explanation, it can be concluded that the company has proper action regarding the NC, therefore the NC is stated closed and will be verify again in the next audit.

Follow up on next audit (filled by auditor):

Verified by : Dinda Febrima Napitupulu

NCR No.	:	2023.08	Issued by	:	Rahmat Abdiansyah
Date Issued	:	13 July 2023	Time Limit	:	11 October 2023
NC Grade	:	Major	Date of Closing	:	05 October 2023
Standard Ref. & Requirement	:	RSPO Certification System 2020 Clause 5.5.2 Time Bound Plan			
Evidence observed (filled by auditor):					
<p>The company shows the Time Bound Plan for all management subsidiary units of PT Perkebunan Nusantara III which have been updated in 2022 where there are several Uncertified Units (41 Units) that are planned to be certified past 30 June 2023. Based on the 2020 RSPO Certification System clause 5.5.2 it is known that the exclusion period outside the maximum period of the Time Bound Plan must be approved by the RSPO Secretariat. Based on the announcement for the Time Bound Plan from RSPO on 21 December 2021, RSPO members must be certified no later than 5 years starting from the effective RSPO Certification System from 1 July 2018 (until 30 June 2023). However, until this audit is completed, the company has not been able to show evidence that the Time Bound Plan for several uncertified units (exceeding 30 June 2023) has received approval from the RSPO.</p>					
Non-Conformance Description (filled by auditor):					

The company has not been able to provide evidence that the Time Bound Plan for several uncertified units (exceeding 30 June 2023) has received approval from the RSPO.	
Root Cause Analysis <i>(filled by organization audited):</i>	
The 2023 TBP has not yet been sent by the PIC of PTPN IV's planning and sustainability section to the Indonesian plantation holding to report the TBP to the RSPO.	
Correction <i>(filled by organization audited):</i>	
<ul style="list-style-type: none"> • Send PTPN IV TBP 2023 documents submitted to the Plantation Holding as well as proof of document submission on July 12 2023 • Send proof of screen shoot. Send back TBP repairs on August 21 2023 • Send Screen Shoot Evidence of RSPO Review results for improvements to PTPN XIII certification year on 29 August 2023 	
Corrective Action <i>(filled by organization audited):</i>	
Sending proof of reporting to the RSPO regarding plantation holding TBP to RSPO Certification	
Assessor Evaluation and Conclusion <i>(filled by auditor):</i>	
Auditor Verification September 3, 2023	
The company has sent proof of improvements in the form of:	
<ul style="list-style-type: none"> • Proof of sending TBP to RSPO on 21 August 2023. • Proof of sending the revised TBP from the results of the review carried out by the RSPO and sent back on 29 August 2023. • Root problem, correction, and corrective action. However, there are still auditor comments regarding the TBP excel file sent to the RSPO and proof of TBP approval from the RSPO. • Based on proof of improvement sent by the company, the non-conformity was declared not yet fulfilled. 	
Auditor Verification Date 05 October 2023	
The company can show evidence of improvement as follows:	
<ul style="list-style-type: none"> • PT Perkebunan Nusantara III TBP document in excel file format. In this document, it is known that uncertified units under PT Perkebunan Nusantara III members are planned to be certified in 2023-2026. The document has been approved by the RSPO. • Email Approval of TBP Holding Perkebunan Nusantara PTPN III (Persero) in 2023 from certification@rspo.org on 22 September 2023 which stated that the RSPO Secretariat agreed with the proposed new timeline for certification under PTPN III (PERSERO) Holding Perkebunan. 	
Based on this evidence, the discrepancies in this indicator are declared to have been fulfilled.	
Follow up on next audit <i>(filled by auditor):</i>	
Verified by	: Rahmat Abdiansyah

1.1. Opportunity for Improvement

No	Ref.	Description
1	6.2.4	<p>The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p> <p>Companies have the opportunity to ensure that the realization of rehabilitation/renovation and the construction of permanent housing for workers can proceed according to a predetermined plan.</p>
2	6.7.1	<p>Person in charge of Occupational Safety and Health (K3) is identified. Records of periodic meetings between the person in charge and the workers are available. The interests of all parties regarding safety, health and welfare were discussed at the meeting. Any issues that arise are recorded.</p> <p>The company showed a letter of change in the composition of the P2K3 management with number BER/X/74/VII/2023 dated July 3, 2023 to the UPT Labor Inspection Region IV, the Manpower Office of North Sumatra Province regarding the approval of the P2K3 management. The OHS Committee secretary for Estate unit namely R.S.E (initial), who is a General OHS Expert, regarding the appointment letter as AK3U and the company's General K3 Expert shows a Certificate from PJK3 PT Safindo Raya stating that on behalf of R.S.E (initial), has followed training on July 5 – 17, 2023 but for Licensing, OHS Expert appointment certificate (SKP) and General K3 Expert Certificate are in the process of being issued from the Ministry of Manpower of the Republic of Indonesia. This creates an opportunity for improvement for the company to ensure that changes to the Composition of the P2K3 Management have been approved by the North Sumatra Provincial Manpower Office and the General K3 Expert as P2K3 Secretary has obtained a License, OHS Expert appointment certificate (SKP) and General K3 Expert Certificate.</p>

3.5 Summary of Arising Issues from Public and Auditor Verification



Public Issues (Institution/ NGO/Community)	Auditor Verification
Village representative: Pasang Lela Head Village & Perkebunan Berangir Village <ol style="list-style-type: none"> 1. Receive qurban cattle from the company as CSR program. 2. No land dispute with villagers. 3. Socialize HCV area through signboard. 4. No environmental issue with company. 	<p>In general, there are no negative issues that need further clarification.</p>
Environmental Agency of Labuhanbatu Utara Regency: Head Office <ol style="list-style-type: none"> 1. The certification unit has a Temporary Hazardous Waste Storage and have been approved by Labuhanbatu Utara Regency. 2. Hazardous Waste management activities carried out by storing hazardous waste in licensed hazardous waste storage and transported have permission by KLH. Quarterly management reporting to relevant agencies. 3. The certification unit has POME disposal permit to surface water. 4. The certification unit has tested the quality of mill wastewater per month and reported the results of testing to Environmental Agency Labuhanbatu Utara Regency per quarter. 5. The certification unit has conducted POME quality testing per quarterly and reports the results of testing to Environmental Agency Labuhanbatu Utara Regency. 6. The certification unit has conducted noise, vibration and noise testing and reported the results of testing to Environmental Agency Labuhanbatu Utara Regency per semester. 7. The certification unit has reported Hazardous waste (balance and manifest) management to Environmental Agency Labuhanbatu Utara Regency per quarter. 8. The certification unit has sent the <i>RKLI/RPL</i> implementation report to Environmental Agency of Labuhanbatu Utara Regency periodically. 9. There have not been any issues and reports from other parties regarding the negative impacts on the environment due to the management operational activity. 	<p>Based on the interview with The Environmental Agency, there is no environmental issue arise and confirmed by field observation.</p>
Land Office of Labuhanbatu Utara Regency: Head of Dispute Control and Handling Section <ul style="list-style-type: none"> • There are no additions related to land use permits and location permits. • Company has a good relationship with National Land Agency. • There are no problems related to land conflicts and dispute which has been reported to National Land Agency. • Company has routinely reported its report of land utilization to National Land Agency. 	<p>In general, there are no negative issues that need further clarification</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> Communication between company and National Land Agency works well. 	
<p>CV Kurnia Mitra Mandiri (FFB Supplier) Interviewee: Director</p> <ul style="list-style-type: none"> The purchase agreement mentioned by the FFB supplier is valid for a year. FFB supplier already has a cooperation agreement with company which is still valid today. FFB prices are updated daily via <i>WhatsApp</i> every day. FFB suppliers have complied with provisions in agreement with the company including OSH (PPE) and employment obligations (<i>BPJS</i> and minimum wages). There were no complaints while working with company. No payment issue with the company. 	<p>In general, there are no negative issues that need further clarification</p>
<p>Ministry of Labor and Industry at Labuhanbatu Utara Regency Head of Sub-coordinator of Work Requirements Administration and Industrial Relations Mediator July 11th, 2023</p> <ul style="list-style-type: none"> Agencies routinely conduct visits to certification units at least once a year to carry out supervision of the employment system. The last visit was in semester 2 of 2022. The company provides PPE for workers and there have been no fatal work accidents in the past year. The unit of certification has paid wages to employees according to applicable regulations, namely the North Sumatera Provincial Minimum Wage. The unit of certification has provided health and employment insurance for all employees, namely <i>BPJS Ketenagakerjaan</i> and <i>BPJS Kesehatan</i>. The unit of certification already has a CLA, labor union and bipartite organization that has been approved by the agency. There are no issues of discrimination, child labour, forced labor and sexual harassment in the unit of certification. There are no reports related to industrial relations or mediation cases that are being resolved at the agency. The service has never received a report regarding the use of workers with <i>PKWT</i> status in the certification unit during 2022 and 2023. So, the service advises the certification unit to be more open about information in reporting if there is use of <i>PKWT</i> workers. 	<p>Regarding matters that need further verification, related to reporting on the use of <i>PKWT</i> workers, this has been conveyed in a related indicator, namely in indicator 1.1.2.</p>
<p>Plantation Sector of Agriculture Service at Labuhanbatu Utara Regency Head of Seeds and Plantation Protection July 11th, 2023</p>	

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> The plantation business assessment has done in 2022. In general, unit of certification has routinely submitted mandatory reports, such as Plantation Business Development Report. There were no negative issues from the community around the unit of certification regarding disturbances caused by the unit of certification's operational activities. The unit of certification already has adequate fire prevention and control facilities and infrastructure, in addition there is no history of fire incidents in the unit of certification's concession area in the last 1 year. Regularly reporting on land fires and CSR. Communication between agency and unit of certification has been well established. 	<p>There are no issues that need to be verified further, all information obtained from the results of the interviews has been submitted to the relevant indicators.</p>
<p>Gender Committee Head of Gender Committee July 11th, 2023</p> <p>Based on interviews, information was obtained that the realization of the work program of the gender committee in 2022 had been carried out such as, socialization regarding sexual harassment and the flow of complaints.</p> <p>Over the past year, there have been no issues related to gender, discrimination, harassment, violence or serious violations of reproductive rights in the corporate environment. At present it is certain that no workers who work with chemicals are pregnant or breastfeeding women, this is because the company has its own policy regarding the prohibition for pregnant or breastfeeding women workers to work in jobs related to chemicals. In addition, female workers are also entitled to menstrual leave and maternity leave.</p>	<p>There are no issues that need to be verified further, all information obtained from the results of the interviews has been submitted to the relevant indicators.</p>
<p>Labor Union (SPBUN) Member of <i>LKS</i> Bipartite July 11th, 2023</p> <ul style="list-style-type: none"> Labor Union have been registered in the Ministry of Labor and Industry at Labuhanbatu Utara Regency. Internal meetings of SPBUN or bipartite meetings (between the unit of certification and the union) have been documented in the minutes of meeting document. The implementation of payroll is in accordance with the determination of the minimum wage in North Sumatera Province in 2022 and 2023. Payment of salaries has been in accordance with the specified time and through the bank transfer. Unit of certification has included all of its workers in the <i>BPJS Ketenagakerjaan</i> and <i>BPJS Kesehatan</i> programs, including <i>PKWT</i> employees. 	<p>Regarding matters that need further verification, this has been conveyed in related indicators, such as:</p> <ul style="list-style-type: none"> Workers with <i>PKWT</i> status are described in indicator 6.2.7. Employee housing conditions are described in indicator 6.2.4.

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> Until the audit was carried out, there were still 48 harvest workers with <i>PKWT</i> status. The SPBUN representative added advice to the certification unit to immediately designate the <i>PKWT</i> workers as a permanent worker. In the last year there were no complaints regarding forced labor, child labor, discrimination or sexual harassment/violence. The resource person also added advice to the management of the certification unit to pay more attention to the eligibility conditions of employee housing area and immediately carry out renovations to the condition of the house, drainage and others. 	
<p>PT Aidil Putra Perdana (FFB Supplier and FFB Transportation) Head of Operational Contractor/Supplier July 11th, 2023</p> <ul style="list-style-type: none"> The form of cooperation between the contractor and the unit of certification is the transportation of FFB to all plantation units and the suppliers of FFB. The company routinely conducts outreach to contractors regarding compliance with regulations and policies that apply within the company such as implementing OHS while working, fulfilling labor rights, environmental management and others. The socialization is carried out at least once a year. These provisions are also stated in the work agreement letter. The contractor has provided BPJS and PPE for the workers. The contractor has also paid wages according to the minimum wage provisions in force in North Sumatera Province and provided other benefits, such as premium and rice allowance. While working with the company, the contractor said that he had no complaints. The cooperation and communication that has been established so far has been quite good. 	<p>There are no issues that need to be verified further, all information obtained from the results of the interviews has been submitted to the relevant indicators.</p>
<p>PT Karyawan Nusantara Jaya (Labor Service Provider/Outsourcing) HR of PT KNJ July 12th, 2023</p> <ul style="list-style-type: none"> The form of cooperation between the contractor and the unit of certification is the labor service provider The company routinely conducts outreach to contractors regarding compliance with regulations and policies that apply within the company such as implementing OHS while working, fulfilling labor rights, environmental management and others. The socialization is carried out at least once a year. These provisions are also stated in the work agreement letter. The contractor has provided BPJS and PPE for the workers 	<p>There are no issues that need to be verified further, all information obtained from the results of the interviews has been submitted to the relevant indicators.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> The contractor has also paid wages according to the minimum wage provisions in force in North Sumatera Province and provided other benefits, such as premium and rice allowance. While working with the company, the contractor said that he had no complaints. The cooperation and communication that has been established so far has been quite good 	
<p>PT Wahana Adidaya Pertiwi (CPO Transportation) Communicator between driver of CPO transport with PT WAP management July 12th, 2023</p> <ul style="list-style-type: none"> The form of cooperation between the contractor and the unit of certification is the transportation of CPO The company routinely conducts outreach to contractors regarding compliance with regulations and policies that apply within the company such as implementing OHS while working, fulfilling labor rights, environmental management and others. The socialization is carried out at least once a year. These provisions are also stated in the work agreement letter. The contractor has provided BPJS and PPE for the workers The contractor has also paid wages according to the minimum wage provisions in force in North Sumatera Province and provided other benefits, such as premium and rice allowance. While working with the company, the contractor said that he had no complaints. The cooperation and communication that has been established so far has been quite good. 	<p>There are no issues that need to be verified further, all information obtained from the results of the interviews has been submitted to the relevant indicators.</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Here under sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Perkebunan Nusantara IV Management Representative</p>  <p>Pirgok Panggabean Thursday, 05 October 2023</p> </div> <div style="text-align: center;"> <p>PT Mutuagung Lestari Tbk Lead Auditor</p>  <p>Rahmat Abdiansyah Thursday, 05 October 2023</p> </div> </div>

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
1.	Land Office	Labuhanbatu Utara Regency	-	Via phone	11 th July 2023	✓	
2.	Environmental Agency	Labuhanbatu Utara Regency	-	Direct interview	12 th July 2023	✓	
3.	Pasang Lela Village	Labuhanbatu Utara Regency	-	Via phone	11 th July 2023	✓	
4.	CV Kurnia Mitra Mandiri	Labuhanbatu Utara Regency	-	Via phone	12 th July 2023	✓	
5.	Ministry of Labor and Industry	Labuhanbatu Utara Regency	-	Via phone	11 th July 2023	✓	
6.	Plantation Sector of Agriculture Service	Labuhanbatu Utara Regency	-	Via phone	11 th July 2023	✓	
7.	Labor Union (SPBUN)	PTPN IV - Labuhanbatu Utara Regency	-	Direct interview	11 th July 2023	✓	
8.	Gender Committee	PTPN IV - Labuhanbatu Utara Regency	-	Direct interview	11 th July 2023	✓	
9.	PT Aidil Putra Perdana	Labuhanbatu Utara Regency	-	Via phone	11 th July 2023	✓	
10.	PT Karyawan Nusantara Jaya	Labuhanbatu Utara Regency	-	Via phone	12 th July 2023	✓	
11.	PT Wahana Adidaya Pertiwi	Labuhanbatu Utara Regency	-	Via phone	12 th July 2023	✓	
12.	Berangir POM: • 1 WWTP worker • 1 reservoir worker • 2 housing residents • 4 sortation officers • 1 engine room officers • 1 security officer • 2 weighbridge operators • 1 WTP operator • 2 warehouse officer	PTPN IV - Labuhanbatu Utara Regency	-	Direct interview	11 th July 2023	✓	
13.	Berangir Estate: • 12 harvesting workers • 1 pest census worker • 2 chemical and fertilizer warehouse officers	PTPN IV - Labuhanbatu Utara Regency	-	Direct interview	11 th July 2023	✓	

14.	World Wide Fund	-	wwf-indonesia@wwf.or.id	Via email	3 rd June 2023		✓
15.	Wahana Lingkungan Hidup Indonesia	-	informasi@walhi.or.id	Via email	3 rd June 2023		✓
16.	Sawit Watch	-	info@sawitwatch.or.id	Via email	3 rd June 2023		✓
17.	Aliansi Masyarakat Adat Nusantara	-	rumahaman@cbn.net.id	Via email	3 rd June 2023		✓

Appendix 2. Assessment Program

DATE	10 - 14 July 2023	
PLANNED TIME (WIB)	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 10 July 2023		
05.50 – 08.10	Jakarta → Medan (QG-910)	All Auditor
08.30 – 16.00	From the airport to the audit location	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, Management Representative PTPN IV
Tuesday, 11 July 2023		
08.00 – 12.00	<ul style="list-style-type: none"> Stakeholders' consultation to related agencies. Stakeholder consultation to affected communities surrounding the plantations, indigenous peoples, local communities, and previous land owners. Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Smallholders, Third Party Supplier (if any), local NGO (if any) 	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 16.30	Field observation to Berangir POM <ul style="list-style-type: none"> Supply Chain verification (FFB Receiving, Weighbridge) Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect, security post, FFB Sorting, Processing Activity, Despatch CPO) Implementation of Environmental aspect, Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond & land application 	AFF RAN RAB & DIN
16.30 – 17.00	submission of audit progress	All Auditor
Wednesday, 12 July 2023		
08.00 – 12.00	Field Observation to Berangir Estate <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 AFF RAN & DIN
12.00 – 14.00	Break	All Auditor
12.00 – 16.00	<ul style="list-style-type: none"> Document Verification Continuing stakeholder consultation (if anything was not done the previous day) 	All Auditor
16.00 – 17.00	submission of audit progress	All Auditor
Thursday, 13 July 2023		
08.00 – 12.00	<ul style="list-style-type: none"> Document Verification 	All Auditor

DATE	10 - 14 July 2023	
PLANNED TIME (WIB)	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
12.00 – 14.00	Break	All Auditor
14.00 – 15.30	Internal discussion by auditor team preparing for Closing Meeting	All Auditor
16.00 – 17.00	CLOSING MEETING <ul style="list-style-type: none"> • Presentation of audit findings (Noteworthy Positive Component, Non-Conformities, OFI, Timeline of CAR's, Conclusion) • Presentation of audit findings (Noteworthy Positive Component, Non-Conformities, OFI, Timeline of CAR's, Conclusion) 	All Auditor, Management Representative PTPN IV
18.00 – 24.00	From the audit location to the Medan	All Auditor
Friday, 14 July 2023		
10.30	Transit at Medan	All Auditor
10.30 – 12.55	Medan (KNO) – Jakarta (CGK) (GA-185)	All Auditor