

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (1\_3)
- Recertification Assessment (Choose an item.)
- Extension of Scope

<b>PT Socfin Indonesia (SOCFIN SA)</b>
Client company Address: JL KL.Yos Sudarso No.106 Medan 20115, Sumatera Utara - Indonesia
Certification Unit: <b>PT Socfin Indonesia – Negeri Lama Palm Oil Mill</b>
Location of Certification Unit: Desa Perkebunan Negeri Lama, Kecamatan Bilah Hilir, Kabupaten Labuhan Batu, Sumatera Utara 21471, Indonesia
Date of Final Report: 05/07/2022

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### Section 1: Scope of the Assessment

1. Company Details			
<b>Parent Company</b>	SOCFIN SA		
<b>RSPO Membership Number</b>	1-0269-19-000-00	<b>Membership Approval Date</b>	06/12/2004
<b>Address</b>	Jl. KL. Yos Sudarso No.106 Medan 20115, Sumatera Utara - Indonesia		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	PT Socfin Indonesia – Negeri Lama Palm Oil Mill		
<b>Location / Address</b>	Desa Perkebunan Negeri Lama, Kecamatan Bilah Hilir, Kabupaten Labuhan Batu, Sumatera Utara 21471, Indonesia		
<b>Website</b>	<a href="http://www.socfindo.co.id">www.socfindo.co.id</a>		
<b>Management Representative</b>	Andria Zulmanitra	<b>E-mail</b>	<a href="mailto:andria@socfindo.co.id">andria@socfindo.co.id</a>
<b>Telephone</b>	(061) 6616-066	<b>Facsimile</b>	(061) 6616-066

2. Certification Information			
<b>Certificate Number</b>	RSPO 705569	<b>Certificate Start Date</b>	10/03/2019
<b>Date of First Certification</b>	10/03/2014	<b>Certificate Expiry Date</b>	09/03/2024
<b>Scope of Certification</b>	Production of Palm Oil and Palm Kernel		
<b>Visit Objectives</b>	<ul style="list-style-type: none"> <li>Determination of the conformity and consistency implementation of Negeri Lama Palm Oil Mill and its supply bases against Indonesia National Interpretation 2020 for RSPO P&amp;C 2018 for the Production of Sustainable Palm Oil.</li> <li>Evaluation of the ability of the management system to ensure Negeri Lama Palm Oil Mill and its supply bases meets applicable statutory, regulatory and contractual requirements.</li> </ul>		
<b>Assessment Cycle</b>	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 1_3) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
<b>Applicable Standards / Normative Reference</b>	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input type="checkbox"/> Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
<b>Supply Chain Module</b>	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	<b>Mill Capacity</b>	12 MT/Hr
<b>ISH certification Phase</b>	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
BSI-ISPO 742429	Permentan 11/2015 (ISPO)	19 July 2021	18 July 2026

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Negeri Lama Palm Oil Mill	Desa Perkebunan Negeri Lama, Kecamatan Bilah Hilir, Kabupaten Labuhanbatu, Sumatera Utara 21471, Indonesia	2° 19' 02.00" N	100° 04' 13.00" E
Negeri Lama Estate	Desa Perkebunan Negeri Lama, Kecamatan Bilah Hilir, Kabupaten Labuhanbatu, Sumatera Utara 21471, Indonesia	2° 19' 02.00" N	100° 04' 13.00" E

Note:  
Mill and estate office are in the same location.

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Negeri Lama Estate	2,126.38	25.12	13.30	2,164.80	98.85
<b>Total</b>	<b>2,126.38</b>	<b>25.12</b>	<b>13.30</b>	<b>2,164.80</b>	<b>98.85</b>

6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Negeri Lama Estate	395.79	423.94	420.44	411	475.21	1,730.59	395.79
<b>Total (Ha)</b>	<b>395.79</b>	<b>423.94</b>	<b>420.44</b>	<b>411</b>	<b>475.21</b>	<b>1,730.59</b>	<b>395.79</b>

7. Summary of Certified Tonnage of FFB (Own Certified Scope)	
	Tonnage / year

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Estate / Smallholders	Estimated (Mar 2021 – Feb 2022)	Actual (Feb 2021 – Jan 2022)		Forecast (Mar 2022 - Feb 2023)
		Previous license period (Feb 2021)	Current license period (Mar 2021 – Jan 2022)	
Negeri Lama Estate	40,589.09	2,592.74	33,242.56	35,000
<b>Total</b>	<b>40,589.09</b>	<b>35,835.30</b>		<b>35,000</b>

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage / year			
	Estimated (Mar 2021 – Feb 2022)	Actual (Feb 2021 – Jan 2022)		Forecast (Mar 2022 - Feb 2023)
		Previous license period (Feb 2021)	Current license period (Mar 2021 – Jan 2022)	
NIL		NIL	NIL	
<b>Total</b>		<b>NIL</b>		

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage / year			
	Estimated (Mar 2021 – Feb 2022)	Actual (Feb 2021 – Jan 2022)		Forecast (Mar 2022 - Feb 2023)
		Previous license period (Feb 2021)	Current license period (Mar 2021 – Jan 2022)	
NIL	NIL	NIL	NIL	NIL
<b>Total</b>	<b>NIL</b>	<b>NIL</b>		<b>NIL</b>

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (MT)	Volume of FFB from uncertified supply base (MT)	Total FFB/Month (MT)
1	February 2021	2,592.74	-	2,592.74
2	March 2021	3,492.03	-	3,492.03
3	April 2021	3,267.57	-	3,267.57
4	May 2021	2,683.70	-	2,683.70
5	June 2021	2,981.61	-	2,981.61
6	July 2021	3,506.78	-	3,506.78
7	August 2021	3,527.97	-	3,527.97
8	September 2021	3,057.73	-	3,057.73
9	October 2021	2,770.79	-	2,770.79

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10	November 2021	2,827.07	-	2,827.07
11	December 2021	2,678.97	-	2,678.97
12	January 2022	2,448.34	-	2,448.34
<b>TOTAL</b>		<b>35,835.30</b>	<b>-</b>	<b>35,835.30</b>

<b>10. Summary of Certified Tonnage (not applicable for ISS)</b>			
<b>Estimated (Mar 2021 – Feb 2022)</b>	<b>Actual (Feb 2021 – Jan 2022)</b>		<b>Forecast (Mar 2022 - Feb 2023)</b>
	Previous license period (Feb 2021)	Current license period (Mar 2021 – Jan 2022)	
<b>FFB</b>	<b>FFB</b>		<b>FFB</b>
40,944.39 mt	2,592.74 mt	33,242.56 mt	35,000 mt
	35,835.30 mt		
<b>CPO (OER 23.00%)</b>	<b>CPO (OER 22.78%)</b>		<b>CPO (OER 23.00%)</b>
9,417.21 mt	590.68 mt	7,622.60 mt	8,050 mt
	8,213.28 mt		
<b>PK (KER 4.25%)</b>	<b>PK (KER 4.07%)</b>		<b>PK (KER 4.20%)</b>
1,740.14 mt	105.44 mt	1,363.48 mt	1,470 mt
	1,468.92 mt		

<b>10A. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (mt)</b>	<b>Certified PK (mt)</b>
1	February 2021	590.68	105.44
2	March 2021	805.33	146.98
3	April 2021	745.50	140.19
4	May 2021	618.98	118.06
5	June 2021	665.96	114.65
6	July 2021	775.16	139.21
7	August 2021	839.86	151.62
8	September 2021	708.59	132.14
9	October 2021	639.96	104.60
10	November 2021	642.67	115.73
11	December 2021	636.92	105.64
12	January 2022	543.67	94.66
<b>TOTAL</b>		<b>8,213.28</b>	<b>1,468.92</b>

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<b>11. Summary of Actual Volume sold</b>					
<b>Current License period (Mar 2021 – Jan 2022)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>CPO (MT)</b>	7,351.61	0	0	0	7,351.61
<b>PK (MT)</b>	1,315.00	0	0	0	1,315.00
<b>Credits</b>	0	0	0	0	0
<b>Previous License period (February 2021)</b>					
<b>CPO (MT)</b>	724	0	0	0	724
<b>PK (MT)</b>	141	0	0	0	141
<b>Credits</b>	0	0	0	0	0

**Note:** Conventional is RSPO certified material but sold as non-RSPO.

<b>11A. Records of Certified CPO &amp; PK Sold under PalmTrace since the last audit (if any)</b>				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	PT Multimas Nabati Asahan	RSPO_PO1000001250	724	141
2	PT Multimas Nabati Asahan	RSPO_PO1000001250	7,351.61	1,225.00
3	PT. DOMAS SAWIT INTI PERDANA	RSPO_PO1000001250	-	90
<b>TOTAL</b>			<b>8,075.61</b>	<b>1,456.00</b>

<b>11B. Records of CPO &amp; PK Sold under other schemes since the last audit (if any)</b>				
No.	Buyers Name	Scheme Name	CPO Sold (MT)	PK Sold (MT)
	NIL	NIL	NIL	NIL
<b>TOTAL</b>			<b>NIL</b>	<b>NIL</b>

<b>11C. Records of CPO &amp; PK Sold as conventional since the last audit (if any)</b>			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
	NIL	NIL	NIL
<b>TOTAL</b>		<b>NIL</b>	<b>NIL</b>

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11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (MT)
	NIL	NIL	NIL
<b>TOTAL</b>			<b>NIL</b>

12. Independent Smallholders Certified Tonnage / Volume									
Phase	Estimated last year (Not applicable)			Actual (Not applicable)			Forecast (Not applicable)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB									
IS-CSPO									
IS-CSPKO									
IS-CSPKE									

13. Independent Smallholders Actual Sold Tonnage / Volume						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
<b>Current License period (Not applicable)</b>						
Credits						
Physical						
<b>Previous License period (Not applicable)</b>						
Credits						
Physical						

## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)  
Suite 29.01 Level 29, The Gardens North Tower,  
Mid Valley City, Lingkaran Syed Putra,  
59200 Kuala Lumpur, Malaysia.  
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639  
Representative: Nicholas Cheong ([Nicholas.Cheong@bsigroup.com](mailto:Nicholas.Cheong@bsigroup.com))  
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### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **8 – 11 February 2022**. The audit programme is included as Section 2.3.

The approach to the audit was to treat the mill and supply base as an RSPO Certification Unit. A range of occupational health and safety, environmental, best practice management, and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas, local communities engagement and workers welfare and safety.

The Critical NC close out on-site assessment was conducted on **27 April 2022**. The audit programs are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Indonesia National Interpretation 2020 of the RSPO P&C 201 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula  $N = (\sqrt{y}) \times (z)$  where y is the number of estates and where z is the multiplier defined by risk assessment. While, the sampling of smallholders were based on the formula  $(\sqrt{y}) \times (z)$ ; where y is total number of group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix E.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

The non-conformities for this audit are detailed in Section 3.3 and unless it is stated in this section, all previous nonconformities including minor nonconformities are remains closed.

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This report is structured to provide a summary of assessment finding as provided in Appendix A. The assessment was conducted based on risk based approach sampling and therefore nonconformities may exist.

For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer reviewer prior to certification decision by BSI.

For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

**The following table would be used to identify the locations to be audited each year in the 5 year cycle**

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Certification)</b>	<b>Year 2 (ASA 1)</b>	<b>Year 3 (ASA 2)</b>	<b>Year 4 (ASA 4)</b>	<b>Year 5 (ASA 5)</b>
Negeri Lama Palm Oil Mill	X	X	X	X	X
Negeri Lama Estate	X	X	X	X	X

**Tentative Date of Next Visit: February 6, 2023 - April 21, 2023**

**Total Number of Mandays: 9 mandays onsite**

**2.2 BSI Assessment Team**

<b>Name</b>	<b>Role</b>	<b>Competency</b>
Andi Pratama Pasaribu	Team Leader	<p><b>Education:</b> Holds a Bachelor Degree majoring Social Economy from Jember University</p> <p><b>Work Experience:</b> 5 years working experience as Field Agronomy Assistant. 8 years working experience as RSPO Auditor / Lead Auditor.</p> <p><b>Training attended:</b> Completed Indonesian Sustainable Palm Oil (ISPO) Lead Auditor training, Endorsed RSPO P&amp;C Lead Auditor course, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISO 9001:2008 Lead Auditor course, ISO 14001:2005 Lead Auditor course, ISO45001:2018 Lead Auditor Course, RSPO endorsed RSPO SCCS Lead Auditor course, SMETA requirements training</p> <p><b>Aspect Covered in This Audit:</b> During this assessment, he assessed legal, social and best management practices aspect.</p> <p><b>Language Proficiency:</b> He is fluent in English and Bahasa Indonesia.</p>
Yudwi Wisnu Rahmanto	Team Member	<p><b>Education:</b> Holds a Bachelor of Forestry with Silviculture background.</p> <p><b>Work Experience:</b> 7 months working experience in palm oil industry as Agronomy Field Assistant. 11 years working experience as sustainability auditor covering Sustainable Forest Management by FSC FM/COC Scheme, RSPO, ISPO, Coffee And Farmer Equity (C.A.F.E Practices) Starbucks, Organic Standard (EU, NOP, JAS) for Coffee Farmers and Organic Exchange for Textile</p> <p><b>Training attended:</b> Completed Endorsed RSPO P&amp;C Lead Auditor Training Course, RSPO NEXT, ISPO Auditor/Lead Auditor Course, RSPO P&amp;C Social and Labour Standards and the Mechanics of Social Auditing Training, SMETA Requirements Training, ISO 9001:2008 Auditor/Lead Auditor Course, GIS-Basic Mapping and Spatial Analysis, Timber Legality Assurance System</p>

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		<p>(SVLK), Verification Organization Training C.A.F.E Practices (Starbucks), UTZ Programme, High Conservation Value (HCV) Training, Sustainability Reporting Assurance Training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, RSPO ISH Standard Training Course and Endorsed RSPO Supply Chain Lead Auditor Training Course.</p> <p><b>Aspect covered in this audit:</b> Social, HCV, GHG Verification and Stakeholder Consultation.</p> <p><b>Language proficiency:</b> He is fluent in English and Bahasa Indonesia.</p>
Imam Fakhrurozi	Team Member	<p><b>Education:</b> Holds a Bachelor Degree majoring in Agriculture Technology from Gadjah Mada University.</p> <p><b>Work Experience:</b> 2 years working experience oil palm industry, as a sustainability and HSE officer. 7 years working experience as RSPO Auditor / Lead Auditor</p> <p><b>Training attended:</b> Completed ISO 9001:2008 Lead Auditor Course, 14001:2004 Lead Auditor Course, SMK3 Lead Auditor Course, Endorsed RSPO P&amp;C Lead auditor course, ISO 45001:2018 Lead Auditor Course, SMETAR requirements training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation</p> <p><b>Aspect covered in this audit:</b> Occupational Health and Safety, Environmental Aspect, Supply Chain.</p> <p><b>Language proficiency:</b> He is fluent in English and Bahasa Indonesia.</p>

**Accompanying Persons: NIL**

### 2.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment.

Date	Time	Subjects	AP	IF	YW
Tue, 08/02/2022	05.35 – 07.00	Flight Jakarta – Medan	√	√	√
	07.00 – 12.00	Travelling to Negeri Lama POM	√	√	√
Wed, 09/02/2022	08.00 - 08.30	Opening meeting <ul style="list-style-type: none"> <li>Auditee Speech (Introduction of PIC, Profile of Certified Management Unit)</li> <li>Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)</li> </ul>	√	√	√
	08.30 – 12.00	Field visit to <b>Negeri Lama Estate:</b> <ul style="list-style-type: none"> <li>Implementation of Agronomy Aspect</li> <li>Implementation of Environmental, Conservation and Waste Management Aspect</li> <li>Implementation of Occupational Health &amp; Safety Aspect</li> <li>Implementation of Legal Aspect and Land Rights</li> </ul>		√	√
	12.00 – 14.00	Lunch Break	√	√	√

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	14.00 – 17.00	Field visit to <b>Negeri Lama POM:</b> <ul style="list-style-type: none"> <li>• BMP for Mill Processing – site visit</li> <li>• Occupational Health &amp; Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, Processing Activities)</li> <li>• Implementation of Environmental and Waste Management Aspect (POME Pond, Empty Bunch Area, Reservoir/Intake Point, Biogas Plant – if any)</li> <li>• Supply Chain for CPO Mill (site visit) - FFB Receiving, Weighbridge, Dispatch CPO.</li> </ul>	√	√	√
Thu, 10/02/2022	08.00 – 12.00	<ul style="list-style-type: none"> <li>• Consultation with external stakeholders (government agencies in Rantau Prapat - Labuhan Batu District) by Phone</li> </ul>	√	√	√
	08.00 – 12.00	<b>Document Review Negeri Lama Estate and POM:</b> <ul style="list-style-type: none"> <li>• Legal &amp; Land Rights</li> <li>• Social and Transparency</li> <li>• Environmental, Waste Management &amp; HCV</li> <li>• Occupational Health &amp; Safety</li> <li>• Best Management Practices</li> <li>• Worker Welfare</li> <li>• Review of previous assessment findings.</li> </ul> <p>Consultation with internal stakeholder (labor union, gender committee etc) and external stakeholder (NGO's, local communities, contractor, previous landowner etc).</p>	√	√	√
	12.00 – 14.00	Lunch Break	√	√	√
	14.00 – 17.00	Document review continuation	√	√	√
Friday, 11/02/2022	08.00 – 12.00	Document review continuation	√	√	√
	12.00 – 14.00	Lunch Break	√	√	√
	15.00 – 16.00	Closing Meeting	√	√	√
Saturday, 12/02/2022	08.00 – 15.00	Traveling to Mata Pao POM	√	√	√

**NCR Close Out Assessment Plan**

Date	Time	Subjects	Auditor
Wed, 27/04/2022	08.00 - 08.30	Opening meeting <ul style="list-style-type: none"> <li>• Auditee Speech (Introduction of PIC, Profile of Certified Management Unit)</li> <li>• Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)</li> </ul>	<b>AP</b>
	08.30 – 09.30	NCR Verification	✓
	10.00 – 10.30	Closing Meeting	✓

*\*Note: due to covid19 pandemic issue, the auditor team conducted the NCR Close Out remotely to reduce risk.*

### Section 3: Assessment Findings

#### 3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	Yes. The timebound plan for Socfin SA have listed all estate and mill under their membership.	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	PT. Socfin Indonesia have been active members of RSPO since 6 December 2004. All management unit under the original PT. Socfin Indonesia Group has been RSPO certified. PT. Socfin Indonesia merge under Socfin SA since 15 February 2019 whereby grouping all Indonesian and African oil palm operations under one membership number. Socfin SA only becomes RSPO Member on 15 February 2019. Hence, 5 years period will be by 14 February 2024.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.	No. There is no new acquisition from last assessment.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	PT. Socfin Indonesia has been an active members of RSPO since 7 December 2004. Since 15 February 2019, Socfin SA became a member of RSPO, grouping all Indonesian and African oil palm operations under one membership number (No.1-0269-19-000-00). The parent company kept the membership date of PT. Socfin Indonesia due Article 5.6 – (i) of the RSPO Membership Rule 2016, which states that if any Related Entities (PT. Socfin Indonesia) hold a membership earlier than that of the Parent’s membership, then the Parent’s effective membership date shall change to follow that of the earliest membership date of the Related Entity. All subsidiaries except PT. Socfin Indonesia however are only members since 15 February 2019, and follow the RSPO membership rules with effect from 15 February 2019. Socfin SA only becomes RSPO Member on 15 February 2019. Hence, 5 years period will be by 14 February 2024.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required.	Yes. There is changes in the time bound plan in December 2021.	Complied

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<p>Is this consistent with the ACOP reporting?</p>	<p>The timebound plan changes reported because of pending LUCA review and RaCP review from RSPO Secretariat.</p> <p>SOCFIN SA demonstrates commitment to comply with RSPO P&amp;C certification system by submitting LUCA report, preparing Remediation and/or Compensation plan to RSPO Secretariat. SOCFIN SA demonstrate commitment to certify the uncertified management units. Since last audit, there have been 3 more management units undergo RSPO P&amp;C initial certification audit in September 2021.</p>	
<p>Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised</p>	<p>No. There is no isolated lapse in implementation of the plan.</p> <p>The uncertified units demonstrated effort to comply with RSPO requirement such as preparing SIA reports, continues stakeholder engagement, implement FPIC building blocks, record compensation progress, address and handles grievance and perform annual internal audit.</p>	<p>Complied</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised</p>	<p>No. There is no fundamental failure. The uncertified units demonstrated effort to comply with RSPO requirement such as preparing SIA reports, continues stakeholder engagement, implement FPIC building blocks, record compensation progress, address and handles grievance and perform annual internal audit.</p>	<p>Complied</p>
<p><b>Un-Certified Units or Holdings</b></p>		
<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&amp;C criterion 7.12.</p>	<p>Socfin SA have submitted LUCA for review of all uncertified unit to RSPO Secretariat on 13 December 2017. Later, Socfin SA submitted revision on 8 September 2018. The decision on replacement after 2005 for primary forest and/or area required to maintain or enhance HCV in accordance to RSPO P&amp;C criterion – awaiting LUCA review from RSPO.</p> <p>According to the RSPO RaCP tracker (<a href="https://www.rspo.org/certification/remediation-and-compensation/racp-tracker">https://www.rspo.org/certification/remediation-and-compensation/racp-tracker</a>), Socfin SA has:</p> <ul style="list-style-type: none"> <li>• MU's with potential liabilities: 9 unit</li> <li>• LUCA Submitted: 9 units</li> <li>• LUCA review Completed: 8 unit</li> <li>• Concept Note Required: 8 units</li> <li>• Concept Note Submitted: 3 units</li> <li>• Concept Note Approved: 3 units</li> <li>• Compensation Plan Submitted: 1 unit</li> <li>• Compensation Plan Endorsed: 1 unit</li> <li>• Remediation Plan Required: 8 units</li> <li>• Remediation Plan Submitted: 1 unit</li> </ul>	<p>Complied</p>

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	<ul style="list-style-type: none"> <li>• Remediation Plan Approved: -</li> </ul> <p>Latest update for Socapalm Kienke, LUCA approved on December 2021. Last update for PSG the LUCA for whole site not yet completed and the RaCP process take longer to get finalized.</p>	
<p>Any new plantings since January 1<sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>PT. Socfin Indonesia made New Planting Procedure Public Notification on 16 February 2017. After 30 days, there was no comment received by RSPO secretariat. Link <a href="https://www.rspo.org/certification/new_planting-procedure/public_consultations/socfin-group-pt-socfindo-and_socfinco-sa-pt-socfin-indonesia--lima-puluh_estate">https://www.rspo.org/certification/new_planting-procedure/public_consultations/socfin-group-pt-socfindo-and_socfinco-sa-pt-socfin-indonesia--lima-puluh_estate</a></p> <p>According to the RSPO RaCP tracker (<a href="https://www.rspo.org/certification/remediation-and-compensation/racp-tracker">https://www.rspo.org/certification/remediation-and-compensation/racp-tracker</a>) as per February 2022, Socfin SA has:</p> <ul style="list-style-type: none"> <li>• MU's with potential liabilities: 9 unit</li> <li>• LUCA Submitted: 9 units</li> <li>• LUCA review Completed: 8 unit</li> <li>• Concept Note Required: 8 units</li> <li>• Concept Note Submitted: 3 units</li> <li>• Concept Note Approved: 3 units</li> <li>• Compensation Plan Submitted: 1 unit</li> <li>• Compensation Plan Endorsed: 1 unit</li> <li>• Remediation Plan Required: 8 units</li> <li>• Remediation Plan Submitted: 1 unit</li> <li>• Remediation Plan Approved: -</li> </ul>	<p>Complied</p>
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&amp;C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>According to the RSPO RaCP tracker (<a href="https://www.rspo.org/certification/remediation-and-compensation/racp-tracker">https://www.rspo.org/certification/remediation-and-compensation/racp-tracker</a>) as per February 2022, Socfin SA has:</p> <ul style="list-style-type: none"> <li>• MU's with potential liabilities: 9 unit</li> <li>• LUCA Submitted: 9 units</li> <li>• LUCA review Completed: 8 unit</li> <li>• Concept Note Required: 8 units</li> <li>• Concept Note Submitted: 3 units</li> <li>• Concept Note Approved: 3 units</li> <li>• Compensation Plan Submitted: 1 unit</li> <li>• Compensation Plan Endorsed: 1 unit</li> <li>• Remediation Plan Required: 8 units</li> <li>• Remediation Plan Submitted: 1 unit</li> <li>• Remediation Plan Approved: -</li> </ul>	<p>Complied</p>

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<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&amp;C criterion 4.2</p>	<p>Based on audit and based on review upon RSPO Case Tracker (<a href="https://askrspo.force.com/Complaint/s/casetracker">https://askrspo.force.com/Complaint/s/casetracker</a>) as at February 2022, there is no labor dispute reported for Socfin SA and its subsidiary.</p> <p>Based on internal audit reports for uncertified unit, there is no labor dispute.</p>	<p>Complied</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&amp;C criteria 2.1</p>	<p>Based on audit and based on review upon RSPO Case Tracker (<a href="https://askrspo.force.com/Complaint/s/casetracker">https://askrspo.force.com/Complaint/s/casetracker</a>) as at February 2022, there is no legal non-compliance reported for Socfin SA and its subsidiary.</p> <p>Based on internal audit reports for uncertified unit, there is no legal non-compliance.</p>	<p>Complied</p>
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.</p>	<p>Yes. Socfin SA manages and monitors internal audit for uncertified management units. The internal audit covers RSPO P&amp;C 2018 (Generic) and relevant RSPO P&amp;C Certifications System June 2020. Internal audit reports covered RSPO P&amp;C criterion 2.1, 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12.</p> <ul style="list-style-type: none"> <li>- Internal audit for Agripalma (Sao Tome) carried out January 2021.</li> <li>- Internal audit for Brabanta SA (Democratic Republic of Congo) carried out April 2021.</li> <li>- Internal audit for Okomu Oil Palm Company PLC – Extension 1 (Nigeria) carried out February 2021.</li> <li>- Internal audit for Okomu Oil Palm Company PLC – Extension 1 (Nigeria) carried out December 2020.</li> <li>- Internal audit for Plantations Socfinaf Ghana (PSG) Manso and Subri Management Units (Ghana) carried out May 2021. Minor NC issued against 2.1 and prepared with corrective action.</li> <li>- Internal audit for SAFACAM TF151 (Cameroon) carried out June-July 2021.</li> <li>- Internal audit for Socapalm ESEKA (Cameroon) carried out June 2021.</li> <li>- Internal audit for Socapalm Kienke (Cameroon) carried out May-June 2021.</li> <li>- Internal audit for La Société des Caoutchoucs de Grand Béréby (SoGB) carried out August 2021.</li> </ul> <p>Positive assurance: Socfin SA committed to fulfil all the requirement related to RSPO certification process. Socfin SA has detailed the correction and corrective action plan and any unresolved issues has been on the right path towards the certification process.</p>	<p>Complied</p>

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<p>Are there any Critical (Major) non-compliance raised against any of the RSPO P&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?</p>	<p>Yes. The Critical (Major) non-compliance was issued related to RSPO P&amp;C criterion 7.12. The management units prepared corrective action in form of carried out HCV assessment and Land Use Change Analysis to RSPO Secretariat.</p> <ul style="list-style-type: none"> <li>- SAFACAM finalized an HCV assessment of their whole concession in January 2020, with the field visit happening in December 2018. Safacam submitted a LUCA for its full concession on the 5 August 2020 were replantings of plantings done before 2005. The LUCA was approved on the 4 of February 2021. RSPO finalized the review of the Annex 7 Concept Note on 12 May 2021 and it was validated by the compensation panel on the 16 of August 2021. SAFACAM is currently preparing the Annex 8.</li> <li>- SOGB finalized an HCV assessment in February 2020, with the field visit happening in November 2019. SOGB conducted a Land Use Change Analysis for its whole concession. This was first submitted on the 22 July 2020 and was approved by RSPO on the 6 October 2020. SOGB is now in the process of finalizing the Annex 8 Remediation Plan. It was last submitted to RSPO and the Compensation Panel on the 9 July 2021 for review.</li> </ul>	<p>Complied</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Yes. Stakeholder consultation carried out in uncertified management unit.</p> <p>Social Impact Assessment (SIA) report recorded the stakeholder consultation process for villages near Agripalma (Sao Tome): for Emolve village in 21 March 2011, Vila Clotilde in 15 March 2011, Ribeira Piexe in 15 March 2011, Monte Mario in 8 August 2011, Praia Pesqueira in 15 March 2011, Lo Grande in 15 March 2011, Healthcare NGO (AMI) in 28 February 2011, Women group in 14 March 2011,</p> <p>FPIC meeting in Safacam (Cameroon) for Chefferie de Dikola in 7 December 2010, for Chefferie de Koungue in 11 September 2011.</p>	<p>Complied</p>

**3.2 Progress of scheme smallholders and/or outgrowers**

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a</p>	<p>There is no scheme smallholder and/or scheme outgrowers supplying FFB to PT Socfin Indonesia – Negeri Lama POM.</p>	<p>Complied</p>

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major NC if this requirement is not met after three years.		
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**Approved Time Bound Plan**

Updated on 23 December 2021

No.	Name of Company	Name of Mill	Location	Supply Base	Timebound Plan	Remarks
1	PT. Socfin Indonesia	Seunagan Mill	Aceh Province, Indonesia	Seunagan Estate	Certified	Recertified on 30 Dec 2019
2	PT. Socfin Indonesia	Lae Butar Mill	Aceh Province, Indonesia	Lae Butar Estate	Certified	Recertified on 29 Feb 2020
3	PT. Socfin Indonesia	Aek Loba Mill	North Sumatera Province, Indonesia	Aek Loba Estate	Certified	Recertified on 14 Jul 2019
4	PT. Socfin Indonesia	Bangun Bandar Mill	North Sumatera Province, Indonesia	Bangun Bandar Estate	Certified	Recertified on 29 Dec 2019
5	PT. Socfin Indonesia	Sungai Liput Mill	Aceh Province, Indonesia	Sungai Liput Estate	Certified	Recertified on 4 Aug 2019
6	PT. Socfin Indonesia	Tanah Gambus Mill	North Sumatera Province, Indonesia	Tanah Gambus Estate	Certified	Recertified on 20 Dec 2019
7	PT. Socfin Indonesia	Negeri Lama Mill	North Sumatera Province, Indonesia	Negeri Lama Estate	Certified	Recertified on 10 Jun 2020
8	PT. Socfin Indonesia	Seumanyam Mill	Aceh Province, Indonesia	Seumanyam Estate	Certified	Recertified on 16 Jan 2020
9	PT. Socfin Indonesia	Mata Pao Mill	North Sumatera Province, Indonesia	Mata Pao Estate	Certified	Recertified on 25 Jul 2019
10	Okomu Oil Palm Company (PLC)	Okomu Mill	Nigeria	Main Estate	Certified	7 Jan 2020
			Nigeria	Extension 1 Estate	Quarter 4 of 2022	- LUCA status: LUCA for Extension 1 submitted 3 March 2021. Approved LUCA by RSPO on 22 June 2021. SOCFIN SA preparing to submit Annex 7 Concept Note.

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No.	Name of Company	Name of Mill	Location	Supply Base	Timebound Plan	Remarks
						<ul style="list-style-type: none"> <li>- LUCA status: LUCA for Extension 2 submitted in September 2021. Waiting RSPO approval.</li> <li>- There are no unresolved land or labour disputes.</li> <li>- There are no legal non-compliance.</li> </ul>
11	Okomu Oil Palm Company (PLC)	Okomu Oil Palm Company Extension 2 mill	Nigeria	Okomu Oil Palm Company Extension 2 Estate	Quarter 4 of 2022	<ul style="list-style-type: none"> <li>- LUCA status: LUCA for Extension 1 submitted 3 March 2021. Approved LUCA by RSPO on 22 June 2021. SOCFIN SA preparing to submit Annex 7 Concept Note.</li> <li>- LUCA status: LUCA for Extension 2 submitted in September 2021. Waiting RSPO approval.</li> <li>- There are no unresolved land or labour disputes.</li> <li>- There are no legal non-compliance.</li> </ul>
12	Safacam	Safacam Mill	Cameroon	Safacam TF129, TF136, TF180, TF, Bail Ossa	Certified	30 December 2020
13	Safacam	Safacam Mill	Cameroon	Safacam TF151, Safacam Provisional Concession	Quarter 4 of 2022	<ul style="list-style-type: none"> <li>- LUCA status: sent to RSPO for verification in August 2020. Approved LUCA by RSPO on 4 February 2021.</li> <li>- RaCP: RSPO finalized Annex 7 Concept Note in 12 May 2021. Annex 7 Concept Note validated by Compensation Panel 16 August 2021. SOCFIN SA preparing Annex 8</li> </ul>

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No.	Name of Company	Name of Mill	Location	Supply Base	Timebound Plan	Remarks
						<ul style="list-style-type: none"> <li>- There are no unresolved land or labour disputes.</li> <li>- There are no legal non-compliance.</li> </ul>
14	Socapalm	Mbongo Mill	Cameroon	Mbongo Estate	Certified	Certified on 2 November 2021
15	Socapalm	Mbambou Mill	Cameroon	Mbambou Estate	Certified	Certified on 7 December 2021
16	Socapalm	Kienke Mill	Cameroon	Kienke Estate	Quarter 1 of 2022	<ul style="list-style-type: none"> <li>- LUCA status: LUCA for Socapalm Kienke submitted 15 June 2020. Completed review by RSPO December 2021.</li> <li>- There are no unresolved land or labour disputes.</li> <li>- There are no legal non-compliance.</li> </ul>
17	Socapalm	Edea Mill	Cameroon	Edea Estate	Audited 9 September 2021	<ul style="list-style-type: none"> <li>- LUCA status: Not complete. Expected to be sent to RSPO for verification in Q1 2021.</li> <li>- There are no unresolved land or labour disputes.</li> <li>- There are no legal non-compliance.</li> </ul>
18	Socapalm	Dibombari Mill	Cameroon	Dibombari Estate	Audited 14 September 2021	<ul style="list-style-type: none"> <li>- LUCA status: Not required. All land clearing for oil palms was done before 2005.</li> <li>- There are no unresolved land or labour disputes.</li> <li>- There are no legal non-compliance.</li> </ul>
19	Socapalm	Eseka Mill	Cameroon	Eseka Estate	Certified	Certified 2 June 2021

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No.	Name of Company	Name of Mill	Location	Supply Base	Timebound Plan	Remarks
20	Brabanta	Brabanta Mill	Kasai Province and Mai-Ndombe Province, Democratic Republic of Congo	Sanga sanga, Kadima, and Kanangai Estate; Lumbundji and Savanah Estate	Audited 2 September 2021	<ul style="list-style-type: none"> <li>- LUCA status: LUCA for Brabanta submitted 26 July 2021. Waiting RSPO comment/ approval up to November 2021.</li> <li>- There are no unresolved land or labour disputes.</li> <li>- There are no legal non-compliance.</li> </ul>
21	Plantations Socfinaf Ghana (PSG)	PSG Mill	Western Region of Ghana	Subri Site; Manso Site	Quarter 4 of 2022	<ul style="list-style-type: none"> <li>- LUCA status: LUCA for PSG Manso MU submitted 26 May 2021. Waiting RSPO comment/ approval up to December 2021</li> <li>- Since starting operation, no land or labour disputes have been recorded. There are no legal non-compliance.</li> </ul>
22	La Societe des Caoutchoucs de Grand Bereby (SoGB)	SoGB Mill	Cote D'Ivoire	SoGB 1 Plantation	Certified 26 January 2021	<ul style="list-style-type: none"> <li>- LUCA status: Approved by RSPO.</li> <li>- There are no unresolved land or labour disputes.</li> <li>- There are no legal non-compliance.</li> </ul>
23	La Societe des Caoutchoucs de Grand Bereby (SoGB)	-	Cote D'Ivoire	SoGB 2 Plantation	Quarter 4 of 2022	<ul style="list-style-type: none"> <li>- LUCA status: LUCA for all SoGB submitted 22 July 2020. Approved LUCA by RSPO on 6 October 2020.</li> <li>- RaCP: SOCFIN SA submitted Annex 8 Remediation Plan on 9 July 2021. Waiting for review.</li> <li>- There are no unresolved land or labour disputes.</li> <li>- There are no legal non-compliance.</li> </ul>

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No.	Name of Company	Name of Mill	Location	Supply Base	Timebound Plan	Remarks
24	Socfin Agricultural Company (SL) LTF	SAC Mill	Sierra Leone	SAC Plantation	Certified	Certified on 20 December 2021
25	Agripalma	Agripalma Mill	Sao Tomé	Agripalma Estate (Titulo 409)	Certified	Certified on 26 October 2021
26	Agripalma	-	Sao Tomé	Agripalma Estate (Titulo 410)	Quarter 4 of 2022	<ul style="list-style-type: none"> <li>- LUCA status: LUCA for Titulo 410 submitted April 2020. 6 August 2021 respond to reviewer comment. Waiting RSPO comment/ approval up to December 2021</li> <li>- There are no unresolved land or labour disputes.</li> <li>- There are no legal non-compliance.</li> </ul>

**Management Note:** At this current stage, all certification progress is on schedule. However, the global impact of the COVID-19 pandemic is expected to affect certain parts of the certification progress, including audits, HCV assessment, LUCA and RaCP.

**3.3 Details of Nonconformities**

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A.

During this Assessment there were **1 (one)** Critical nonconformities raised. **The PT Socfin Indonesia – Negeri Lama POM** Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
<b>NCR Ref #</b>	2165185-202202-M1	<b>Date Issued</b>	11 February 2022
<b>Due Date</b>	12 May 2022	<b>Date of nonconformity Closure</b>	27 April 2022
<b>Clause &amp; Category (Critical / Minor)</b>	3.6.1 (Critical)		
<b>Statement of Nonconformity:</b>	The auditor team found any H&S issues such as found of 7 goats and 8 cows are around the POME pond have not been identified in the risk assessment (Doc no: Soc/Form/4.04-01), last updated on 20 January 2022.		
<b>Requirement Reference:</b>	(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.		
<b>Objective Evidence:</b>	PT Socfin Indonesia – Negeri Lama POM has demonstrated the document of risk assessment as per "Daftar Aspek Lingkungan, Keselamatan dan Kesehatan Kerja, no Dok: Soc/Form/4.04-01", last review on 20 January 2022. Based on field visit in POME Ponds (dated 10/02/2022), auditor team found any H&S issues such as found of 7 goats and 8 cows are around the POME pond. However, these H&S issues have not been identified in the risk assessment (Doc no: Soc/Form/4.04-01).		
<b>Corrections:</b>	POME pond officers and security escort incoming cows and goats out of the POME ponds areas. The mill chief met with the cattle owner and conducted a briefing on the prohibition of entering the POME ponds area.		
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>• Villager around the estate still use road access that passes through the POME ponds during flood conditions so that access is still not closed.</li> <li>• Cattle shepherds can enter the POME pond area because access is still open.</li> <li>• Cattle shepherds do not understand the dangers of being in the POME ponds area even though there is a warning sign on the location that prohibits herding livestock in the PT. Socfindo and warning signs about the danger of drowning.</li> <li>• There is no warning information to the surrounding community regarding the dangers of the POME ponds area and only officers are allowed to enter the restricted area.</li> <li>• The risk analysis document for the POME ponds area is available but does not explain in detail the risk identification and mitigation.</li> </ul>		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>• The mill chief held a meeting with the Village Head and his staff, which was attended by the Head of the Village and the cattle shepherds around the mill</li> </ul>		

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	<p>to agree on restrictions on access to the POME ponds pool by considering the needs of the company and the community.</p> <ul style="list-style-type: none"> <li>• Make a gate to cover the entrance and exit for cattle at the end of the last pond of POME and repair the gate near the empty hopper.</li> <li>• Sustainability department reviewing the POME ponds area risk analysis document from external activities and their control.</li> <li>• Installing a warning sign prohibiting access to the POME ponds area.</li> <li>• The POME ponds officer checks the situation of the waste pool area every month then fills it into the 'POME ponds LK3 patrol form'.</li> </ul>
<b>Assessment Conclusion:</b>	<p>During the Close NCR remote audit, the certification unit has shown video evidence and some photos to support the CAP. The video shows the process of closing access around the POME ponds area to avoid the entry of cattle sheperds into the area. The evidence that has been shown is in the installation of fences, no entry signs and danger signs that can occur in the POME ponds area.</p> <p>The process of review and updated aspects of OHS has carried out by OHS committee meeting. The meeting was attended by OHS expert, operation staff (both of Estate and Mill) and related interested parties (if any, i.e: local village head, labor union). The result of review documented in Document "Daftar Aspek Penting Lingkungan" which identified all the environmental and OHS risk each activity in each station in estate and mill. The assessment covered the issue as follows:</p> <ul style="list-style-type: none"> <li>• Description of environmental and OHS risk</li> <li>• Impact score</li> <li>• Impact level</li> <li>• Significant impact control</li> </ul> <p>In addition, the audit team also interviewed POME ponds officer and obtained information that the company has made efforts to correct identified RSPO non-conformities by:</p> <ul style="list-style-type: none"> <li>• Coordinate and socialize the prohibition of livestock grazing in the POME ponds area, village heads and local community leaders.</li> <li>• Install the fences and restrict the access of shepherds in and out.</li> <li>• Install no entry signs and OHS hazard signs in the POME ponds area.</li> </ul> <p>Based on CAP evidence's and audio/video evidences show, this nonconformity <b>satisfactorily closed</b>.</p>

<b>Opportunity for Improvements</b>	
<b>OFI #</b>	<b>Description</b>
<b>OFI 1</b>	NIL

Positive Findings	
PF #	Description
PF 1	All employees have been completed vaccinated of Covid-19 in October 2021.

### 3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
<b>NCR Ref #</b>	2016569-202102-N1	<b>Date Issued</b>	4 February 2021
<b>Due Date</b>	Next ASA	<b>Date of nonconformity Closure</b>	11 February 2022
<b>Clause &amp; Category (Critical / Minor)</b>	7.3.2 (Minor)		
<b>Statement of Nonconformity:</b>	The waste disposal in Kebun Negeri Lama's housing compound was not performed according to procedures "Prosedur Pengendalian Limbah No.SOC/PSM/4.1 rev.5" dated 1 October 2015.		
<b>Requirement Reference:</b>	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
<b>Objective Evidence:</b>	<p>a. PT. Socfin Indonesia - Negeri Lama has prepared waste disposal procedure under "Prosedur Pengendalian Limbah No.SOC/PSM/4.1 rev.5" dated 1 October 2015.</p> <ul style="list-style-type: none"> <li>- Section 6.3.1 stated hazardous waste produced stored in licensed hazardous waste storage.</li> <li>- Section 6.4.1 stated all worker collected the organic and inorganic waste into waste bin according to type. Organic waste collected into organic waste bin. Inorganic waste collected into inorganic waste bin.</li> </ul> <p>b. In Division 2 emplacement, audit team found hazardous waste disposal not in accordance with waste disposal procedure:</p> <ul style="list-style-type: none"> <li>- Hazardous waste: empty motorcycle lubricant "Union" found to be stored in house No. 60A, one of Division 2 housing compound.</li> <li>- Hazardous waste: empty agrochemical "Ally" and empty motorcycle lubricant "Union" container found to be stored in housing; one of housing compound at Division 2.</li> <li>- Segregated waste bin; organic and inorganic waste bin are in place, however, worker disposed of the plastic household rubbish into waste water ditch and some rubbish put under oil palm.</li> <li>- Audit team found landfill in block 33, empty motorcycle lubricant "Union" container found to be disposed into inorganic pit.</li> </ul>		
<b>Corrections:</b>	<p>a. Handed over hazardous waste that exist in housing emplacement to the licensed temporary hazardous waste storage, e.g. ex chemical "Ally" container, ex lubricant "Union" container.</p> <p>b. Cleaning plastic waste that was disposed of to the back trench and under the palm trunk behind the Division 2 housing. Then the domestice waste disposed of to landfill separately (organic/inorganic).</p>		

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<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>a. There are no clear rules for handling hazardous and toxic waste from households, such as: oil container and agrochemical container.</li> <li>b. There is no routine cleaning program at the housing complex that is run in each Division.</li> <li>c. There is no plastic waste management program implemented in the es to control plastic waste produced, especially from household activities.</li> <li>d. Dissemination of handling organic / inorganic waste has not been effective.</li> </ul>
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>a. Prepare and establish guidelines for handling hazardous and toxic waste from housing complex.</li> <li>b. Division Assistant creates a routine program "Jumat/minggu bersih" or emplacement cleaning competition which involves all residents of the housing to clean house, garden, ditches and garbage.</li> <li>c. Carrying out "Eco brick" program as an effort to control plastic waste that generated from the emplacement.</li> <li>d. Conducting more frequent dissemination to emplacement residents, approaching the chief of prayer group to coordinate local residents and installing appropriate sign boards.</li> </ul>
<b>Assessment Conclusion:</b>	<p>The CAP is accepted by the audit team, and subject to review effectiveness during subsequent assessment visit.</p> <p><b>11 Feb 2022:</b></p> <p>To verify the effectiveness closure in this NC, auditor carry out onsite visit to landfill at Block 33 (Division 2). Organic and inorganic wastes are disposed in open pit and segregated. Auditor sighted that all wastes comprises of plastic material only. There are no hazardous wastes found at this inorganic pit.</p> <p>According to this, this NC is closed satisfactorily, and the corrective action was implemented effectively.</p>

Non-conformity			
<b>NCR Ref #</b>	2016569-202102-N2	<b>Date Issued</b>	4 February 2021
<b>Due Date</b>	Next ASA	<b>Date of nonconformity Closure</b>	11 February 2022
<b>Clause &amp; Category (Critical / Minor)</b>	7.3.3 (Minor)		
<b>Statement of Nonconformity:</b>	In housing compound PT Socfin Indonesia - Negeri Lama, audit team found signs from use of open fire for waste disposal, under the oil palm trees.		
<b>Requirement Reference:</b>	The unit of certification does not use open fire for waste disposal.		
<b>Objective Evidence:</b>	In housing compound PT Socfin Indonesia - Negeri Lama Division 2, audit team found signs from use of fire for waste disposal, under the oil palm trees.		
<b>Corrections:</b>	Dredging burnt rubbish under the oil palm tree behind the Division 2 emplacement.		
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>a. The Division Assistant did not provide understanding regarding the prohibition of burning waste.</li> </ul>		

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	b. The Division Assistant does not facilitate the transportation of waste disposal from the emplacement to the landfill.
<b>Corrective Actions:</b>	<p>a. Provide understanding to the residents of the emplacement regarding the prohibition of burning waste; Put up a sign board prohibiting waste burning at several points around the emplacement.</p> <p>b. Determine a schedule for transporting domestic waste and allocate transport unit for transporting domestic waste.</p>
<b>Assessment Conclusion:</b>	<p>The CAP is accepted by the audit team, and subject to review effectiveness during subsequent assessment visit.</p> <p><b>11 Feb 2022:</b></p> <p>To verify the effectiveness closure in this NC, auditor carry out onsite visit to Block 39/40 (Division 2) as entering point and public access road from/to Sidomulyo village Auditor sighted that NO WASTE BURNING signboard is installed. During interview with stakeholders (representative of Sidomulyo village), they are aware with company policy particularly on NO BURNING policy.</p> <p>According to this, this NC is closed satisfactorily, and the corrective action was implemented effectively.</p>

Opportunity for Improvement	
OFI#	Description
<b>OFI 1</b>	<p><b>OFI Statement:</b> <b>Indicator 7.8.2</b></p> <p>Bamboo and Trembesi trees can be considered as crops species aimed to restore of riparian zones, including canal buffer which identified as HCV 4.1.</p> <p><b>Verification / Follow-up actions:</b></p> <p>Unit management has been transplanted in the riparian area.</p>
<b>OFI 2</b>	<p><b>OFI Statement:</b> <b>Indicator 7.10.1</b></p> <p>Planting Trembesi (<i>Samanea saman</i>) trees surrounding POME pond and peatlands area can be considered as crops species aimed to reduce or minimize GHG emissions (Carbon/methane capture).</p> <p><b>Verification / Follow-up actions:</b></p> <p>Unit management has been transplanted in the POME ponds area.</p>

**3.3.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
<b>Current finding</b>				
2165185-202202-M1	Critical	3.6.1	11 February 2022	12 May 2022
<b>Previous findings</b>				
2016569-202102-N1	Minor	7.3.2	4 February 2021	11 February 2022
2016569-202102-N2	Minor	7.3.3	4 February 2021	11 February 2022

### 3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss **PT Socfin Indonesia – Negeri Lama POM** Certification Unit's environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as below.

<b>Stakeholders contacted</b>		
<b>Type of Stakeholder</b> (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	<b>Stakeholder name / organization</b>	<b>Means of communication</b> (e.g. face to face interview, email, phone interview, comment from public notice)
<b>Internal Stakeholders</b>		
Gender Committee	Mrs Suriana	Face to face interview
Employee Cooperative	Julianus P. Bukit	Face to face interview
Labour Representative	Edy Syah Putra Saragih	Face to face interview
<b>External Stakeholders</b>		
<i>Dinas Lingkungan Hidup Kabupaten Labuhan Batu</i> / Environmental Service of Labuhan Batu Regency	Rusli Siregar	Phone interview
<i>Badan Pertanahan Nasional Kabupaten Labuhan Batu</i> / National Land Agency of Labuhan Batu Regency	Sulaiman	Phone interview
<i>Dinas Tenaga Kerja Kabupaten Labuhan Batu</i> / Manpower Service of Labuhan Batu Regency	Tumpak Manik	Phone interview
Dinas Pertanian Kabupaten Labuhan Batu / Agriculture Service of Labuhan Batu Regency	Yayan Mulyanto	Phone interview
Local NGO - LSM Gerakan Mempertahankan Amanah Rakyat (GEMPAR)	Nur Ahmad	Face to face interview
Local community	Village of Sidomulyo	Face to face interview
Independent Smallholders	Kelompok Tani Maju Jaya	Face to face interview

Contracted party	UD Mirada	Face to face interview
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Stakeholders comment	
<b>1</b>	<p><b>Feedbacks:</b> <b>Kabid Hubungan Industrial/Mediator Dinas Tenaga Kerja Kabupaten Labuhan Batu (Labour Department of Labuhan Batu Regency)</b></p> <ul style="list-style-type: none"> <li>• Until this audit, there is no negative issues related to industrial relationship in Negeri Lama Estate/Mill.</li> <li>• the company has pay their employee in accordance to the current minimum wage regulation. Pension and work termination is also pay according to the current regulation.</li> <li>• The company has registered the collective labour agreement with their labour union.</li> </ul> <p><b>Audit Team verification and response:</b> Positive comments, follow up not necessary.</p>
<b>2</b>	<p><b>Feedbacks:</b> <b>Kasi Usaha Tani Perkebunan, Dinas Pertanian, Kabupaten Labuhan Batu (Agriculture Department of Labuhan Batu Regency)</b></p> <ul style="list-style-type: none"> <li>• Communication runs smoothly and harmoniously.</li> <li>• Plantation business reassessment has been carried out in 2021, class II.</li> <li>• There are no any land conflicts with local communities or NGOs.</li> <li>• There is no issue of environmental pollution.</li> <li>• Limited partnership, cannot be done in the form of plasma due to limited land or with FFB receipts due to limited capacity of the mill. However, it is carried out in other forms, plasma assistance, infrastructure, social and so on.</li> <li>• Reports of plantation are carried out regularly every semester.</li> <li>• The Department of Agriculture encourages companies to play an active role in supporting community plantations towards sustainable palm oil certification such as RSPO/ISPO so that smallholders can get the maximum benefit.</li> </ul> <p><b>Audit Team verification and response:</b> Based on document verification, unit of certification has been engaged with smallholder in order to promote sustainable palm oil towards RSPO certification. Further explanation can be seen in criterion 5.2.</p>
<b>3</b>	<p><b>Feedbacks:</b> <b>Staf Pengawasan Dinas Lingkungan Hidup Kabupaten Labuhan Batu (Environmental Department of Labuhan Batu Regency)</b></p> <ul style="list-style-type: none"> <li>• There are no complaints/complaints related to environmental pollution.</li> <li>• In 2020, there was a meeting with the management of Agus Hutapea regarding CSR (providing clean water) in Negeri Lama Seberang Village and has been executed in 2021.</li> <li>• North Sumatra Province DLH PROPER Team in 2021 (PROPER BIRU).</li> <li>• Environmental management and monitoring report run in an orderly and timely manner.</li> </ul> <p><b>Audit Team verification and response:</b> Positive comments, follow up not necessary.</p>
	<p><b>Feedbacks:</b></p>

<p><b>4</b></p>	<p><b>Staf Kantor Pertanahan Nasional Kabupaten Labuhan Batu (National Land Agency of Labuhan Batu Regency)</b></p> <ul style="list-style-type: none"> <li>No complaints or cases of land disputes have been submitted to the National Land Office.</li> <li>The HGU is in the process of being extended and will be subject to an obligation to procure smallholders land.</li> <li>The company has been operating since colonial times and there is no overlap with mining concessions.</li> <li>No company concessions/HGU areas are included in the abandoned land database.</li> </ul> <p><b>Audit Team verification and response:</b>          Due to limited land banks near the concession area (HGU), certificate holder will try to other for of partnership with smallholders community.</p>
<p><b>5</b></p>	<p><b>Feedbacks:</b>  <b>LSM Gerakan Mempertahankan Amanah Rakyat (GEMPAR) / Local NGO</b></p> <ul style="list-style-type: none"> <li>There is no dispute between the community and the company.</li> <li>As residents of the village surrounding the company, GEMPAR felt that the company often provided community assistance. For example, watering roads during the dry season, providing clean water if there is a community celebration, etc.</li> <li>Open job opportunities with information to the village office if there are job vacancies.</li> </ul> <p><b>Audit Team verification and response:</b>          Positive comments, follow up not necessary.</p>
<p><b>6</b></p>	<p><b>Feedbacks:</b>  <b>Village of Sidomulyo</b></p> <ul style="list-style-type: none"> <li>PT SOCFIN are responsible to surrounding community, giving dissemination of company policies and procedures.</li> <li>CSR program is frequent implemented, such as drain cleaning which nearest village.</li> <li>Staple food donations given annually to poor people during Islamic or Christian Holiday.</li> </ul> <p><b>Audit Team verification and response:</b>          Positive comments, follow up not necessary</p>
<p><b>7</b></p>	<p><b>Feedbacks:</b>  <b>Kelompok Tani Maju Jaya (independent smallholders supported by Unit of certification)</b></p> <ul style="list-style-type: none"> <li>Supporting program developed by company through training and assistance of Agronomy aspect, including re-measurement of land preparation for replanting.</li> <li>Dissemination of Agronomy program, such as Pest and Disease management, Productivity program, seeds selection, etc.</li> <li>Policies and relevant procedures also informed by the company, including explanation on benefit value to be RSPO member and involved in certifications..</li> </ul> <p><b>Audit Team verification and response:</b>          Positive comments, follow up not necessary</p>
<p><b>8</b></p>	<p><b>Feedbacks:</b>  <b>UD Mirada (local contractor for material procurement)</b></p> <ul style="list-style-type: none"> <li>Long established partnership with SOCFIN in regards of material procurement.</li> <li>Good relationship with the company and no outstanding payment.</li> </ul>

	<ul style="list-style-type: none"> <li>Positive influence given by the company, particularly for complying with applicable regulation in all aspects within contracts.</li> </ul>
	<p><b>Audit Team verification and response:</b> Positive comments, follow up not necessary</p>
<b>9</b>	<p><b>Feedbacks:</b> <b>Mrs. Suriana – Gender Committee</b></p> <ul style="list-style-type: none"> <li>Gender committee was established to represent the voice of women in company.</li> <li>Gender committee has 15 active members.</li> <li>Gender committee provides definition of sexual harassment and/or discriminatory behaviour.</li> <li>Gender committee has monthly program to communicating policies: no child worker, no sexual harassment, protection of pregnant and breastfeeding women, etc. They promotes breastfeeding corner.</li> </ul>
	<p><b>Audit Team verification and response:</b> Positive comments, follow up not necessary</p>
<b>10</b>	<p><b>Feedbacks:</b> <b>Worker Union</b> <b>Edy Syahputra Saragih - SPSI</b></p> <ul style="list-style-type: none"> <li>Company abide regulation pertaining minimum wage</li> <li>Registration for social insurance/BPJS Ketenagakerjaan &amp; BPJS Kesehatan covers all employees.</li> <li>There was no employee recruitment period 2016 – 2022.</li> <li>There was no employee layed off during COVID-19 pandemic in 2021.</li> <li>Collective work agreement ended in 2020, and under discussion for extension process. The employee and company agreed to use the 2018-2020 collective work agreement, until new agreement finalized.</li> <li>The number of accident related to locomotive &amp; lorries activity was reduced throughout year 2021</li> </ul>
	<p><b>Audit Team Findings:</b></p> <ul style="list-style-type: none"> <li>Audit team verified the claim for the said worker was submitted to BPJS on November 2021. Follow up by company has been made on January 2022.</li> <li>Audit team will verified the progress related to worker union inquiries and follow up from management through bipartite meeting on subsequent surveillance visit.</li> </ul>
<b>11</b>	<p><b>Feedbacks:</b> <b>Julianus P. Bukit – Treasurer of Employee Cooperatice</b></p> <ul style="list-style-type: none"> <li>Employee cooperative established since 12 July 1984.</li> <li>Currently the cooperative registered with 343 members.</li> <li>Cooperative explains received support from company in maintain and develop business in form of: guidance, advocacy, office building.</li> <li>Cooperative maintains obligation related to financial transparency, annual general meeting with all members, and reporting obligation.</li> </ul>
	<p><b>Audit Team verification and response:</b> Positive comments, follow up not necessary</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions

*Notes:*

*PT Socfin Indonesia – Negeri Lama POM was operated since the Dutch Era (approximately on 1919) and there was no new land expansion after that time. There is no previous land owner/user existed.*

**Previous land owner / user comment**

**Feedbacks:**

*Notes:*

*PT Socfin Indonesia – Negeri Lama POM was operated since the Dutch Era (approximately on 1919) and there was no new land expansion after that time. There is no previous land owner/user existed.*

**Audit Team verification and response:**

**3.5 Impartiality and conflict of interest**

During this assessment there was no circumstances or pressure that had influenced the independence or confidentiality of the assessment team.

**Formal Signing-off of Assessment Conclusion and Recommendation**

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that PT Socfin Indonesia – Negeri Lama POM has complied with the Indonesia National Interpretation 2020 of the RSPO P&C 201 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that PT Socfin Indonesia – Negeri Lama POM is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
<b>Name: Andi Pratama Pasaribu</b>	<b>Name: Andri Zulmanitra</b>
<b>Company Name: On behalf BSI Malaysia Sdn Bhd</b>	<b>Company Name: PT Socfin Indonesia</b>
<b>Title: Lead Auditor</b>	<b>Title: Sustainability Coordinator</b>
<b>Signature:</b> 	<b>Signature:</b> <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
<b>Date: 9 May 2022</b>	<b>Date: 9 May 2022</b>

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<p><b>Principle 1: Behave ethically and transparently</b></p>			
<p>Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p><b>Criteria 1.1:</b> The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p>			
<p>1.1.1</p>	<p><b>(C)</b> Management documents that are specified in the RSPO P&amp;C are made publicly available.</p>	<p>Based on document verification, certificate holder has established "Prosedur Komunikasi Sosial No.SOC/PSM/9.01 Rev.6", dated 1 April 2020. In clause 6.2.3.3 written the list of publicly accessible document as follows:</p> <ul style="list-style-type: none"> <li>a) Land/building title;</li> <li>b) Occupational health and safety plan;</li> <li>c) Assessment plan of social and environmental impact/AMDAL;</li> <li>d) Pollution mitigation and pollution reduction plan;</li> <li>e) Negotiation procedure;</li> <li>f) Continual Improvement Program;</li> <li>g) Public summary of certification;</li> <li>h) Human right policy;</li> <li>i) Company policies;</li> <li>j) Code of ethics for worker and supplier;</li> </ul> <p>Section 6.2.3.2 stated communication and consultation applicable for procedure socialization, policy socialization, or other activity which may have impact to community; information request/aspiration need to</p>	<p>Complied</p>

		communicate and consulted with community; HCV in company area; CSR programme.	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	<p>All publicly available documents are written in Bahasa Indonesia.</p> <p>The procedure has been socialized to the internal or external stakeholder. For example, sighted the evidence of socialization to the mill workers on 29 November 2021. Attended by 36 mill workers (ripple mill, loading ramp, sterilizer, sludge pit, engine room operator, steam boiler operator, warehouse keeper, processing). There is no engagement with the external stakeholders on management documents.</p> <p>All the publicly accessible document as explain in the previous indicator such as company policy and sustainability report can be downloaded in their official website. The public summary of certification, for example RSPO public summary report can be downloaded in RSPO website. Meanwhile, the remain document can be accessed through the official request letter to the management representatives.</p>	Complied
1.1.3	<b>(C)</b> Records of requests for information and responses are maintained.	<p>Based on document verification, certificate holder has established "Prosedur Komunikasi Sosial No.SOC/PSM/9.01 Rev.6", dated 1 April 2020. In section 6.2.3.2 stated communication and consultation applicable for procedure socialization, policy socialization, or other activity which may have impact to community; information request/aspiration need to communicate and consulted with community; HCV in company area; CSR programme.</p> <p>Record of incoming information request or aspiration from stakeholder documented in file "Catatan Permintaan Informasi &amp; Aspirasi", summarized on monthly basis. The document consists information: date</p>	Complied

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		<p>of request, name of person/organization requesting, type of aspiration, early response by certificate holder, following response/realization and status of request.</p> <p>Since previous assessment there is no request information from stakeholder. Mostly incoming letter request for help such as road maintenance, water supply, heavy weight. For example, incoming letter on 21 January 2022 from Village Head of Negeri Lama Seberang that requested the water supply for wedding celebration one of the villager. The request has been approved on the same day by the Tekniker 1.</p>	
1.1.4	<p><b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p>	<p>Based on document verification, certificate holder has established "Prosedur Komunikasi Sosial No.SOC/PSM/9.01 Rev.6", dated 1 April 2020. In section 6.2.3.2 stated communication and consultation applicable for procedure socialization, policy socialization, or other activity which may have impact to community; information request/aspiration need to communicate and consulted with community; HCV in company area; CSR programme.</p> <p>According to the procedures, certificate holder shall respond to all incoming aspirations/request for information maximum 1 months after the submission date.</p> <p>Certificate holder has submitted their mandatory report to the respective government agencies on regular bases. For example:</p> <ul style="list-style-type: none"> <li>- Environmental management and monitoring on six monthly basis;</li> <li>- Waste water monitoring report on three monthly bases;</li> <li>- Hazardous waste management report on three monthly basis;</li> <li>- Plantation business development report on annual bases;</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>- OHS committee meeting report on three monthly basis;</li> <li>- Accident report on three monthly basis;</li> <li>- Social Impact Assessment review on two-yearly basis;</li> </ul> <p>During stakeholder consultation with respective government agencies: Dinas Lingkungan Hidup (Environmental service) Kabupaten Labuhanbatu, Dinas Ketenagakerjaan (Manpower service) Kabupaten Labuhanbatu, Dinas Pertanian (Agriculture/plantation service) Kabupaten Labuhanbatu obtained information that PT. Socfin Indonesia - Negeri Lama Estate/POM fulfil their obligation and has submitted their mandatory report regularly. For example, <i>Laporan Perkembangan Usaha Perkebunan Semester II tahun 2021</i> has been submitted on 24 January 2022 to the Plantation Services of Labuhan Batu Regency.</p> <p>According to the procedure above, estate manager nominated as the communication and consultation representative which handled all the communication process with related stakeholders.</p>	
1.1.5	An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.	<p>PT. Socfin Indonesia - Negeri Lama updated the list of stakeholders on annual basis. The list of stakeholders consists of information: stakeholder name, contact and address.</p> <p>Based on document verification, there is two types of stakeholder which is internal and external stakeholder. Internal stakeholder consists of group manager, estate manager, general affair manager etc.</p> <p>External stakeholder divided into government agencies and subdistrict head, local communities' leader or village head (Desa Perkebunan</p>	Complied

		Negeri Lama, Sidomulyo, Negeri Lama Seberang, and Negeri Lama), labor union, gender committee, general contractor/supplier and local NGO's (TIPAN-RI, GEMPAR).	
<b>Criteria 1.2:</b> The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	<p>PT. Socfin Indonesia established code of ethical conduct that signed by Principal Director since March 2019. The ethical code divided into internal and external (supplier, buyer and other third parties). The document "Socfindo – Employee and Corporate Code of Ethics (Edition 2 – March 2019) made available in softcopy and/or hardcopy in each unit (mill and estate).</p> <p>The ethical code can be downloaded in the company's official website for internal (corporate and employee) <a href="https://www.socfindo.co.id/documents/eng/Corporate-Code-of-Ethics.pdf">https://www.socfindo.co.id/documents/eng/Corporate-Code-of-Ethics.pdf</a> and external <a href="https://www.socfindo.co.id/documents/eng/Suppliers-Code-of-Ethics.pdf">https://www.socfindo.co.id/documents/eng/Suppliers-Code-of-Ethics.pdf</a>. This document covered policy as follows:</p> <ul style="list-style-type: none"> <li>• Competition issues</li> <li>• Confidential information and intellectual property</li> <li>• Conflict of interest</li> <li>• Drugs, alcohol and firearms</li> <li>• Use of e-mail and internet.</li> <li>• Use of company assets</li> <li>• Environment, health and safety.</li> <li>• Government relations</li> <li>• Human rights and the workplace</li> <li>• Payments of illicit sums</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>• Money laundering</li> <li>• Business dealing</li> <li>• Political work</li> <li>• Securities laws and insider training</li> <li>• Sexual harassment, workplace harassment and violence</li> <li>• Shareholder, media and community relations</li> <li>• Safety in the workplace.</li> <li>• Code of compliance</li> </ul> <p>For example:  Socialization to the external stakeholder (contractor) on 29 November 2021. Attended by 6 contractors (CPO/PK transporter and housing contractor).</p> <p>During the audit, auditor has interviewed female workers from estate (pesticide applicators). Based on her explanation, estate manager, field assistant and field supervisor has communicated the company's policy including ethical conduct such as company's commitment regarding to non-discrimination in workplaces, forced labour, minimum age, disallowing child labour and reproduction rights.</p>	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	PT. Socfin Indonesia – Negeri Lama established a procedure of identification and evaluation of legal requirements (Doc No.SOC/PSM/4.05 dated 15 May 2017). Person in charge to identify and evaluate was legal staff in coordinate with unit head. Evaluation period conducted in two period which is January – June and July to December. Each relevant regulation written in SOC/Form/4.05-01 and implemented in place.	Complied

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		<p>Due diligence process for contractor was regulated under "Prosedur Manajemen Kontraktor No.SOC/PSM/4.16, rev.04" dated 1 March 2020. Section 6.2.3 stated the work agreement contract inclusive of company policies. Section 6.2.5 stated contractor and plantation staff conduct meeting to reach common perception on work agreement and type of work. Section 6.2.8 stated Plantation safety officer made verification and identification of risk control from contractor. Section 6.2.9 stated Plantation safety officer monitors contractor's activity to ensure clauses in contract is fulfilled. Monitoring minimum 2 times per annum.</p> <p>Interview and document review against replanting contractor, PT. Surya Baru Prima Nusantara as in "Surat Perjanjian Pekerjaan Land Clearing Lahan Sawit Program 2021 Kebun Negeri Lama No. PD-GM/XBi/519/2021" dated 22 November 2021. The work agreement includes work scope of ripping 105.67 Ha, chipping oil palm and stump, including and deboling.</p> <p>Inside the contract, point 8 stipulates "Pihak Kedua yang bekerja di kebun PT. SOCFIN Indonesia harus mematuhi persyaratan Lingkungan Kesehatan dan Keselamatan Kerja serta bertanggungjawab terhadap keselamatan dan kesehatan para pekerjanya. Pihak kedua harus mematuhi Undang-undang dan Peraturan Ketenagakerjaan dan BPJS yang berlaku di Indonesia" – Contractor working in plantation of PT. Socfin Indonesia shall abide to Environment, Health and Safety requirement and be responsible to their worker's health and safety. Contractor shall comply to act, and regulation related to worker and social insurance.</p> <p>Implementation by contractor, monitored by PT. Socfin Indonesia – Negeri Lama, recorded under form "Monitoring Pekerjaan Kontraktor PT.</p>	
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		<p>Surya Baru Prima Nusantara – Ripping and Chipping dated 17 January 2022:</p> <ul style="list-style-type: none"> <li>- Worker using PPE according to work type, PPE provided by contractor;</li> <li>- Contractor’s worker holds valid operator license (Achmad Hakim bulldozer operator, Lisensi K3 Pesawat Angkut Angkut No.175161-OPK3-LT/PAA/XI/2020 until 2 November 2025; Azis Siregar, excavator operator, Lisensi K3 Pesawat Angkut Angkut No.137831-OPK3-LT/PAA/III/2019 until 1 March 2024; Muhammad Salim, excavator operator, Lisensi K3 Pesawat Angkut Angkut No.150191-OPK3-LT/PAA/III/2019 until 9 August 2024);</li> <li>- Contractor’s worker registered with BPJS Ketenagakerjaan and BPJS Kesehatan (Muhammad Salim-BPJS Ketenagakerjaan, Azis Siregar-Kartu Indonesia Sehat);</li> <li>- Contractor’s worker minimum age 18 years (Achmad Hakim 52 years, Azis Siregar 37 years, Muhammad Salim 30 years);</li> <li>- Worker payslip, received payment;</li> <li>- Contractor maintains worker conduct when performing work (no sexual harassment, no violence behaviour).</li> </ul>	
<p><b>Principle 2: Operate legally and respect rights</b>  Implement legal requirements as the basic principles of operation in any jurisdiction.</p>			
<p><b>Criteria 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	<p><b>(C)</b> The unit of certification complies to relevant regulations.</p>	<p>PT Socfin Indonesia - Negeri Lama as Unit of Certification has had procedure of identification and evaluation of legal requirements (No. Doc SOC/PSM/4.05 dated 15 May 2017). Person in charge to identify and evaluate was legal staff in coordinate with unit head. Evaluation period conducted in two period which is January – June and July to December.</p>	Complied

		<p>Legal requirements for Negeri Lama consist of:</p> <p><b>Organisation legal standing</b></p> <ul style="list-style-type: none"> <li>- Company Deed:             <ol style="list-style-type: none"> <li>1. No. 45 dated 7 December 1930, 1<sup>st</sup> registered as PT. SOCFIN MEDAN SA.</li> <li>2. No. 23 dated 21 June 1968 renamed as PT. SOCFIN INDONESIA (SOCFINDO).</li> <li>3. No. 129 dated 28 January 1980, registered by Ministry of Justice No: C2-8232.HT.01.04.Th.85 (24 December 1985).</li> <li>4. No. 20 (dated 9 June 1989) and No. 56 (dated 26 May 1990). Registered by Ministry of Justice No: C2-6301.HT.01.04.Th.90 (23 November 1990).</li> <li>5. No. 14 (31 October 2000), registered by Ministry of Justice Number: C2-6560.HT.01.04.Th.2001 (1 May 2001).</li> <li>6. No. 5 (3 May 2002) based on Shareholders Statement. Registered by Ministry of Justice and Human Rights Number: C-16575.HT.01.04.TH.2002 (30 August 2002).</li> <li>7. Amended Company Deed (based on Extraordinary Shareholders Meeting): Deed No.41 dated 16 June 2020. Noraty: Ika Nora, SH, M.Kn. Approval Ministry of Laws and Human Righst: AHU-AH.01.03-0252102, dated 17 June 2020.</li> </ol> </li> <li>- Renewal of Company Registered Number: 02.12.1.01.00385/0533/1304/ 02/2017, dated 27 March 2017. Validity: 2 March 2022. Issued from Integrated Services and Investment Agency of Medan.</li> <li>- Company Tax Registration Number (NPWP): 01.001.806.7-116.002.</li> </ul> <p><b>Land Tenure and Land-Use Rights</b></p>	
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		<p>HGU Certificate Number: 1, dated 28 June 1979. Ministry of Home Affairs Decree SK.64/HGU/DA/1978, dated 3 August 1978. Valid until 31 December 2024. Area: 2,164.80 Ha.</p> <p><b>Plantation Permit</b>          Surat Pendaftaran Usaha Perkebunan Nomor: HK.350/84/Dj.Bun.5/II/2002, dated 25 Februari 2002. Plantation area permitted: 2,164.80 Ha; Mill capacity: 16 MT FFB/hr.</p> <p><b>Industrial Permit</b>          Ijin Usaha Industri No. 581/T/Pertanian Industri/1995, 27 November 1995.</p> <p>All the legal permit listed in the document "Daftar Perizinan PT Socfin Indonesia Kebun Negeri Lama". Updated regularly by the document control. The last updated on January 2022. All the documents are valid.</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.</p>	<p>A documented system for ensuring legal compliance, Unit of Certification implement updating law and regulations periodically. An updating law and regulations was documented within "Updating Peraturan PT. Socfindo", dated 3 January 2022. There are 25 updated national regulation that were identified in 2022. Person in charge for updating this document is Administration Head with supported by Sustainability Team and Legal Department as evaluation team. For example: <i>Undang – Undang Cipta Kerja No. 11/2020</i> and its clauses, <i>Permentan 38/2020</i> related to Indonesian Sustainable Palm Oil (ISPO), Minimum Wage of 2022 based on Governor Sumatera Utara Decree No. 188.44/781/KPTS/2021 dated 19 November 2021. All of the document mentioned before has been updated in the "Daftar Update Peraturan 2022".</p>	Complied

		The legal department also conducted the evaluation of legal compliance of third parties engaged. Especially the fulfilment of working agreement.	
2.1.3	Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.	<p>PT. SOCFIN Indonesia - Negeri Lama concession has 31 boundary poles. Based on the last report "<i>Patroli LK3 – 2020 Patok HGU Division 1 and 2</i>" dated 11 January 2021 – 11 January 2022 verified that all boundary poles are in place. The checklist comprises of several aspect: poles identity/boundary pole number, boundary pole physical condition, boundary pole position, boundary pole's exact coordinate.</p> <p>There was no record of broken or missing boundary poles.</p> <p>During the audit, audit team visited sampled boundary poles number</p> <ul style="list-style-type: none"> <li>- Boundary poles No. BPN PT SOC XV located in Block 25, adjacent to Desa Negeri Lama Seberang.</li> <li>- Boundary poles No. BPN PT SOC XIV located in Block 25, adjacent to Desa Negeri Lama Seberang</li> </ul> <p>All boundary poles visited are clearly demarcated and visibly maintained and there was no planting beyond these legal boundaries.</p>	Complied
<b>Criteria 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is available.	List of contracted parties made available in "Daftar Stakeholder Kebun Negeri Lama" updated on January 2022. The list of contracted parties is UD. Mirada (general contractor), PT Gunung Kawi Sukses Makmur (CPO/PK transporter), PT. Surya Baru Prima Nusantara (replanting contractor – land clearing/felling and chipping). There is no contractor or agreement for FFB supply because FFB delivery from estate to the mill is using own transport (railway/locomotive).	Complied

<p>2.2.2</p>	<p>All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.</p>	<p>Sample of contracts verified:          Contract agreement "Perjanjian Kerjasama" No/NL/PKS-Rev/04/2022, dated 11 February 2022 (amendment upon agreement No/NL/PKS/16/2021, dated 28 December 2021). Agreement with contractor UD Mirada for general material supplier. Validity period of this contract is 11 Feb – 31 Dec 2022.          Specific clause on meeting relevant legal requirements already covers within "<i>Pasal 3: Syarat dan Ketentuan Pekerjaan</i>":  <i>2. Memenuhi upah minimum yang berlaku</i>  <i>3. Tidak mempekerjakan anak dibawah umur (18 tahun)</i>  <i>4. Pihak kedua wajib mengikutsertakan pekerjanya pada BPJS Ketenagakerjaan dan Kesehatan.</i>  <i>8. Larangan praktik kerja paksa dan perdagangan manusia.</i>  <i>10. Memenuhi peraturan dan perundangan yang relevan.</i>          Inside the contract, point 8 stipulates "Pihak Kedua yang bekerja di kebun PT. SOCFIN Indonesia harus mematuhi persyaratan Lingkungan Kesehatan dan Keselamatan Kerja serta bertanggungjawab terhadap keselamatan dan kesehatan para pekerjanya. Pihak kedua harus mematuhi Undang-undang dan Peraturan Ketenagakerjan dan BPJS yang berlaku di Indonesia" – Contractor working in plantation of PT. Socfin Indonesia shall abide to Environment, Health and Safety requirement and be responsible to their worker's health and safety. Contractor shall comply to act and regulation related to worker and social insurance.          Based on document verification, the contractor has been comply with the regulation. Sighted the tax receipt for 'Pajak Pertambahan Nilai/PPn' of UD Mirada period December 2021 dated 5 January 2022.</p>	<p>Complied</p>
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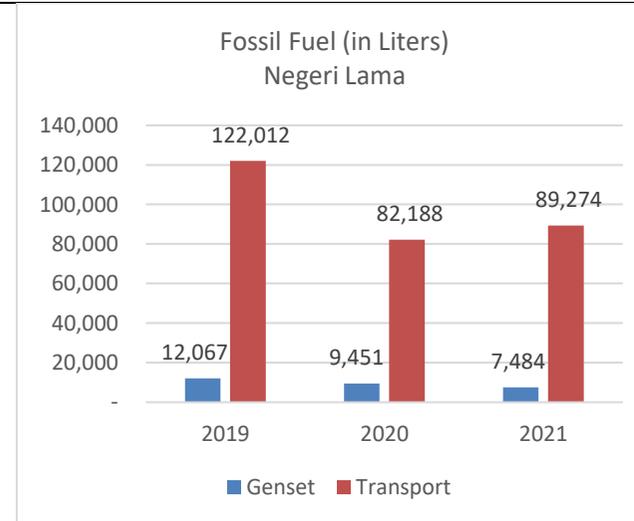
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.	<p>Sample of contracts verified:</p> <p>Contract agreement "Perjanjian Kerjasama" No/NL/PKS-Rev/04/2022, dated 11 February 2022 (amendment upon agreement No/NL/PKS/16/2021, dated 28 December 2021). Agreement with contractor UD Mirada for general material supplier. Validity period of this contract is 11 Feb – 31 Dec 2022.</p> <p>Specific clause on meeting relevant legal requirements already covers within "Pasal 3: Syarat dan Ketentuan Pekerjaan":</p> <ul style="list-style-type: none"> <li>2. Memenuhi upah minimum yang berlaku</li> <li>3. Tidak mempekerjakan anak dibawah umur (18 tahun)</li> <li>4. Pihak kedua wajib mengikutsertakan pekerjanya pada BPJS Ketenagakerjaan dan Kesehatan.</li> <li>8. Larangan praktik kerja paksa dan perdagangan manusia.</li> <li>10. Memenuhi peraturan dan perundangan yang relevan.</li> </ul> <p>Inside the contract, point 8 stipulates "Pihak Kedua yang bekerja di kebun PT. SOCFIN Indonsia harus mematuhi persyaratan Lingkungan Kesehatan dan Keselamatan Kerja serta bertanggungjawab terhadap keselamatan dan kesehatan para pekerjanya. Pihak kedua harus mematuhi Undang-undang dan Peraturan Ketenagakerjan dan BPJS yang berlaku di Indonesia" – Contractor working in plantation of PT. Socfin Indonesia shall abide to Environment, Health and Safety requirement and be responsible to their worker's health and safety. Contractor shall comply to act and regulation related to worker and social insurance.</p>	Complied

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<b>Criteria 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.																															
2.3.1	<p><b>(C)</b> For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> <li>Information regarding the geolocation of FFB origins;</li> <li>Proof of ownership status, right/claim of the land by grower/smallholder;</li> <li>If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB.</li> </ul>	PT Socfin Indonesia - Negeri Lama POM as unit of certification was implementing Identity Preserved supply chain system. Therefore, all FFB certified source from its own Estate (Negeri Lama Estate) which has land use right. Geolocation information and supply base of Negeri Lama POM as listed in RSPO Certificate.	Complied																												
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1.	PT Socfin Indonesia - Negeri Lama POM as unit of certification implement Identity Preserved supply chain system. Therefore, all FFB certified source from its own Estate (Negeri Lama Estate) which has land use right. Geolocation information and supply base of Negeri Lama POM as listed in RSPO Certificate.	Complied																												
<b>Principle 3: Optimise productivity, efficiency, positive impact and resilience</b> Implement plans, procedures and systems for continuous improvement.																															
<b>Criteria 3.1:</b> There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.																															
3.1.1	<p><b>(C)</b> A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.</p>	<p>Unit of Certification (UoC) has documented long term management plan in 5 years basis within "Rencana Jangka Panjang". Long term management plan of UoC Negeri Lama for period 2021-2025 as below:</p> <table border="1"> <thead> <tr> <th>Remarks</th> <th>Unit</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>FFB Prod.</td> <td>MT</td> <td>40,944</td> <td>44384</td> <td>44716</td> <td>46465</td> <td>44148</td> </tr> <tr> <td>CPO Prod</td> <td>MT</td> <td>9458</td> <td>10253</td> <td>10329</td> <td>10733</td> <td>10198</td> </tr> <tr> <td>PK Prod.</td> <td>MT</td> <td>1802</td> <td>1953</td> <td>1968</td> <td>2044</td> <td>1943</td> </tr> </tbody> </table>	Remarks	Unit	2021	2022	2023	2024	2025	FFB Prod.	MT	40,944	44384	44716	46465	44148	CPO Prod	MT	9458	10253	10329	10733	10198	PK Prod.	MT	1802	1953	1968	2044	1943	Complied
Remarks	Unit	2021	2022	2023	2024	2025																									
FFB Prod.	MT	40,944	44384	44716	46465	44148																									
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		OER	%	23.10	23.10	23.10	23.10	23.10
		KER	%	4.40	4.40	4.40	4.40	4.40
		Prod. Cost	IDR/kg	1,976	2,055	2,137	2,223	2,312
		CPO Price	IDR/MT	7.5 mio	7.6 mio	7.7 mio	7.8 mio	7.9 mio
		PK Price	IDR/MT	5 mio	5.3 mio	5.6 mio	5.9 mio	6.1 mio
		Seeds material for replanting are using their own seeds (produced by SOCFINDO): Socfin DxP L/Y and Socfin DxP Moderat Tahan Gano						
		Replanting Program	Ha	104.09	95.17	55.02	79.42	68.35
		<p>Related on Scheme Smallholders inclusion, Unit of Certification Negeri Lama had agreement with surrounding smallholders group. The agreement documented in "Perjanjian Kerjasama antara PT. SOCFINDO KEBUN NEGERI LAMA dengan KELOMPOK TANI MAJU JAYA", dated 27 January 2021. This agreement has been registered and acknowledge by Agriculture Agency of Labuhanbatu Regency Number: 520/0189/DIPERTA-BUN/2021, dated 29 January 2021.</p> <p>According to the current agreement as per December 2021, total area was 420 Ha with 80 members.</p> <p>Since previous assessment, certificate holder has conducted the smallholder training. For example, sighted the smallholder training related to Best Management Practices (pruning and castration on 14 October 2021, manuring on 13 August 2021, smallholder's partnership training on 15 July 2021 facilitated by plantation agency of Labuhan Batu Regency). Training evidence and list of attendance has been verified by the auditor team.</p>						

3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	<p>According to the indicator 3.1.1, During 2021, the total of replanting 105.47 Ha in Division II according to the plan. Based on the annual management review, the progress of replanting is in line with the established long-term plan. There are no specific issues affecting the implementation of annual replanting.</p> <p>Meanwhile, the total of all of 95.17 Ha replanting plan of 2022 is now in progress. Felling and chipping step was done in January 2022 while trenching is underway. Based on interview with estate manager, the seed transplanting from nursery will be conducted on February – March 2022.</p>	Complied
3.1.3	The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.	Certificate holder conduct management review regularly to ensuring all operational activity implemented refer to the organizational procedures through the scheduled internal audit. For example, internal audit RSPO/ISPO on 12 – 14 January 2022. Based on internal audit result, management review has been conducted on 3 February 2022. All NC's identified has been closed.	Complied
<b>Criteria 3.2:</b> 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	<b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification.	<p>Unit of Certification has had several continuous improvements, particularly on Social and Environmental aspect during 2021 as below:</p> <p>Actual Continuous Improvement Year 2021 (period Jan-Dec):</p> <ol style="list-style-type: none"> <li>1. Environment:           <ul style="list-style-type: none"> <li>Reducing fossil fuel for Generator and transport vehicle. Increasing fuel for transportation in 2021 is due to additional vehicle.</li> </ul> </li> </ol>	Complied



Additional aero diffuser application for POME: 1 unit (2020) to 3 unit (2021), installed on aerobic pond. Aims: increasing oxygen to reduce COD value.

*Note: increasing fuel is due to addition one unit Wheel Tractor for Mill and Estate activities. Average fuel used for 2021 is 2.67 Liter/Hour, previous year no Wheel Tractor is exist.*

2. Social:

- New recruitment (42 persons recruited) from adjacent community. Sample taken 6 persons.
- Indirectly benefit obtained by local communities from estate, such as collecting of:
  - a. EFB mushroom (15-35 people).
  - b. Fishing (20-40 people)

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		<ul style="list-style-type: none"> <li>c. Palm frond stick (10-15 people)</li> <li>d. Palm frond for hut wall (15-20 people)</li> <li>e. Fodder grass (10-30 people)</li> <li>f. Fern (15-25 people)</li> <li>g. Providing clean water tank for local community</li> <li>h. Road access maintenance. During the audit, the auditor team has verified the road condition. There is no issue from stakeholder so far. However, the FFB transportation and distribution of fertilizer is using railway.</li> </ul>	
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.	<p>Based on explanation of management representatives, until audit finish the RSPO Metric – 2021 was submitted to the RSPO Secretariat and verify by the auditor team.</p> <p>Annual Communication of Progress (ACOP) 2021 also submitted to the RSPO Secretariat under organization name Socfin SA, membership No.1-0269-19-000-00. In accordance with ACOP 2021, Socfin SA has submitted the ACOP report to the RSPO secretariat. According to the report, Socfin SA has a program to train surrounding smallholder on Best Management Practices.</p>	Complied
<b>Criteria 3.3:</b> Operating procedures are appropriately documented, consistently implemented and monitored.			
3.3.1	<b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.	Certificate holder has had Standard Operating Procedures (SOPs) and Work Instructions for Estate been documented. The procedures cover key processes, harvesting, transportation, manuring, IPM, GAP, Supply Chain requirements for the mill, land clearing, nursery, preparation before replanting, drainage system, maintenance of immature and mature upkeep.	Complied

		<p>SOP for Estate:</p> <ul style="list-style-type: none"> <li>• Socfindo Management System Procedure for Oil Palm Plantation No.SOC/PSM/7.10</li> <li>• Socfindo Management System Procedure Debolling Oil Palm No.SOC/PSM/7.10-03</li> <li>• Work Instruction Oil Palm Nursery No.SOC/KKS/IK/01</li> <li>• Work Instruction Land Preparation for Oil Palm No.SOC/KKS/IK/02</li> <li>• Work Instruction Continuous Terrace No.SOC/KKS/IK/03</li> <li>• Work Instruction Legume Cover Crop Planting No.SOC/KKS/IK/04</li> <li>• Work Instruction Oil Palm Planting No.SOC/KKS/IK/05</li> <li>• Work Instruction Oil Palm Pruning No.SOC/KKS/IK/06</li> <li>• Work Instruction Oil Palm Harvesting No.SOC/KKS/IK/07</li> <li>• Work Instruction Operating Fogging Machine No.SOC/KKS/IK/08</li> <li>• Work Instruction Debolling Oil Palm Infested Ganoderma No.SOC/KKS/IK/09</li> <li>• Work Instruction Castration and Sanitation No.SOC/KKS/IK/10</li> <li>• Work Instruction Operating Bore Machine for Oil Palm No.SOC/KKS/IK/11</li> <li>• Work Instruction EFB Application No.SOC/KKS/IK/12</li> <li>• Work Instruction Weed Control for Oil Palm No.SOC/KKS/IK/13</li> <li>• Work Instruction Harvesting Pole No.SOC/KKS/IK/14</li> <li>• Work Instruction Solid Application No.SOC/KKS/IK/15</li> <li>• Work Instruction FFB Transport No.SOC/KKS/IK/16</li> <li>• Work Instruction Compost application No.SOC/KKS/IK/17</li> <li>• Work Instruction Nurture Beneficial Plant for Oil Palm No.SOC/KKS/IK/18</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Work Instruction Spear Rot Control for Oil Palm No.SOC/KKS/IK/19</li> <li>• Work Instruction Mechanical Fertilizer Application No.SOC/KKS/IK/20</li> <li>• Work Instruction Sub seilling and ripping No.SOC/KKS/IK/21</li> <li>• Work Instruction Ploughing and Harrowing No.SOC/KKS/IK/22</li> <li>• Work Instruction Water Drainage Construction No.SOC/KKS/IK/23</li> <li>• Work Instruction Mounding Construction No.SOC/KKS/IK/24</li> <li>• Work Instruction Terrace and Platform No.SOC/KKS/IK/25</li> <li>• Work Instruction Bagworm Control with <i>Beauveria beassina</i> Fungi No.SOC/KKS/IK/27</li> </ul> <p>IPM Procedure:</p> <ul style="list-style-type: none"> <li>• SOC/PSM/7.10-11: Procedure of <i>Oryctes rhinoceros</i> Control</li> <li>• SOC/PSM/7.10-12: Procedure of Integrated <i>Ganoderma</i> Control</li> <li>• SOC/PSM/7.10-13: Procedure of Leaf Eating Caterpillar Control</li> <li>• SOC/PSM/7.10-21: Procedure of Rat Control</li> </ul> <p><b>SOP for Mill:</b></p> <p>Procedure and Work instructions in local language for supporting Mill activities have been established for all of its operations from receiving of FFB, processing CPO and palm kernel, dispatch and also supply chain requirements. The procedure also describes quality control check, sampling methods including its reporting from reception of FFB up to dispatch of CPO and palm kernel.</p> <ul style="list-style-type: none"> <li>• SOC-POM/IK-01 FFB receiving in loading ramp</li> <li>• SOC-POM/IK-02 Operation of steriliser</li> <li>• SOC-POM/IK-02 Operation of hoisting crane</li> <li>• SOC-POM/IK-04 Operation of stripper</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Work instruction of sludge separator</li> <li>• Work instruction of decanter</li> <li>• Work instruction of nut silo</li> <li>• Work instruction of ripple mill</li> <li>• Work instruction of claybath</li> <li>• Work instruction of locomotif operation</li> </ul> <p>Based on document review on master document SOP and interview with sustainability staff/document control obtain information that each part of procedure and work instruction reviewed annually and revised on latest regulation, organizational needs or certification standard changing basis. For example, SOP'S of Integrated Pest Management on Oryctes rhinoceros and leaf eater caterpillar were revised on 1 January 2020.</p> <p>All document verified above is the latest version used according to the table of monitoring procedures or work instruction that informed the latest version of the procedures or work instruction. Entire documents above are available in Bahasa Indonesia in each unit estate and mill.</p>	
3.3.2	A mechanism to check consistent implementation of procedures is in place.	<p>A mechanism to check consistent implementation of procedures is conducted through Field Visit by management. It conducted twice a year. In example: Visit of Sub-Head Technique Department on 27 May 2021. There were some issues observed as follows:</p> <ol style="list-style-type: none"> <li>1. FFB receipt</li> <li>2. CPO/PK losses</li> <li>3. Maintenance</li> <li>4. Cost control on processing and maintenance</li> </ol>	Complied

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		<ul style="list-style-type: none"> <li>5. Effluent pond and housekeeping</li> <li>6. Socialization of OHS procedures and work instruction</li> </ul> <p>All of the follow up action has been implemented and reported to the Sub-Head Technique Department on August 2021.</p>	
3.3.3	Records of monitoring and any actions taken are maintained and available.	<p>A mechanism to check consistent implementation of procedures is conducted through Field Visit by management. In example: Visit of Sub-Head Technique Department on 27 May 2021. There were some issues observed as follows:</p> <ul style="list-style-type: none"> <li>1. FFB receipt</li> <li>2. CPO/PK losses</li> <li>3. Maintenance</li> <li>4. Cost control on processing and maintenance</li> <li>5. Effluent pond and housekeeping</li> <li>6. Socialization of OHS procedures and work instruction</li> </ul> <p>All of the follow up action has been implemented and reported to the Sub-Head Technique Department on August 2021. For example, maintenance of the cage tracks in mill area to reduce the trouble on the mill area that can be slowed the mill activity.</p>	Complied
<p><b>Criteria 3.4:</b> 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.</p>			
3.4.1	<b>(C)</b> SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.	<p>At the current surveillance (ASA-1.3), no amendment of SEIA document because no changes to activities.</p> <p>Initial Environmental Impact Assessment documents (ANDAL, RKL and RPL) were available for Negeri Lama Mill and Estate as approval No. #RC.220/907/B/V/1994 dated 24th May 1994. The EIA (ANDAL, RKL</p>	Complied

		<p>and RPL) has been conducted and documented according to local requirements and include consultation with relevant stakeholders to identify impacts and to develop any mitigation measures.</p> <p>For internal environmental aspect and evaluated its impact document, as required by the procedure SOC/PSM/4.04, the information of environmental aspect and impact was reviewed and updated at least once a year. Last review and update of environmental aspect and impact register was performed on January 2020. Document of environmental impact assessment included:</p> <ul style="list-style-type: none"> <li>• Building new roads, processing mills or other infrastructure;</li> <li>• Putting in drainage or irrigation systems;</li> <li>• Replanting and/or expansion of planting areas;</li> <li>• Management of mill effluents;</li> <li>• Clearing of remaining natural vegetation;</li> <li>• Management of pests and diseases palms by controlled burning;</li> <li>• Result of stakeholder consultation.</li> </ul> <p>Environmental Monitoring and Management Report document (Laporan Pelaksanaan RKL-RPL) is part of review and update information against the environmental aspect and impact. This activity conducted twice a year (six monthly basis) and the report is obligatory submitted to Environmental Office (Dinas Lingkungan Hidup).</p> <p>Environment document and its permit was shown as below:</p> <ol style="list-style-type: none"> <li>1. Document of ANDAL/PEL for Negeri Lama Mill and Estate No. RC220/476/B/III/1994 dated 17 March 1994. Initial Environmental Impact Assessment documents (ANDAL/PEL, RKL and RPL) which were approved by Department of Agriculture, Republic of Indonesia</li> </ol>	
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		<p>on March 17, 1994 for Negeri Lama Mill and Estate were available.</p> <ol style="list-style-type: none"> <li>2. Revised of UKL UPL PT Socfin Indonesia Negeri Lama Mill and Estate dated 18 August 2010. In 2010, UKL UPL of PT Socfin Indonesia Negeri Lama Mill and Estate has been revised due to request from regional government. In actual condition, there is no change in mill capacity or in hectarage area.</li> <li>3. The information of environmental aspect and impact was provided document procedure No. SOC/PSM/4.04. Document of environmental impact assessment included:             <ul style="list-style-type: none"> <li>• Building new roads, processing mills or other infrastructure;</li> <li>• Putting in drainage or irrigation systems;</li> <li>• Replanting and/or expansion of planting areas;</li> <li>• Management of mill effluents;</li> <li>• Clearing of remaining natural vegetation;</li> </ul> </li> <li>4. Social impact assessment has been conducted by the organisation and documented in SIA report 2012. Assessment was conducted by internal assessor through PRA (Participatory Rural Appraisal) and interview with people who get direct impact of the presence of Negeri Lama plantations.             <p>Social impact assessment (SIA) including records of meetings has been documented in Laporan Sosial Assessment PT. Socfindo Perkebunan Negeri Lama, 2012. Scope of assessment covered villages: Ledong Barat Village, Negeri Lama Village, Lobu Jiur Village, Aek Korsik Village, Rawa Sari Village, Alang Bonbon Village, Sengon Sari Village and Negeri Lama Pekan Village.</p> <p>Evidence of participatory action from local communities was also sighted in related SIA documentation including photos. Some aspects were considered during assessment such as:</p> <ul style="list-style-type: none"> <li>- Access and use rights;</li> </ul> </li> </ol>	
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		<ul style="list-style-type: none"> <li>- Economic livelihoods and working conditions;</li> <li>- Subsistence activities;</li> <li>- Cultural and religious values;</li> <li>- Health and education facilities;</li> <li>- Other community values.</li> </ul> <p>During the audit, the auditor team has been verified the sample of assessment. For example is management of mill effluents through an installation 3 units of air diffuser at POME pond. The assessment through collecting data from daily measurement each unit started July 2021 and is still undergoing until June 2022. This assessment is to find out the COD value to reduce. The result is attached in the Management and Monitoring Environmental Report ("Laporan Pelaksanaan RKL-RPL") every six months.</p> <p>Positive impacts on SIA were identified, such as: 1. employment opportunities, 2. New livelihoods, 3. access road, and 4. public facilities availability.</p> <p>Negative impacts on SIA were identified, such as: dust impact in dry season caused by company transportation.</p> <p>The Social Impact assessment has revised on January 2020 (2 years based) and undertaken through a participatory methodology involving the affected stakeholders particularly of surrounding communities of Negeri Lama Estate.</p> <p>According to SIA 1994, positive impacts that have been implemented and verified by auditor team are:</p> <ol style="list-style-type: none"> <li>1. Employment opportunities: 42 workers recruited during 2021. 6 person of them has been interviewed during the audit.</li> </ol>	
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		<ol style="list-style-type: none"> <li>2. New livelihoods: local communities is given access to collect EFB mushroom, fishing, collect palm frond stick, palm frond, fodder grass, collect fern.</li> <li>3. Access road: the UoC implementing mini locomotive for FFB transport and fertilizer distribution in whole area. Road access is only for surveillance and monitoring activities. One of reason to add one unit Wheel Tractor is aims to road maintenance program.</li> <li>4. Public facilities availability: actual program 2021 is providing clean water tank for local community located in east side of Mill office. Mitigation of negative impact is installation of railway in whole area. FFB transportation and fertilizer distributing using mini locomotive to reduce dust impact in dry season. Locomotive track developed after EIA conducted in 1994.</li> </ol>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.</p>	<p>Social Environment management and monitoring plan document were available in Environmental management plan (RPL-Rencana Pengelolaan Lingkungan) document. Document has approved by Department of Agriculture, Republic of Indonesia on March 17, 1994 for Negeri Lama Mill and Estate. Revised of UKL UPL PT Socfin Indonesia Negeri Lama Mill and Estate dated 18 August 2010. In 2010, UKL UPL of PT Socfin Indonesia Negeri Lama Mill and Estate has been revised due to request from regional government. In actual condition, there is no change in mill capacity or in hectarage area.</p> <p>Environmental management based on document, e.g:</p> <ul style="list-style-type: none"> <li>- Implementation of measurement and monitoring of air emissions, noise, liquid waste, groundwater, B3 waste, solid waste and the health of the Masyarakat. Measurement of air emission based on PermenLH No. 7 year 2007; Boiler, PermenLH No. 13 year 2009; Genset, PermenLH No. 5 year 2006; Vehicle and ambient air based on PP No. 41 year 1999.</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>- Surface water quality and water biota management performed in order to prevent and control the physic and chemist quality of surface water comply to PP Nomor 82 tahun 2001. Perfomed by create terracing, land cover crop planting in open area and sloping area, organic fertilizer usage, natural predator usage for pest control, operating IPAL, land application, flat bed maintenance in land application area, housekeeping implementation and proper waste handling.</li> <li>- Soil quality management performed by land application management according to KepMen LH No. 28 Tahun 2003, groundwater quality check, flat bed maintenance, vegetation planting around wastewater pond and maintenance of wastewater pond, domestic and hazardous waste management.</li> <li>- Flora fauna management performed by signboard installation regarding prohibition of plant destruction in conservation area, vegetation enrichment in conservation area, wildlife protection and maintain the conservation area.</li> <li>- Community perception management performed in order to prevent and control the negative perception and potential conflict from community against employee recruitment process. Company has conducted workers recruitment transparently, each vacancy was publish to surrounding village, FFB purchasing from local plantation surrounding company, coaching and counseling to plasma member, CSR programed implementation.</li> </ul> <p>During field observation and document verification, it was demonstrated that all the environmental management plan has been implemented as per document RKL-RPL. The evaluation of social environmental management plan effectivity has been carried out and presented in RKL-RPL report Semester I and II.</p>	
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		<p>In example, report of "RKL-RPL" Negeri Lama submitted to Ministry of Forestry and Environment through "SIMPEL" application system and hardcopy to Environmental Agency of Labuhanbatu Regency.</p> <p>SIMPEL e-receipt:</p> <ol style="list-style-type: none"> <li>1. Semester I 2021 (Jan-Jun). ID TTE: 1625891832-4014, dated 10 Jul 2021. This report includes: SEIA management plan, Water Pollution Management Report, Air Pollution Management Report, Hazardous Waste Management Report.</li> <li>2. Semester II 2021 (Jul-Dec). ID TTE: 1625891832-4014, dated 3 Feb 2022. This report includes: SEIA management plan, Water Pollution Management Report, Air Pollution Management Report, Hazardous Waste Management Report.</li> </ol> <p>Report to Environmental Agency of Labuhanbatu:</p> <ol style="list-style-type: none"> <li>1. Semester I 2021 (Jan-Jun), submitted on 12 Aug 2021.</li> <li>2. Semester II 2021 (Jul-Dec), submitted on 7 Jan 2022.</li> </ol> <p>The SIA questionnaire was conducted based on aspects of Public Health and Resources, Road Access Rights, Utilization of Plantation Resources, GHG Emission Sources, etc.</p> <p>In the Social Assessment Report 2021 of NEGERI LAMA Estate, the Identification and Impact Analysis is as follows:</p> <ol style="list-style-type: none"> <li>a. Impact Identification includes parameters such as: Plantation Operations, Ops. Factories, Factory support facilities, infrastructure development, Livelihoods, Land Ownership and User Rights, Cost analysis of benefits on social aspects, Impacts on livelihoods of communities around plantations, Potential human rights violations,</li> </ol>	
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		<p>Impacts on Food Security, Assessment of activities that can affect air quality or produce significant GHG emissions.</p> <p>b. Impact Analysis</p> <ul style="list-style-type: none"> <li>- Livelihood. Impact details: recruitment of workers is tailored to the needs and 100% of the surrounding villagers. Management and Monitoring Plan: continuously, refer to workers need analysis from HR department.</li> <li>- Analysis of costs over benefits in social aspects. Impact details: Potential increase in operational costs in stakeholder communication, but not in accordance with the social benefits obtained. Management plan: company participation in village activities; Involvement of citizens in company events. Monitoring through cost evaluation basis. In example: Frequency of stakeholder meeting (surrounding villages) is calculated through transportation and meal cost. Organizing events with surrounding local communities, all cost are borne by the company. If the program successfully running, than will be calculated as social benefit with cost approach. Monitoring through financial internal audit.</li> <li>- Impact of Community Livelihood. Around the Estate. Impact details: recruitment of workers tailored to the needs and 100% of the surrounding villagers; Increasing the number of business units around the plantation; Increasing the number of residents who use estate resources. Management plan: involving the village head in the work socialization process; support the development of small businesses around the estate; does not prohibit the use of estate resources. Monitoring: monitoring the origin of beneficiary; monitoring the number and types of</li> </ul>	
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		<p>small businesses that exist around the plantation; monitoring the number of users of plantation resources. Assessment on this aspect is through annual questionnaire with random method. Collect data from questionnaire and direct record. In example: record of villagers who collecting EFB mushroom, water spinach, ferns, frond stick, fishing, grass fodder, etc. The data record are collected from "Buku Satpam" in daily basis.</p>	
3.4.3	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p>	<p>During field observation and document verification, it was demonstrated that all the environmental management plan has been implemented as per document RKL-RPL. The evaluation of social environmental management plan effectivity has been carried out and presented in RKL-RPL report Semester I and II. Participatory way is through annual questionnaire spreads to sample respondent and active communication to government office. Questionnaire spreads on period July – August 2021 for 30 respondent.</p> <p>In example, report of "RKL-RPL" Negeri Lama submitted to Ministry of Forestry and Environment through "SIMPEL" application system and hardcopy to Environmental Agency of Labuhanbatu Regency.</p> <p>SIMPEL e-receipt:</p> <ol style="list-style-type: none"> <li>1. Semester I 2021 (Jan-Jun). ID TTE: 1625891832-4014, dated 10 Jul 2021. This report includes: SEIA management plan, Water Pollution Management Report, Air Pollution Management Report, Hazardous Waste Management Report.</li> <li>2. Semester II 2021 (Jul-Dec). ID TTE: 1625891832-4014, dated 3 Feb 2022. This report includes: SEIA management plan, Water Pollution</li> </ol>	Complied

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		<p>Management Report, Air Pollution Management Report, Hazardous Waste Management Report.</p> <p>Report to Environmental Agency of Labuhanbatu:</p> <ol style="list-style-type: none"> <li>1. Semester I 2021 (Jan-Jun), submitted on 12 Aug 2021.</li> <li>2. Semester II 2021 (Jul-Dec), submitted on 7 Jan 2022.</li> </ol> <p>The social and environmental management and monitoring plan is explained and captured within the "RKL-RPL" report, including wastes, water analysis, wastewater quality analysis, etc.</p> <p>The monitoring implemented to monitor the effectiveness of the mitigation measure and reviewed every 6 months. The plan based on EIA (RKL RPL) that covered:</p> <ul style="list-style-type: none"> <li>- Monitoring river water quality every 3 months;</li> <li>- Monitoring ground water quality annually;</li> <li>- Monitoring of emission from immobile source every 6 months;</li> <li>- Monitoring of emission from mobile source annually;</li> <li>- Monitoring of POME every 1 months;</li> <li>- Monitoring of noise every 6 months;</li> <li>- Monitoring air ambient quality at mill and emplacement every 6 months;</li> </ul> <p>The reporting of RKL/RPL was conducted 6 monthly issued by Head of administration/KTU that consist of the implementation of environment management and monitoring plan include analysis of wastewater quality and flow rate also the air emissions measured by third party environmental laboratory. Some parameter as refer to EIA document is</p>	
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		<p>requires annually, such as ground water quality and emission from mobile source, this is also required by regulations.</p> <p>The effectiveness of the outcome from the implementation of environmental management and monitoring was reviewed on the report through the evaluation of compliance, evaluation of trends and evaluation of the effectiveness of management and environmental monitoring.</p> <p>The unit of certification is supervised by the sustainability department in monitoring the results of environmental testing. The company already has standards for mitigating environmental risks, including coordinating with the local environmental service.</p> <p>The certification unit and the sustainability department have a regular environmental monitoring meeting schedule every 3 months. The meeting is to discuss the results of environmental monitoring carried out by internal and independent laboratories. This aims to ensure environmental management is in accordance with the quality standards set by the government. Especially in the preparation of environmental monitoring reports (RKL/RPL) every semester to ensure the reports are presented properly.</p>	
<p><b>Criteria 3.5:</b> A system for managing human resources is in place.</p>			
<p>3.5.1</p>	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.</p>	<p>PT Socfin Indonesia – Negeri Lama POM has demonstrated the document of employment procedures for recruitment, selection, hiring, promotion, retirement, and termination in accordance with the applicable regulation (Peraturan Pemerintah/Government Act No.35/2021).</p>	<p>Complied</p>

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		<p>Recruitment process was documented in procedure "Penerimaan Pekerja KHT Kebun" No. Doc: SOC/PSM/6.01.01, 1<sup>st</sup> revision dated 1 December 2015. There are 3 steps in employee recruitment such as:</p> <ol style="list-style-type: none"> <li>1. Request recruitment of estate employee             <ol style="list-style-type: none"> <li>a. Letter of application for recruitment from Site Management devoted to management via the General Section</li> <li>b. Letter of approval for recruitment from management (Head Office)</li> </ol> </li> <li>2. The selection process:             <ol style="list-style-type: none"> <li>a. The collection of application file</li> <li>b. Selection of administration</li> <li>c. Announcement of the selection schedule</li> <li>d. Test questions and physical tests</li> <li>e. Summary of selection results</li> <li>f. Announcement of selection results</li> </ol> </li> <li>3. Provision of a cover letter MCU to candidates who pass the selection Implementation of medical check-up (MCU)</li> </ol> <p>Based on interview with labor representatives, the recruitment procedure are available in estate office and has been disseminated to the respective employees.</p> <p>The announcement of selected candidate Through interviews with workers in mill and plantation, it confirmed that there was no discrimination on working opportunities, all workers treated equally. Records of employee's recruitment were available and have been reviewed during audit.</p>	
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		<p>PT Socfin Indonesia – Negeri Lama POM has also prepared the procedure for promotion, retirement, and termination as per “Sistem Manajemen Socfindo Prosedur Promosi, Mutasi dan Demosi”, document number: SOC/PSM/6.14, 1<sup>st</sup> edition dated 17 October 2016.</p>	
3.5.2	<p>Employment procedures are implemented and records are maintained.</p>	<p>Recruitment process was documented in procedure “Penerimaan Pekerja KHT Kebun” No Doc: SOC/PSM/6.01.01, 1st revision dated 1st December 2015. Based on that procedure can be seen that the selection, recruitment, and promotion of workers based on qualification for the job.</p> <p>Employee credential and medical history were documented and recorded very well and has been reviewed during audit. All company policies reviewed every year by Sustainability Sub Department, PT Socfin Indonesia. Employees’ evaluation was conducted every November to decide promotion of employees.</p> <p>Data verified – recruitment process year 2021:</p> <ul style="list-style-type: none"> <li>• Letter of employee request in PT Socfin Indonesia – Negeri Lama, document no. NL/UM/Bi/024/21 dated 14 July 2021, requested from Negeri Lama to General Department related to recruitment for 4 harvesters</li> <li>• Management through General Department has approved the request based on letter No: UM/Bi/1431/2021 dated 38 July 2021</li> <li>• Management of Negeri Lama has informed to head of local communities/villages and Manpower Agency in Labuhanbatu Regency based on letter No: NL/UM/Bi/037/21 related to open recruitments (total: 4 workers). It has completed with schedule of recruitment process and the requirement needed.</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>• Document of recruitment: application letter, selection result records (administration, competition and MCU) and the final recommendation of recruitment process.</li> <li>• Determination of recruitment result based on letter No UM/NL/Bi/231/2021, dated 18 November 2021.</li> <li>• Induction for new employee related to company policy, OHS policy and collective labour agreement dated 1 December 2021 was attended by all new workers.</li> <li>• Promotion document as per letter from the General Division No. NL/Div/II/039/2021 dated 20 January 2021 concerning promotion of employee Group for Mr Denni Sukamto - promotion from group IV/4 to IV/5, effective dated 1<sup>st</sup> January 2021.</li> </ul>	
<b>Criteria 3.6:</b> An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<b>(C)</b> All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.	<p>PT Socfin Indonesia – Negeri Lama POM has revise the procedure of OHS risk assessment as per “Prosedur Identifikasi Aspek Lingkungan Keselamatan dan Kesehatan Kerja (LK3) SOC/PSM/4.04” Revision 10 dated 1 March 2020.</p> <p>Risk assessment was considered the stages of OHS risk control hierarchy such as elimination, substitution, engineering, administrative and PPE (Personnel Protective Equipment), in order OHS risk precautions.</p> <p>Environmental and occupational Health (LK3) procedures SOC/PSM/4.04, rev. 08 explains about the review and up dated aspects of the LK3 every year. Explain also related risk assessment LK3.</p> <p>PT Socfin Indonesia – Negeri Lama POM has demonstrated the document of risk assessment as per “Daftar Aspek Lingkungan,</p>	Non-compliance

		<p>Keselamatan dan Kesehatan Kerja, no Dok: Soc/Form/4.04-01", last review on 20 January 2022.</p> <p>Based on field visit in POME Ponds (dated 10/02/2022), auditor team found any H&amp;S issue of 7 goats and 8 cows are around the POME pond.</p> <p>However, these H&amp;S issues have not been identified in the risk assessment (Doc no: Soc/Form/4.04-01). This is raised as <b>noncompliance</b>.</p>	
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</p>	<p>PT Socfin Indonesia – Negeri Lama POM has been monitoring the health and accident aspects of the work that occurred to employees during activities and recorded on "Daftar Aspek Lingkungan, Keselamatan dan Kesehatan Kerja", document No. SOC/Form/4-04-01.</p> <p>PT Socfin Indonesia – Negeri Lama POM has also managing and monitoring the aspects of occupational health and safety through the "Health and Safety Plan" which has been reviewed on 15 January 2021, such as:</p> <ul style="list-style-type: none"> <li>• Comply with all applicable laws, regulations, and standards</li> <li>• Ensure best management practices with Zero Accident and Zero Fatality objectives. There was no accident with fatality category.</li> <li>• Ensure optimal socialization and training.</li> <li>• Do the correctives action: Performing revision of the procedure, completing the PPE.</li> <li>• Monitoring of statistic and</li> <li>• Program evaluation.</li> </ul>	Complied

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		<p>Data verified on implementation the OHS plan year 2021, such as:</p> <ul style="list-style-type: none"> <li>• In 2021 due to pandemic covid-19 the MCU has postpone based on Memorandum from Top Management No. UM/KK/Bi/1308/202, dated 4<sup>th</sup> July 2020 with reference by Letter from Manpower Ministry of Republic of Indonesia No M/7/AS.02.02/V/2020. Next MCU will program in July 2022.</li> <li>• OHS committee (P2K3) has registered in Manpower Agency in North Sumatera under letter "P2K3 nomor: 034-7/P2K3/Wil-IV/DTK/SU/II/2022 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) dan Tanggap Darurat di Perusahaan, dated 3<sup>rd</sup> February 2022.</li> <li>• OHS Expert namely Mr Alderson F Saragih has registered to Manpower Ministry of RI, based on license No Reg: 5/13314/AS.02.04/X/2021, dated 29<sup>th</sup> October 2021 valid until 3 years.</li> <li>• Evaluate and analyse accidents based on accident/investigation report and compared with the Health and Safety plan. Last Monitoring conducted on 20 January 2022</li> <li>• License of operator (SIO) for all operators in Negeri Lama Estate and Mill, namely:             <ul style="list-style-type: none"> <li>– Mr Mangara Nainggolan (locomotive operator), license no. 115661-OPK3-LT/PAA/VI/2016, dated 4/6/2018, valid until 4/6/2023.</li> <li>– Mr Sukamto (excavator operator), license no. 13.27680-OPK3/PAA/XI/2018, dated 3/11/2018, valid until 3/11/2023.</li> <li>– Mr Suharyadi (Boiler operator) license no. P.12.3409.OPK3-PUBT-B.I/XI/2017, dated 12/11/2017, valid until 12/11/2022.</li> <li>– Mr Irwanto (welder), license no. 00289.0721.0000125.2020, dated 2<sup>nd</sup> March 2020, valid until 3 years.</li> </ul> </li> </ul>	
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		<ul style="list-style-type: none"> <li>• Boiler permit no. 18-7/DTK/KU/XII/2017, checking is done by 2 years bases, last done in November 2021</li> <li>• Sterilizer-1 Permit no. 678/116-03/2009, checking is done by 2 years bases, last done on 20<sup>th</sup> November 2020 and next will be on 10<sup>th</sup> November 2022</li> <li>• Electricity Installation permit based on "Keputusan Gubernur Sumatera Utara No: 671.23/7271/DIS PM PPTSP/5/X.2.c/V/2019 tentang Izin Operasi Usaha Penyediaan Tenaga Listrik untuk Kepentingan Sendiri), dated 23<sup>rd</sup> May 2019 – valid until 3 years</li> <li>• Based on interview with interested stakeholder (manpower agency in Labuhanbatu regency) dated 9<sup>th</sup> February 2022 – the company has complied with related legal requirement e.g: report of workers (wajib lapor ketenagakerjaan), report of OHS committee,</li> <li>• PT Socfin Indonesia – Negeri Lama POM has conducted the P2K3 (safety committee) meeting on 15 January 2021. The meeting was attended by P2K3 (safety committee), staff and workers representative from each department/station. The meeting discussed all aspects related to OHS including: OHS program review, OHS performance, accident report (occurred on 2 December 2020), near miss report, unsafe condition, activity progress. Particularly for accident report was review based on the investigation result and the follow up action taken to prevent the similar accident in the future. Minutes of meeting and attendance list can be demonstrated during audit.</li> <li>• PT Socfin Indonesia has addressed the issues related to loco operation particularly on fixing the lorry during operation which was high risk to the accident, such as: handling the lorry out of the rail returning to the railroad track. For this activity company has developed the lorry locker arm - the tools &amp; equipment provided to control potential hazard/risk,</li> </ul>	
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		<ul style="list-style-type: none"> <li>• During interview with workers (Loco operator &amp; supervision) on 10/02/2022 confirmed that the safety committee meeting has involve the representative of workers from each department/mill station and the issued to handle the lorry out of the rail returning is fixed.</li> <li>• Based on field visit in Negeri Lama POM and interview with workers on 10/02/2022, all workers are aware the rule of smoking prohibition and the sanction consequences. Negeri Lama POM also has provided the Smoking Area to accommodate the smokers and to prevent the workers smoking in the mill station area and fuel station area.</li> <li>• The unit of certification has had Safety Committee (P2K3 – Panitia Pembina Keselamatan dan Kesehatan Kerja). OHS committee (P2K3) has registered in Manpower Agency in North Sumatera under letter "P2K3 nomor: 034-7/P2K3/Wil-IV/DTK/SU/II/2022 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) dan Tanggap Darurat di Perusahaan, dated 3<sup>rd</sup> February 2022.</li> <li>• P2K3 has performed the monthly meeting to review and monitoring the effectiveness of the H&amp;S plan to address health and safety risk. Example: PT Socfin Indonesia – Negeri Lama POM has conducted the P2K3 (safety committee) meeting on 15 January 2022. The meeting was attended by P2K3 (safety committee), staff and workers representative from each department/station. The meeting was discussed all aspect related to OHS including: OHS program review, OHS performance, accident report (occurred on 2 December 2021), near miss report, unsafe condition, activity progress. Particularly for accident report was review based on the investigation result and the follow up action taken to prevent the similar accident in the future. Minutes of meeting and attendance list can be demonstrated during audit.</li> </ul>	
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<b>Criteria 3.7:</b> All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.			
3.7.1	(C) A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender- specific needs, and which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training.	<p>PT Socfin Indonesia – Negeri Lama POM has shown the document of training Program year 2020 – 2021 related to the aspects of RSPO Principles and Criteria under document No: SOC/Form/6.02-06.</p> <p>Training program has shown as per “Daftar Rencana Pelatihan 2021”, updated in January 2021 consisted of:</p> <ul style="list-style-type: none"> <li>• (refreshment) Training of sustainability (RSPO-ISPO) requirement planned in February 2021</li> <li>• (refreshment) Training of handling of hazardous material (pesticides), planned in March 2021</li> <li>• (refreshment) Training for Integrated Pest Management, planned in April 2021</li> <li>• (refreshment) Training of traceability requirement (SCCS), planned in June 2021</li> <li>• (refreshment) Training for first aider, planned in July 2021</li> <li>• Training for operator of heavy equipment, planned in July and October 2021</li> <li>• (refreshment) Training for spraying applicator, planned in September 2021</li> <li>• (refreshment) Training for harvester, planned in October 2021</li> <li>• (refreshment) Fire drill/simulation, planned in December 2021</li> </ul> <p>Sample of record of training implementation – during ASA 1.3 in 2022:</p> <ul style="list-style-type: none"> <li>• Record of sustainability training dated 16 February 2021 – was attended by 43 workers both in estate and mill. Data verified:</li> </ul>	Complied

		<p>attendance list, training material, training evaluation and documentation</p> <ul style="list-style-type: none"> <li>Record of Integrated Pest Management training dated 16<sup>th</sup> April 2021 – was attended by 8 workers. Data verified: attendance list, training material, training evaluation and documentation</li> <li>Record training of awareness of LOTO implementation dated 17<sup>th</sup> July 2021 was attended by 13 workers.</li> <li>Refreshment training for harvester dated 15<sup>th</sup> October 2021 – was attended by 16 harvesters.</li> <li>PT Socfin Indonesia – Negeri Lama POM has also provided internal training for worker on handling of pesticides. Record of Integrated Pest Management training dated 16<sup>th</sup> April 2021 – was attended by 8 workers. Data verified: attendance list, training material, training evaluation and documentation.</li> </ul> <p>Based on field visit and interview with pesticides applicator during audit (dated 09/02/2022), in block 13 – in Negeri Lama Estate, confirmed that all pesticide applicator has attended the safe use pesticide training above. They have explained and demonstrated the safe working procedure (spraying technics, PPE usage and environmental protection).</p>	
3.7.2	Records of training are maintained, where appropriate on an individual basis.	<p>Record of training for each employee has demonstrated under “Catatan Khusus Pelatihan Yang Pernah Diikuti”.</p> <p>Data verified during surveillance audit ASA 1.3 – year 2022:</p> <p>1) Namely Mr H**** (Operator of processing in Negeri Lama POM)</p> <ul style="list-style-type: none"> <li>Dated 13<sup>th</sup> February 2017 – training of code of business ethical conduct</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>• Dated 17<sup>th</sup> April 2017 – training of OHS</li> <li>• Dated 7<sup>th</sup> February 2018 – training of HCV</li> <li>• Dated 11<sup>th</sup> December 2018 – training of processing procedure in POM</li> <li>• Dated 3<sup>rd</sup> October 2019 – training of socialization the procedure of communication</li> <li>• Dated 11<sup>th</sup> December 2019 – training for operator in sterilizer</li> <li>• Dated 4-8<sup>th</sup> July 2020 – training of work instruction in POM</li> <li>• Dated 16<sup>th</sup> February 2021</li> </ul> <p>2) Namely Mr. S***** (pesticides applicator), record of training:</p> <ul style="list-style-type: none"> <li>• Dated 13<sup>th</sup> February 2017 – training of code of business ethical conduct</li> <li>• Dated 17<sup>th</sup> April 2017 – training of OHS</li> <li>• Dated 7<sup>th</sup> February 2018 – training of HCV</li> <li>• Dated 22 November 2018 - Socialization of PKB</li> <li>• Dated 10 December 2018 - training of Use First aid box for accidents (P3K)</li> <li>• Dated 8 April 2019 - training of pesticides application</li> <li>• Dated 4-8<sup>th</sup> July 2020 – training on handling of hazardous waste</li> <li>• Dated 17<sup>th</sup> July 2021 – training of integrated Pest Management</li> </ul>	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	Training SCCS was programmed every year by Sustainability team. In 2021, training of RSPO SCCS has been carried out on 16 February 2021. The latest training was delivered by Endro Kuswanto (Tekniker 1) and attend by 6 personnel of Negeri Lama Mill including Head of Clerk, Transport clerk, weighbridge operator/clerk, expedition clerk and Mill	Complied

		<p>assistant. Evidence of training can be demonstrated such as: attendance list and minutes of training.</p> <p>During interview with key personnel on supply chain operation (dated 10/02/2022) at Negeri Lama Palm Oil Mill (weighbridge operator, mill assistant and clerk) confirmed that they have understand the RSPO supply chain system and their responsibility on the implementation.</p>	
<p><b>Criteria 3.8:</b> Supply chain requirements for mills.          Procedure note: all requirements are classified as <b>Critical Indicators</b>. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
3.8.1	<p><b>Identity Preserved Module</b>            A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>PT Socfin Indonesia – Negeri Lama POM is only receiving FFB from certified source, which is a company-owned estate, Negeri Lama Estate. PT Socfin Indonesia – Negeri Lama POM is implementing Supply Chain Standard Module Identity Preserve for Mill.</p>	Complied
3.8.2	<p><b>Mass Balance Module</b>            A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>PT Socfin Indonesia – Negeri Lama POM implemented Identity Preserved Module, therefore this indicator is not applicable.</p>	Complied

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<p>3.8.3</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&amp;C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The projection for certified FFB and production of certified CPO and PK in Negeri Lama POM has been recorded in CB's public summary report and registered in RSPO IT Platform.</p> <p>According to public summary report surveillance 1.2 PT Socfin Indonesia - Negeri Lama POM the estimated tonnage of CPO and PK products that could potentially be produced by the certified mill are as bellow:</p> <table border="1" data-bbox="1133 619 1966 810"> <thead> <tr> <th>Description</th> <th>Estimated (Mar 2021 – Feb 2022)</th> <th>Actual (Feb 2021 – Jan 2022)</th> </tr> </thead> <tbody> <tr> <td>CPO</td> <td>9,417.21 MT</td> <td>8,213.27 MT</td> </tr> <tr> <td>PK</td> <td>1,741.14 MT</td> <td>1,468.90 MT</td> </tr> </tbody> </table>	Description	Estimated (Mar 2021 – Feb 2022)	Actual (Feb 2021 – Jan 2022)	CPO	9,417.21 MT	8,213.27 MT	PK	1,741.14 MT	1,468.90 MT	<p>Complied</p>
Description	Estimated (Mar 2021 – Feb 2022)	Actual (Feb 2021 – Jan 2022)										
CPO	9,417.21 MT	8,213.27 MT										
PK	1,741.14 MT	1,468.90 MT										
<p>3.8.4</p>	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>The site is a Palm Oil Mill which take legal ownership and physically handle RSPO certified sustainable oil palm product, it has registered their transaction in RSPO IT Platform (PalmTrace) through member ID RSPO_PO1000001250.</p>	<p>Complied</p>									
<p>3.8.5</p>	<p>Documented procedures  The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ol style="list-style-type: none"> <li>Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able</li> </ol>	<p>PT Socfin Indonesia has established complete and up to date procedures to implement RSPO supply chain requirements in Negeri Lama POM:</p> <ol style="list-style-type: none"> <li>"Prosedur Supply Chain Certification Standard – Identity Preserved" document No. SOC/PSM/9.10 rev.10 dated 1<sup>st</sup> March 2020. The procedure covers FFB receiving and its records, FFB process and its records, production records, delivery of product, daily production report, contract and DO issuance, record keeping, abnormal conditions, report of projected over production to CB, Shipping Announcement in PalmTrace, PIC of RSPO SCCS, processing on the day change from MB to IP, and outsourcing process.</li> <li>"Prosedur Internal Audit Sistem Manajemen" No.SOC/PSM/8.02 Rev.09 dated 1<sup>st</sup> January 2022; described planning and preparation</li> </ol>	<p>Complied</p>									

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	<p>to demonstrate awareness of the mill's procedures for the implementation of this standard.</p> <p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill.</p>	<p>of internal audit that conducted once a year at minimum; audit implementation, findings; corrective action and audit report.</p> <p>3. "Prosedur Penanganan Keluhan Sosial" No.SOC/PSM/9.02 Rev.05 dated 03/10/2019 described mechanism of complaint handling mechanism.</p> <p>4. "Prosedur Pengiriman MKS/IKS dan Cangkang dengan Transportasi darat" No.SOC-POM/PSM/7.06 Rev.04 dated 01/01/2017, described delivery of CPO and PK from Palm Oil Mill to buyer or storage tank.</p> <p>Negeri Lama POM has maintained complete and up to date records and reports that demonstrated compliance with the RSPO Supply Chain model Identity Preserved, among others: "Buku Collection Trip" (FFB Delivery Note); Weighbridge ticket; "Laporan Jumlah Janjang per Blok" (total bunches); "Laporan pemeriksaan Bahan Baku Per Blok" (supply base verification); Daily Production Report; Monthly production report; CPO/PK Delivery Note.</p> <p>According to procedure, identification of the person having overall responsibility for RSPO Supply Chain implementation was Tekniker I (Mill Manager), whilst Sustainability staff and sales is responsible to conduct the transaction at PalmTrace. For RSPO SCCS administration, Head of Negeri Lama Mill assigned Mill clerk (Mr. Misran) as PIC of SCCS administration based on Manager Decree letter no. NL/Div/Bi/008/2020 dated 17 January 2020.</p> <p>During audit ASA 1.3 - year 2022, the person able to demonstrate awareness of the organization's procedures for the implementation of the RSPO Supply Chain requirements. Last training conducted on 16<sup>th</sup> April 2021. Record of training provided.</p>	
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		<p>PT Socfin Indonesia – Negeri Lama POM is implementing Identity Preserved for supply chain, it means that all FFB receive by mill was from certified estate, which is own estate (Negeri Lama Estate). There is no non-certified FFB receive by Negeri Lama palm oil mill.</p>	
<p>3.8.6</p>	<p><b>Internal Audit</b></p> <ul style="list-style-type: none"> <li>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill; <ul style="list-style-type: none"> <li>a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>b) Effectively implements and maintains the standard requirements within its organisation.</li> </ul> </li> <li>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</li> </ul>	<p>As per “Prosedur Audit Internal Sistem Manajemen” No.SOC/PSM/8.02 revision 08 dated 1<sup>st</sup> January 2022, described Sustainability Manager or Team conducted internal audit and management review to ensure all operational and documentation activities are comply to the RSPO Supply Chain requirement and the RSPO Market Communications and Claims Documents. The internal audit and management review planned once a year at minimum.</p> <p>The site has effectively implement and maintains the standard requirement by performing internal audit. Latest internal audit conducted on 12, 13, 14 January 2022 by internal auditor from Sustainability Department (Andria Zulmanitra, Samuel Situmorang and Ester Kristin Natalia) against RSPO P&amp;C Indonesia National Interpretation 2020 that include supply chain requirements. Audit result can be demonstrated during audit as per “Checklist Audit Internal Supply Chain Certification Standard”. There was eight NC related to RSPO Supply Chain. Root cause analysis, correction and corrective action has been established and effectively implemented. The NC status has been closed on 1<sup>st</sup> February 2022 as per “Laporan Ketidaksesuaian (LKS) SOC/FORM/8.02-05”.</p> <p>Management review has been held on 3<sup>rd</sup> February 2022, attended by all key personnel involved in RSPO supply chain requirements including Group Manager and Administratur. Management review has discussed:</p>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>- Follow up action from previous management review</li> <li>- Internal and external audit result</li> <li>- Process performance</li> <li>- Stakeholder complaints</li> <li>- Work accident</li> <li>- Performance of environment and OHS</li> <li>- Fulfilment of environment and OHS requirements</li> <li>- Quality objective and achievements</li> <li>- Correction and corrective action status</li> <li>- Change that could affect management system</li> <li>- Recommendation for improvement.</li> </ul>	
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>PT Socfin Indonesia - Negeri Lama POM only received FFB from certified source, which is Negeri Lama Estate. Transportation from field to palm oil mill are using locomotive and its rail. From the process observed, there is no FFB contamination found. Documents such as FFB delivery note and Weighbridge Card described identity and location of FFB source and other item required, e.g. locomotive number and type, product delivered, date of delivery, trip number, division, weighbridge card number, lorry number, gross weight, tara weigh and nett weigh, signed by driver, weighbridge clerk and administration staff. Movement of FFB from Negeri Lama Estate to Negeri Lama POM with no sales transaction, it is under the control of same entity, PT Socfin Indonesia. The certification of the supply base is fall under the palm oil mill, PT Socfin Indonesia – Negeri Lama POM, therefore a check of the validity of the Supply Chain Certificate is not necessary.</p> <p>The unit of certification has defined the procedure no: SOC-POM/PSM/7.08 related to FFB receiving trough transportation. The</p>	Complied

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		<p>procedure has explained FFB criterions and mechanism on handling of non-conforming of FFB.</p> <p>Based on document verification, field observation and interview with weighbridge clerk, it was confirmed accuracy of input between FFB delivery note and Weighbridge Card.</p> <p>Sample verified during surveillance-3 in 2022:          Delivery note dated 4<sup>th</sup> January 2022 from Division I Block 01OP97 and block 3OP97, Driver Budiono, Loco PS 100 No. 5 Mitsubishi, Trip 2; Stated input lorry number were 1005, 2119, 0613 (tara 2,130 kg), 1619, 0417, 2013 (tara 2,170 kg), 0416, 0520, 1921 (tara 2,140 kg), 2719, 1009, 0209 (tara 1,970 kg), 1621,1016,0815 (tara 2,200 kg), 0818,0814,0317 (tara 2,190 kg), 1919,0810,0219 (tara 2,130 kg), 2191, 2015, 0819 (tara 2,270 kg). Total tara 17,200 kg; net weight 25,160 kg; in weighbridge card CWD/2020/000076-000083 stated input lorry number total tara 17,200 kg; net weight 25,160 kg;</p> <table border="1" data-bbox="1131 1002 1966 1375"> <thead> <tr> <th>Lorry number</th> <th>Tara weight (kg)</th> <th>Gross weight (kg)</th> <th>Net weight (kg)</th> </tr> </thead> <tbody> <tr> <td>1005, 2119, 0613</td> <td>2,130</td> <td>5,246</td> <td>3,116</td> </tr> <tr> <td>1619, 0417, 2013</td> <td>2,170</td> <td>5,344</td> <td>3,174</td> </tr> <tr> <td>0416, 0520, 1921</td> <td>2,140</td> <td>5,270</td> <td>3,130</td> </tr> <tr> <td>2719, 1009, 0209</td> <td>1,970</td> <td>4,852</td> <td>2,882</td> </tr> <tr> <td>1621, 1016, 0815</td> <td>2,200</td> <td>5,418</td> <td>3,218</td> </tr> <tr> <td>0818, 0814 0317</td> <td>2,190</td> <td>5,394</td> <td>3,204</td> </tr> <tr> <td>1919, 0810, 0219</td> <td>2,130</td> <td>5,246</td> <td>3,116</td> </tr> </tbody> </table>	Lorry number	Tara weight (kg)	Gross weight (kg)	Net weight (kg)	1005, 2119, 0613	2,130	5,246	3,116	1619, 0417, 2013	2,170	5,344	3,174	0416, 0520, 1921	2,140	5,270	3,130	2719, 1009, 0209	1,970	4,852	2,882	1621, 1016, 0815	2,200	5,418	3,218	0818, 0814 0317	2,190	5,394	3,204	1919, 0810, 0219	2,130	5,246	3,116	
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		2191, 2015, 0819	2,270	5,591	3,321
		<b>Total</b>	<b>17,200</b>	<b>42,360</b>	<b>25,160</b>
<p>The unit of certification has defined the procedure no: SOC-POM/PSM/7.08 related to FFB receiving through transportation. The procedure has explained FFB criterions and mechanism on handling of non-conforming of FFB.</p>					
<p>Sampel of CSPO sold data taken:</p>					
<ol style="list-style-type: none"> <li>1. Both of contract and Delivery Order (DO) verified during ASA3 were issued in January 2022.</li> <li>2. The contract consisted of 2 (two) Delivery Order (DO).</li> <li>3. The quantity of contract "Kontrak Penjualan Lokal" No. 40011612 dated 26<sup>th</sup> January 2022 is 750 MT;</li> <li>4. The sample of DO is Delivery Order No.300026229 dated 26<sup>th</sup> January 2022, with quantity is 312.89 MT.</li> </ol>					
<p>Sampel of CSPO sold data taken:</p>					
<ol style="list-style-type: none"> <li>1. Both of contract and Delivery Order (DO) verified during ASA3 were issued in January 2022.</li> <li>2. The contract consisted of 8 (eight) Delivery Order (DO).</li> <li>3. The quantity of contract "Kontrak Penjualan Lokal" No. 40011608 dated 25<sup>th</sup> January 2022 is 500 MT</li> <li>4. The sample of DO is Delivery Order No. 300026218 dated 7<sup>th</sup> February 2022 56 MT.</li> </ol>					

<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> <li>i) A unique identification number.</li> </ul>	<p>PT Socfin Indonesia – Negeri Lama POM has shown records that include minimum information required for RSPO certified product. During this period of assessment, the site sold RSPO certified CPO and PK to PT Multimas Nabati Asahan.</p> <p>Sample verified during surveillance-3 in 2021:</p> <ul style="list-style-type: none"> <li>• “Kontrak Penjualan Lokal” No. 40011612 dated 26<sup>th</sup> January 2022; described the seller name is PT Socfin Indonesia; at Jl. K.L. Yos Sudarso No.105 Medan Barat, Sumatera Utara; the buyer name is PT Multimas Nabati Asahan; at Gedung B&amp;G Tower Lantai 9, Jalan Putri Hijau No.10 Kesawan, Medan Barat, Sumatera Utara; product name is Crude Palm Oil (CPO); quality is RSPO IP Certified; quantity is 750 MT; time of delivery is January 2022.</li> <li>• Delivery Order No.300026229 dated 26<sup>th</sup> January 2022 described the name of the buyer is PT Multimas Nabati Asahan, address Kawasan Berikat PT MNA at Kuala Tanjung; the name of the Seller is PT Socfin Indonesia – Negeri Lama; date of document issued is 26<sup>th</sup> January 2020; description of product is Crude Palm Oil (CPO); quality RSPO Certified IP; quantity is 312.89 MT; related Contract number 40011612; Unique Identification Number is 40011612; transporter PT Gunung Kawi Sukses Makmur.</li> <li>• Delivery Note No: 043/NL/2/2022 dated 5<sup>th</sup> February 2022; from PT Socfin Indonesia – Negeri Lama POM; to PT Multimas Nabati Asahan; vehicle No. BK 9329 GK; product is CPO; supply chain is RSPO Certified IP; quantity is 18,420 kg; seal number 636443-636448; related transport document: WB ticket No. WD/GST 9600/2022/00094, Contract No. 40011612 DO No. 300026229; certificate number RSPO 705569.</li> </ul>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>• Weighbridge Card No. WD/GST No. WD/GST 9600/2022/00094dated 5<sup>th</sup> February 2022 described the transporter is PT Gunung Kawi Sukses Makmur, BK 9329 GK; the name of sender is PT Socfin Indonesia – Negeri Lama POM; the name of the buyer is PT Multimas Nabati Asahan; delivery date and date of document issued is 5<sup>th</sup> February 2022; description of product is CPO; quantity is 18,420 kg; related transport document is Delivery Note No : 043/NL/2/2022 and Contract No. No. 40011612</li> <li>• “Kontrak Penjualan Lokal” No. 40011608 dated 25<sup>th</sup> January 2022; described the seller name is PT Socfin Indonesia; at Jl. K.L. Yos Sudarso No.105 Medan Barat, Sumatera Utara; the buyer name is PT Multimas Nabati Asahan; at Gedung B&amp;G Tower Lantai 9, Jalan Putri Hijau No.10 Kesawan, Medan Barat, Sumatera Utara; product name is Palm Kernel (PK); quality is RSPO IP Certified; quantity is 500 MT; time of delivery is February 202240011612</li> <li>• Delivery Order No. 300026218 dated 7<sup>th</sup> February 2022 described the name of the buyer is PT Multimas Nabati Asahan; address Kawasan Berikat PT MNA at Kuala Tanjung; the name of the Seller is PT Socfin Indonesia – Negeri Lama; date of document issued is 7<sup>th</sup> February 2022; description of product is Palm Kernel (PK); quality RSPO Certified IP; quantity is 56 Ton; related Contract number 40011608; Unique Identification Number is 40011608; transporter is PT Gunung Kawi Sukses Makmur.</li> <li>• Delivery Note 048/NL/2/2022 dated 7<sup>th</sup> February 2022; from PT Socfin Indonesia – Negeri Lama POM; to PT Multimas Nabati Asahan; vehicle No. BK 8829 GK; product is PK; supply chain is RSPO Certified IP; quantity is 18.91 Ton; related transport document: WB ticket WD/GST 9600/2022/000104, DO No. 300026218; contract No. 40010966, certificate number RSPO 705569.</li> <li>• Weighbridge Card No. WD/GST WD/GST 9600/2022/000104dated 7<sup>th</sup> February 2022 described the transporter is PT Gunung Kawi</li> </ul>	
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		<p>Sukses Makmur, BK 8829 GK; the name of sender is PT Socfin Indonesia – Negeri Lama POM; the name of the buyer is PT Multimas Nabati Asahan; delivery date and date of document issued is 7<sup>th</sup> February 2022; description of product is PK; quantity is 18.91MT; related transport document is Delivery Note No. 048/NL/2/2022 and Contract No. 40011608</p> <p>Information is presented on across a range of documents, such as contract, Delivery Order, Weighbridge Card and Delivery Note.</p> <p>PT Socfin Indonesia – Negeri Lama POM has registered their transaction consist of Shipping Announcement in RSPO IT Platform (PalmTrace).</p> <p>Sample of Shipping Announcement:</p> <ul style="list-style-type: none"> <li>• Transaction ID TR-9ee139ce-b915 dated 02/02/2022; Seller is PT Socfin Indonesia – Negeri Lama Mill (RSPO_PO1000001250); Buyer is PT Multimas Nabati Asahan (RSPO_PO1000000150); Product CSPO; Program IP; Volume 70 MT; Transaction Type: Shipping; Status: Confirmed on 02/02/2022; Based on Seller reference number: 300025955, Contract No. 40011548.</li> <li>• Transaction ID TR-d20fe5ab-8b5bdated 20/01/2022; Seller is PT Socfin Indonesia – Negeri Lama Mill (RSPO_PO1000001250); Buyer is PT Multimas Nabati Asahan (RSPO_PO1000000150); Product CSPO; Program IP; Volume 137.01 MT; Transaction Type: Shipping; Status: Confirmed on 20/01/2022; Based on seller reference number 300025918 Contract No. 400011535</li> <li>• The quantity of contract "Kontrak Penjualan Lokal" No. 40011612 dated 26<sup>th</sup> January 2022 is 750 MT;</li> </ul>	
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		<ol style="list-style-type: none"> <li>1. The sample of DO is Delivery Order No.300026229 dated 26<sup>th</sup> January 2022, with quantity is 312.89 MT.</li> <li>2. The contract still remains yet completed (until the audit ASA3 in February 2022)</li> </ol>	
3.8.9	<p>Outsourcing Activities</p> <ol style="list-style-type: none"> <li>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</li> <li>ii) The mill shall ensure the following:             <ol style="list-style-type: none"> <li>a) The mill has legal ownership of all input material to be included in outsourced processes</li> <li>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</li> <li>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</li> </ol> </li> </ol>	<p>The organization use third party contractor for transportation of certified product, CSPO and CSPK. PT Socfin Indonesia – Negeri Lama POM only operate one contractor for delivery of CSPO and CSPK, which is PT Gunung Kawi Sukses Makmur.</p> <p>Valid contract was available e.g.:</p> <ol style="list-style-type: none"> <li>1. PD-GM/X/589/2021 dated 29<sup>th</sup> November 2021 for transport of CPO, valid from 1 January 2022 until 31 December 2022.</li> <li>2. PD-GM/X/590/2021 dated 29<sup>th</sup> November 2021 for transport of PK, valid from 1 January 2022 until 31 December 2022.</li> </ol> <p>PT Socfin Indonesia – Negeri Lama POM has ensured that the independent third party complies with the requirements of the RSPO Supply Chain Module Identity Preserved. The requirement to comply with RSPO Supply Chain was explained and include in the contract agreement. In Article III (term and conditions) of the contract mentioned such as:</p> <ul style="list-style-type: none"> <li>- Understood the ethical code of conduct PT Socfin Indonesia</li> <li>- The contractor understood the supply chain type of the product transported based on "Surat Pengantar Barang"</li> <li>- Understood the procedure of all product type transported based on supply chain model of the Palm Oil Mill</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>- The contractor engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</li> </ul> <p>PT Socfin Indonesia – Negeri Lama POM control the CPO and PK transporter before shipping by:</p> <ul style="list-style-type: none"> <li>- “Berita acara pemeriksaan truck CPO dan Penyegelan” (completeness of vehicle including legality and safety, tank condition, faucet out, main hole tank, hinge/key lock faucet out).</li> <li>- “Surat Perintah Pemompaan” Dispatch direction letter.</li> <li>- “Surat Pengantar” Delivery note from “CV Gunung Kawi” contain information of DO number, vehicle number, driver name, and company CV Gunung Kawi signed.</li> <li>- “Kartu Keluar Masuk angkutan”</li> </ul> <p>After shipping controlled by checking completeness of vehicle including legality and safety, tank condition, faucet out, main hole tank, hinge/key lock faucet out, seal number and seal condition.</p> <p>The quantity of CPO monitored by Weighbridge Card and SPK (with 0.20% tolerance).</p> <p>During field audit and document verification can be demonstrated that the transporter is under control of PT Socfin Indonesia – Negeri Lama POM management. PT Socfin Indonesia – Negeri Lama POM has communicated the procedure related to RSPO SCCS to the contractor.</p>	
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		<p>Socialization to contractor has been conducted on 24<sup>th</sup> January 2022 was attended by 6 participants (drivers from Gunung Kawi Sukses Makmur). RSPO Supply Chain procedure also has include in the agreement contract with contractor which is updated annually.</p> <p>The auditor team has been verification the legal ownership.</p> <table border="1" data-bbox="1146 587 1908 1177"> <thead> <tr> <th>NO URUT</th> <th>PERALATAN</th> <th>NOMOR IZIN</th> <th>PEMERIKSAAN TERAKHIR</th> <th>PEMERIKSAAN BERKUTNYA</th> <th>KETERANGAN</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Ketel Uap</td> <td>18-7/DTK/KU/XII/2017</td> <td>20/01/2022</td> <td>20/01/2024</td> <td>2 Tahun sekali</td> </tr> <tr> <td>2</td> <td>Izin HGU</td> <td>SK.64/HGU/DA/78</td> <td>01/01/1999</td> <td>31/12/2024</td> <td>25 Tahun</td> </tr> <tr> <td>3</td> <td>NIB</td> <td>812011410216</td> <td>11/01/2018</td> <td></td> <td></td> </tr> <tr> <td>4</td> <td>SIUP</td> <td>744/1/INDUSTRI/2006</td> <td>09/01/2006</td> <td></td> <td></td> </tr> <tr> <td>5</td> <td>NPWP</td> <td>01.001.806.7-116.002</td> <td>02/04/2017</td> <td></td> <td></td> </tr> <tr> <td>6</td> <td>IMB 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<p>3.8.10</p>	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p>Currently PT Socfin Indonesia – Negeri Lama POM only use one contractor for transport of CPO and PK, which is PT Gunung Kawi Sukses Makmur. The contact person is Mr. Sumida as the Director. The contact detail was provided in the Contract Agreement and List of Stakeholder Kebun Negeri Lama 2022.</p>	<p>Complied</p>																																																																																																																																																

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3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	The documented procedure of supply chain, "Prosedur Supply Chain Standard – Identity Preserved" (SOC/PSM/9.10) Rev.09 dated 14 October 2019, in section 6.13.5 has explicitly described that the site will inform CB if there is addition or change in contractor used.	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>PT Socfin Indonesia – Negeri Lama POM has maintained accurate, complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain requirements, as evident in "Laporan Produksi Harian", "Berita Acara Pengukuran dan Perhitungan Stok CPO", "Kontrak Penjualan Lokal", Delivery Order, Weighbridge Card and Delivery Note.</p> <p>The procedure "Prosedur Supply Chain Certification Standard – Identity Preserved" No.SOC/PSM/9.10 rev.09 dated 14/10/2019, section 6.7 requires that all related records and reports, e.g: FFB receiving, Laporan Produksi Harian, Contract, Delivery Order, Weighbridge Card and Delivery Note must keep for a period of minimum five (5) years. Record verification confirms record as early as 2016 are still maintained.</p> <p>PT Socfin Indonesia – Negeri Lama POM able to provide estimate volume of CPO and PK in a year period as in Annual Budget, consists of Production of FFB, CPO and PK. The organization also keep up to date record of the FFB volume received, CPO and PK produced over a period of twelve (12) month, as in "Laporan Produksi Bulanan".</p> <p>Negeri Lama POM has recorded and balanced all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis, there is no negative stock. For the period of February 2021 – January 2022, PT Socfin Indonesia - Negeri Lama POM the estimated</p>	Complied

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		<p>tonnage of CPO and PK products that could potentially be produced by the certified mill are as bellow:</p> <table border="1"> <thead> <tr> <th>Description</th> <th>Estimated (Mar 2021 – Feb 2022)</th> <th>Actual (Feb 2021 – Jan 2022)</th> </tr> </thead> <tbody> <tr> <td>CPO</td> <td>9,417.21 MT</td> <td>8,213.27 MT</td> </tr> <tr> <td>PK</td> <td>1,741.14 MT</td> <td>1,468.90 MT</td> </tr> </tbody> </table>	Description	Estimated (Mar 2021 – Feb 2022)	Actual (Feb 2021 – Jan 2022)	CPO	9,417.21 MT	8,213.27 MT	PK	1,741.14 MT	1,468.90 MT	
Description	Estimated (Mar 2021 – Feb 2022)	Actual (Feb 2021 – Jan 2022)										
CPO	9,417.21 MT	8,213.27 MT										
PK	1,741.14 MT	1,468.90 MT										
3.8.13	<p><b>Extraction Rate</b>            The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The site has determined and set their own conversion rates be based upon past-experience defined as Oil Extraction Rate (OER) and and Kernel Extraction Rate (KER). The site has set OER for budget 2021 as 23.13% and KER as 4.50%.</p>	Complied									
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The site has annually update OER and KER to ensure accuracy against actual performance. The recorded actual OER and KER as in average February 2021 – January 2022 OER is 23.10% and KER is 4.34%.</p>	Complied									
3.8.15	<p><b>Processing</b>            For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Negeri Lama POM has had the procedure to assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation. It written in the Supply Chain Certification Standard – Identity Preserved Procedur (SOC/PSM/9.10 valid since 14 October 2019).</p> <p>Negeri Lama POM has ensured through documented system and operation that RSPO certified oil palm product is kept separated from non-certified oil palm product. There is no receiving of any non-certified FFB, therefore no non-certified FFB being entered the process, no non-</p>	Complied									

		certified CPO and PK being produced, no non-certified product being dispatched. Storage tank for CPO were dedicated only for certified palm oil. Silo for PK are used to store certified product only.	
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>The site is a Palm Oil Mill which take legal ownership and physically handle RSPO certified sustainable oil palm product, has registered their transaction in RSPO IT Platform (PalmTrace).</p> <p>PT Socfin Indonesia – Negeri Lama POM has registered all of their transaction consist of Shipping Announcement in RSPO IT Platform (PalmTrace).</p> <p>Sample of Shipping Announcement:</p> <ul style="list-style-type: none"> <li>Transaction ID TR-9ee139ce-b915 dated 02/02/2022; Seller is PT Socfin Indonesia – Negeri Lama Mill (RSPO_PO1000001250); Buyer is PT Multimas Nabati Asahan (RSPO_PO1000000150); Product CSPO; Program IP; Volume 70 MT; Transaction Type: Shipping; Status: Confirmed on 02/02/2022; Based on Seller reference number: 300025955, Contract No. 40011548.</li> <li>Transaction ID TR-d20fe5ab-8b5bdated 20/01/2022; Seller is PT Socfin Indonesia – Negeri Lama Mill (RSPO_PO1000001250); Buyer is PT Multimas Nabati Asahan (RSPO_PO1000000150); Product CSPO; Program IP; Volume 137.01 MT; Transaction Type: Shipping; Status: Confirmed on 20/01/2022; Based on seller reference number 300025918 Contract No. 400011535</li> </ul> <p>There are no certified CPO and PK sold as another scheme or uncertified, therefor PalmTrace’s “Remove” is not applicable.</p>	Complied
3.8.17	Claims	The procedure for claims is stated in SOP for RSPO Supply Chain “Prosedur Supply Chain Certification Standard Identity Preserved” No.	Complied

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	<p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>SOC/PSM/9.10" Rev.9 dated 14 October 2019. The mill only makes claims on RSPO Certified product in compliance with RSPO Rules on Market Communications and Claims. Statement of RSPO certified and Identity Preserved model are only stated in sales documents of RSPO certified product</p> <p>Based on field visit and interview with relevant staff, it demonstrated good understanding on the use of RSPO corporate logo and RSPO trademark on product.</p>	
<b>General corporate communications</b>			
4.1	<p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p>	<p>Previously PT Socfin Indonesia was a registered RSPO member with membership number 1-0017-04-000-00, since 7 February 2004. Since 16 February 2019 PT Socfin Indonesia registered as a member of Socfin SA, with RSPO membership number 1-0269-19-000-00, as seen in website address <a href="https://www.rspo.org/members/8070/Socfin-SA">https://www.rspo.org/members/8070/Socfin-SA</a>.</p> <p>The reason of the change is because the commitment of Socfin's commissioner to certify all of their oil palm plantation under the RSPO scheme. The corporate communication of Socfin Group can found in website address <a href="http://www.socfin.com">http://www.socfin.com</a>.</p>	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> <li>• Display its RSPO membership status</li> <li>• Display the RSPO web address (www.rspo.org)</li> <li>• State that the member supports the work of the RSPO</li> <li>• State the member's history with regard to the RSPO.</li> <li>• Use the RSPO trademark to promote its membership of the RSPO.</li> </ul>	<p>a. Display its RSPO membership status: In the website Socfin Group did not its RSPO membership status, however Socfin Group display the company group that have been certified, which is Okomu (Nigeria), Safacam (Cameroon) and Socfindo (Indonesia).</p> <p>b. Display the RSPO web address (www.rspo.org): The website has a link to www.rspo.org in certification tab&gt;links&gt;RSPO, at address: <a href="https://www.socfin.com/en/certifications">https://www.socfin.com/en/certifications</a>.</p>	Complied

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	Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rsपो.org' where the link must lead to the member's profile page.	<p>c. State that the member supports the work of the RSPO: not in direct manner, however in the website Socfin Group stated: "The Socfin Group, from its beginnings in 1909, has always been attentive to its social and environmental impact in the countries where it operates. Aware of the development challenges that are evolving, the Socfin Group is constantly working to improve its activities in order to be the leader in responsible tropical agriculture".</p> <p>d. State the member's history with regard to the RSPO: the website display link to RSPO certificate of each unit certified.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO: the website does not display RSPO trademark.</p>	
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	In the website, Socfin Group does not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	In the website, Socfin Group ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	In the website, Socfin Group does not use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document.	Complied
<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	PT Socfin Indonesia – Negeri Lama POM stated in sales documents, e.g. "Kontrak Penjualan Lokal" and Delivery Order that the product sold is RSPO Certified CPO or RSPO Certified PK Identity Preserved (IP) Module.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	It was verified that when selling certified oil palm product, PT Socfin Indonesia – Negeri Lama POM stated the supply chain model IP and, e.g. in "Kontrak Penjualan Lokal" and Delivery Order.	Complied

5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a) If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	<p>PT Socfin Indonesia – Negeri Lama POM is not an end-product producer, the site is a palm oil mill with storage tank that only receive, stored and dispatch CPO and PK.</p> <p>Not applicable.</p>	Not Applicable
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>PT Socfin Indonesia – Negeri Lama POM is not an end-product producer, the site is a palm oil mill with storage tank that only receive, stored and dispatch CPO and PK.</p> <p>Not applicable.</p>	Not Applicable
Business to consumer communication			
6.1	<p>Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as ‘product-specific’ claims. Product-specific claims are voluntary.</p>	<p>PT Socfin Indonesia – Negeri Lama POM is an RSPO certificate holder with certificate number RSPO 705569 issued by BSI on 29 May 2019. The unit of certification sold its oil palm product in bulk, no product label attached. No ‘product-specific’ claims are used.</p> <p>Not applicable.</p>	Not Applicable

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6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	PT Socfin Indonesia – Negeri Lama POM is an RSPO certificate holder with certificate number RSPO 705569 issued by BSI on 29 May 2019. The unit of certification sold its oil palm product in bulk, no product label attached. No 'product-specific' claims are used. Not applicable.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	PT Socfin Indonesia – Negeri Lama POM sold its oil palm product in bulk no product pack are used. Not applicable.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	PT Socfin Indonesia – Negeri Lama POM communication has not stated information about the claimant's RSPO membership status.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	PT Socfin Indonesia – Negeri Lama POM is certified RSPO P&C, selling CSPO and CSPK. PT Socfin Indonesia – Negeri Lama POM and the parent company - Socfin Group did not make any communication about their supplier's RSPO membership status.	Not Applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	The site sold its oil palm product in bulk, there is no business to consumer communication implemented.	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	The site sold its oil palm product in bulk, there is no business to consumer communication implemented.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified	PT Socfin Indonesia – Negeri Lama POM is not a retailer or food service company. Not applicable.	Not Applicable

	<p>supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on <a href="http://www.rspo.org">www.rspo.org</a>.</p>		
<p><b>MODULE A – IDENTITY PRESERVED &amp; SEGREGATED SPECIFIC RULES</b></p>			
<p><b>Certified oil palm content (IP)</b></p>			
	<p>For IP, 95% or above of the oil palm content must be RSPO IP-certified.</p>	<p>The IP volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under IP model is considered 100% content.</p>	<p>Complied</p>
	<p>For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.</p>	<p>The site implemented RSPO Supply Chain Module Identity Preserved (IP).</p>	<p>Complied</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.</p>	<p>The IP volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under IP model is considered 100% content.</p>	<p>Complied</p>
<p><b>Labelling and trademark (IP)</b></p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• RSPO trademark which includes the tag 'CERTIFIED' or</li> <li>• RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately</li> </ul>	<p>There is no product partial claims</p>	<p>Not Applicable</p>

	<p>under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.</p>		
<b>Messaging (IP)</b>			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> <li>• The oil palm products contained in this product have been certified to come from RSPO sources. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• The entire supply chain is monitored by independent, RSPO-accredited auditors. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records.</li> </ul>	<p>There are no product partial claims</p>	<p>Not Applicable</p>
<b>Principle 4: Respect community and human rights and deliver benefit</b>			
<p>Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p>			
<b>Criteria 4.1:</b> The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and</p>	<p>PT Socfin Indonesia – Negeri Lama POM as a part of Socfin SA has had human rights policy that signed by Principal Director since 1 June 2019.</p>	<p>Complied</p>

	<p>communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p>	<p>PT Socfin Indonesia – Negeri Lama POM has recognised and is committed to respecting international human rights standards. These shall include at a minimum the human rights standards as set out and defined in:</p> <ul style="list-style-type: none"> <li>• The United Nations declaration on Human Rights Defenders</li> <li>• The Universal Declaration of Human Rights</li> <li>• The International Covenant on Civil and Political Rights (explicitly the protection of whistle-blowing as an aspect of freedom of expression under Article 19)</li> <li>• The International Covenant on Economic, Social and Cultural Rights</li> <li>• The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)</li> <li>• The International Labour Organisation’s (ILO) Declaration on Fundamental Principles and rights to work</li> <li>• Any other guidelines or human rights standards as set out in the laws of the Republic of Indonesia.</li> </ul> <p>PT Socfin Indonesia expressly grants protection for any report documents or information in any form made with a reasonable belief that the information is true at the time it is disclosed.</p> <p>PT Socfin Indonesia shall protect individuals against violence, threats, all forms of retaliation, direct or indirect, pressure or any other arbitrary action as consequence of the individual’s legitimate exercise of their fundamental human rights in course of their engagement with Socfindo.</p> <p>PT Socfin Indonesia shall protect individuals from all forms of retaliation, disadvantage or discrimination in the workplace linked or resulting from</p>	
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		<p>HRD activities. Socfindo shall preserve the individual’s confidentiality and the identity of the individual may not be disclosed without the individual’s explicit informed consent.</p> <p>PT Socfin Indonesia – Negeri Lama POM has also conducted refreshment socialization of policy to the respective stakeholder, such as:</p> <ul style="list-style-type: none"> <li>• Socialization to workers in Negeri Lama POM, dated 17<sup>th</sup> October 2021– was attended by 35 workers</li> <li>• Refreshment for socialization to upkeep workers (fertilizer and pesticide applicator) from Division I &amp; II on 13 September – was attended by 72 participants.</li> <li>• Socialization to the external stakeholder (government agencies staff, police officer, gender committee, labour union, contractor, Siderejo Village) 13<sup>th</sup> June 2021 – was attended by 20 participants.</li> </ul> <p>Based on interview with communities and elder from Negeri Lama Seberang Village and representative of labour union (dated 09/02/2022 obtain information that Socfin Indonesia does not intimidating or violence to solve problem.</p>	
4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.	Based on interview with local communities and elderly from Negeri Lama Seberang Village and representative of Labour Union (dated 09/10/2021) obtain information that PT Socfin Indonesia – Negeri Lama POM does not intimidate or violence (including any form of harassment or paramilitary usage) to solve any problem.	Complied
<b>Criteria 4.2:</b> 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	<b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and	PT Socfin Indonesia – Negeri Lama POM as a part of Socfin SA has had human rights policy that signed by Principal Director since 1 June 2019. The policy stated that:	Complied

	<p>whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p>	<ul style="list-style-type: none"> <li>• PT Socfin Indonesia expressly grants protection for any report documents or information in any form made with a reasonable belief that the information is true at the time it is disclosed.</li> <li>• PT Socfin Indonesia shall protect individuals against violence, threats, all forms of retaliation, direct or indirect, pressure or any other arbitrary action as consequence of the individual’s legitimate exercise of their fundamental human rights in course of their engagement with PT Socfin Indonesia.</li> <li>• PT Socfin Indonesia shall protect individuals from all forms of retaliation, disadvantage or discrimination in the workplace linked or resulting from HRD activities. PT Socfin Indonesia shall preserve the individual’s confidentiality and the identity of the individual may not be disclosed without the individual’s explicit informed consent.</li> </ul> <p>Based on interview with local communities and elder from Negeri Lama Seberang Village (dated 9 February 2022) obtain information that Socfin Indonesia does not intimidating or violence (including any form of harassment or paramilitary usage) to solve any problem.</p>	
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p>	<p>PT Socfin Indonesia – Negeri Lama POM has social communication procedure which consist the procedure to handle complaint, (Document No. SOC/PSM/9.01, Rev.7 dated 01 February 2019).</p> <p>The complaints divided into:</p> <ul style="list-style-type: none"> <li>• External complaint</li> <li>• Internal complaint</li> <li>• Sexual harassment, intimidation, and violence</li> <li>• Complaint from human rights defender and whistle blower.</li> </ul>	Complied

		<p>The procedure is completed with a flowchart for each type of complaint and a description of handling the complaint.</p> <p>Based on document verification, the procedure has been socialized to the respective stakeholder together with communication of company's policies. For example, socialization to the internal stakeholder (mill workers) on 17 January 2022 and attended by 25 workers in scrapper station.</p> <p>Based on interview with government agencies staffs and local community representatives obtain information that they have generally understood on the procedures.</p>	
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p>	<p>According to the complaint handling, PT Socfin Indonesia – Negeri Lama POM has provided the procedure to handling complaint No. SOC/PSM/9.01, Rev.7 dated 01 February 2019. Those shows that it has been arranged regarding the time-period for responding to complaints. For example:</p> <ul style="list-style-type: none"> <li>• Incoming complaints from internal stakeholder shall responded by top management unit's maximum 1 month after the complaint accepted.</li> <li>• Incoming complaints from external stakeholder also shall responded by top management unit's maximum 1 month after the complaint accepted. If the complaints still not met with any settlements, general affair shall inform the complainants regarding the complaint status, progress and any other things needed to reach a settlement. If the settlement of a complaint is not approved by both parties, the complaint can involve a technical or independent mediator or a legitimate third party. Head clerk monitored all the settlement process and progress.</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>Resolution for sexual harassment complaint, intimidation and violence will held by Gender Committee. The meeting for complaints and investigation conducted maximum 1 month after the complaint submitted and the status will be updated on a monthly base by Gender Committee.</li> <li>Resolution of human rights defender complaints and reporting violations will be carried out by the Estate Manager and may involve the General Affair Department. The duration of handling this complaint is not specifically regulated and depends on the size of the case.</li> </ul> <p>Based on the results of interviews with NGOs, community leaders and other interested parties (dated 10<sup>th</sup> February 2022) who had a dispute with PT Socfin Indonesia showed that the resolution of complaints that had been carried out had been done well, without intimidation and violence, including by using mediation by the head of local government agencies and NGOs appointed as their attorneys.</p>	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p>	<p>According to the complaint handling, PT Socfin Indonesia – Negeri Lama POM has provided the procedure to handling complaint No. SOC/PSM/9.01, Rev.7 dated 01 February 2019. The document sighted that the external complaints resolution can be involved with from third party mediator.</p> <p>Based on the results of interviews with local NGO’s (LSM GEMPAR) and community leaders from Desa Sidomulyo and Dusun Sidorejo (dated 10<sup>th</sup> February 2022) stated that there was no land conflict or any form of conflict existing since previous assessment.</p>	Complied

		Based on document review, since 2020 – there was no complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	
<b>Criteria 4.3:</b> The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local community are demonstrated.	<p>PT Socfin Indonesia – Negeri Lama POM has prepared a Corporate Social Responsibility (CSR) Plan 2021 - 2022 which was approved by Estate Manager.</p> <p>Year 2021 – the document of realization of CSR Program has documented “Laporan Corporate Social Responsibility – Kebun Negeri Lama”, such as:</p> <ul style="list-style-type: none"> <li>• Religious activities consist of the assistance of religious holidays, donations for worship places.</li> <li>• Health Care Program is in the form of health development and counsel activities for the surrounding community. Including prepared facility for Covid19 vaccination for surrounding communities.</li> <li>• Educational programs in the form of scholarships for outstanding students and assistance for schools near the company operation.</li> <li>• Infrastructure, road and building for local community development program.</li> <li>• Sports and recreation program in the form of donation of sports equipment and facilities for the community near the area.</li> <li>• Smallholders development program – training program was realization in March 2020. For example, smallholder training related to Best Management Practices (pruning and castration on 14 October 2021, manuring on 13 August 2021, smallholder’s partnership training on 15 July 2021 facilitated by plantation agency of Labuhan Batu Regency).</li> </ul>	Complied

		<p>Total of realization of CSR program year 2021, the organization has provided more than one hundred million.</p> <p>Based on public consultations with the village representatives from Negeri Lama Seberang Village stated that the company has helped many surrounding communities especially material and heavy equipment assistance for the maintenance of public facilities as well as the provision of clean water and sports facilities.</p>	
<p><b>Criteria 4.4:</b> 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.</p>			
<p>4.4.1</p>	<p><b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p>	<p>PT. Socfin Indonesia - Negeri Lama is an oil palm plantation company that has been operating since the Dutch East Indies period at that time still called NV Sennah Rubber Coy Ltd. The concession right issued by Ressen der Oostkust van Sumatra on 21 March 1919 (concession rights No 350 and 351) valid for 75 years. After Indonesian Government issued the policy of converting foreign concession rights imposed as the implementation of the Basic Agrarian Law No. 5 of 1960, the concession rights were converted to Land Use Right (HGU) as per Minister of Agriculture and National Land Decree dated 1 November 1962 which ended on 24 September 1973. In 1965 this estate was controlled by the Indonesian government based on Presidential Decree No. 6 of 1965 and subsequently based on an Agreement between the Government of Indonesia and Plantations Noord Sumatra SA Brussels on 24 April 1968 a joint venture was formed between the Government of Indonesia and the original owner with new provisions to the new company granted a 30-year HGU as mentioned in article 4.a of the agreement.</p> <p>Subsequently, PT Socfin Indonesia get HGU of Negeri Lama Estate which covering an area of 1,900 Ha in accordance with the Decree of the</p>	<p>Complied</p>

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		<p>Minister of Home Affair dated 3 August 1978. On 25 July 1997, this HGU has been extended based on National Land Minister Decree No. 88/HGU/BPN/1997 counting from 1 January 1999 until 31 December 2024 with area 2,164.80 Ha. This latest decree known as legal ownership certificate.</p> <p>Based on public consultation with village representatives from Negeri Lama Seberang obtain information that the company has been operating since the Dutch Colonial Era (approximately 1919). During that time, there was no village near the concession area. At that time, most of the land was owned by Centeng Ongah Diris, which then had been a transfer of land ownership through the selling process or grants. During the selling or grant process, the pipeline area, which is become land dispute object with some villager was not a sales object.</p> <p>As written in previous surveillance report and information gathering through public consultation with related stakeholders (village representative and government agencies concluded that the pipeline case has been closed.</p> <p>The land concession of PT. Socfin Indonesia – Negeri Lama Estate is a land of former concession rights since the Dutch Colonial Era government which was then continued by a joint venture between the Government of Indonesia and previous company under the new name PT. Socfin Indonesia.</p>	
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<p>4.4.2</p>	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p>	<p>Based on document verification on land use title, environmental document, HCV assessment report and public consultation with village representatives from Negeri Lama Seberang, audit team obtain information the company has been operating since the Dutch Colonial Era (approximately 1919) and there was no new land expansion thereafter.</p> <p>However, certificate holder had land acquisition procedure (Document No. SOC/PSM/9.04 Rev.1 that dated 1 January 2010). The procedures describe the process of land acquisition starting from conducting the survey, obtaining directives from the government, land suitability survey, follow-up of land suitability survey, submission of plantation business permit, land acquisition plan and submission of land use title (HGU).</p> <p>At the point of the Land Acquisition Plan related to the Free, Prior and Informed Consent mechanism has been explained including providing information to the surrounding community, meeting with the community, posting announcements to the public and the mass media. Community approval is done through a voluntary process, without coercion and openness. The local the community can be represented by lawyers that appointed by the community itself during the negotiation process. The process of land acquisition is owned by the community or customary rights based on the procedure of giving compensation where in the process of land acquisition. It is possible to be elicited if no agreement is reached with the local community.</p>	<p>Complied</p>
	<p>4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;</p>	<p>PT. Socfin Indonesia – Negeri Lama has procedure for land acquisition and complaints handling. Based on document verification, field visit, and public consultation obtain information that there is no new land expansion since 2005.</p>	

	<p>4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities. Including the implications for the legal status of their land at the expiry of the unit of certification’s title, concession or lease on the land.</p>	<p>Based on document verification, interview with the village representative of Sidomulyo and Sidorejo obtain information that there was no land conflict, or any form of land issue exist since previous assessment.</p> <p>PT. Socfin Indonesia – Negeri Lama has procedure for land acquisition and complaints handling. Based on document verification, field visit, and public consultation obtain information that there is no new land expansion since 2005.</p> <p>Based on document verification, interview with the village representative of Sidomulyo and Sidorejo obtain information that there was no land conflict, or any form of land issue exist since previous assessment.</p>	
<p>4.4.3</p>	<p><b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p>	<p>PT. Socfin Indonesia – Negeri Lama has established procedure for land acquisition and complaints handling. The procedures describe the process of land acquisition starting from conducting the survey, obtaining directives from the government, land suitability survey, follow-up of land suitability survey, submission of plantation business permit, land acquisition plan and submission of land use title (HGU).</p> <p>Inside the procedure Land Acquisition Plan related to the Free, Prior and Informed Consent mechanism has been explained including providing information to the surrounding community, meeting with the community, posting announcements to the public and the mass media. Community approval is done through a voluntary process, without coercion, and to maintain transparency. The local the community can be represented by lawyers that appointed by the community itself during the negotiation process. The process of land acquisition is owned by the community or customary rights based on the procedure of giving compensation where in the process of land acquisition. It is possible to be elicited if no agreement is reached with the local community.</p>	<p>Complied</p>

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		<p>Based on document verification on land use title, environmental document, HCV assessment report and public consultation with village representatives from Sidomulyo Village obtain information that the company has been operated since the Dutch Colonial Era (approximately on 1919) and there was no new land expansion after that time.</p> <p>In 1994, the company conducted an Environmental Impact Assessment that was completed with an Environmental Management Plan (RKL) and an Environmental Monitoring Plan (RPL). Based on the document verification it was revealed there was no customary rights or any others land use rights inside the PT. Socfin Indonesia - Negeri Lama concession (HGU).</p>	
4.4.4	All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.	All documents are available in Bahasa Indonesia. This is contextual with community in Negeri Lama, whereby the language used is Bahasa Indonesia.	Complied
4.4.5	<b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	<p>PT. Socfin Indonesia – Negeri Lama has established procedure for land acquisition and complaints handling. The procedures describe the process of land acquisition starting from conducting the survey, obtaining directives from the government, land suitability survey, follow-up of land suitability survey, submission of plantation business permit, land acquisition plan and submission of land use title (HGU).</p> <p>Inside the procedure Land Acquisition Plan related to the Free, Prior and Informed Consent mechanism has been explained including providing information to the surrounding community, meeting with the community, posting announcements to the public and the mass media. Community approval is done through a voluntary process, without coercion, and to maintain transparency. The local the community can be</p>	Complied

		<p>represented by lawyers that appointed by the community itself during the negotiation process. The process of land acquisition is owned by the community or customary rights based on the procedure of giving compensation where in the process of land acquisition. It is possible to be elicited if no agreement is reached with the local community.</p> <p>Based on document verification, field visit, and public consultation obtain information that there is no new land expansion at least since 2005.</p>	
4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.	<p>PT Socfin Indonesia – Negeri Lama has established procedure for land acquisition and complaints handling.</p> <p>Based on document verification, field visit and public consultation obtain information that there is no new land expansion since 2005.</p>	Complied
<p><b>Criteria 4.5:</b> 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.</p>			
4.5.1	<b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	<p>Based on public consultation with village representatives from Sidomulyo Village obtain information that the company has been operated since the Dutch Colonial Era (approximately 1919). There was no new land expansion since 2005.</p> <p>In 1994, the company conducted an Environmental Impact Assessment that was completed with an Environmental Management Plan (RKL) and an Environmental Monitoring Plan (RPL). Based on the document verification it was revealed there was no customary rights or any others land use rights inside the PT. Socfin Indonesia - Negeri Lama concession (HGU).</p>	Complied

		<p>PT Socfin Indonesia – Negeri Lama conducted HCV assessment and Social Impact Assessment (SIA) in 2011. Based on the document verification, it showed that there was no customary rights or any other land use rights inside the concession area. The information is consistent with the results of public consultations with relevant agencies in Labuhan Batu District and villager representatives especially from Negeri Lama Seberang, Sidomulyo and Sungai Bunga.</p> <p>Company has established Prosedur Identifikasi dan Perhitungan Kompensasi Lahan No.SOC/PSM/9.05 rev.01, dated 1 April 2015.</p> <p>Responsibilities:</p> <ul style="list-style-type: none"> <li>- Principal Director is responsible for final decision in land acquisition.</li> <li>- General Manager is responsible for final recommendation to Principal Director related to acquisition decision related to land acquisition and land compensation calculation.</li> <li>- Related Departments (Planting Dept., General Affairs Dept., Purchasing Dept., Internal Audit Dept.) are responsible to provides data, analysis and recommendation in line with land acquisition purpose.</li> </ul> <p>Activities:</p> <ul style="list-style-type: none"> <li>- Landowner propose land to PT Socfin Indonesia (legal ownership documents, land location, land maps and coordinates, offer letter from landowner).</li> <li>- Principal Director/General Manager: a) Conduct viability review of the offer letter for follow up; b) If viable, can instruct Planting Dept. and General Affairs Dept. to conduct desk study. If not viable, offer letter be archived.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Review the viability of the land based on desk study report carried out by Planting Dept. and General Affairs Dept.</li> <li>- If viable, can instructed for field survey. If not viable, desk study report be archived.</li> <li>- Review the viability of the land based on survey report from Planting Dept. and General Affairs Dept.</li> <li>- If viable, can instructed for due diligence or business feasibility study or appraisal. If not viable, field survey report be archived.</li> <li>- Planting Department: Conduct desk study for the land being offered, consist of a) Land location digital identification based on land coordinates or HGU map from BPN. b) Identification of land cover in the said location from satellite imagery/Google Earth; c) Topographic analysis and land slope from secondary data (satellite imagery); d) Climate type analysis, dry months and wet months. e) Soil type analysis based on Peta Tanah Balai Penelitian Tanah Bogor scale 1:250,000; f) Soil suitability study.</li> <li>- Conduct field survey: ground check the land location, ground check coordinate poles, Area statement or planted area statement, identifies conflicted area, identifies enclaved area, taking soil sample, observing production potential, gather secondary data, check agronomy data.</li> </ul> <p>Company has established Prosedur Pembebasan Lahan No.SOC/PSM/9.04 rev.01, dated 1 January 2010.</p> <p>Activities:</p> <ul style="list-style-type: none"> <li>- Board of Director determines the area needed. Directors appoint survey team to check potential area for oil palm plantation. Survey team clarifies land status: KBK (Kawasan Budidaya Kehutanan),</li> </ul>	
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		<p>Kawasan Budidaya Non Kehutanan (KBNK), Tanah Masyarakat atau Tanah Ulayat (Adat).</p> <ul style="list-style-type: none"> <li>- General Affairs Department proposed "Surat Arahan Lokasi" to local Regent, for area with status Kawasan Budidaya Non Kehutanan (KBNK).</li> <li>- For land area with status Kawasan Budidaya Kehutanan (KBK), General Affairs Department prepare permit for forest area release to Ministry of Forestry. If permit cannot be obtained, Director appoint new area.</li> <li>- Survey team prepared for land suitability survey, once obtained "Surat Arahan Lokasi" from local Regent to check: land ownership identification, land use by local communities; land quality and suitability (soil physical and chemical); social condition (local community acceptance and potential social conflict); produce land suitability report, including land condition and social-economy condition. The report submitted to board of director.</li> </ul>	
4.5.2	<p><b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions. All the relevant information and documents are made available, and community have option of resourced access to independent third-party advice through a documented, long-term and two- way process of consultation and negotiation.</p>	<p>Based on public consultation with village representatives from Sidomulyo Village obtain information that the company has been operated since the Dutch Colonial Era (approximately 1919). There was no new land expansion since 2005.</p> <p>Inside the procedure Land Acquisition Plan related to the Free, Prior and Informed Consent mechanism has been explained including providing information to the surrounding community, meeting with the community, posting announcements to the public and the mass media. Community approval is done through a voluntary process, without coercion, and to maintain transparency. The local the community can be represented by lawyers that appointed by the community itself during the negotiation process. The process of land acquisition is owned by the community or customary rights based on the procedure of giving</p>	Complied

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		<p>compensation where in the process of land acquisition. It is possible to be elucidated if no agreement is reached with the local community.</p> <p>PT. Socfin Indonesia – Negeri Lama carried out communication and consultation process in form of review of social studies and documented under <i>"Review of Social Impact Assessment Report"</i>. The last review was carried out in January 2020 involving the participation of the parties including the affected communities and randomly sampled workers. The collection of data from response through the structured interview method using a list of questions in the "Social Impact Assessment Questionnaire". The list of questionnaires consist guidance list such as livelihood, access to food, road access and public facilities, and provision of basic resources (water, etc.) including cattle feed.</p> <p>Access to independent third-party advice was freely demonstrated by local communities. Based on document verification, field visit, and public consultation obtain information that there is no new land expansion at least since 2005. However, there was a record of complaint from some of villagers from Negeri Lama Seberang (represented by the NGO TIPAN-RI). The complaint was related to the use of land under water pipe located crossing the community's land. This case was being resolved and as per "RSPO letter on Decision by Complaints Panel on the Complaint against PT. Socfin Indonesia Complaint Ref:RSPO/2019/17/SW dated 12 May 2020" stating "Considering the fact that the Complainant has failed to respond to the Secretariat's queries on the withdrawal and taking into consideration that information obtained from a community member indicates that the Complaint was lodged without their knowledge against the Respondent, the Complaints Panel hereby delivers its decision to dismiss and close this Complaint against PT. Socfin Indonesia".</p>	
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		<p>However, according to the case tracker: <a href="https://askrspo.force.com/Complaint/s/case/5000o00002aSOxkAAG/detail">https://askrspo.force.com/Complaint/s/case/5000o00002aSOxkAAG/detail</a>, this case was officially dismissed and closed since 12 May 2020.</p>	
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'agree' or 'not agree' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p>	<p>Based on public consultation with village representatives from Sidomulyo obtain information that the company has been operated since the Dutch Colonial Era (approximately 1919). There is no new land expansion since 2005.</p> <p>In 1994, the company conducted an Environmental Impact Assessment that was completed with an Environmental Management Plan (RKL) and an Environmental Monitoring Plan (RPL). Based on the document verification it was revealed that there were no customary rights or any others land use rights inside the PT Socfin Indonesia - Negeri Lama concession (HGU).</p>	Complied
4.5.4	<p>To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of land allocations process.</p>	<p>Based on public consultation with village representatives from Sidomulyo obtain information that the company has been operated since the Dutch Colonial Era (approximately 1919). There was no new land expansion since 2005.</p> <p>In 1994, the company conducted an Environmental Impact Assessment that was completed with an Environmental Management Plan (RKL) and an Environmental Monitoring Plan (RPL). Based on the document verification it was revealed that there were no customary rights or any others land use rights inside the PT Socfin Indonesia - Negeri Lama concession (HGU).</p>	Complied

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		<p>PT. Socfin Indonesia – Negeri Lama carried out communication and consultation process in form of review of social studies and documented under <i>"Review of Social Impact Assessment Report"</i>. The last review was carried out in January 2020 involving the participation of the parties including the affected communities and randomly sampled workers. The collection of data from response through the structured interview method using a list of questions in the "Social Impact Assessment Questionnaire". One of questionnaires consist inquiries related to food security and water resources. The response from consultation carried out: company support in provision of road access to reach market and stores in town, free access to gather mushroom and other vegetables, water provision from refill water station.</p>	
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p>	<p>Based on public consultation with village representatives from Sidomulyo obtain information that the company has been operated since the Dutch Colonial Era (approximately 1919). There was no new land expansion since 2005.</p> <p>In 1994, the company conducted an Environmental Impact Assessment that was completed with an Environmental Management Plan (RKL) and an Environmental Monitoring Plan (RPL). Based on the document verification it was revealed that there were no customary rights or any others land use rights inside the PT. Socfin Indonesia - Negeri Lama concession (HGU).</p>	Complied
4.5.6	<p>Evidence is available that the communities or their representatives gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p>	<p>Based on public consultation with village representatives from Sidomulyo obtain information that the company has been operated since the Dutch Colonial Era (approximately 1919). There was no new land expansion since 2005.</p> <p>As explained under indicator 4.4.1, PT. Socfin Indonesia - Negeri Lama has been operating since the Dutch East Indies period at that time still</p>	Complied

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		<p>called NV Sennah Rubber Coy Ltd. The concession right issued by Ressen der Oostkust van Sumatra on 21 March 1919 (concession rights No 350 and 351) valid for 75 years. After Indonesian Government issued the policy of converting foreign concession rights imposed as the implementation of the Basic Agrarian Law No. 5 of 1960, the concession rights were converted to Land Use Right (HGU) as per Minister of Agriculture and National Land Decree dated 1 November 1962 which ended on 24 September 1973. In 1965 this estate was controlled by the Indonesian government based on Presidential Decree No. 6 of 1965 and subsequently based on an Agreement between the Government of Indonesia and Plantations Noord Sumatra SA Brussels on 24 April 1968 a joint venture was formed between the Government of Indonesia and the original owner with new provisions to the new company granted a 30-year HGU as mentioned in article 4.a of the agreement.</p> <p>After that, PT Socfin Indonesia get HGU of Negeri Lama Estate which covering an area of 1,900 Ha in accordance with the Decree of the Minister of Home Affair dated 3 August 1978.</p> <p>In 1994, the company conducted an Environmental Impact Assessment that was completed with an Environmental Management Plan (RKL) and an Environmental Monitoring Plan (RPL). Based on the document verification it was revealed that there were no customary rights or any others land use rights inside the PT. Socfin Indonesia - Negeri Lama concession (HGU).</p>	
4.5.7	<p>After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.</p>	<p>SOCFIN – NEGERI LAMA has been established since 1919, where the Mill constructed in 1928. There are no expansion area or crops conversion up to 2021. The Mill and estate are still existing.</p>	Complied

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		<p>However, unit of certification has procedure for land acquisition and complaints handling. At the point of the Land Acquisition Plan (Point 5.5.3) the Free, Prior and Informed Consent mechanism has been explained including providing information to the surrounding community, meeting with the community, posting announcements to the public and the mass media. Community approval is done through a voluntary process, without coercion and openness. The local the community can be represented by lawyers that appointed by the community itself during the negotiation process. The process of land acquisition is owned by the community or customary rights based on the procedure of giving compensation where in the process of land acquisition. It is possible to be elicited if no agreement is reached with the local community.</p>	
4.5.8	<p><b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation.</p>	<p>SOCFIN – NEGERI LAMA has been established since 1919, where the Mill constructed in 1928. There are no expansion area or crops conversion up to 2021. The Mill and estate are still existing.</p> <p>However, unit of certification has procedure for land acquisition and complaints handling. At the point of the Land Acquisition Plan (Point 5.5.3) the Free, Prior and Informed Consent mechanism has been explained including providing information to the surrounding community, meeting with the community, posting announcements to the public and the mass media. Community approval is done through a voluntary process, without coercion and openness. The local the community can be represented by lawyers that appointed by the community itself during the negotiation process. The process of land acquisition is owned by the community or customary rights based on the procedure of giving compensation where in the process of land acquisition. It is possible to be elicited if no agreement is reached with the local community.</p>	Complied

<p><b>Criteria 4.6:</b> 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.</p>		
<p>4.6.1</p>	<p><b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p>	<p>Based on interviews with village head and community from Sidomulyo village and public consultation with local government agencies in Labuhanbatu Regency, audit team obtain information that PT. Socfin Indonesia – Negeri Lama has been operating since the Dutch Colonial Era around 1919. There was no new expansion or new land acquisition process from the local communities since that time.</p> <p>Through the SEIA, SIA and HCV assessment that has been conducted conclude that there were no customary land or indigenous people in their concession areas.</p> <p>Therefore, no identification of legal right, customary right, or user right for compensation or payment made to any landowner.</p> <p>However, certificate holder has established procedure for land acquisition and complaints handling (if any). At the point of the Land Acquisition Plan related to the Free, Prior and Informed Consent mechanism has been explained including providing information to the surrounding community, meeting with the community, posting announcements to the public and the mass media. Community approval will be done through a voluntary process, without coercion and be uphold transparency. The local the community can be represented by lawyers that appointed by the community itself during the negotiation process. The process of land acquisition is owned by the community or customary rights based on the procedure of giving compensation where in the process of land acquisition. It is possible to be elucidated if no agreement is reached with the local community.</p>

Complied

<p>4.6.2</p>	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p>	<p>Based on interviews with village head and community from Sidomulyo village and public consultation with local government agencies in Labuhanbatu Regency, audit team obtain information that PT. Socfin Indonesia – Negeri Lama has been operating since the Dutch Colonial Era around 1919. There was no new expansion or new land acquisition process from the local communities since that time.</p> <p>Through the SEIA, SIA and HCV assessment that has been conducted conclude that there were no customary land or indigenous people in their concession areas.</p> <p>Therefore, no calculation and distribution for compensation or payment made to any landowner.</p> <p>However, certificate holder has established procedure for land acquisition and complaints handling (if any). At the point of the Land Acquisition Plan related to the Free, Prior and Informed Consent mechanism has been explained including providing information to the surrounding community, meeting with the community, posting announcements to the public and the mass media. Community approval will be done through a voluntary process, without coercion and be uphold transparency. The local the community can be represented by lawyers that appointed by the community itself during the negotiation process. The process of land acquisition is owned by the community or customary rights based on the procedure of giving compensation where in the process of land acquisition. It is possible to be elicited if no agreement is reached with the local community.</p>	<p>Complied</p>
<p>4.6.3</p>	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement).</p>	<p>Based on interviews with village head and community from Sidomulyo village and public consultation with local government agencies in Labuhanbatu Regency, audit team obtain information that PT. Socfin Indonesia – Negeri Lama has been operating since the Dutch Colonial</p>	<p>Complied</p>

		<p>Era around 1919. There was no new expansion or new land acquisition process from the local communities since that time.</p> <p>Through the SEIA, SIA and HCV assessment that has been conducted conclude that there were no customary land or indigenous people in their concession areas. Furthermore, there is no development for smallholding.</p>	
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them.</p>	<p>Based on interviews with village head and community from Sidomulyo village and public consultation with local government agencies in Labuhanbatu Regency, audit team obtain information that PT. Socfin Indonesia – Negeri Lama has been operating since the Dutch Colonial Era around 1919. There was no new expansion or new land acquisition process from the local communities since that time.</p> <p>Through the SEIA, SIA and HCV assessment that has been conducted conclude that there were no customary land or indigenous people in their concession areas.</p> <p>Therefore, no calculation and distribution for compensation or payment made to any landowner.</p> <p>However, certificate holder has established procedure for land acquisition and complaints handling (if any). At the point of the Land Acquisition Plan related to the Free, Prior and Informed Consent mechanism has been explained including providing information to the surrounding community, meeting with the community, posting announcements to the public and the mass media. Community approval will be done through a voluntary process, without coercion and be uphold transparency. The local the community can be represented by</p>	Complied

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		<p>lawyers that appointed by the community itself during the negotiation process. The process of land acquisition is owned by the community or customary rights based on the procedure of giving compensation where in the process of land acquisition. It is possible to be elucidated if no agreement is reached with the local community.</p>	
<p><b>Criteria 4.7:</b> Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
<p>4.7.1</p>	<p><b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.</p>	<p>Based on interviews with village head and community from Sidomulyo village and public consultation with local government agencies in Labuhanbatu Regency, audit team obtain information that PT. Socfin Indonesia – Negeri Lama has been operating since the Dutch Colonial Era around 1919. There was no new expansion or new land acquisition process from the local communities since that time.</p> <p>Therefore, there is no identification for compensation or payment made to any landowner.</p> <p>Through the SEIA, SIA and HCV assessment that has been conducted conclude that there were no customary land or indigenous people in their concession.</p> <p>However, certificate holder has established procedure for land acquisition and complaints handling (if any). At the point of the Land Acquisition Plan related to the Free, Prior and Informed Consent mechanism has been explained including providing information to the surrounding community, meeting with the community, posting announcements to the public and the mass media. Community approval will be done through a voluntary process, without coercion and be uphold transparency. The local the community can be represented by</p>	<p>Complied</p>

		<p>lawyers that appointed by the community itself during the negotiation process. The process of land acquisition is owned by the community or customary rights based on the procedure of giving compensation where in the process of land acquisition. It is possible to be elicited if no agreement is reached with the local community.</p>	
<p>4.7.2</p>	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p>	<p>Based on interviews with village head and community from Sidomulyo village and public consultation with local government agencies in Labuhanbatu Regency, audit team obtain information that PT. Socfin Indonesia – Negeri Lama has been operating since the Dutch Colonial Era around 1919. There was no new expansion or new land acquisition process from the local communities since that time.</p> <p>Therefore, there is no identification for compensation or payment made to any landowner.</p> <p>Through the SEIA, SIA and HCV assessment that has been conducted conclude that there were no customary land or indigenous people in their concession.</p> <p>However, certificate holder has established procedure for land acquisition and complaints handling (if any). At the point of the Land Acquisition Plan related to the Free, Prior and Informed Consent mechanism has been explained including providing information to the surrounding community, meeting with the community, posting announcements to the public and the mass media. Community approval will be done through a voluntary process, without coercion and be uphold transparency. The local the community can be represented by lawyers that appointed by the community itself during the negotiation process. The process of land acquisition is owned by the community or customary rights based on the procedure of giving compensation where</p>	<p>Complied</p>

		in the process of land acquisition. It is possible to be elicited if no agreement is reached with the local community.	
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	<p>Based on interviews with village head and community from Sidomulyo village and public consultation with local government agencies in Labuhanbatu Regency, audit team obtain information that PT. Socfin Indonesia – Negeri Lama has been operating since the Dutch Colonial Era around 1919. There was no new expansion or new land acquisition process from the local communities since that time.</p> <p>Therefore, there is no calculation or distribution for compensation or payment made to any landowner.</p>	Complied
<b>Criteria 4.8:</b> The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	<p>Based on public consultation with village representatives from Sidomulyo obtain information that the company has been operated since the Dutch Colonial Era (approximately on 1919). There was no land expansion since 2005. During the audit found some facts as follows:</p> <ul style="list-style-type: none"> <li>• Based on document verification <i>Onderneming Map, Origineel 1953 schaal 1: 10,000</i>, according to to measurement report <i>Landmeetkundige Dienst</i> on August 1949 and diperbaharui (<i>Bijgewerkt</i>) on August 1952 showed that the pipe was included in the total area of the concession (2,248 Ha).</li> <li>• Based on document verification of the land title map year 1978 shows the pipeline area inside the concession area of 2,077 Ha and the HGU area of of 1,866 Ha were still drawn on the map.</li> </ul> <p>Based on document verification, there was a dispute between some of the villagers of Negeri Lama Seberang regarding the claim that PT. Socfin Indonesia – Negeri Lama Estate occupied their land for water</p>	Complied

		<p>pipelines by mill for the mill operational and supply of clean water for employee. The case was submitted by</p> <p>However, the complainants expressed dissatisfaction and appointed legal counsel or Non-Government Organization (NGO) namely <i>Tim Penyelamat Aset Negara Republic Indonesia – TIPAN RI</i>. They has got the decision letter has been furnished and submitted to both parties and the closure of this complaint is without an appeal period as it is based on the considering the fact that the Complainant has failed to respond to the Secretariat's queries on the withdrawal of the Complaint and taking into consideration that information obtained from a community member indicates that the Complaint was lodged without their knowledge against the Respondent.</p> <p>Therefore, the Complaint is officially dismissed and closed on 12 May 2020. The decision can be seen on <a href="https://askrspo.force.com/Complaint/s/case/5000o00002aSOxkAAG/detail">https://askrspo.force.com/Complaint/s/case/5000o00002aSOxkAAG/detail</a>.</p>	
4.8.2	<p><b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p>	<p>Based on public consultation with village representatives from Sidomulyo obtain information that the company has been operated since the Dutch Era (approximately on 1919). There is no new land expansion at least since 2005. During the audit found some facts as follows:</p> <p>In 1994, the company conducted an Environmental Impact Assessment that was completed with an Environmental Management Plan (RKL) and an Environmental Monitoring Plan (RPL). Based on the document verification it was revealed that there were no customary rights or any others land use rights inside the PT Socfin Indonesia - Negeri Lama concession (HGU).</p>	Complied

		<p>As explained in indicator 1.1.1, certificate holder has had social communication procedure which consist the procedure to handling complaint. The complaints divided into:</p> <ul style="list-style-type: none"> <li>• External complaint</li> <li>• Internal complaint</li> <li>• Sexual harassment, intimidation, and violence</li> <li>• Complaint from human rights defender and whistle blower.</li> </ul> <p><i>Note: External complaint are also regarding to land dispute.</i></p> <p>Based on document verification through RSPO website <a href="https://askrspo.force.com/Complaint/s/case/5000o00002aSOxkAAG/">https://askrspo.force.com/Complaint/s/case/5000o00002aSOxkAAG/</a> and desk study in local news, there was a dispute between some of the villagers of Negeri Lama Seberang regarding the claim that PT Socfin Indonesia – Negeri Lama Estate occupied their land for water pipelines by mill for the mill operational and supply of clean water for employee.</p> <p>Update regarding to this issue</p> <p><b>26 February 2020:</b></p> <ul style="list-style-type: none"> <li>• The Complainant sent a formal letter to the Secretariat stating their wishes to withdraw the Complaint.</li> <li>• The Complaints Panel has directed the Secretariat to obtain confirmation from the community on the status of the withdrawal.</li> </ul> <p><b>25 March 2020</b></p>	
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		<p>Pending response from the Complainant with respect to the confirmation from the community on the status of withdrawal of Complaint.</p> <p><b>12 May 2020</b></p> <p>The decision letter has been furnished and submitted to both parties and the closure of this complaint is without an appeal period as it is based on the considering the fact that the Complainant has failed to respond to the Secretariat's queries on the withdrawal of the Complaint and taking into consideration that information obtained from a community member indicates that the Complaint was lodged without their knowledge against the Respondent.</p> <p>Therefore, the Complaint is officially dismissed and closed.</p> <p>This information and document can be found and downloaded on:  <a href="https://askrspo.force.com/Complaint/s/case/5000o00002aSOxkAAG/">https://askrspo.force.com/Complaint/s/case/5000o00002aSOxkAAG/</a></p>	
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).</p>	<p>Based on interviews with village head and community from Sidomulyo village and public consultation with local government agencies in Labuhanbatu Regency, audit team obtain information that PT. Socfin Indonesia – Negeri Lama has been operating since the Dutch Colonial Era around 1919.</p> <p>There was no new expansion or new land acquisition process from the local communities since that time.</p> <p>There was no acquisition through dispossession or forced abandonment of customary or user rights.</p>	Complied

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4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).	<p>PT. Socfin Indonesia – Negeri Lama implemented participatory mapping and ground truthing to seek factual information, with participation of interested parties.</p> <p>Audit team follow up the close out of dispute between some of the villagers of Negeri Lama Seberang regarding the claim that PT Socfin Indonesia – Negeri Lama Estate occupied their land for water pipelines by mill for the mill operational and supply of clean water for employee.</p> <p>The villagers objection was then followed up with negotiations facilitated by local government of Bilah Hilir District and followed with joint measurement that was carried out on 22 January 2019. According to the minutes of meeting of measurement, those measurement attended by local government staff, police officer, complainants, village head of Negeri Lama Seberang and company’s staff and the report of measurement recorded in minutes of meeting of water pipeline from the mill to the Bilah River. Based on the results of these measurements it is stated that "Community owned land is not crossed by the PT. Socfin Indonesia pipeline" and boundary stakes have been set up in the residents' right and left of the pipeline network. The Minutes of Meeting are signed by the relevant parties including community leaders of the Negeri Lama Seberang Village, complainants and the surveyor team including the Water Pipeline Sketch.</p>	Complied
<p><b>Principle 5: Support smallholder inclusion</b></p>			
<p>Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p>			
<p><b>Criteria 5.1:</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
5.1.1	Current and previous period prices for FFB are publicly available and accessible by smallholders.	PT Socfin Indonesia – Negeri Lama POM was not receiving FFB from another FFB sources/supplier/smallholder. All FFB receive by POM was	Complied

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		from company-own Estate (Negeri Lama Estate) which - RSPO certified. Therefore, FFB pricing for FFB supplier/smallholder is not applicable.	
5.1.2	<b>(C)</b> Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	PT Socfin Indonesia – Negeri Lama POM was not receiving FFB from another FFB sources/supplier/smallholder. All FFB receive by POM was from company-own Estate (Negeri Lama Estate) which - RSPO certified. Therefore, FFB pricing for FFB supplier/smallholder is not applicable.	Complied
5.1.3	<b>(C)</b> Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	PT Socfin Indonesia – Negeri Lama POM was not receiving FFB from another FFB sources/supplier/smallholder. All FFB receive by POM was from company-own Estate (Negeri Lama Estate) which - RSPO certified. Therefore, FFB pricing for FFB supplier/smallholder is not applicable.	Complied
5.1.4	<b>(C)</b> Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and repayments through FFB price reductions for replanting and/or, other support mechanisms where applicable.	PT Socfin Indonesia – Negeri Lama POM was not receiving FFB from another FFB sources/supplier/smallholder. All FFB receive by POM was from company-own Estate (Negeri Lama Estate) which - RSPO certified. Therefore, FFB pricing for FFB supplier/smallholder is not applicable.	Complied
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	PT Socfin Indonesia – Negeri Lama POM was not receiving FFB from another FFB sources/supplier/smallholder. All FFB receive by POM was from company-own Estate (Negeri Lama Estate) which - RSPO certified. Therefore, FFB pricing for FFB supplier/smallholder is not applicable.	Complied
5.1.6	<b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.	PT Socfin Indonesia – Negeri Lama POM was not receiving FFB from another FFB sources/supplier/smallholder. All FFB receive by POM was from company-own Estate (Negeri Lama Estate) which - RSPO certified. Therefore, FFB pricing for FFB supplier/smallholder is not applicable.	Complied
5.1.7	Weighing equipment is verified by an independent third party on a regular basis.	Weighbridge has been calibrated based on: "Surat Keterangan Hasil Pengujian UPTD Metrologi Legal Dinas Perdagangan dan Perindustrian Kabupaten Labuhanbatu No.510.3/076/Dagind-Met/KHP/06/2021" dated 24 June 2021, valid until 24 June 2022. Detail information; Brand	Complied

		GSC; Type GST-9600; S/N 9670030; Capacity 30,000 kg; User PT. Socfin Indonesia.	
5.1.8	The unit of certification supports Independent smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholder on who runs the Internal Controlling System (ICS), who holds the certificate, and who owns and sells certified materials.	<p>Unit of Certification have established “Perjanjian Kerjasama Kemitraan Berkelanjutan antara Perusahaan PT Socfin Indonesia – Kebun Negeri Lama dengan Kelompok Tani Maju Jaya” dated 27 January 2021. The agreement stipulates PT. Socfin Indonesia – Negeri Lama provide guidance and supervisory in terms of planning, technical management and administrative support for smallholder of 53 households covering area of 490.3 Ha. Further information described in indicator 5.2.1.</p> <p>However, the collaboration for the certification process for independent smallholders has not yet reached due to several land title constraints and other technical aspects.</p>	Complied
5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.	<p>PT Socfin Indonesia – Negeri Lama POM has prepared the procedure on grievance mechanism, as documented at procedure to handling complaint No. SOC/PSM/9.01, Rev.7 dated 01 February 2019.</p> <p>Incoming complaints from external stakeholder (including smallholders) shall responded by top management unit’s maximum 1 month after the complaint accepted. If the complaints still not met with any settlements, general affair shall inform the complainants regarding the complaint status, progress and any other things needed to reach a settlement. If the settlement of a complaint is not approved by both parties, the complaint can involve a technical or independent mediator or a legitimate third party. Head clerk monitored all the settlement process and progress.</p>	Complied

		<p>Based on public consultation with external stakeholders confirmed that they understand of grievance mechanism, which respects anonymity and protects complainants where requested. There was no complaints submitted within 2021 – 2022.</p>	
<p><b>Criteria 5.2:</b> The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			
<p>5.2.1</p>	<p>The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p>	<p>Unit of Certification have established “Perjanjian Kerjasama Kemitraan Berkelanjutan antara Perusahaan PT Socfin Indonesia – Kebun Negeri Lama dengan Kelompok Tani Maju Jaya” dated 27 January 2021. The agreement stipulates PT. Socfin Indonesia – Negeri Lama provide guidance and supervisory in terms of planning, technical management and administrative support for smallholder of 53 households covering area of 490.3 Ha.</p> <p>This agreement has been reported to Plantation Service and responded “Surat Kepala Dinas Pertanian Kabupaten Labuhanbatu No.520/0189/DIPERTA-BUN/2021 perihal Surat Keterangan”, dated 29 January 2021. The letter stipulates the plantation service acknowledge the agreement between PT. Socfin Indonesia – Negeri Lama and Kelompok Tani Maju Jaya Desa Sidomulyo; and the plantation service will conduct verification.</p> <p>PT Socfin Indonesia – Negeri Lama POM demonstrated independent smallholder’s livelihood improvement programmes “Realisasi Program Kemitraan Tahun 2021 PT Socfin Indonesia - Negeri Lama dengan Kelompok Tani Maju Jaya Desa Sidomulyo” approved 20 January 2022.</p> <p>The program comprises of different aspects and activities:</p> <ul style="list-style-type: none"> <li>• Dissemination of “Program Sawit Rakyat (PSR)” by “Tim Pemasaran Bibit Kelapa Sawit PT Socfin Indonesia Medan – March 2021; Inventory land ownership letter – May 2021;</li> <li>• Facilitating land certification to BPN - June 2021;</li> </ul>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>• Facilitate meeting with Plantation Services related to Perkebunan Sawit Rakyat (PSR) &amp; Facilitate meeting with banking/financial institution related to Perkebunan Sawit Rakyat (PSR) – June 2021;</li> <li>• Technical guidance and practice for nursery – July 2021;</li> <li>• Technical guidance and practice for replanting – August 2021;</li> <li>• Technical guidance and practice for fertilizer application and upkeep for immature palm &amp; Socialization of RSPO P&amp;C for sustainable oil palm – September 2021;</li> <li>• Technical guidance and practice for fertilizer application and upkeep for mature palm – October 2021;</li> <li>• Technical guidance and practice for pruning and bunch cutting – November 2021;</li> <li>• Technical guidance and practice for transport management &amp; Evaluation on “Program Kemitraan” – December 2021.</li> </ul>	
5.2.2	<p>The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).</p>	<p>Unit of Certification have established “Perjanjian Kerjasama Kemitraan Berkelanjutan antara Perusahaan PT Socfin Indonesia - Kebun Negeri Lama dengan Kelompok Tani Maju Jaya” dated 27 January 2021. The agreement stipulates PT Socfin Indonesia – Negeri Lama provide guidance and supervisory in terms of planning, technical management and administrative support for smallholder of 53 households covering area of 490.3 Ha. This agreement has been reported to Plantation Service and responded “Surat Kepala Dinas Pertanian Kabupaten Labuhanbatu No.520/0189/DIPERTA-BUN/2021 perihal Surat Keterangan”, dated 29 January 2021. The letter stipulates the plantation service acknowledge the agreement between PT. Socfin Indonesia – Negeri Lama and Kelompok Tani Maju Jaya Desa Sidomulyo; and the plantation service will conduct verification.</p>	Complied
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p>	<p>PT. SOCFIN Indonesia – Negeri Lama POM is implementing IP supply chain model. There is no uncertified FFB entering the mill. Beside, this</p>	Complied

		unit of certification does not have scheme smallholders. Supporting to independent smallholders surrounding the plantation was performed continuously, on of which is assisting smallholders to obtain land title. Obviously, this program is aimed to promote legality of FFB production by independent smallholders.	
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	PT. Socfin Indonesia – Negeri Lama provided Best Management Practices Training to independent smallholder of Sidomulyo village, 24 April 2020. The training attended by 28 smallholders and 5 village authorities. The training includes information related to agrochemical handling, agrochemical storage, agrochemical dosage and application, agrochemical waste disposal.	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	Monitoring of partnership program implemented in 2020 recorded under “Evaluasi Kinerja Kebun Negeri Lama tahun 2020”, carried out on 19 January 2021 (attended by 7 personnel). Monitoring highlighted: <ul style="list-style-type: none"> <li>- Progress for implementation of smallholder partnership program 2020 was in phase of identification and land survey. Other program planned for 2020 was postponed due to COVID-19 pandemic.</li> <li>- Management has coordinates with seedling marketing in Medan for socialization of certified seedling to smallholders.</li> <li>- Assistant manager to prepare 2021 smallholder partnership program.</li> </ul>	Complied
<p><b>Principle 6: respect workers’ rights and conditions</b>  Protect workers’ rights and ensure safe and decent working conditions.</p>			
<p><b>Criteria 6.1:</b> Any form of discrimination is prohibited.</p>			
6.1.1	(C) A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic	PT Socfin Indonesia – Negeri Lama POM has procedure, which regulated that hiring and promotion of workers are based on skill, work experiences, and job evaluation.	Complied

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	<p>origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p>	<p>Recruitment process was documented in procedure “<i>Penerimaan Pekerja KHT Kebun</i>” No Doc: SOC/PSM/6.01.01, 1st revision dated 1st December 2015. Based on that procedure can be seen that the selection, recruitment, and promotion of workers based on qualification standard for the job.</p> <p>Employee credential and medical history were documented and recorded very well and has been reviewed during audit. All company policy reviewed every year by Sustainability Sub Department, PT Socfin Indonesia. Employees’ evaluation was conducted every November to decide promotion of employees.</p> <p>PT Socfin Indonesia – Negeri Lama POM has also prepared the procedure for promotion, retirement, and termination as per “Sistem Manajemen Socfindo Prosedur Promosi, Mutasi dan Demosi”, document number: SOC/PSM/6.14, edition 01 dated 17<sup>th</sup> October 2016.</p> <p>Promotion and upgrade are based on employee appraisal conducted annually as outlined in the Employee Assessment Form signed by the employee concerned, approved by the line manager, and checked by the General Manager. The form indicates that there is no indication of employment discrimination in terms of ethnicity, caste, religion, disability, gender, sexual orientation, union membership, political affiliation and/or age.</p> <p>Based on interview with random workers during field visit and labour representatives during public consultation obtained information that there is no discrimination among the workers. All workers in estate and</p>	
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		<p>mill came from various race, tribes, religion and gender. All workers are equal in pay, career opportunities, treatment in the work environment and other benefits.</p> <p>Data verified – recruitment process year 2021:</p> <ul style="list-style-type: none"> <li>• Letter of employee request in PT Socfin Indonesia – Negeri Lama, document no. NL/UM/Bi/024/21 dated 14 July 2021, requested from Negeri Lama to General Department related to recruitment for 4 harvesters</li> <li>• Management through General Department has approved the request based on letter No: UM/Bi/1431/2021 dated 38 July 2021</li> <li>• Management of Negeri Lama has informed to head of local communities/villages and Manpower Agency in Labuhanbatu Regency based on letter No: NL/UM/Bi/037/21 related to open recruitments (total: 4 workers). It has completed with schedule of recruitment process and the requirement needed.</li> <li>• Document of recruitment: application letter, selection result records (administration, competition and MCU) and the final recommendation of recruitment process.</li> <li>• Determination of recruitment result based on letter No UM/NL/Bi/231/2021, dated 18 November 2021.</li> <li>• Induction for new employee related to company policy, OHS policy and collective labour agreement dated 1 December 2021 was attended by all new workers.</li> <li>• Promotion document as per letter from the General Division No. NL/Div/II/039/2021 dated 20 January 2021 concerning promotion of employee Group on behalf of Mr Denni Sukamto - promotion from group IV/4 to IV/5, effective dated 1<sup>st</sup> January 2021.</li> </ul>	
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6.1.2	<p><b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.</p>	<p>PT Socfin Indonesia – Negeri Lama has been established since 1919, where the Mill constructed in 1928. Most of the workers are hereditary generations from their parents who previously also worked for the company. Due to the excess supply of workers, the company does not need migrant workers.</p> <p>Based on interview with random workers during field visit and labour representatives during public consultation obtained information that there is no discrimination against local people or women. All workers are equal in pay, career opportunities, treatment in the work environment and other benefits.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p>	<p>PT Socfin Indonesia – Negeri Lama POM has procedure, which regulated that hiring and promotion of workers are based on skill, work experiences, and job evaluation.</p> <p>Recruitment process was documented in procedure “<i>Penerimaan Pekerja KHT Kebun</i>” No Doc: SOC/PSM/6.01.01, 3<sup>rd</sup> revision dated 20th February 2020. Based on that procedure can be seen that the selection, recruitment, and promotion of workers based on qualification standard for the job.</p> <p>Employee credential and medical history were documented and recorded very well and has been reviewed during audit. All company policy reviewed every year by Sustainability Sub Department, PT Socfin Indonesia. Employees’ evaluation was conducted every November to decide promotion of employees.</p>	Complied

		<p>PT Socfin Indonesia – Negeri Lama POM has also prepared the procedure for promotion, retirement, and termination as per “Sistem Manajemen Socfindo Prosedur Promosi, Mutasi dan Demosi”, document number: SOC/PSM/6.14, edition 01 dated 17<sup>th</sup> October 2016.</p> <p>Promotion and upgrade are based on employee appraisal conducted annually as outlined in the Employee Assessment Form signed by the employee concerned, approved by the line manager, and checked by the General Manager. The form indicates that there is no indication of employment discrimination in terms of ethnicity, caste, religion, disability, gender, sexual orientation, union membership, political affiliation and/or age.</p> <p>Data verified – recruitment process year 2021:</p> <ul style="list-style-type: none"> <li>• Letter of employee request in PT Socfin Indonesia – Negeri Lama, document no. NL/UM/Bi/024/21 dated 14 July 2021, requested from Negeri Lama to General Department related to recruitment for 4 harvesters</li> <li>• Management through General Department has approved the request based on letter No: UM/Bi/1431/2021 dated 38 July 2021</li> <li>• Management of Negeri Lama has informed to head of local communities/villages and Manpower Agency in Labuhanbatu Regency based on letter No: NL/UM/Bi/037/21 related to open recruitments (total: 4 workers). It has completed with schedule of recruitment process and the requirement needed.</li> <li>• Document of recruitment: application letter, selection result records (administration, competition and MCU) and the final recommendation of recruitment process.</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Determination of recruitment result based on letter No UM/NL/Bi/231/2021, dated 18 November 2021.</li> <li>• Induction for new employee related to company policy, OHS policy and collective labour agreement dated 1 December 2021 was attended by all new workers.</li> <li>• Promotion document as per letter from the General Division No. NL/Div/II/039/2021 dated 20 January 2021 concerning promotion of employee Group on behalf of Mr Denni Sukamto - promotion from group IV/4 to IV/5, effective dated 1<sup>st</sup> January 2021.</li> </ul>	
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p>	<p>Based on interview with representative of committee gender during surveillance-3 audit (dated 10 February 2022), they stated Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated.</p> <p>PT Socfin Indonesia – Negeri Lama POM is regularly performed monitoring of pregnancy in monthly bases to all women workers on handling of pesticides and chemical material. The latest performed on 7 January 2022, there were reported no workers in pregnant condition (negative detection).</p> <p>Based on the report of pregnancy testing, who is women workers in pregnant then is not allowed to work in related to chemicals. They are usually transferred to light and harmless work. For example, cleaning service in an office or staff residence, manual plant care in a nursery or picking loose fruits. There is no salary deduction during employment or pregnancy leave.</p>	Complied

<p>6.1.5</p>	<p><b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p>	<p>PT Socfin Indonesia – Negeri Lama POM has formed a Gender Committee since year 2012 - approved by Negeri Lama Management. The structure organization consisted of Head of Committee, Secretary and Members.</p> <p>Gender Committee as specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>Based on interview with Gender Committee on 10<sup>th</sup> February 2022, they stated that the activities include training on women’s rights, counselling for women affected by violence, children care facilities and breastfeeding policy. There were no complaints reported in 2021</p>	<p>Complied</p>
<p>6.1.6</p>	<p>There is evidence of equal pay for the same work scope.</p>	<p>PT Socfin Indonesia – Negeri Lama POM proven that it guarantees that related to the wage is in accordance with the laws and regulations applicable to the scope of work that has been made.</p> <p>All payment are refer to the minimum wage that stipulated by the local government annually. The minimum wage applies to all employees regardless of gender.</p> <p>Based on document verification on payslip periode December 2021 – January 2022, the minimum wage of men and women worker area equal according to the minimum wage stipulated by the local government. Through the interview with random workers during field visit and labour representatives during public consultation obtained information that there is no salary discrimination against men and women workers.</p>	<p>Complied</p>

<b>Criteria 6.2:</b> 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	<p><b>(C)</b> Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.</p>	<p>Document of pay and working condition in accordance with applicable labour laws has demonstrated by document of Collective Labour Agreements (CLA) - "Kesepakatan Bersama Tentang Pemberlakuan Perjanjian Kerja Bersama (PKB) Tahun 2018 – 2020", based on the result of discussed between labour Union in Plantation Sectoral (Pengurus Pusat Federasi Serikat Pekerja Pertanian dan Perkebunan SPSI - PP FSP.PP-SPSI) with Representative of Plantation Management in Sumatera (Badan Kerjasama Perusahaan Perkebunan Sumatera - BKS PPS), dated 8 April 2018".</p> <p>PKB are describe the documentation of pay and conditions and available in Indonesian language. The PKB has been explained to all workers at Negeri Lama Estate and Negeri Lama POM. It was confirmed during interview with workers.</p> <p>In article XXIV was stated that CLA – PKB 2018-2020 is still valid until the progress of discussion of new PKB has finished.</p>	Complied
6.2.2	<p><b>(C)</b> 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.</p>	<p>Employment contract was refer to "Perjanjian Kerja Bersama (PKB) 2018 – 2020" which has been agreed according to Collective Labour Agreements (CLA) - "Kesepakatan Bersama Tentang Pemberlakuan Perjanjian Kerja Bersama (PKB) Tahun 2018 – 2020, based on the result of discussed between labour Union in Plantation Sectoral (Pengurus Pusat Federasi Serikat Pekerja Pertanian dan Perkebunan SPSI - PP FSP.PP-SPSI)" with Representative of Plantation Management in Sumatera (Badan Kerjasama Perusahaan Perkebunan Sumatera - BKS PPS), dated 8 April 2018".</p>	Complied

		<p>CLA - PKB consists of 24 articles which include, among others:</p> <ul style="list-style-type: none"> <li>• Working hours, leave including maternity leave and sick leave</li> <li>• Wages (basic wage, incentives, allowances, dependents)</li> <li>• Tariff per unit: determination of price level wages</li> <li>• Pain relief</li> <li>• Absent</li> <li>• Payment for extra food (food costs), travel expenses</li> <li>• Overtime and overtime incentives</li> <li>• Determination of incentives</li> <li>• Provision of tools and work equipment by the company</li> <li>• Allowances and bonuses for religious holidays</li> <li>• Social security and assistance</li> <li>• Health insurance</li> <li>• Vacation right</li> <li>• Notification period</li> <li>• Pension plans and severance pay</li> <li>• Others related to labour rights and obligations.</li> </ul>	
6.2.3	<p><b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p>	<p>PT Socfin Indonesia – Negeri Lama POM has demonstrated is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p> <ul style="list-style-type: none"> <li>• Working hours has been determined in CLA-PKB as 7 hour/day with working day 6 days or 40 hour/weeks. Overtime has determined according to KepMenakertrans RI No. KEP-102/MEN/VI/2004 with formula (monthly wages + rice intensive incentive monthly)/173. Overtime will adjust for workday, holiday, number of hour overtime according to regulation.</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>Sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice are stipulated in Article VIII CLA-PKB and has refer to UU No. 13 Tahun 2003.</li> </ul> <p>Based on document verification of Payslip, attendance register and employee documentation, can be demonstrated that legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice are complied.</p>	
6.2.4	<p><b>(C)</b> 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>PT Socfin Indonesia – Negeri lama POM has provide the housing sanitation facilities, water supplies, medical, educational and welfare amenities to national standards.</p> <p>Based on field visit in workers housing in Division 1 &amp; 2 and verification on list workers facilities updated in February 2022 "Rekapitulasi Fasilitas Umum (Fasum) Kebun Negeri Lama", there facilities were shown as below:</p> <ul style="list-style-type: none"> <li>Employee hall: 3 unit (544 m2)</li> <li>Masjid/Mosque: 3 unit (356 m2)</li> <li>Gereja/Church: 1 unit (100 m2)</li> <li>TPA/Childcare: 2 unit (145 m2)</li> <li>Poliklinik/Clinic: 1 unit (124 m2)</li> <li>Football field: 2 unit (20,000 m2)</li> <li>Badminton field: 1 unit (400 m2)</li> <li>Water reservoir: 15 unit (540 m2)</li> <li>Rubbish BIN: 17 unit (153 m2)</li> <li>Public bathroom: 1 unit (25 m2)</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>School bus: 1 unit (capacity 20 passenger)</li> </ul>	
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	<p>PT Socfin Indonesia – Negeri Lama POM has a policy that workers will be given 15 kg additional rice (if worker is not married) and if worker have a family then will be give 15 kg additional rice, 9 kg rice for wife and 7,5 kg rice for each child, maximum 3 child. Besides that, extra food given for the workers such as milk and green bean porridge.</p> <p>The evidence has been reviewed such as payroll for January 2022 (payroll contains of salaries, premium and other benefits) and based on interviews with the workers.</p> <p>Based on visit in workers housing in Division I and II dated 09/02/2022, there was also near to the traditional market which provide the basic needs including affordable food.</p>	Complied
6.2.6	A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours.	<p>PT Socfin Indonesia – Negeri Lama Estate have calculated the Decent Living Needs using the calculation method as set out in the "RSPO Guidance for Implementing a Decent Living Wage", June 1, 2019. PT Socfin Indonesia – Negeri Lama POM has also conducted an account of the DLW year 2021 period with data drawn from Estates and POM.</p> <p>In 2021 – the wages paid for employee was referred to "Penetapan Upah KHT Tahun 2021, letter number: UM/KK/Bi/0640/21, dated 30<sup>th</sup> March 2021.</p> <p>Minimum wages determination 2022 is still in progress of discussion between company alliance BKS-PPS and labour union SPSI and have referred to current government decision letter "Keputusan Gubernur</p>	Complied

		<p>Sumatera Utara No. 188.44/528/KPTS/2012 dated 30 October 2021 – valid since 1<sup>st</sup> January 2021 with minimum wage for workers determined as IDR 3,285,025. PT Socfin Indonesia – Negeri Lama POM will follow the highest wages determination.</p> <p>Data verified: Pay slip month January 2022 e.g: workers code: 230822 – Take Home Pay IDR 3,675,000 and worker code: 2307774 – Take Home Pay IDR 3,960,000.</p>	
6.2.7	<p>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</p>	<p>PT Socfin Indonesia - Negeri Lama POM was using permanent employee for all type of jobs: harvesting, spraying workers, administration, upkeep, pruning, operator, driver.</p> <p>Based on interview with labour union and HRD (dated 09/02/2022) – there is no temporary workers use by PT Socfin Indonesia – Negeri Lama POM.</p>	Complied
<p><b>Criteria 6.3:</b> 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.</p>			
6.3.1	<p><b>(C)</b> A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p>	<p>PT Socfin Indonesia – Negeri Lama POM has shown the document of published statement of association as mentioned in Ethics Policy No Doc: SOC/Dp/4.01-64, revision 5, dated 18 January 2020.</p> <p>Management of PT Socfin Indonesia – Negeri Lama has also committed to provided workers have the right to argue, associate and organize in a labour union and opportunities for workers to organize in unions and express an opinion.</p> <p>Commitment covered in the policy on freedom of association, was signed by Principal Director, dated 1 June 2019, that stated:</p>	Complied

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		<ul style="list-style-type: none"> <li>• PT Socfin Indonesia recognizes workers' rights to express their opinions and organize freely and responsibly in labour union organizations.</li> <li>• PT Socfin Indonesia policies related to ensure workers' rights are discussed and decided by taking into consideration the union.</li> <li>• Ensured that the disclosure made by aspiration unions did not cause the collapse of a termination for union leaders and members.</li> <li>• Promoting the principle of dialogue to reach consensus in addressing the aspirations from labour union to the company.</li> </ul> <p>There were union workers represent estate and mill employee incorporated in the SPSI Serikat Pekerja Perkebunan PT Socfin Indonesia Negeri Lama Estate and registered in Manpower Agency as per Decree from PC FSP. PP-SPSI Indonesian Agriculture &amp; Plantation Workers Federation no. 47ORG/PC FSP.PP-LBR/I/2021 Regarding the "Penguhan Pengurus Unit Kerja Serikat Pkerja Pertanian dan Perkebunan PUK SP. PP-SPSI" dated 5<sup>th</sup> January 2021 with Chairperson of SPSI Br Edy Syahputra Saragih.</p> <p>Based on interview with labour union leader dated 09/02/2022 stated that Management of Negeri Lama POM has accommodated employee rights to argue, associate and organize in a labour union. All workers allowed to form associations and bargain collectively with their employer.</p>	
6.3.2	Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.	There is union of workers represent estate and mill employee incorporated in the SPSI Serikat Pekerja Perkebunan PT Socfin Indonesia Negeri Lama Estate and registered in Manpower Agency as per Decree from PC FSP. PP-SPSI Indonesian Agriculture & Plantation Workers Federation no. 47ORG/PC FSP.PP-LBR/I/2021 Regarding the	Complied

		<p>"Pengukuhan Pengurus Unit Kerja Serikat Pkerja Pertanian dan Perkebunan PUK SP. PP-SPSI" dated 5<sup>th</sup> January 2021 with Chairperson of SPSI Br Edy Syahputra Saragih.</p> <p>Labour Union Office has regularly meeting with representative of management. Minutes of meeting we available at list of attendance was sighted. The minutes were made readily available to employees upon request, e.g: Minute of Meeting dated 27<sup>th</sup> January 2022 – was attended by 6 participants, agenda related no national holiday event and intensive for workers in holiday event.</p>	
6.3.3	<p>Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.</p>	<p>PT Socfin Indonesia – Negeri Lama POM has shown the commitment that management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers as mentioned in Ethics Policy No Doc: SOC/Dp/4.01-64, revision 5<sup>th</sup>, dated 18<sup>th</sup> January 2020.</p> <p>Based on the interview with chairman of labour union – dated 09/02/2022 stated that the management does not intervene in the formation/the establishment of a union manager, but the facility/office is indeed provided.</p> <p>PT Socfin Indonesia – Negeri Lama POM has also provided allowance to labour union officers to hold events related to the union organization e.g. permission to hold board meetings, electing admins.</p>	Complied
<p><b>Criteria 6.4:</b> Children are not employed or exploited.</p>			

<p>6.4.1</p>	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p>	<p>PT Socfin Indonesia – Negeri Lama POM has established a policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements as in Ethics Policy No Doc: SOC/Dp/4.01-64, revision 5, dated 18 January 2020.</p> <p>PT Socfin Indonesia – Negeri Lama POM has also conducted refreshment socialization of policy to the respective stakeholder, such as:</p> <ul style="list-style-type: none"> <li>• Socialization to workers in Negeri Lama POM, dated 17<sup>th</sup> October 2021– was attended by 35 workers</li> <li>• Refreshment for socialization to upkeep workers (fertilizer and pesticide applicator) from Division I &amp; II on 13 September – was attended by 72 participants.</li> <li>• Socialization to the external stakeholder (government agencies staff, police officer, gender committee, labour union, contractor, Siderejo Village) 13<sup>th</sup> June 2021 – was attended by 20 participants.</li> </ul> <p>Based on document review of list of workers “Daftar Pekerja” in Negeri Lama Estate and POM, updated in February 2022, the youngest worker was born in 8 March 1995 (27 years old) – namely Mr T** Ans*r S (worker ID: 2308423).</p>	<p>Complied</p>
<p>6.4.2</p>	<p><b>(C)</b> Documented evidence on the fulfilment of worker’s minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.</p>	<p>PT Socfin Indonesia – Negeri Lama POM has shown the documented evidence on the fulfilment of worker’s minimum age requirements in accordance with applicable regulation – as per recruitment process “Penerimaan Pekerja KHT Kebun” No Doc: SOC/PSM/6.01.01, 1st revision dated 1 December 2015.</p>	<p>Complied</p>

		<p>The procedure stated requirement on the fulfilment of worker’s minimum age.</p> <p>Based on document review of list of workers “Daftar Pekerja” in Negeri Lama Estate and POM, updated in February 2022, the youngest worker was born in 8 March 1995 (27 years old) – namely Mr T** Ans*r S (worker ID: 2308423).</p>	
<p>6.4.3</p>	<p><b>(C)</b> Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.</p>	<p>PT Socfin Indonesia – Negeri Lama POM has shown committee on young person employed only for non-hazardous work with protective restrictions, as mentioned in Ethics Policy No Doc: SOC/Dp/4.01-64, revision 5<sup>th</sup>, dated 18<sup>th</sup> January 2020.</p> <p>PT Socfin Indonesia – Negeri Lama POM has also conducted refreshment socialization of policy to the respective stakeholder, such as:</p> <ul style="list-style-type: none"> <li>• Socialization to workers in Negeri Lama POM, dated 17<sup>th</sup> October 2021– was attended by 35 workers</li> <li>• Refreshment for socialization to upkeep workers (fertilizer and pesticide applicator) from Division I &amp; II on 13 September – was attended by 72 participants.</li> <li>• Socialization to the external stakeholder (government agencies staff, police officer, gender committee, labour union, contractor, Siderejo Village) 13<sup>th</sup> June 2021 – was attended by 20 participants.</li> </ul> <p>If any young employees, they will always be guided and supervised by the foreman in doing its work, especially for the job that has a high risk. The guidance in the form of coaching, training, and briefing each will do the job.</p>	<p>Complied</p>

		<p>During field visit and interview with random workers, there is no young person employee founded. Based on document verification on the employee list period Desember 2021 and January 2022 obtained information that the younger employee is 23 year old.</p>	
<p>6.4.4</p>	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p>	<p>PT Socfin Indonesia – Negeri Lama POM has demonstrated the document on communication about its 'no child labour' policy and the negative effects of child labour and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>Based on interviews with workers, officers of unions, as well as officers in the field indicates that they have understood management policy to prohibit the use of the child labour in all types of the company's operations activities.</p> <p>Based on the verification document shows that the management have done socialization ban on the use of child labour policy through:</p> <ul style="list-style-type: none"> <li>• Put up the policy in the bulletin board in every office/mill estate</li> <li>• Do direct socialization to workers especially vulnerable types of workers who are utilizing "informal worker" who are children like at the harvesting (harvesting) that is prohibited include the sons of workers to help her parents work (pricing the lose fruit).</li> <li>• Lists the prohibition clause on each contract with contractors power the use of child documents.</li> </ul> <p>PT Socfin Indonesia – Negeri Lama POM has also conducted refreshment socialization of policy to the respective stakeholder, such as:</p>	<p>Complied</p>

		<ul style="list-style-type: none"> <li>• Socialization to workers in Negeri Lama POM, dated 17<sup>th</sup> October 2021– was attended by 35 workers</li> <li>• Refreshment for socialization to upkeep workers (fertilizer and pesticide applicator) from Division I &amp; II on 13 September – was attended by 72 participants.</li> <li>• Socialization to the external stakeholder (government agencies staff, police officer, gender committee, labour union, contractor, Siderejo Village) 13<sup>th</sup> June 2021 – was attended by 20 participants.</li> </ul> <p>Based on document review of list of workers “Daftar Pekerja” in Negeri Lama Estate and POM, updated in February 2022, the youngest worker was born on 8<sup>th</sup> March 1995 (27 years old) – namely Mr T** Ans*r S (worker ID: 2308423).</p>	
<p><b>Criteria 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p><b>(C)</b> A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.</p>	<p>PT Socfin Indonesia has established a policy to prevent sexual and all other form of harassment and violence is documented, implemented, and communicated to all levels of the workforce as per “Kebijakan Pencegahan Kekerasan dan Pelecehan” was signed by Principal Director, dated 1<sup>st</sup> June 2019.</p> <p>PT Socfin Indonesia – Negeri Lama POM has also conducted refreshment socialization of policy to the respective stakeholder, such as:</p> <ul style="list-style-type: none"> <li>• Socialization to workers in Negeri Lama POM, dated 17<sup>th</sup> October 2021– was attended by 35 workers</li> <li>• Refreshment for socialization to upkeep workers (fertilizer and pesticide applicator) from Division I &amp; II on 13 September – was attended by 72 participants.</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• Socialization to the external stakeholder (government agencies staff, police officer, gender committee, labour union, contractor, Siderejo Village) 13<sup>th</sup> June 2021 – was attended by 20 participants.</li> </ul> <p>PT Socfin Indonesia – Negeri Lama POM has also formed a Gender Committee since year 2012 and has been approved by Negeri Lama management consist Head of Committee, Secretary and Members.</p> <p>Gender Committee activities such as handle complaint from female workers, reporting and data collecting if case appeared concerning sexual harassment. Documented procedure for complaints related to women workers as per procedure “Penanganan Keluhan Sosial” No Doc: SOC/PSM/9.02 First Edition, 6<sup>th</sup> Rev, dated 15 September 2019.</p> <p>Based on interview with Gender Committee dated 10/02/2022, the program of GC consisted of training on women’s rights, counselling for women affected by violence, children care facilities and breastfeeding policy.</p>	
6.5.2	<p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.</p>	<p>PT Socfin Indonesia – Negeri Lama POM has established a policy to protect the reproductive rights of all, especially of women, is documented, implemented, and communicated to all levels of the workforce as per “Kebijakan Hak Reproduksi”, was signed by Principal Director dated 1<sup>st</sup> June 2019.</p> <p>PT Socfin Indonesia – Negeri Lama POM has also conducted refreshment socialization of policy to the respective stakeholder, such as:</p> <ul style="list-style-type: none"> <li>• Socialization to workers in Negeri Lama POM, dated 17<sup>th</sup> October 2021– was attended by 35 workers</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>Refreshment for socialization to upkeep workers (fertilizer and pesticide applicator) from Division I &amp; II on 13 September – was attended by 72 participants.</li> <li>Socialization to the external stakeholder (government agencies staff, police officer, gender committee, labour union, contractor, Siderejo Village) 13<sup>th</sup> June 2021 – was attended by 20 participants.</li> </ul> <p>Based on interview with Gender Committee dated 10/02/2022, the program of GC consisted of training on women’s rights, counselling for women affected by violence, children care facilities and breastfeeding policy and reproductive right.</p>	
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.	<p>PT Socfin Indonesia – Negeri Lama POM has conducted in assessment the needs of new mothers, consisted of:</p> <ul style="list-style-type: none"> <li>For breastfeeding mothers and had children under 5 years, the company has provided children care (TPA) which located in each division/Afdeling.</li> <li>In estate and mill office provides special space and 1 hour breastfeeding to nurse the baby.</li> </ul> <p>Based on field visit in Division I and II (dated 09/02/2022), there was children care facilities (TPA) – creche. And based on interview with Gender Committee Officer has stated that the company has provided the facilities for new mother in workplace.</p>	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.	PT Socfin Indonesia – Negeri Lama POM has prepared the procedure on grievance mechanism, as documented at procedure to handling complaint No. SOC/PSM/9.01, Rev.7 dated 01 February 2019.	Complied

		<p>The procedure stated that any employee can report the complaint in writing to the officer who has been appointed (KTU-HR, Assistance Staff, Head of Mill (Tekniker I-II) and Manager-Pengurus). Grievance mechanism procedures listed in point 5 of the description of the procedure, as follows:</p> <ul style="list-style-type: none"> <li>• Complaints against the company may be in the form of complaints from internal (workers) and external complaints, namely from stakeholders or citizens around the palm-oil site</li> <li>• Worker/stakeholder complaints submit complaints in writing to the company through KTU-HR, Assistance Staff, Head of Mill (Tekniker I-II) and Manager-Pengurus</li> <li>• Site Management/Pengurus studied the complaints made by stakeholders and provided follow-up instructions to tekniker, head assistant, field assistant, head clerk or other staff in accordance with the type of complaint.</li> <li>• There is clear that the trouble with the complaint and the settlement does not require big resources and still under the authority of the Site Management/Pengurus, can be directly followed by a Site Management.</li> <li>• Complaints that require further clarification and communication with the complainant will be communication with the complainant in accordance with the Procedures for Social Communications. Staff/specialized personnel will be appointed to carry out this communication.</li> <li>• For internal complaints, communication with labour unions also required - Staff / personnel designated to be communicated to the complainant to obtain more complete information about the complaint, the settlement is desirable and so on.</li> <li>• Results of communication with the complainant submitted to the Site Management/Pengurus to discuss follow-up. If the follow-up does</li> </ul>	
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		<p>not require large resources and still under the authority of the Site Management/Pengurus, can be acted upon by Site management.</p> <ul style="list-style-type: none"> <li>• To follow up on such complaints require critical decision resources and requires the approval of Head Office in Medan, then Site Management/Pengurus will submit a complaint in writing to the field including communication notes that has been done</li> <li>• General Affairs will study the complaints submitted by Site Management/Pengurus and will provide guidance/direction of the solution to the Site Management/Pengurus</li> <li>• Site Management/Pengurus will conduct a follow-up according to the instructions of Medan. Communication with the complainant may be required if the instructions of the field is not in accordance with the results of previous communications</li> <li>• All complaints are recorded in the Complaint Form Notes In point 5.20 in the procedure stated that the company will respects anonymity and protects complainants where requested. All company policy reviewed every year by Sustainability Department, PT Socfindo.</li> </ul> <p>Based on the results of interviews with labour union (dated 09/02/2022), they confirmed that understand of grievance mechanism, which respects anonymity and protects complainants where requested – during 2020 there was no complaints reported.</p>	
<b>Criteria 6.6:</b> No forms of forced or trafficked labour are used.			
6.6.1	<p><b>(C)</b> All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports;</li> <li>• Payment of recruitment fees;</li> <li>• Contract substitution without worker’s consent</li> </ul>	<p>During the surveillance audit ASA 1.3 – year 2022, there was no indication the company practices:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports</li> <li>• Payment of recruitment fees</li> </ul>	Complied

	<ul style="list-style-type: none"> <li>• Involuntary overtime;</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul>	<ul style="list-style-type: none"> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>Based on interview with labour union (dated 09/02/2022) confirmed that there was no use of foreign workers and no substitution of an employment agreement/contract.</p>	
6.6.2	<p><b>(C)</b> Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.</p>	<p>During the surveillance audit ASA 1.3 – in February 2022, there was no workers in specified time work agreement or migrant workers. All of workers in PT Socfin Indonesia – Negeri Lama POM as form of permanent employee.</p> <p>The confirmation was verified during audit documentation list of workers updated in January 2021, interview with employee representative including labour union and workers during field visit (dated 09/02/2022).</p> <p>Data seen – document of work contract:</p> <ul style="list-style-type: none"> <li>– Namely Mr K*rd*n (harvester), work ID: 2309702, dated 18 January 2021 – as permanent employee. The contract was signed by Management of PT Socfin Indonesia – Negeri Lama POM and the employee.</li> <li>– Namely Mr B*mb*ng Sy*hp*tr* (harvester), work ID: 2309719, dated 18 January 2021 – as permanent employee. The contract was signed by Management of PT Socfin Indonesia – Negeri Lama POM and the employee</li> </ul>	Complied

Criteria 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	<p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	<p>PT Socfin Indonesia – Negeri Lama POM has demonstrated the document of OHS committee as the responsible person for identification of OHS issues. OHS Meeting conducted in a monthly basis.</p> <p>Data verified on implementation the OHS plan year 2021, such as:</p> <ul style="list-style-type: none"> <li>• In 2021 due to pandemic covid-19 the MCU has postpone based on Memorandum from Top Management No. UM/KK/Bi/1308/202, dated 4<sup>th</sup> July 2020 with reference by Letter from Manpower Ministry of Republic of Indonesia No M/7/AS.02.02/V/2020. Next MCU will program in July 2022.</li> <li>• OHS committee (P2K3) has registered in Manpower Agency in North Sumatera under letter "P2K3 nomor: 034-7/P2K3/Wil-IV/DTK/SU/II/2022 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) dan Tanggap Darurat di Perusahaan, dated 3<sup>rd</sup> February 2022.</li> <li>• OHS Expert namely Mr Alderson F Saragih has registered to Manpower Ministry of RI, based on license No Reg: 5/13314/AS.02.04/X/2021, dated 29<sup>th</sup> October 2021 valid until 3 years.</li> <li>• Evaluate and analyse accidents based on accident/investigation report and compared with the Health and Safety plan. Last Monitoring conducted on 20 January 2022</li> <li>• License of operator (SIO) for all operator in Negeri Lama Estate and Mill, namely:             <ul style="list-style-type: none"> <li>– Mr Mangara Nainggolan (locomotive operator), license no. 115661-OPK3-LT/PAA/VI/2016, dated 4/6/2018, valid until 4/6/2023.</li> </ul> </li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>- Mr Sukanto (excavator operator), license no. 13.27680-OPK3/PAA/XI/2018, dated 3/11/2018, valid until 3/11/2023.</li> <li>- Mr Suharyadi (Boiler operator) license no. P.12.3409.OPK3-PUBT-B.I/XI/2017, dated 12/11/2017, valid until 12/11/2022.</li> <li>- Mr Irwanto (welder), license no. 00289.0721.0000125.2020, dated 2<sup>nd</sup> March 2020, valid until 3 years.</li> <li>• Boiler permit no. 18-7/DTK/KU/XII/2017, checking is done by 2 years bases, last done in November 2021</li> <li>• Sterilizer-1 Permit no. 678/116-03/2009, checking is done by 2 years bases, last done on 20<sup>th</sup> November 2020 and next will be on 10<sup>th</sup> November 2022</li> <li>• Electricity Installation permit based on "Keputusan Gubernur Sumatera Utara No: 671.23/7271/DIS PM PPTSP/5/X.2.c/V/2019 tentang Izin Operasi Usaha Penyediaan Tenaga Listrik untuk Kepentingan Sendiri), dated 23<sup>rd</sup> May 2019 – valid until 3 years</li> <li>• Based on interview with interested stakeholder (manpower agency in Labuhanbatu regency) dated 9<sup>th</sup> February 2022 – the company has complied with related legal requirement e.g: report of workers (wajib lapor ketenagakerjaan), report of OHS committee,</li> <li>• PT Socfin Indonesia – Negeri Lama POM has conducted the P2K3 (safety committee) meeting on 15 January 2021. The meeting was attended by P2K3 (safety committee), staff and workers representative from each department/station. The meeting was discussed all aspect related to OHS including: OHS program review, OHS performance, accident report (occurred on 2 December 2020), near miss report, unsafe condition, activity progress. Particularly for accident report was review based on the investigation result and the follow up action taken to prevent the similar accident in the future. Minutes of meeting and attendance list can be demonstrated during audit.</li> </ul>	
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		<ul style="list-style-type: none"> <li>• PT Socfin Indonesia has addressed the issues related to loco operation particularly on fixing the lorry during operation which was high risk to the accident, such as: handling the lorry out of the rail returning to the railroad track. For this activity company has developed the lorry locker arm - the tools &amp; equipment provided to control potential hazard/risk,</li> <li>• During interview with workers (Loco operator &amp; supervision) on 10/02/2022 confirmed that the safety committee meeting has involving the representative of workers from each department/mill station and the issued to handling the lorry out of the rail returning has fixes.</li> <li>• Based on field visit in Negeri Lama POM and interview with workers on 10/02/2022, all workers have aware the rule of smoking prohibition and the sanction consequences. Negeri Lama POM also has provided the Smoking Area to accommodate the smokers and to prevent the workers smoking in the mill station area and fuel station area.</li> </ul>	
6.7.2	<p>Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p>	<p>PT Socfin Indonesia – Negeri Lama POM has prepared the procedure for emergency and work accident written in Bahasa Indonesia, such as:</p> <ul style="list-style-type: none"> <li>• Procedure for emergency No: SOC/PSM/4.08. The procedure described the roles and responsibilities of each emergency response team include the mechanism how to conduct medical evacuation to near hospital/local health centre, also it was available the emergency contact number of each internal emergency team and external related parties such as public fire station at Rantau Prapat and nearest health facility Rantau Prapat Hospital. Evacuation route and muster point are available and made known to the employee.</li> <li>• Incident investigation procedure were documented in procedure SOC/PSM/4.14. Accident and investigation reports described the</li> </ul>	Complied

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		<p>accident chronology, cause and impacts of the accident and has also to find the root causes of the accident happened and formulize the corrective and preventive action.</p> <ul style="list-style-type: none"> <li>Emergency Response Team has been defined and the emergency flow charts have been established for any kind of emergency such as earthquake, fire, and flood.</li> </ul> <p>Based on field visit in Negeri Lama POM (dated 10/02/2022), there was an emergency signs and boards were provided in several areas and assembly points available in each area such as workshop. All the condition in shown good. There were 55 fire extinguishers that was conducted regularly inspection by foreman. The emergency facility has shown during audit and well maintained (ready to use).</p> <p>The First aid kits carried by foreman were available at worksites such as at harvesting area. The first aid kits were checked in accordance with Manpower Ministry Regulation – stated in: PEMENAKER No 15, year 2008.</p> <p>All staff and foreman in estate and mill has attended the first aider training. The last refreshment training 14 January 2022.</p>	
6.7.3	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>PT Socfin Indonesia – Negeri Lama POM has provided the OHS facilities for all workers involved in the operation was appropriately trained in safe working practices. Unit of certification provides the PPE to all employees especially for high risk station in mill and chemical handling in estate. PPE will distributed twice a year or if it broken. According to the document verification, the last PPE distributed on 7 January 2022 in estate/mill. All PPE distributed for free.</p>	Complied

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		<p>Data verified during surveillance Asa 1.3 – year 2022:</p> <ul style="list-style-type: none"> <li>• OHS committee (P2K3) has registered in Manpower Agency in North Sumatera under letter "P2K3 nomor: 034-7/P2K3/Wil-IV/DTK/SU/II/2022 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) dan Tanggap Darurat di Perusahaan, dated 3<sup>rd</sup> February 2022.</li> <li>• OHS Expert namely Mr Alderson F Saragih has registered to Manpower Ministry of RI, based on license No Reg: 5/13314/AS.02.04/X/2021, dated 29<sup>th</sup> October 2021 valid until 3 years.</li> <li>• PT Socfin Indonesia – Negeri Lama POM has conducted the P2K3 (safety committee) meeting on 14 January 2022. The meeting was attended by P2K3 (safety committee), staff and workers representative from each department/station.</li> <li>• Based on field visit in mill obtained information that all operators in high-risk area such as engine room, boiler, polishing drum has provided PPE such: ear muff/ear plug, masker and safety gloves.</li> <li>• Based on field visit to the estate known that unit of certification provided rinse house called "<i>rumah bilas</i>" in each division to ensure the pesticide handler are clean before the back home.</li> </ul>	
6.7.4	<p>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.</p>	<p>PT Socfin Indonesia – Negeri Lama has been performed Medical Check-up to all employees on 17-19 June 2019 and 18 November 2019 was covered for 379 workers.</p> <p>In 2020 and 2021 due to pandemic covid-19 the MCU has postpone based on Memorandum from Top Management No. UM/KK/Bi/1308/202, dated 4<sup>th</sup> July 2020 with reference by Letter from Manpower Ministry of</p>	Complied

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		<p>Republic of Indonesia No M/7/AS.02.02/V/2020. Last Medical chekup conducted by Laboratorium Klinik Kimia Farma in Medan conducted medical check-up both of general MCU and of special MCU for sprayer team (cholinesterase and spirometry test) and operator in high-risk area in POM (audiometry test).</p> <p>Next MCU will planned in July 2022</p> <p>All workers (permanent and contract) were covered by accident and medical care insurance including contract workers. Evidence was sighted and documented in BPJS Ketenagakerjaan (accident insurance) and BPJS Kesehatan (medical care) payment description and bank slip payment.</p> <p>Data verified – during surveillance Asa 1.3 – in February 2022, e.g:</p> <ul style="list-style-type: none"> <li>• Bank slip payment of medical care (BPJS Kesehatan) period January 2022 covered all workers (number of employees is 354, number of dependent is 876) – transaction reference No: 20211210507707578.</li> <li>• Bank slip payment of BPJS Ketenagakerjaan (accident insurance) period January 2022, (status: PAID), covered for workers – transaction reference number: 202012211527958764.</li> </ul>	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	<p>PT Socfin Indonesia – Negeri Lama POM has shown the report of Lost Time Accidents metrics were using to record the accidents and injuries during year 2021.</p> <p>The Lost Time accidents and injuries were determined according to Decree of the Minister of Manpower and Transmigration No. 609 year 2012. In 2021 – there was accident records for mill and estate were</p>	Complied

		<p>reported 3 cases accidents. Total of lost time accident in 2021 (caused by 3 accidents) are 60 mandays.</p> <p>All the accidents had been reviewed during OHS meeting, recommendation of investigation report has been followed up.</p>	
<p><b>Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.</b></p>			
<p><b>Criteria 7.1:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>			
7.1.1	<p><b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.</p>	<p>The company has established Integrated Pest Management plan as in "Rencana Pengelolaan Pestisida dan Hama Terpadu", described that PT Socfin Indonesia implementing plan to reduce pesticide to minimize the impact to the environment. The objective is to optimize the use of natural predator to reduce the use of pesticides and to manage ex pesticide container. Detail of plan consist of planting beneficial plant and ist monitoring; reproduction of <i>Tyto alba</i> and its monitoring; record all pesticide container and contaminated goods; deliver all hazardous waste to the registered hazardous waste collector.</p> <p>As written in indicator 3.3.1, unit of certification has procedure of integrated pest management (including disease).</p> <p>During the audit, auditor has observe and interview daily pest census at Block 29 Division II. Based on interview with pest monitoring officer obtain information that the pest infestation was monitoring on daily bases.</p> <p>Unit of certification through Socfin Research has train pest monitoring officer (4 person each division). Each block has an observational row (multiples of five, starting from the fifth row). Observations are made</p>	Complied

		<p>every month. The outermost tree in the line of observation has been red-marked to facilitate the pest control officer.</p> <p>During the field observation in Block 29 Division II obtain information that the observation conducted to monitoring the infestation of leaf eater caterpillar, bag worm, <i>Ganoderma</i>, rat, termite, disease so on. The record of observation written in daily pest infestation report. All of two pest monitoring officers can explain the pest monitoring procedure and reporting process.</p>	
7.1.2	Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.	Based on verification of document "Daftar Identifikasi Invasive Species Tahun 2021", interview with estate manager and field visit obtain information that there is no invasive species in Negeri Lama Estate.	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	Based on document verification, interview with estate manager and field visit obtain information that there is no fire use for pest control in Negeri Lama Estate.	Complied
<b>Criteria 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.	<p>Based on the document verification and interview with management, obtain information that pesticide usage for chemical weeding and pest control (if needed).</p> <p>As written in No Deforestation, Development on Peat &amp; Environmental Policy that was signed by Principle Director of Socfin Indonesia on 1 June 2019, Socfin Indonesia has specific commitment related to pesticide usage as follows:</p> <ul style="list-style-type: none"> <li>• Specific attention is given to the use of pesticides. Integrated Pest Management (IPM) plans are developed for all operations and reviewed annually,</li> <li>• All active ingredients in use are also reviewed annually for safety and efficacy,</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• Delaying the pesticide if weed or pest is under control. According to the interview with estate manager obtain information that the pesticide rotation can be delayed or reduced especially in mature or old palm where weeds/pest population are under control.</li> <li>• Minimalize contamination for pesticide applicator and their families by ensuring them to clean themselves before back home.</li> </ul>	
7.2.2	<b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided.	<p>Unit of certification has demonstrated record of pesticide use including active ingredient and their LD50, area treated, amount of active ingredients per Ha and number of applications. For example (for period January to December 2021):</p> <ul style="list-style-type: none"> <li>- Ally 20 WDG: active ingredient <i>Metil metsulfuron</i> 20%; LD50 is 5,000 mg/kg; volume used 206.43 kg; active ingredients used 41.28 kg; area treated 1,840.2 Ha; amount of active ingredients per Ha 0.022 kg/Ha; target species wide leaf weed, <i>Mucuna bracteate</i>, <i>Stenochlaena palustri</i>, <i>Dicranopteris linearis</i>; register No.RI.0103011988837 valid until 12 Nov 2023.</li> <li>- Roundup 486 SL: active ingredient <i>Isopropil amina glyphosate</i> 486 g/L; LD50 is 9,041 mg/kg; volume used 8,867.28 L; active ingredients used 4,309.49 kg; area treated 1,840.2 Ha; amount of active ingredients per Ha 2.342 kg/Ha; target species <i>Imperata cylindrica</i>, <i>Ageratum conyzoides</i>, <i>A. Houstonianum</i>, <i>Borreria alate</i>, <i>Eupatorium riparium</i>, <i>E. hirta</i>, <i>Cynodon dactylon</i>, <i>Ottochloa nodosa</i>, <i>Digitaria adscendens</i>.</li> </ul>	Complied
7.2.3	<b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	The unit of certification monitor the use of pesticides. Available record of pesticide use since 2018. Based on the records, minimizing pesticide use is part of a plan, the use of Paraquat has been eliminated since 2019.	Complied

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		Unit of certification has also has a internal procedure to reduce the usage of pesticide especially in circle and path weeding from 4 round to 3 round a year. Especially in mature area.	
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.	Based on document verification, interview and field observation obtained information that there is no prophylactic use of pesticides.	Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <p>7.2.5a Judgment of the threat and verify why this is a major threat.</p> <p>7.2.5b Why there is no other alternative which can be used.</p> <p>7.2.5c Which process was applied to verify why there is no other less hazardous alternative.</p> <p>7.2.5d Process to limit the negative impacts of the application.</p> <p>7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p>	<p>Considering the rat infestation in 2021, certificate holder has usage the rodenticide with active ingredients Coumatetralyl during January – May 2021. However, due to the rat infestation increased during within that time, estate manager has asked the permit to the Head of Agronomist (Kepala Bagian Tanaman) for Brodifacoum usage (Ratgone) on 28 May 2021 to reduce the infestation rate. Estate has a granted for using Brodifacoum with total 40 kg to reduce the rat infestation level in 2 months. The application scheduled based on the weekly report of rat census to limited the negative impacts of the application.</p> <p>During this outbreak, there is no other alternative that can be reduce the impact quickly. However, During the field visit obtain information that certificate holder is develop the owl breeding in owl aviary. Each mature owl produced will be transferred into the existing barn owl box in field. Until this audit, there is 10 barn owl boxes existing and counting.</p> <p>The company has a list of pesticides usage that are included in WHO Class 1A (extremely hazardous) 1 types which is Brodifacoum (under the due diligence process and agronomist advised) and 1 types WHO Class 1B which is Coumatetralil. The company has established Ethic Policy regarding safe use of chemicals, efficient and effective.</p>	Complied

		Based on interview with estate manager, the application of Brodifacoum only for 3 months as estimated by research and development department.	
7.2.6	<b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.	<p>PT Socfin Indonesia – Negeri Lama POM has conducted pesticide handling training regularly.</p> <p>PT Socfin Indonesia – Negeri Lama POM has also provided internal training for worker on handling of pesticides. Record of Integrated Pest Management training dated 16<sup>th</sup> April 2021 – was attended by 8 workers. Data verified: attendance list, training material, training evaluation and documentation</p> <p>Based on field visit and interview with pesticides applicator during audit (dated 09/02/2022), in block 13 – in Negeri Lama Estate, confirmed that all pesticide applicator has attended the safe use pesticide training above. They have explained and demonstrated the safe working procedure (spraying technics, PPE usage and environmental protection).</p>	Complied
7.2.7	<b>(C)</b> Storage of all pesticides in accordance with recognized best practices.	<p>Based on field visit to agrochemical storage, certificate holder has stored all pesticides properly. Each pesticide product equipped with SDS. The storage also provided PPE's, hand/eye wash facilities and first aid kit.</p> <p>Each pesticide/herbicide stored separated with its level of toxicity, material and its use. Agrochemical material store at specific warehouse and located at the Mill.</p>	Complied
7.2.8	All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.	PT Socfin Indonesia – Negeri Lama POM has had a mechanism to waste management that is Procedure of Pengendalian Limbah No. SOC/PSM/4.11, rev.05 dated 1 October 2018. Describe that: The company has classified the type of waste generated from plantation	Complied

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		<p>activities to: Hazardous waste (LB3), organic waste, inorganic waste and waste that is economical value. The container provided in the form of TPS: Temporary collection Place, TPA: Landfill (location in block 33 division 2) and Temporary storage hazardous waste (TPS LB3).</p> <p>PT Socfin Indonesia – Negeri Lama POM already make categorize the collecting waste colour is regulated in accordance with the following classification:</p> <ul style="list-style-type: none"> <li>• Waste B3: black</li> <li>• organic waste that is not economic value: green</li> <li>• inorganic waste is not economic worth: blue</li> <li>• waste of economic value: Yellow</li> </ul> <p>All empty agrochemical containers were triple rinsed, the jerry can were reused for spraying activities, while bottles containers were stored in the designated area and categorized as hazardous waste (B3). Records of chemical containers quantity disposed were evident. Liquid waste from agrochemical was reused for the next spraying application. While the ex-fertilizer sacks also rinsed and reuse for fertiliser distribute at estate operations.</p> <p>PIC in temporary storage has been trained on environmental requirement.</p>	
7.2.9	<p><b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p>	<p>Based on field observation on Block 23 Division 2 (date 9<sup>th</sup> February 2022), spraying pesticides conducted by team. There is no aerial spraying that implemented by PT Socfin Indonesia – Negeri Lama POM</p>	Complied

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7.2.10	<p><b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p>	<p>PT Socfin Indonesia – Negeri Lama has been performed Medical Check-up to all employees on 17-19 June 2019 and 18 November 2019 was covered for 379 workers.</p> <p>In 2021 due to pandemic covid-19 the MCU for 2020 and 2021 has postpone based on Memorandum from Top Management No. UM/KK/Bi/1308/202, dated 4<sup>th</sup> July 2020 align with reference by Letter from Manpower Ministry of Republic of Indonesia No M/7/AS.02.02/V/2020. Last medical heck up conducted by Laboratorium Klinik Kimia Farma in Medan conducted medical check-up both of general MCU and of special MCU for sprayer team (cholinesterase and spirometry test) and operator in high-risk area in POM (audiometry test).</p> <p>PT Socfin Indonesia – Negeri Lama POM has shown the P2K3 Program consisted of MCU program year 2022, planned in June 2022.</p>	Complied
7.2.11	<p><b>(C)</b> No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives.</p>	<p>PT Socfin Indonesia – Negeri Lama POM is regularly performed monitoring of pregnancy in monthly bases to all women workers on handling of pesticides and chemical material. The latest performed on 6<sup>th</sup> January 2021, there were reported no workers in pregnant condition (negative detection).</p> <p>Based on the report of pregnancy testing, who is women workers in pregnant then is not allowed to work in related to chemicals.</p> <p>Based on field visit and interview (dated 3<sup>rd</sup> February 2021) with labour union and sample worker (harvester, pesticide applicator, pest monitoring officer and mill worker) obtain information that there is no pesticide-related work is carried out by pregnant or breastfeeding</p>	Complied

		women, or people with medical limitations and they are offered other equivalent work alternatives.	
<b>Criteria 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.	<p>PT Socfin Indonesia – Negeri Lama POM has had a mechanism to waste management that is Procedure of Pengendalian Limbah No. SOC/PSM/4.11, rev.05 dated 1 October 2018. Describe that: The company has classified the type of waste generated from plantation activities to: Hazardous waste (LB3), organic waste, inorganic waste and waste that is economical value. The container provided in the form of TPS: Temporary collection Place, TPA: Landfill (location in block 33 division 2) and Temporary storage hazardous waste (TPS LB3).</p> <p>PT Socfin Indonesia – Negeri Lama POM already make categorize the collecting waste colour is regulated in accordance with the following classification:</p> <ul style="list-style-type: none"> <li>• Waste B3: black</li> <li>• organic waste that is not economic value: green</li> <li>• inorganic waste is not economic worth: blue</li> <li>• waste of economic value: Yellow</li> </ul> <p>All empty agrochemical containers were triple rinsed, the jerry can were reused to spraying activities, while bottles containers were stored in the designated area and categorized as hazardous waste (B3). Records of chemical containers quantity disposed were evident. Liquid waste from agrochemical was reused for the next spraying application. While the ex-fertilizer sacks also rinsed and reuse for fertiliser distribute at estate operations.</p>	Complied

		<p>PIC in temporary storage has been trained on environmental requirement.</p>	
<p>7.3.2</p>	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p>	<p>PT Socfin Indonesia – Negeri Lama POM has had a mechanism to waste management that is Procedure of Pengendalian Limbah No. SOC/PSM/4.11, rev.05 dated 1 October 2018. Describe that: The company has classified the type of waste generated from plantation activities to: Hazardous waste (LB3), organic waste, inorganic waste and waste that is economical value. The container provided in the form of TPS: Temporary collection Place, TPA: Landfill (location in block 33 division 2) and Temporary storage hazardous waste (TPS LB3). This procedure is available in each division and estate office.</p> <p>Based on interview with staff (including manager) and random workers during field visit, they can demonstrate well the waste management procedure. For example, all hazardous waste shall be collected and sent to the temporary waste store facility. Meanwhile, the domestic waste shall be separated into organic and inorganic waste and placed in the garbage bin before sent to the landfill by respective officer.</p> <p>PT Socfin Indonesia – Negeri Lama POM has registered specific store to keep hazardous waste as per Regent decree "Keputusan Bupati Labuhanbatu No. 503.660.31/631/DPMPSTP-BP2MNP/2021, dated 14<sup>th</sup> September 2021. Validity period for 5 years.</p> <p>PT Socfin Indonesia – Negeri Lama POM only collect and keep the pesticides and other agrochemical containers, and store at registered storage. As periodic time, those wastes will be collected by licensed collector and will be handled as referred to the collector license.</p>	<p>Complied</p>

		Third party collector which make an agreement and registered in Ministry of Environmental and Forestry.	
7.3.3	The unit of certification does not use open fire for waste disposal.	<p>PT Socfin Indonesia - Negeri Lama are not use open fire for waste disposal. As described above, all wastes generated from all activities at plantation and mill categorized as: organic waste (solid &amp; liquid), inorganic waste, medical waste, laboratory waste, hazardous waste. The company has also installed a sign board do not perform garbage/waste burning in housing.</p> <p>For domestic wastes, unit of certification already install domestic wastewater treatment at workers compound and provide landfill onsite.</p>	Complied
<b>Criteria 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.	<p>According to the latest best management practices procedure, unit of certification using chemical fertilizer and organic fertilizer such as empty fruit bunch, bunch ash and solid to increase soil fertility. Available fertilizer work instruction No.SOC-KB/IK/01 Rev.04 dated 1 Oct 2016. All record of fertilizer application recorded in document <i>Booklet Pemupukan</i>. Based on field visit on EFB application in block 12 Division 1 with dosage 45 ton EFB/MT/Year.</p> <p>During January – December 2021, estate has recapitulated the total fertilizer usage as follows:</p> <ul style="list-style-type: none"> <li>• Borate: 7,535 kg</li> <li>• KCl: 6,670 kg</li> <li>• Kieserite: 21,771 kg</li> <li>• NPK 12-12-17-2: 1,900,384 kg</li> <li>• Rock Phosphate: 12,901 kg</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• Urea: 23,923 kg</li> </ul>	
7.4.2	Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.	<p>Unit of certification conducted regularly soil and leaf sampling to monitored soil and trees fertility. This assessment conducted by company owned Research Station, Bangun Bandar Analytical Laboratory.</p> <p>Available Soil Analysis Report (Ref Number S15-020/LAB-SSPL/III/2015), analysis date 13 April 2015 (10 sample). Parameter analysed were pH-H<sub>2</sub>O, pH-KCL, N-Kjh, C Organic, P, CEC, K, Ca, Mg, Na. For example: ID 9247; Labcode S1500559; user PNL/1; depth 30-60; pH<sub>2</sub>O is 3.7; pH-KCl is 2.5; 0.57% N-Kjh; 22.55% C-Org; 474.61 ppm P-Bray; 1.39 me/100g K; 59.93 me/100g Ca; 11.22 me/100g Mg and 0.77 me/100g Na.</p> <p>Available Leaf Analysis Report (Ref Number L2020-661/LAB-SSPL/III/2021), analysis date 26 March 2021 (46 samples). Parameter analysed were N-Kjehl, P-total, K-total, Ca-total and Mg-total. For example: Labcode L2021-661-5112; User code NL1201991; analysis result is 2.33% N-Kjehl; 0.15% P-total; 0.74% K-total; 0.57% Ca-total; 0.35% Mg-total.</p>	Complied
7.4.3	A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	<p>Negeri Lama Estate is only applied Empty Fruit Bunch (EFB) and bunch ash. Based on the agronomy's SOP, unit of certification has stipulated the EFB dosage on planting age basis as follows:</p> <ul style="list-style-type: none"> <li>• Under 1 year: 10 tonnes/Ha</li> <li>• 1 – 2 year: 20 tonnes/Ha</li> <li>• 3 year's up: 45 tonnes/Ha</li> </ul>	Complied

		<p>During the audit, auditor has observed the EFB application in mature area. The EFB placed at interrows. In addition to increase soil fertility, this application also aims to maintain soil moisture needed by new plants. Based on record of FFB application in 2021, FFB applied in whole area was 7,740 MT (target 9,877 MT). Based on estate manager explanation, EFB application not achieved due to low production of EFB during 2021.</p>	
7.4.4	Records of fertilizer inputs are maintained.	<p>The record of EFB application documented in 'Booklet Pemupukan' which reported by upkeep supervisor in daily basis. Based on the document obtain information that unit of certification has documented the total of fertilizer applied versus fertilizer recommendation.</p> <p>During January – December 2021, estate has recapitulated the total fertilizer usage as follows:</p> <ul style="list-style-type: none"> <li>• Borate: 7,535 kg</li> <li>• KCl: 6,670 kg</li> <li>• Kieserite: 21,771 kg</li> <li>• NPK 12-12-17-2: 1,900,384 kg</li> <li>• Rock Phosphate: 12,901 kg</li> <li>• Urea: 23,923 kg</li> </ul> <p>Based on the record of fertilizer recommendation, total fertilizer needed as follows:</p> <ul style="list-style-type: none"> <li>• Borate: 7,519 kg</li> <li>• KCl: 6,670 kg</li> <li>• Kieserite: 21,771 kg</li> <li>• NPK 12-12-17-2: 1,921,037 kg</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• Rock Phosphate: 12,822 kg</li> <li>• Urea: 20,042 kg</li> </ul> <p>Based on estate manager explanation, some kinds of fertilizer such as urea, NPK 12-12-17-2 and Rock Phosphate was unachieved the target due to weather condition.</p>	
<b>Criteria 7.5:</b> Practices minimise and control erosion and degradation of soils.			
7.5.1	(C) Maps that identify marginal and fragile soils, including steep sloped land are available.	<p>PT Socfin Indonesia - Negeri Lama Estate has a concession area 2,164.80 Ha of which 2,140 Ha planted. This area has conducted semi detailed soil survey and assessment. The study was carried out by PARAM AGRICULTURAL SOIL SURVEYS (M) Sdn Bhd on June 2004. Map of soil type is available including border of marginal soil. Soil type in Negeri Lama Estate are <i>Typic Endoaquept, Humic Endoaquepts</i> and <i>Typic Haplohemis</i>.</p> <p>Based on the soil survey and assessment who carried out by PARAM AGRICULTURAL SOIL SURVEYS (M) Sdn Bhd on June 2004, obtain information that slope class of Negeri Lama Estate was Flat (0% - 4%). There is no steep terrain in the ground.</p>	Complied
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.	<p>Based on the soil survey and assessment who carried out by PARAM AGRICULTURAL SOIL SURVEYS (M) Sdn Bhd on June 2004, obtain information that slope class of Negeri Lama Estate was Flat (0% - 4%). There is no steep terrain in the ground.</p>	Complied
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.	<p>Based on the soil survey and assessment who carried out by PARAM AGRICULTURAL SOIL SURVEYS (M) Sdn Bhd on June 2004, obtain information that slope class of Negeri Lama Estate was Flat (0% - 4%). There is no new planting carried out by PT Socfin Indonesia - Negeri Lama Estate.</p>	Complied

<b>Criteria 7.6:</b> 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	<b>(C)</b> Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations.	PT Socfin Indonesia – Negeri Lama has been established since 1919, where the Mill constructed in 1928. There is no new expansion until this audit.  This indicator is <b>not applicable</b> .	Not Applicable
7.6.2	Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan.	PT Socfin Indonesia – Negeri Lama has been established since 1919, where the Mill constructed in 1928. There is no new expansion until this audit.  This indicator is <b>not applicable</b> .	Not Applicable
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	PT Socfin Indonesia – Negeri Lama has been established since 1919, where the Mill constructed in 1928.. There is no new expansion until this audit.  This indicator is <b>not applicable</b> .	Not Applicable
<b>Criteria 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<b>(C)</b> No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas.	PT Socfin Indonesia – Negeri Lama has been established since 1919, where the Mill constructed in 1928. There are no expansion/new development area and/or crops conversion up to 2021 especially in peatlands.  This indicator is <b>not applicable</b> .	Not Applicable
7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).	PT Socfin Indonesia – Negeri Lama has been established since 1919, where the Mill constructed in 1928. There are no expansion/new	Not Applicable

		development area and/or crops conversion up to 2021 especially in peatlands.  This indicator is <b>not applicable</b> .	
7.7.3	<b>(C)</b> Subsidence of peat is monitored, documented and minimised.	Refer to 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', Negeri Lama estate are managed peat area with proper facilities and equipment such as water weirs, water table, piezometer and subsidence pole. All of these facilities regularly monitored and reported to the estate manager on monthly bases.  According to "Form Monitoring Subsiden Divisi II Tahun 2021" demonstrate that ZERO subsidence on peat area from January to December. This monitoring and measurement conducted in monthly basis at 3 peat block (BL.26; BL.32 and BL.38).	Complied
7.7.4	<b>(C)</b> Availability of implementation evidence of the water and land cover management program.	Piezometer for monitoring water level on peatland conducted in monthly basis. Piezometer that installed on field is using Water Level Logger System where data recording collected automatically by remote system every 6 hours a day. According to Monitoring Pieziometer Divisi II Kebun Negeri Lama 2021 as below:	Complied

		<p style="text-align: center;">Monitoring Piezometer (water level) on Peatland Block          Division II Negeri Lama Estate - 2021          (in centimeters)</p> <p style="text-align: center;"> <span style="color: blue;">—</span> Piezo 1 (Block 21)    <span style="color: red;">—</span> Piezo 2 (Block 26)  <span style="color: green;">—</span> Piezo 3 (Block 32)    <span style="color: purple;">—</span> Piezo 4 (Block 38)         </p>	
7.7.5	<p><b>(C)</b> Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better</p>	<p>Based on document verification sighted the record of water table monitoring report. Through the field observation sighted that water weirs in peat areas are equipped with water gate facilities to ensuring water is available along the years.</p> <p>Drainability Assessment of The Peatlands of Negeri Lama Estate -RSPO Methodology Tier 2 Approach December 2019. This assessment conducted and led by Prof. Dr. Abdul Rauf, MS, Faculty of Agriculture, Sumatera Utara University.</p> <p>Result of Drainability Assessment as below:          Summary:          1. The peat area that is cultivated with oil palm in Negeri lama estate covering an area of 133.93 Ha is in the administrative location of Division I and Division II.</p>	Complied

	<p>suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation.</p>	<ol style="list-style-type: none"> <li>2. In each block at peat locations in Blocks 21, 26, 32, and 38, a good water management system has been put in place by placing water retaining embankments and water gate that effectively maintains the ground water level in the range of 40 - 50 cm below land surface.</li> <li>3. In 2015 - 2019, peat surface subsidence measured at intervals of 0.3 - 0.4 cm per year and it is estimated that the subsidence level will be lower (close to 0) in the coming years because the peat has undergone a final decomposition process and will not experience a noticeable decline because it has been opened for more than 80 years (3-4 generations of oil palm).</li> <li>4. Peat thickness in the whole block (DP) is greater than the depth of the block drainage ditch (DDB), DP &gt; DDB, so it is estimated that water can still flow according to the law of gravity (drain) through the peat layer.</li> <li>5. The 4 peat blocks of Negeri Lama Estate have a varied drainage limit time (DLT) of 105 - 123 years, meaning that they can be replanted while still maintaining the buffer time of 2 generations/ 40 years before reaching the drainage base.</li> </ol> <p>Recommendation:</p> <ol style="list-style-type: none"> <li>1. To consistently monitor the groundwater levels, both measured in centroid blocks using monitoring wells or piezometers or in drainage ditches so that they can immediately anticipate if there is a decrease in the ground water level.</li> <li>2. As far as possible keep the cover crop in the interrow area (other than the circle weed) in the block so that it can help maintain high soil's water content and can contribute to the accumulation of biomass.</li> </ol>	
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		Until this audit, unit of certification has no plan to replace the palm oil with other crops or paludiculture plants.	
7.7.6	<b>(C)</b> All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).	<p>According to soil survey and assessment which carried out by PARAM AGRICULTURAL SOIL SURVEYS (M) Sdn Bhd on June 2004, obtain information that through the total of Negeri Lama’s concession, it only 126.59 Ha (5.8%) of them are peat area.</p> <p>The program for Negeri Lama Estate consists of peatland fire simulation; hotspot monitoring by security; hotspot monitoring from tower and dissemination to communities related peatland fire.</p> <p>According to "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019), Negeri Lama Estate are manage peat area with proper facilities and equipment such as water weirs, water table, piezometer and subsidence pole. All of this facility regularly monitored and reported to the estate manager on monthly bases.</p> <p>The reports of monitored are in place and has been verified by auditor. For example, during 2015 – 2020 the subsidence measured at 0.3 – 0.4 cm per year. Piezometer read in January 2021 range from 36 to 38 cm.</p>	Complied
7.7.7	<b>(C)</b> All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non-corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines.	PT Socfin Indonesia - Negeri Lama Estate is an old established plantation which has been established since 1919. In addition, there have been no new land clearing or new development since 15 November 2018. The peat areas in Negeri Lama Estate used for palm oil cultivation. There is no more unplanted peat area.	Complied
<b>Criteria 7.8:</b> Practices maintain the quality and availability of surface and groundwater.			

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<p>7.8.1</p>	<p>A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters:          7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.</p>	<p>SOCFIN – Negeri Lama has implementing water management plan under documented “Rencana Pengelolaan Air”. The documented Procedure Water Management at Mill and Estate (SOC/PSM/4.22 Rev.01 dated 1 July 2015) defined the method of water management plan include water source and distribution identification, volume of water utilization, parameter/standards of water utilization, identify the impacts include water effluents/wastes and also the method to reduce and control water uses.</p> <p>Surface water utilization permit for SOCFIN – Negeri Lama has been issued based on “Keputusan Gubernur Sumatera Utara Nomor 610/1032 Tentang Izin Pengusahaan Sumber Daya Air”, dated 1 September 2020 and valid for three (3) years.</p> <p>Surface water intake was located in Negeri Lama Seberang Village, Bilah Hilir District, Labuhanbatu regency. The water intake coordinate point at 02° 18' 30.08" N and 100° 04' 13.66" E with two (2) intake pipes (3 inches and 6 inches) and a maximum water discharge was 12 litres/sec. This surface water is used for oil palm processing and domestic housing.</p>	<p>Complied</p>
	<p>7.8.1b Workers have adequate access to clean water.</p>	<p>Unit of Certification provide the clean water for workers at housing area with ground water (drill well) at Negeri Lama and clean water from Mill for Mill workers Housing. Water tank also provide by the Mill to access by community freely.</p> <p>During interview with sampled workers (harvester, spraying workers, mill workers and office workers) confirmed that company provide clean water freely for workers. For drinking water, some workers buy bottled/gallon water.</p>	
<p>7.8.2</p>	<p><b>(C)</b> Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or</p>	<p>Unit of Certification already identify water courses and wetland in the plantation area. Based on HCV assessment in 2011, there were identified water courses in Negeri Lama Estate, among others: River in Block 19,</p>	<p>Complied</p>

	<p>Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).</p>	<p>20, 25; Keramat River; Lengkok River; Landia River and Bilah River. The water courses were protected by the company with the following ways:</p> <ul style="list-style-type: none"> <li>• Establishment of conservation areas in riparian area to protect river water from pollutants, such as chemicals (fertilizers and pesticides).</li> <li>• Upkeep work in conservation areas remain to be implemented, but prohibited from using pesticides.</li> <li>• Type of beneficial plants that need to be planted is Cassia cobanensis.</li> <li>• On the river with a width of 15 meters, planted crops such as rubber wood or other wood plants. For river with a width of less than 15 meters, planted with Land Cover Crop.</li> </ul> <p>Unit of Certification has procedures associated riparian buffer zone, procedures of River Conservation Area (SOC/PSM/9.07) Rev.04 dated 1 April 2015. The company also has procedures that regulate the width of riparian listed on HCV Management and Monitoring procedure (SOC/PSM/9.06) Rev.03 dated 1 February 2016. In point 4, explained the definition of the area along the riverbanks are left right rivers, including the artificial river/channel/ primary irrigation channel, which has important benefits to maintain the sustainability of the river functions. Then, in point 5.2.3 stated that the river border management aims to protect the river from pollution by fertilizers and pesticides applied in the palm oil and also to prevent erosion. Riverbanks are managed in a way that serves as a buffer zone. At point 5.2.3 stated that the determination of the width of riparian buffer zone is determined based on the results of a study conducted by HCV assessor, i.e. to the width of the river at &lt;5-meter-wide, river border is 8 meters. Riparian areas in Negeri Lama Esatte have been determined as the area of HCV and have been mapped into the "Map of High Conservation Negeri Lama" scale 1: 27,857.</p>	
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		<p>Based on observations at riparian of Sungai Bilah at Block 53 Division II, the riparian area has been well maintained, with the marking by conservation pegs and prohibition of pesticide applications in the riparian/buffer zone. Unmanaged oil palm trees are keep standing, not replanted within this area.</p>																																																							
<p>7.8.3</p>	<p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p>	<p>Monitoring records of Mill effluent, particularly BOD (Biochemical Oxygen Demand) has demonstrated under Certificate of "Laboratory Analysis Report – Laporan Analisa" that was conducted by SUCOFINDO an Accredited Laboratory in monthly bases.</p> <table border="1" data-bbox="1133 678 1951 1353"> <thead> <tr> <th rowspan="2">Month (2021)</th> <th rowspan="2">Certificate No.</th> <th>BOD (mg/L)</th> <th>COD (mg/L)</th> </tr> <tr> <th>National Threshold 100 mg/L</th> <th>National Threshold 350 mg/L</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>00256/CLACAO</td> <td>99.4</td> <td>236.33</td> </tr> <tr> <td>February</td> <td>01144/CLACAO</td> <td>99.6</td> <td>239.16</td> </tr> <tr> <td>March</td> <td>02155/CLACAO</td> <td>99.8</td> <td>244.62</td> </tr> <tr> <td>April</td> <td>03250/CLACAO</td> <td>99.4</td> <td>233.92</td> </tr> <tr> <td>May</td> <td>04154/CLACAO</td> <td>98.9</td> <td>233.96</td> </tr> <tr> <td>June</td> <td>05224/CLACAO</td> <td>99.8</td> <td>242.71</td> </tr> <tr> <td>July</td> <td>03608/CLAKAO</td> <td>99.6</td> <td>248.71</td> </tr> <tr> <td>August</td> <td>04856/BLAEAO</td> <td>99.2</td> <td>238.74</td> </tr> <tr> <td>September</td> <td>05862/CLAKAO</td> <td>99.4</td> <td>235.68</td> </tr> <tr> <td>October</td> <td>05877/CLAKAO</td> <td>99.0</td> <td>220.74</td> </tr> <tr> <td>November</td> <td>07142/CLAKAO</td> <td>97.6</td> <td>194.70</td> </tr> <tr> <td>December</td> <td>08347/CLACAO</td> <td>82.4</td> <td>164.38</td> </tr> </tbody> </table>	Month (2021)	Certificate No.	BOD (mg/L)	COD (mg/L)	National Threshold 100 mg/L	National Threshold 350 mg/L	January	00256/CLACAO	99.4	236.33	February	01144/CLACAO	99.6	239.16	March	02155/CLACAO	99.8	244.62	April	03250/CLACAO	99.4	233.92	May	04154/CLACAO	98.9	233.96	June	05224/CLACAO	99.8	242.71	July	03608/CLAKAO	99.6	248.71	August	04856/BLAEAO	99.2	238.74	September	05862/CLAKAO	99.4	235.68	October	05877/CLAKAO	99.0	220.74	November	07142/CLAKAO	97.6	194.70	December	08347/CLACAO	82.4	164.38	<p>Complied</p>
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		<p>The result was complied with the Ministry of Environment Decree No. 5/2014 annex III required that BOD of POME discharged is less than 100 mg/litre. The result of POME quality during this period was under 100 mg/litre.</p> <p>Location of testing in outlet of mill wastewater (POME) that was processed through a series of wastewater treatment ponds: one anaerobic pond, one facultative pond and one aerobic pond. Process parameter monitoring and maintenance of the ponds were sighted.</p> <p>Extended of wastewater discharge permit under "Keputusan Kepala Dinas Penanaman Modal Pelayanan Terpadu Satu Pintu Kabupaten Labuhanbatu No. 503.660.31/629/DPMPTSP-BP2MNP/2021 tentang Izin Pembuangan Air Limbah Cair Ke Air atau Sumber Air (IPLC) PT Socfin Indonesia - Pabrik Minyak Kelapa Sawit Perkebunan Negeri Lama yang Terletak di Desa Negeri Lama Seberang Kecamatan Bilah Hilir Kabupaten Labuhanbatu" dated 14 September 2021 that valid for 5 (five) years.</p> <p>Improvement to increasing BOD and reducing COD value, Negeri Lama POM have installed Aero Diffuser at Aerobic Pond No. 4 (1 permanent unit and 2 floating unit). This treatment has decreasing COD value 1% per month in average.</p>							
7.8.4	Mill water use per tonne of FFB is monitored and recorded.	<p>Negeri Lama POM has defined the procedure on the monitoring of mill waster use per ton of FFB processing under POM Water Management Procedure No: SOCPSP/4.22 rev.02, dated 1st January 2016.</p> <p>The record of mill water usage per ton of FFB has demonstrated within document Mill Production Monthly Report 2021 Negeri Lama POM, where the ratio of water usage for FFB processing period Jan-Dec 2021, as follow:</p> <table border="1" data-bbox="1137 1294 1890 1375"> <thead> <tr> <th>Months (2021)</th> <th>FFB Processing (ton)</th> <th>Water Use for Processing (m<sup>3</sup>/t FFB)</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Months (2021)	FFB Processing (ton)	Water Use for Processing (m <sup>3</sup> /t FFB)				Complied
Months (2021)	FFB Processing (ton)	Water Use for Processing (m <sup>3</sup> /t FFB)							

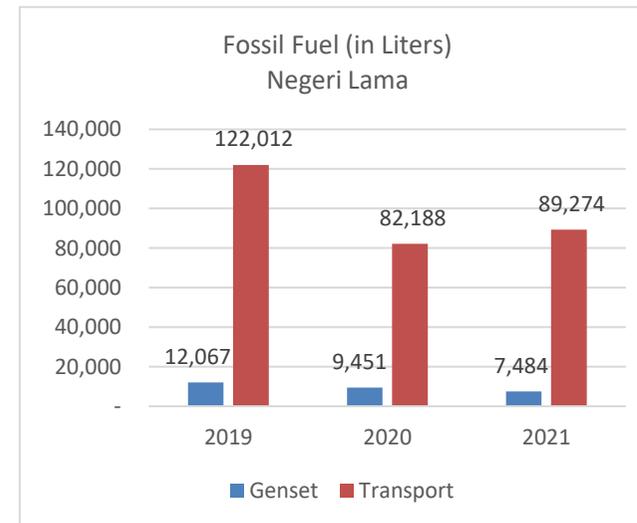
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		<table border="1"> <tr><td>January</td><td>2,526.20</td><td>0.10</td></tr> <tr><td>February</td><td>2,547.90</td><td>0.11</td></tr> <tr><td>March</td><td>3,487.11</td><td>0.10</td></tr> <tr><td>April</td><td>3,302.30</td><td>0.14</td></tr> <tr><td>May</td><td>2,712.24</td><td>0.11</td></tr> <tr><td>June</td><td>2,959.70</td><td>0.11</td></tr> <tr><td>July</td><td>3,466.97</td><td>0.11</td></tr> <tr><td>August</td><td>3,615.07</td><td>0.10</td></tr> <tr><td>September</td><td>3,016.70</td><td>0.11</td></tr> <tr><td>October</td><td>2,786.77</td><td>0.11</td></tr> <tr><td>November</td><td>2,780.80</td><td>0.11</td></tr> <tr><td>December</td><td>2,790.79</td><td>0.11</td></tr> <tr><td><b>Total</b></td><td><b>35,992.55</b></td><td><b>0.11</b></td></tr> </table> <p>Budget of water usage/ton FFB is &lt; 1.3 m<sup>3</sup>/t FFB.</p>	January	2,526.20	0.10	February	2,547.90	0.11	March	3,487.11	0.10	April	3,302.30	0.14	May	2,712.24	0.11	June	2,959.70	0.11	July	3,466.97	0.11	August	3,615.07	0.10	September	3,016.70	0.11	October	2,786.77	0.11	November	2,780.80	0.11	December	2,790.79	0.11	<b>Total</b>	<b>35,992.55</b>	<b>0.11</b>	
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<b>Criteria 7.9:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised																																										
7.9.1	Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented	<p>PT Socfin Indonesia - Negeri Lama POM has demonstrated the program to improving efficiency of the use of fossil fuels and to optimize renewable energy.</p> <p>Data seen:</p> <ol style="list-style-type: none"> <li>Fossil fuels efficiency programed 2020 and 2021, as following: <ul style="list-style-type: none"> <li>Boiler modification by operated water treatment and turbine to reduce the utilization of electrical generator (genset)</li> <li>Nozzle calibration and preventive maintenance for genset and vehicles</li> </ul> </li> </ol>	Complied																																							

- Turbine powers generate to supply electricity to composting activities in order to reduce genset utilization
- Preventive maintenance of all engine to ensure efficient fuel consumption.

**Reducing fossil fuel for Generator and transport vehicle**

Increasing fuel for transportation in 2021 is due to additional vehicle.

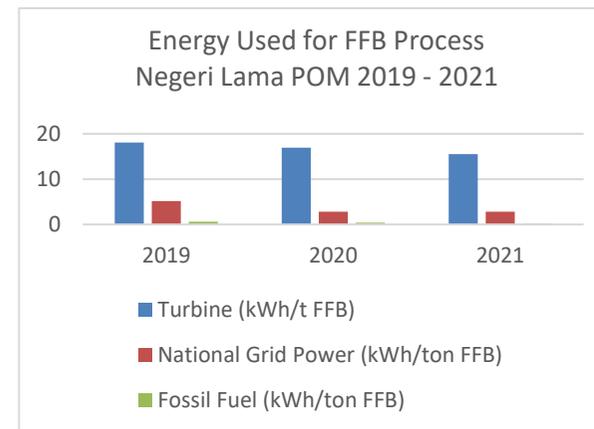


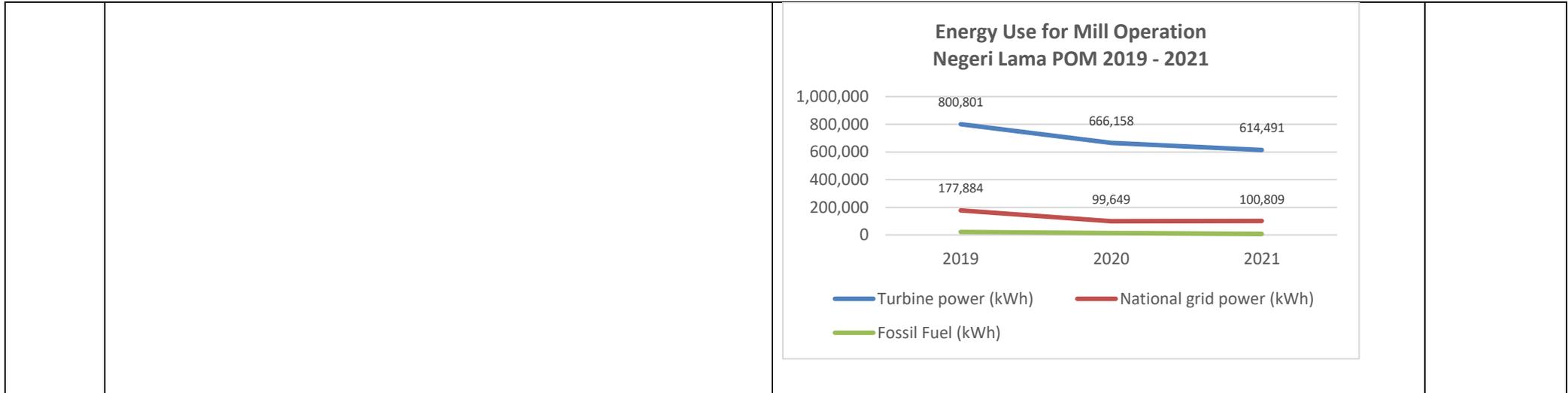
Additional aero diffuser application for POME: 1 unit (2020) to 3 unit (2021), installed on aerobic pond. Aims: increasing oxygen to reduce COD value.

*Note: increasing fuel is due to addition one unit Wheel Tractor for Mill and Estate activities. Average fuel used for 2021 is 2.67 Liter/Hour, previous year no Wheel Tractor is exist.*

2. Renewable energy (fibre and shell) optimization programme year 2021 under "Rekap Hasil dan Pemakaian Cangkang POM Kebun Negeri Lama Tahun 2021". The target was sets on 80% as minimum energy availability and actual energy can be use as 93% (hell: 3,890: kcal/kg and fiber: 2,310 kcal/kg). Monitoring is also carried out every month by counting calories from fiber and shells and used as boiler fuel.

Negeri Lama POM has documented records use of energy for Mill operations. There are two type of energy that used for mill operations which is state electricity company (Perusahaan Listrik Negara/PLN) and mill turbine. Where source of turbine is from fiber and shell as renewable energy. Trend of energy used in period 2019 – 2021 as below:





**Criteria 7.10:** Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.

7.10.1	<p><b>(C)</b> GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p>	<p>PT Socfin Indonesia- Negeri Lama POM has been identified the significant pollutant and GHG emissions under form "Evaluasi Program Gas Rumah kaca dan Efisiensi Energi" period January – December 2021, such as:</p> <ul style="list-style-type: none"> <li>- Efficiency energy from the use of "Traymaster Turbine".</li> <li>- The turn of the power source in nursery from generator into PLN</li> <li>- The turn of the power source for the process of fire up from generator into PLN</li> <li>- The use of compound fertilizer as a substitute for a single fertilizer optimization</li> </ul>	Complied
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		<p>PT Socfin Indonesia- Negeri Lama POM has also minimized pollutant and GHG through, such as</p> <ul style="list-style-type: none"> <li>- Implementing IPM to reduce pesticides usage,</li> <li>- Using fibres and shell for boiler,</li> </ul> <p>PT Socfin Indonesia Negeri Lama Mill already conduct GHG emission calculation using Palm GHG V 4.0.0 as RSPO requirement. The reporting was conducted annually to the RSPO on January to December 2020. The data that submitted to PalmGHG Calculator has been verified and synchronized by auditor onsite.</p>	
7.10.2	<b>(C)</b> Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).	SOCFIN – NEGERI LAMA has been established since 1919, where the Mill constructed in 1928. There are no expansion/new development area and/or crops conversion.	Complied
7.10.3	<b>(C)</b> Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.	SOCFIN – NEGERI LAMA has identify associated with pollution in the form of "Daftar dan Pengendalian Aspek Lingkungan, Keselamatan dan Kesehatan Kerja", last review on January 2022.	Complied
<b>Criteria 7.11:</b> Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	<b>(C)</b> Land for new planting or replanting is not prepared by burning.	<p>Zero burning policy was described in Ethical Policy (SOC/Dp/4.01-64). It described that land preparation of replanting is conducted by cutting and chipping (zero burning).</p> <p>Based on field visit at replanting area (land preparation) in Block 32 Div.2, it was verified that no fire been used for land preparation.</p>	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.	Unit of Certification always conducts a monitoring of land fires conducted by the emergency Response Team which has been	Complied

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		<p>established under the responsibility of the field assistant directly. (There are 3 divisions in Negeri Lama Estate and 1 Mill), while for the handling in Mill by Tekniker 1.</p> <p>Some emergency response equipment has been prepared by the company including: Hydrant (in Mill) as many as 8 units, APAR as much as 32 units, Firefighting house (Rumah PMK) have 2 units and emergency response equipment (consisting of goni sack, broom, shovel, sand etc.). The monitoring method is carried out according to land fire Handling guidelines SOC/DP/4.08-01.</p> <p>Based on interview with local community and relevant stakeholder, it was verified that no land fire cases in SOCFIN - Negeri Lama Estate within last 3 years.</p>	
7.11.3	The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.	<p>The Land Fire Monitoring schedule is performed monthly by the emergency Response Team, until December 2020 there is no fire hazard. The company also made a report on land fire monitoring every 3 months and submitted to the Agriculture Department of Labuhanbatu, the last report for the period of July – December 2021 was reported on January 17, 2022.</p> <p>Based on interview with local community and relevant stakeholder, it was verified that no land fire cases in SOCFIN - Negeri Lama Estate within last 3 years.</p>	Complied
<p><b>Criteria 7.12:</b> 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>			
7.12.1	<p><b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests.</p> <p>Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).</p>	<p>SOCFIN – NEGERI LAMA has been established since 1919, where the Mill constructed in 1928. There are no expansion/new development area and/or crops conversion up to 2021.</p> <p>Therefore, submitting LUCA for this unit of certification is not required.</p>	Complied

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<p>7.12.2</p>	<p><b>(C)</b> HCV and HCS forests, and other conservation areas are identified as follows: 7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.</p>	<p>Unit of Certification has conducted HCV Assessment on July - August 2011. The assessment conducted by HCV Assessor Team from Faculty of Forestry, Bogor Agricultural University by using HCV Toolkit Indonesia 2008. The team led by Ir. Nyoto Santoso, MS, a registered HCV RSPO approved assessor (Expiry date 31 December 2014) and since 23 December 2014 registered as HCV Assessor in HCVRN Assessors License Scheme. The team consist of six members as following:</p> <ol style="list-style-type: none"> <li>1. Ir Heru B Pulonggono, Msc</li> <li>2. Ir. Djoko Arie Sulistianto</li> <li>3. Ahmad Faisal Siregar, S.Hut</li> <li>4. Sutopo, S.Hut</li> <li>5. Sayidina Ali, Amd</li> <li>6. Udi Kusdinar, S.Hut</li> </ol> <p>Based on the assessment report, there are three (3) types of HCV have been identified such as HCV 1.2 (Endangered Species), HCV 4.1 (riparian area) and HCV 6 (cemetery) cover total area of 26.64 Ha (1,22 % of total HGU area of Negeri Lama Estate).</p> <p>The HCV assessment resulting six (6) protected wildlife species (based on PP No. 7/1999) such as:</p> <ol style="list-style-type: none"> <li>1. Pijantung kecil - Little spiderhunter (<i>Arachnothera longirostra</i>);</li> <li>2. Burung madu kelapa - Brown-throated sunbird (<i>Anthreptes malacensis</i>);</li> <li>3. Kipasan belang (<i>Rhipidura javanica</i>);</li> <li>4. Cekakak belukar - White-throated kingfisher (<i>Halcyon smyrnensis</i>);</li> <li>5. Cangak merah (<i>Ardea purpurea</i>);</li> <li>6. Elang tikus (<i>Elanus caeruleus</i>).</li> </ol>	<p>Complied</p>
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		<p>HCV assessments results has been compared to Endemic Bird Area (EBA) and Important Bird Area (IBA) data.</p> <p>The HCV Assessment also identified two (2) wildlife species which are listed as Appendix II (based on Appendiix CITES) such as:</p> <ol style="list-style-type: none"> <li>1. Monyet ekor panjang (<i>Macaca fascicularis</i>);</li> <li>2. Biawak (<i>Varanus salvator</i>).</li> </ol> <p>The protected areas are present in Negeri Lama Estate and it is a riparian area such as Sungai Landia, Sungai Bilah, Sungai Blok 19, 20, 25; Sungai Keramat and Sungai Lengkok.</p> <p>HCV public consultation was held on 23 December 2011 in Gedung Serba Guna Divisi 1, attended by 40 peoples such as Kabid Perkebunan Kabupaten Labuhanbatu, Kepala Dinas Kehutanan dan Perkebunan Kabupaten Labuhanbatu, Local authorities, local communities and company representative.</p> <p>Methodology of assessment using HCV toolkit 2008, implementation of the assessment consists of: Secondary data collection, field survey, mapping and landscape, Assessment of fauna aspect with a rapid assessment (direct observation, interviews with the parties), assessment of flora aspects (direct survey and interview), assessment of socio-economic and cultural aspects (interviews and direct observation at selected sites), analysis and mapping.</p> <p>HCV area has been mapped into "Peta Kawasan Bernilai Konservasi Tinggi Kebun Negeri Lama" scale 1 : 27.857.</p> <p>The company has established procedure for HCV Management and Monitoring (SOC/PSM/9.06, Rev 3) dated 1 February 2016. The revision on 1 February 2016 was add point 5.4 regarding Evaluation of HCV Monitoring. Other than that, the company has established procedure for River Riparian Conservation Areas Management (SOC/PSM/9.07, Rev 4) dated 1 April 2015.</p>	
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		<p>Based on the HCV assessment report in 2011, there are three (3) types of HCV been identified such as HCV 1.2 (Endangered Species), HCV 4.1 (riparian area) and HCV 6 (cemetery) cover total area of 26.64 Ha (1,22 % from total HGU area of Negeri Lama Estate). HCV Area Management and Monitoring documented in "Rencana Pengelolaan dan Pemantauan KBKT di Kebun Negeri Lama PT Socfin Indonesia, Propinsi Sumatera Utara, 2011".</p> <p>HCV Management and Monitoring Plan are reviewed annually, e.g. in 2020 HCV program that have been realized are:</p> <ol style="list-style-type: none"> <li>1. HCV area boundaries</li> <li>2. Manual upkeep activities</li> <li>3. Organic fertilizers</li> <li>4. Warning sign maintenance</li> <li>5. Riparian buffer zone monitoring (monthly)</li> <li>6. Protected wildlife monitoring (monthly)</li> <li>7. Socialization to workers</li> <li>8. Illegal poaching monitoring (monthly)</li> <li>9. Warning sign monitoring (monthly)</li> </ol> <p>Appropriate measures regarding rare, threatened or endangered (RTE) species and or other HCVs present or affected by the plantation and mill operations are included in the HCV Management and Monitoring Plan.</p>	
	<p>7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.</p>	<p>SOCFIN – NEGERI LAMA has been established since 1919, where the Mill constructed in 1928. There are no expansion/new development area and/or crops conversion up to 2021.</p>	

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<p>7.12.3</p>	<p><b>(C)</b> In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p>	<p>SOCFIN – NEGERI LAMA has been established since 1919, where the Mill constructed in 1928. There are no expansion/new development area and/or crops conversion up to 2021.</p> <p>Unit of Certification has conducted HCV Assessment on July - August 2011. The assessment conducted by HCV Assessor Team from Faculty of Forestry, Bogor Agricultural University by using HCV Toolkit Indonesia 2008. The team led by Ir. Nyoto Santoso, MS, a registered HCV RSPO approved assessor (Expiry date 31 December 2014) and since 23 December 2014 registered as HCV Assessor in HCVRN Assessors License Scheme.</p> <p>Based on HCV assessment report 2011 and field visit showed that an analysis of a large landscape area had been carried out and stated that SOCFIN - Negeri Lama's concession were directly bordered by natural ecosystems which were high forest cover landscapes is not exist..</p> <p>Assessment for HFCLs in this Unit of Certification is not required.</p>	<p>Complied</p>
<p>7.12.4</p>	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p>	<p>SOCFIN – NEGERI LAMA has been established since 1919, where the Mill constructed in 1928. There are no expansion/new development area and/or crops conversion after 15 November 2018.</p> <p>Unit of Certification has conducted HCV Assessment on July - August 2011. The assessment conducted by HCV Assessor Team from Faculty of Forestry, Bogor Agricultural University by using HCV Toolkit Indonesia 2008. The team led by Ir. Nyoto Santoso, MS, a registered HCV RSPO approved assessor (Expiry date 31 December 2014) and since 23 December 2014 registered as HCV Assessor in HCVRN Assessors License Scheme.</p> <p>Peatland areas within this concession is identified in 4 blocks (BL.21, BL.26, BL.32 and BL.38) totally 126.59 Ha. Where soil type is Typic Haplohemist and mature (sapric) peat soil. An integrated management plan to maintain this peatland blocks by water management through</p>	<p>Complied</p>

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		water level measurement (piezometer monitoring) and conserving canal buffer (enrichment woody plants).	
7.12.5	Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	<p>SOCFIN – NEGERI LAMA has been established since 1919, where the Mill constructed in 1928. There are no expansion/new development area and/or crops conversion after 15 November 2018.</p> <p>Unit of Certification has conducted HCV Assessment on July - August 2011. According to HCV assessment, there is no rights of local communities in HCV area nor peat area.</p> <p>Peatland areas within this concession is identified in 4 blocks (BL.21, BL.26, BL.32 and BL.38) totally 126.59 Ha. There are no rights of local communities within this area.</p>	Complied
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	<p>SOCFIN – NEGERI LAMA has been established since 1919, where the Mill constructed in 1928. There are no expansion/new development area and/or crops conversion after 15 November 2018.</p> <p>Unit of Certification has conducted HCV Assessment on July - August 2011. The assessment conducted by HCV Assessor Team from Faculty of Forestry, Bogor Agricultural University by using HCV Toolkit Indonesia 2008. The team led by Ir. Nyoto Santoso, MS, a registered HCV RSPO approved assessor (Expiry date 31 December 2014) and since 23 December 2014 registered as HCV Assessor in HCVRN Assessors License Scheme.</p> <p>Refer to HCV Assessment Report and monthly monitoring of wildlife, there are no RTE's species was identified and found within the certified area.</p>	Complied
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	SOCFIN – NEGERI LAMA has been established since 1919, where the Mill constructed in 1928. There are no expansion/new development area and/or crops conversion after 15 November 2018.	Complied

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		<p>Unit of Certification has conducted HCV Assessment on July - August 2011. The assessment conducted by HCV Assessor Team from Faculty of Forestry, Bogor Agricultural University by using HCV Toolkit Indonesia 2008. The team led by Ir. Nyoto Santoso, MS, a registered HCV RSPO approved assessor (Expiry date 31 December 2014) and since 23 December 2014 registered as HCV Assessor in HCVRN Assessors License Scheme.</p> <p>Monitoring of riparian zone (HCV 4) conducted in monthly basis and focused on wildlife monitoring, presence of illegal activities or not and fire hotspot monitoring.</p>	
7.12.8	<p><b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.</p>	<p>SOCFIN – NEGERI LAMA has been established since 1919 and existing plantation, where the Mill constructed in 1928. There are no expansion/new development area and/or crops conversion after 15 November 2018.</p> <p>Unit of Certification has conducted HCV Assessment on July - August 2011. The assessment conducted by HCV Assessor Team from Faculty of Forestry, Bogor Agricultural University by using HCV Toolkit Indonesia 2008. The team led by Ir. Nyoto Santoso, MS, a registered HCV RSPO approved assessor (Expiry date 31 December 2014) and since 23 December 2014 registered as HCV Assessor in HCVRN Assessors License Scheme.</p> <p>Therefore, RaCP is not applicable for this indicator.</p>	Complied

**Appendix B: GHG Reporting Executive Summary**

The GHG emissions that were produced in **2021** for **Negeri Lama POM** and supply base was calculated using the PalmGHG Calculator version 4.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

- i. Estates area planted data
- ii. Fuel consumed
- iii. Mill datas include CPO produced, PKO Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in **2021** for **Negeri Lama POM** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	3.10
PK	3.10

Extraction	%
OER	22.93
KER	4.12

Production	t/yr
FFB Process	
CPO Produced	8,246
PK Produced	1,481

Land Use	Ha
OP Planted Area	1,992.62
OP Planted on peat	133.76
Conservation (forested)	0
Conservation (non-forested)	13.62
<b>Total</b>	<b>2,140</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	15,360.05	0.43	0.00	0.00	0.00	0.00	15,360.05	0.43
CO <sub>2</sub> Emission from fertilizer	2,254.63	0.06	0.00	0.00	0.00	0.00	2,254.63	0.06
NO <sub>2</sub> Emission	1,001.22	0.03	0.00	0.00	0.00	0.00	1,001.22	0.03
Fuel Consumption	276.80	0.01	0.00	0.00	0.00	0.00	276.80	0.01
Peat Oxidation	7,302.75	0.20	0.00	0.00	0.00	0.00	7,302.75	0.20
<b>Sink</b>								
Crop Sequestration	-12,714.34	-0.35	0.00	0.00	0.00	0.00	-12,714.34	-0.35
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>14,963.03</b>	<b>0.42</b>	0.00	0.00	0.00	0.00	<b>14,963.03</b>	<b>0.42</b>

*\*Note: Includes both estates and smallholders*

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	15,141.97	0.42
Fuel Consumption	9.74	0.00
Grid Electricity Utilization	81.73	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	<b>15,233.44</b>	<b>0.42</b>

**Summary of Kernel Crusher Emission and Credit (if applicable)**

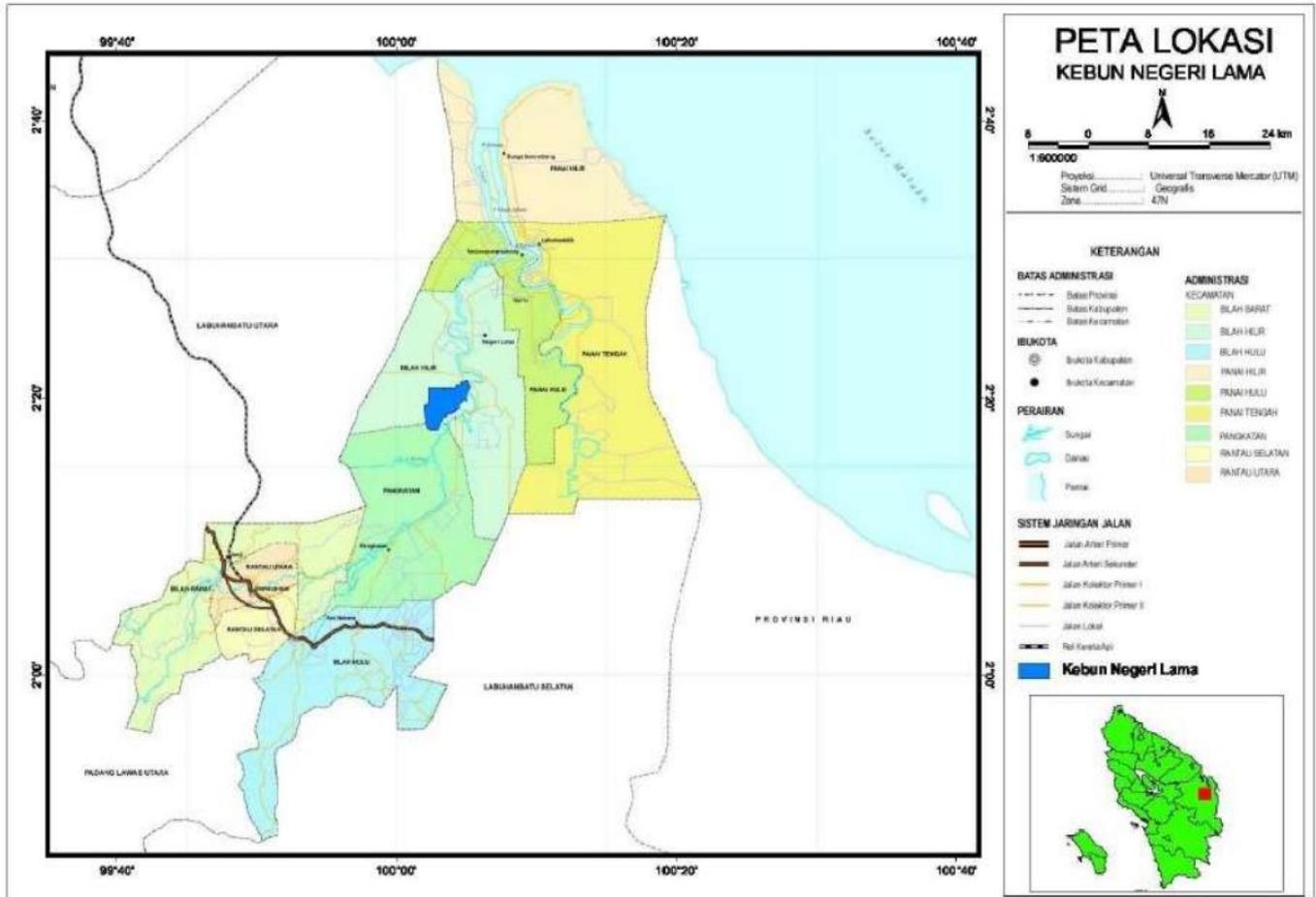
<b>Emissions</b>	<b>tCO<sub>2</sub>e</b>
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
<b>Total Crusher emissions</b>	<b>0.00</b>

\*This mill has no kernel crusher operation.

<b>Palm Oil Mill Effluent (POME) Treatment:</b>	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

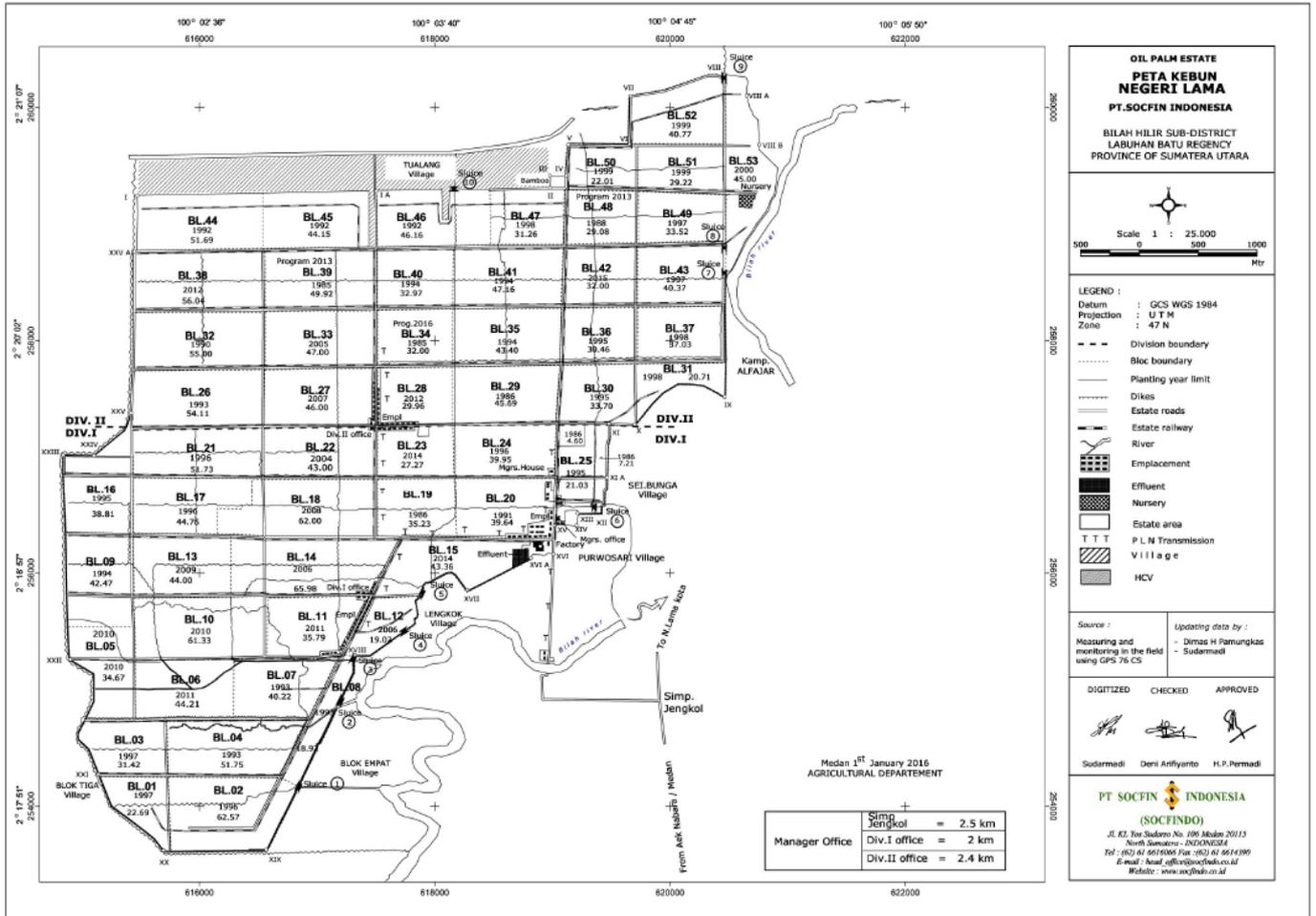
<b>POME Diverted to Anaerobic Digestion:</b>	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

**Appendix C: Location Map of Certification Unit and Supply bases**



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**Appendix D: Estate Field Map**



**Appendix E: List of Smallholder Registered and sampled**

Not applicable.

There is no smallholder engaged in Negeri Lama.

## Appendix F: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
ISS	Independent Smallholder Standard
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure