



PUBLIC SUMMARY REPORT

RSPO SECOND ANNUAL SURVEILLANCE ASSESSMENT (ASA2)

**IOI CORPORATION Bhd
Pamol Kluang**

Located in Kluang – Johor, Malaysia

Report Author:

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SUMMARY

BSi has conducted the Second Annual Surveillance Assessment (ASA2) of IOI Corporation Bhd Pamol Kluang operations located in Kluang – Johor, Malaysia comprising one mill, six company oil palm estates, support services and infrastructure. BSi concludes that IOI Pamol Kluang operations comply with the RSPO requirements [RSPO P&C NI-INAWG 2008; RSPO Certification System June 2007 (revised March 2011) including Annex 4: Procedures for Annual Surveillance; and Supply Chain Certification Standard: November 2011, Module D – CPO Mills: Segregation]

BSi recommends the continuation of the approval of IOI Pamol Kluang operations as a producer of RSPO Certified Sustainable Palm Oil.

ABBREVIATIONS USED

- ASA1 Annual Surveillance Assessment 1
- ASA2 Annual Surveillance Assessment 2
- BOD Biological Oxygen Demand
- CAR Corrective Action Request (for nonconformity)
- CHRA Chemical Health Risk Assessment
- CPO Crude Palm Oil
- DOE Department of Environment
- DOSH Department of Occupational Safety & Health
- EFB Empty Fruit Bunch
- EMS Environmental Management System
- FFB Fresh Fruit Bunch
- HCV High Conservation Value
- IPM Integrated Pest Management
- MSDS Material Safety Data Sheet
- MY-NI Malaysian National Interpretation
- NUPW National Union of Plantation Workers
- PK Palm Kernel
- PPE Personal Protective Equipment
- SEIA Social & Environmental Impact Assessment
- SIA Social Impact Assessment
- SOP Standard Operating Procedure

1.0 SCOPE OF CERTIFICATION ASSESSMENT

1.1 Identity of Certification Unit

The Pamol Kluang mill and estates are located in Johor, Malaysia (Figure 1). The oil mill is central to the estates located near Kluang, while Kahang Estate is located at Kahang, Johor and Swee Lam Estate is located at Kulai, Johor. Additional maps are included (Figures 2 and 3) showing Mamor Estate and Kahang Estate layouts. The GPS location of the mill is shown in Table 1.

Table 1: Mills GPS Locations

MILL	EASTING	NORTHING
Pamol Kluang	103° 23' 24"	2°6' 36"

1.2 Production Volume

The estimated tonnages reported for the ASA1 and the actual production since previous year are detailed in Table 2. It should be noted that the Actual tonnages are for only part of a year from the date of Initial Certification on 16 March 2011 to 28 Feb 2012. The projected tonnages for the 2012–2013 period of the Certificate are based on the annual budget of three yearly bases.

Table 2: Production tonnages

Pamol Kluang Mill	Estimate at ASA1 16/03/11 – 15/03/12	Actual 16/03/11 – 28/02/12	Projected 16/03/12– 15/03/13
CPO	56,942	40,247	55,025
PK	12,721	11,399	12,878

1.3 Certification details

SIPEF RSPO Membership No: 010-04(O)
 BSI RSPO Certificate No: SPO 547027
 Date of previous Assessment (ASA1): 8 – 10/03/2011
 Date of Certification: 16/03/2010

1.4 Description of Supply Base and Supply Chain

The supply base is the FFB from six (6) IOI owned Estates that supplied 99-8% of the FFB processed at the Mill between 16 March 2011 and 28 Feb 2012. In addition, FFB received from ten other IOI Estates was processed at the Kluang Mill during 16 March 2010 and 15 March 2011. All of the IOI estates are RSPO-Certified, except for "IOI Resort" that supplied only 1 tonnes of FFB. IOI ceased purchasing FFB from outgrowers in 2008. The actual FFB production from IOI owned Estates for the first year of the Certificate (16 March 2011 – 28 Feb 2012) and projected for the third year of the Certificate are listed in Table 3. Rainfall was well below average during the 2011 calendar year, resulting in a fall in FFB production compared with the previous year. For the projected tonnages on the following year were based to the potential yield achieved due to planting material and age profile of palms.

Table 3. Estate FFB Tonnages Processed

Source	Estimate at ASA1 16/03/11 – 15/03/12	Actual 16/03/11 – 28/02/12	Projected 16/03/12– 15/03/13
Pamol Kluang Estates:			
1. Pamol Barat	48,240	47,362	39,630
2. Pamol Timur	39,185	35,417	29,260
3. Mamor	55,650	44,520	46,000
4. Unijaya	50,550	19,741	25,830
5. Swee Lam	22,650	24,695	29,940
6. Kahang	26,000	41,237	59,490
Sub Total	242,305	212,974	230,150
Other IOI Estate			
1. Bkt Serampang	--	--	--

2. Sagil	--	--	--
3. Segamat	--	--	--
4. Regent	--	--	--
5. Paya Lalang	--	--	--
6. Tambang	--	--	--
7. Bertam	--	--	--
8. Gomali	--	--	--
Sub Total	--	--	--
Outgrowers*			
1. IOI Resorts	--	1	--
2. Jasin Lalang	--	241	--
Sub Total	--	242	--
OVERAL TOTAL	242,305	213,216	230,150

*** The production from the outgrowers is excluded from the Certificate of Pamol Kluang Palm Oil Mill**

The projected figures show a reduction compared with estimation at initial assessment and also with the actual productions, this is due to enter the year of 2012 there will be replanting programme in some areas that can lead reducing production area so that FFB production will also decrease. Approximately 2,000 ha of the Pamol Barat and Pamol Timur Estates were initially planted to oil palm in the 1940s and the palms are in their fourth cycle. The remainder of the land at these two estates was planted to the second cycle of oil palm in 1986. The other four estates (Mamor, Kahang, Unijaya and Swee Lam) within the Pamol group are in the second cycle of oil palm. The age profile of the palms is shown in Table 4a. The areas of mature and immature palms are detailed in Table 4b for each of the Estates.

Table 4a: Age Profile of Palms

AGE (years)	% of PLANTED AREA
31 – 35	—
21 – 30	30.1
11 – 20	21.7
4 – 10	32.6
0 – 3	15.6

Table 4b: Estates and Areas Planted

Estate	Mature (ha)	Immature (ha)
Pamol Barat	1,985	207
Pamol Timur	1,617	558
Mamor	1,902	213
Kahang	1,920	367
Unijaya	959	235
Swee Lam	1,044	212
TOTAL	9,427	1,792

1.5 Other Certifications Held

Pamol Kluang Mill has achieved ISCC certificate on 2011.

1.6 Organisational Information / Contact Person

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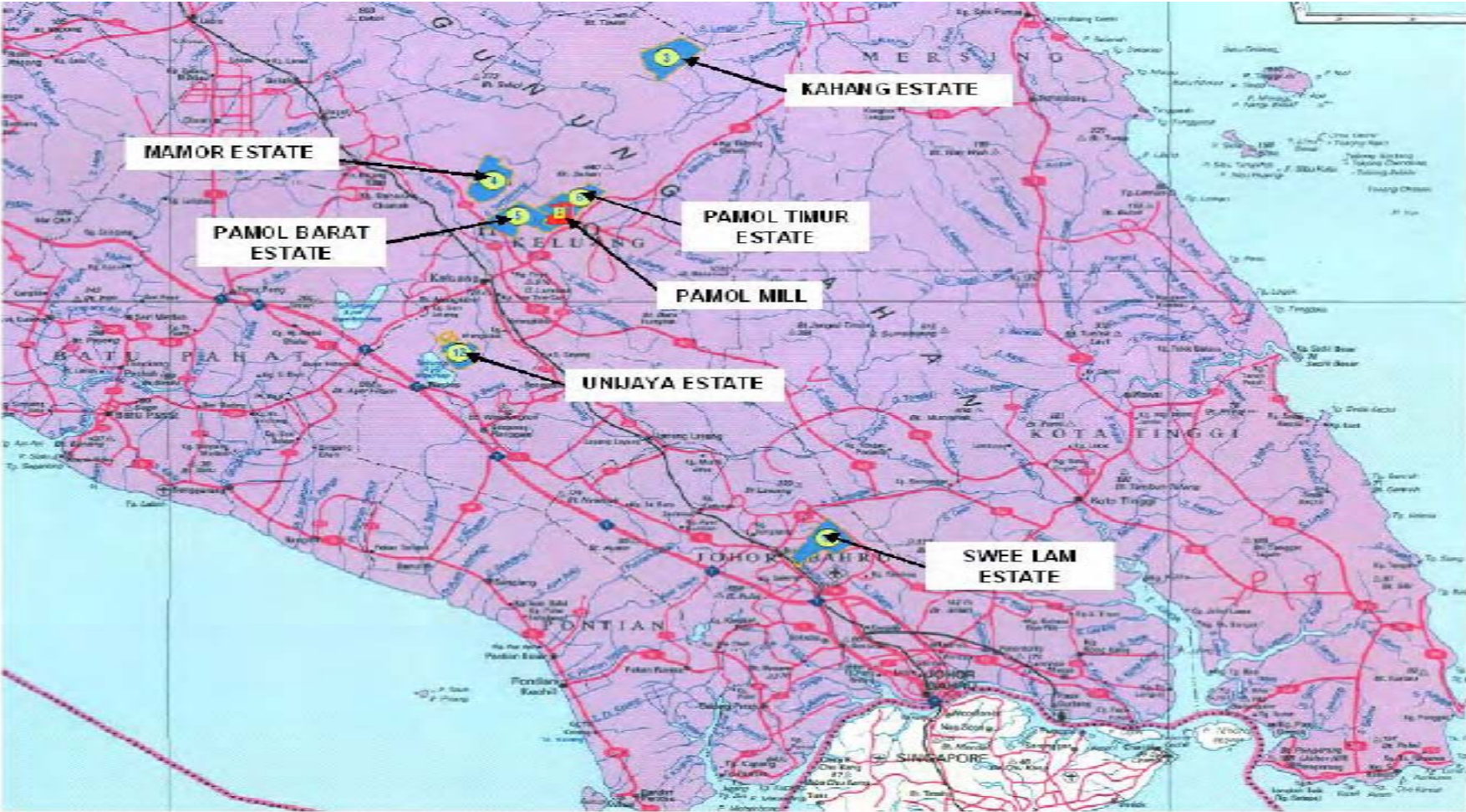
1.7 Progress against Time Bound Plan

IOI Corporation Berhad owns and operates 12 Oil Mills with a supply base of 76 Estates in Peninsula Malaysia and Sabah. The crop from three additional IOI Estates (Sugut, Sejam and Tegai Estates) located in Sarawak, is processed at Mills owned by other companies who have not yet set a target date for RSPO Certification of their mills. IOI Corporation Berhad is implementing a programme to achieve RSPO Certified Sustainable Palm Oil for all of its 12 Oil Mills and 76 Estates in Malaysia by the end of 2011. IOI Time Bound Plan is included as Appendix F. RSPO notified BSi on 06 April 2011 of a claimed breach by IOI of RSPO Code of Conduct 2.3 and Certification Systems 4.2.4 (c). IOI has until 02 May 2011 to respond formally to the claims. One of the claims relates a land dispute at Sarawak and the other to land development in Indonesia. IOI has engaged independent auditors to investigate and report on the claims. IOI has advised BSi that there presently are no labor disputes or any known legal non compliances at its oil palm operations. BSi has reviewed IOI's Time Bound Plan and considers the programme to be challenging to implement as it will require a uniform, high standard of performance across the geographic spread of its operations in Peninsula Malaysia, Sabah and Indonesia. BSi considers IOI's Time Bound Plan to conform to the RSPO requirements for Partial Certification, subject to the clarification and resolution of the claims notified by RSPO on 06 April 2011.

Progress of Associated Smallholders/Outgrowers towards RSPO Compliance

IOI does not purchase crop from smallholders.

Figure 1. Pamol Kluang Location Maps



2.0 ASSESSMENT PROCESS

2.1 Certification Body

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BSi is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSi Standards is the UK's National Standards Body. BSi provides independent, third-party certification of management systems. BSi has a Regional Office in Singapore, and an Office in Kuala Lumpur and Jakarta.

2.2 Qualifications of the Lead Assessor and Assessment Team

Aryo Gustomo - Lead Assessor

He holds a degree in Agricultural -Science majoring - in Agronomy - on the subject of oil palm plantation management; He graduated from Bogor Agriculture University. He had more than 5 (five) years working experience related to oil palm industries i.e. as a Plant - Breeder/Agronomist -with one of the Malaysian oil palm seed producers and as a Field Assistant –with a oil palm plantation company in Indonesia. He has been involved in RSPO implementation and assessment since 2009 as a team member and subsequently as a lead auditor with a RSPO approved certification body covering assessment with RSPO P&C and RSPO NPP in Malaysia and Indonesia. - He has completed several training programmes on - ISO 9001, 14001 and attended the RSPO Lead Auditor courses as well as trainings on HCV identification and management. Currently, he works for BSi Group as a RSPO Scheme Manager for ASEAN and is a RSPO lead auditor/auditor. He has an excellent oral and written command of Bahasa Indonesia and English- During this assessment, he assessed on the aspect of legal, environment, mill and estate best practices, working safety and emergency preparedness, and supply chain requirement for CPO mill.

Iman Nawireja –Social Auditor

Iman Nawireja graduated with Bachelor of Agriculture Science from the Bogor Agricultural University in 1997 and a Masters Degree in Communications from University of Indonesia. Currently, he is PhD Candidate in Rural Sociology from Bogor Agricultural University. He has a lecture in general sociology, intercultural communications, and social statistic at the Bogor Agricultural University and has more than 10 years' experience in conducting social impact assessments of

agriculture, mining and forestry projects. He has assisted with field studies on the effect of resource development projects on farmer and community incomes, health status and household division of labour. He has completed Lead Auditor training in ISO 9001 Quality Management Systems. He has assisted in conducting environmental and social assessments of oil palm projects during the past 7 years. He has assisted with conducting audits of oil palm plantation companies against the RSPO P&C in Indonesia, Malaysia, and Papua New Guinea. During this assessment, he assessed on the aspect of Legal, Social and community engagements, Stakeholders consultation, and workers welfare.

2.3 Assessment Methodology, Programme, Site Visits

The Initial Certification Audit was conducted between 17 and 20 March 2009. The first Annual Surveillance Assessment was conducted between 08 and 10 March 2011.

The Second Annual Surveillance Assessment was conducted on 29 Feb 2012 until 2 March 2011. The audit programme is included as Appendix C.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates (Unijaya Estate and Swee Lam Estate). A range of environmental and social factors were covered. These included consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families, review of documentation and monitoring data. Checklists and questionnaires were used to guide the collection of information. The comments made by external stakeholders were also taken into account in the assessment.

The Nonconformities that were assigned and the Observations that were identified during the ASA1 were followed up to check the effectiveness of corrective actions. The ASA2 findings are detailed in Section 3.2 Page 12.

This report is structured to provide a summary for each Principle, together with details for selected indicators. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

2.4 Stakeholder 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 Pamol Kluang's environmental and social performance.

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 Appendix E.

2.5 Date of Next Surveillance Visit

The date of next surveillance visit will be approximately scheduled on March 2013

3.0 ASSESSMENT FINDINGS

3.1 Summary of Findings

As outlined in Section 2.3, objective evidence was obtained separately for each Principle, together with details for selected Criteria for the Mill and the Estates. The results for each selected indicator from each of these operational areas have been aggregated to provide an assessment of overall conformance of the Company's operations with each Criterion. A statement is provided for each of the Indicators to support the finding of the assessment team.

During the ASA2, there were two (2) Nonconformities and seven (7) Observations/Opportunities for improvement were identified. IOI Pamol Kluang operations have prepared a Corrective Action Plan (Appendix D) for addressing the identified nonconformities that was reviewed and accepted by BSi.

A Nonconformity were assigned during the ASA1 against Minor Compliance Indicators 6.5.3 and the eight (8) observations that were identified were also followed up to check the effectiveness of corrective actions – Refer Section 3.3 Page 13 for details.

BSi recommends continuation of Certification for IOI Pamol Kluang operations as a producer of RSPO Certified Sustainable Palm Oil.

PRINCIPLE 1: Commitment to Transparency

IOI has maintained up to date policies, procedures and management plans for provision of information to the public upon request. The company have effective system for receiving and responding to the request of information to the public and has kept the record of request and responses.

Criterion 1.1: Oil palm growers and millers provide adequate information to other stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages & forms to allow for effective participation in decision making.

Mill and estate maintained record of request and replies to the request from external and internal stakeholders. For example, on MPOB required a weekly report of FFB received, CPO dispatched, and stock of CPO on line through www.e-kilangmpob.com.my. The last report was made on 27 February 2012. Record held on file "Monthly MPOB Return".

Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.

Inspection of document confirmed that mill and estates visited held each copy of management documents (land titles/user right, health and safety plan, plan and impact assessment relating to environmental and social impacts, pollution prevention plan, details of complaints and grievances, negotiation procedures and continues improvement plan) and this are available to public.

PRINCIPLE 2: Compliance with Applicable Laws and Regulations

Inspection of records showed the Pamol Kluang Mill and its Estates complied with all of their respective permit conditions and legal requirements. This confirmed that the internal audits and checks were effective for monitoring compliance. IOI Pamol Kluang operation holds a site permits land use (HGU) and no major land issues were sighted. However some the boundary stones were maintained at each of the Estates visited while other were not sighted.

Criterion 2.1 – There is compliance with all applicable local, national and ratified international laws and regulations.

The Mill and Estates have kept an up to date list of legal requirements. Company has owned mechanism to ensure all relevant legal requirements are comply. I.e. document of Mechanism on Tracking of Law Changes which includes list of laws, regulation reference, permit and license to manage. In addition, each operation has a List of Licenses showing the expiry dates. Inspection of a sample of licenses and permits confirmed all were current. Example: Certificate of Boiler number 2 Inspection in accordance to Act 1970 – *Factories and Machinery Part II 10*; last inspection was on 22/11/2011 while expire on 21/03/2013.

Review of internal audit reports showed that the Mill and the Estates visited had maintained legal compliance with applicable laws and regulations, in particular for Safety, Social, and Environmental regulations. The latest internal audit was 1 February 2012.

Follow up on the previous Observation 01 (2.1.1): Mamor Estate took corrective action immediately by requesting Nalco to advise on the adjustment of the water treatment plant to correct this situation. The result on latest testing in late year of 2011 shown Aluminium levels has below the Malaysia Drinking Water Quality Standard (2009). This observation was considered to be effectively closed out.

However some observations were noted against indicator 2.1.1:

Observation 01: *Company has not been routinely reporting the water quality test results to SPAN as required by the permit.*

Observation 02: *Company need to follow up to the SPAN on the renewal of license for using water and treatment (expired on 31 Dec 2011). The renewal letter has sent to the SPAN on 21 Dec 2011.*

Observation 03: *It is found at Pamol Mill, the waste chemical were kept over than 180 days which are not comply with Environmental Quality (Schedule waste) regulation, 2005. Evidence observed by BSI, the waste chemical were kept since 10 May 2011 and disposed to the licensed facilitator Kualiti Alam Sdn Bhd on 03 February 2012.*

Criterion 2.2 – The right to use the land can be demonstrated and is not legitimately contested by local communities with demonstrable rights.

The Mill and Estates are on Freehold Land. The land is not encumbered by Customary Rights and the right to use the land is not disputed. Estates hold 8 land titles from Johor Government totalling an area of 1,366.85 for example PTD 86173-81, PTD 86173 for 86.79 ha dated 28 February 2008.

The Estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of a sample of boundary stones at Swee Lam Estate confirmed they were clearly marked with red and white paint and maintained. However **Minor finding against indicator 2.2.3.1; Minor NC reference number A694301/1: During field inspections to Unijaya Estate was found some of the boundary stones were not being located and visibly maintained. E.g. Inspection to the Block PM90A and PR10A which are located nearby the smallholders area. Evidence observed by BSI was no programme is in place to monitor and maintaining the boundary stones within the estate.**

Follow up on the previous Observation 02 (2.2.3.1): Inspection to Mamor Estate, now map of boundary stones nearby smallholders area was up to date; the some boundary stones has reinstated. This observation was considered to be effectively closed out.

Criterion 2.3 – Use of the land for oil palm does not diminish the legal rights of other users without their free, prior and informed consent.

The Mill and Estates are on Freehold Land that IOI acquired in 2003 from the Unilever Plantation Group. IOI does not restrict access through the estates, except in relation to trucks. Interview of local community representatives confirmed there is no land dispute or any claim of customary land within the Estates.

PRINCIPLE 3: Commitment to Long Term Economic and Financial Viability

IOI has well developed internal management system for monitoring and improvement of their operating unit against operation target to achieved long term economic and financial viability. In addition IOI Research Centre conduct investigation toward production related issue and provide technical assistant for the estate.

Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.

Mill and estate has annual operating cost and production projected for five years. Mill and estate has prepared “5 Year Business Plan” on June 2007 and review annually. The last review was carried out on February 2012. The plan includes environment, social (workers and staffs welfare), and health and safety component and associated capital expenditure for improvement.

No replanting programme at Swee Lam Estates, however at other estates have replanting programme within 5 years. Example: at Unijaya Estate replanting programme was done on 2010/2011 for 72 Ha, while 155 ha will be conducted on 2014/2015 and 162 ha on 2015/2016.

PRINCIPLE 4: Use of Appropriate Best Practices by the Growers and Millers

IOI has implemented management systems for monitoring and control of best practice implementation at its Mill and Estates. This includes a programme of regular internal audits by the General Manager.

Criterion 4.1: Operating procedures are appropriately documented and consistently implemented and monitored.

IOI has prepared Group Palm Oil Mill Standard Operating Procedures (SOPs) were issued on April 2008 (mill) and December 2008 (estates). The SOPs is under review by Plantation Division in 11 January 2011 and waiting for final approval by the General Manager. There were two SOPs already approved, e.g. SOP on Maintenance of Riparian Buffer Zone (20 December 2011) and SOP on Buffalo Healthcare (January 2012).

GM visited estate on quarterly basis to review estate performance against IOI standard; with the last visit to Swee Lam Estate on 10 February 2012, where several issue being highlighted. Reply to the finding was prepared on 12 February 2012 on the action plan to fix up finding. Record held on file "Group Plantation Director (GPD) & General Manager (GM) Visit Report". The Estate also maintained DOSH Visit Record on "Jabatan Keselamatan dan Kesihatan Pekerjaan, Johor (Department of Occupational Health and Safety) with the last visit was made on 11 May 2011.

Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility, to a level that ensures optimal and sustained yield.

Agronomist of IOI Research Centre – Batang Melaka visited estates for leaf and soil sampling (once a year) and visual analysis and the resultant was used as fertilizer recommendation. Research Centre carried monitoring of fertiliser application once a month. Record held on file "Summary of Monthly Fertiliser Application Monitoring Report".

The last foliar and soil sampling was carried out on May 2011 for both Swee Lam and Unijaya Estates. Record held on file "Research Centre".

EFB application only applied to immature palm, with the last application was done on 31 May 2011 in 10A and 10B Swee lam Estate. Record held on file "Fertiliser Traffic Report".

Criterion 4.3: Practices minimise and control erosion and degradation of soils.

All of the land in Swee Lam and Unijaya estates is undulating and flat, as such there are no significant erosion risk. Inspection at the field indicated in general there ground cover is good with weed serve as ground cover in replanting areas.

Estate has implemented annual Road Maintenance Programme. During audit, ongoing road maintenance was carried out at block 90D Swee Lam Estate. Road inspected are generally in a good condition.

There are no peat soils or soil categorised as problematic or fragile soil at all estates (all are categorised as both Rengam and Jerangau").

Follow up on the previous Observation 03 – Field inspection indicated that now IOI has maintaining groundcover vegetation in some areas within the blocks, such as Block 90D Swee Lam Estate and PR10A Unijaya Estate with good Nephrolepis vegetations. This observation was considered to be effectively closed out.

Criterion 4.4: Practices maintain the quality and availability of surface and groundwater.

Estate has implemented a programme to reinstatement of riparian strips of 3.5 meter at both side of the stream during replanting and is implemented. Inspection to Block 93B Swee Lam Estate confirmed that buffer zone have been set aside for reinstatement during replanting. No bunds/weirs/dams were constructed across the main waterways in the estate.

Research Centre carried out three monthly water analysis in the river (upstream, midstream, and downstream) with the last sampling was on 16 November 2011. The results shown all parameters are complied with Class III of WQI (Water Quality Index). It is noted 66 on average calculation while the standard of Class III requires 61.9 – 76.5. The company has also kept the Water Quality Monitoring Report.

Estates maintained a monthly monitoring of rainfall data, record held on file "Rainfall Report" of Swee Lam and Unijaya Estates.

Water supplies for estate housing were drawn from small stream inside the estate where the testing was done every six months. The last sampling in Swee lam Estate was carried out at 22 February 2012 and been sent to Nalco for analysis—no result yet at the time of audit. However, the last testing for Pamol Timur and Mill housings on 1 February, the result came on 16 February 2012, confirmed that all parameters are meet standard of WHO standard and Malaysian National Drinking Water Quality Standard.

Pamol Kluang mill has maintained monitoring on water usage which recorded every month. Example: Water consumption on January 2012 for the mill is 1.28 M³ per tonne FFB; while for domestic is 3.98 M³ per tonne FFB. According to Mill Manager, the water consumption is normal condition even the domestic consumption was higher unit cost due to low FFB processed during that period.

Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.

The estates have continued to implement biological control pest in the plantation, for example at Swee Lam and Unijaya estates, a barn owl was installed for every 15 ha. The last census in Swee Lam Estate was held on October 2011 indicated approximately 43% of occupancy rate. The estate also has programme of planting cassia and Turnera between July 2011 and June 2012.

Eating caterpillar and rats are not a problem, but there is small number of rhinoceros beetle infestation. Estate implemented *Cypermethrin* Spray Programme that will

be ceased on June 2012. Record of pesticide usage was held on file "Estate Management Plan".

Monitoring of pesticide use is held by estate in term of per ton FFB and per ton CPO since July 2006 trended annually. Record of pesticide usage was held on file "Estate Management Plan".

Criterion 4.6: Agrochemicals are used in a way that does not endanger health or the environment. There is no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. Where agrochemicals are used that are categorised as World Health Organisation Type 1A or 1B, or are listed by the Stockholm or Rotterdam Conventions, growers are actively seeking to identify alternatives and this is documented.

Follow up from previous Observation 04 – Inspection to Unijaya Estate chemical Storage, now it is provided appropriate measuring device for ensuring the quantity of chemical mixing accurately.

Inspection of the Chemical Stores and records confirmed the Estates hold and use only chemicals that are registered under the Pesticides Act 1974. The Kluang Group of Estates has not applied either Monochrotophos or Methamidophos since 2009, as reported in the Initial Certification Assessment. The last usage of *Paraquat* was on 30 December 2010; the record was signed "Stock Movement History July 2010 to June 2011.

However, **Observation 04 has raised against indicator 4.6.2: there are 8 liters of Monocrotophos have been stored in chemical store of Swee Lam Estate since 2005. At the time of assessment there was no programme to phase out the storage of Monocropotophos.**

Medical surveillance carried out once a year for all sprayers and water treatment operator. The last medical surveillance was done by Pathlab on 20 January 2012 to 10 workers; all found no serious medical problems were detected.

Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented.

IOI Top Management has maintained an approved Health and Safety Policy (18 May 2007) that is displayed prominently on notice boards in English and Bahasa Malaysia. For example in the Pamol Kluang Mill notice board at the office and Unijaya office notice boards.

The Mill and Estates have reviewed and updated the health and safety risk assessments associated with each task, for example, Unijaya Estate latest review on 22 September 2011 and the Mill on 12 January 2011.

The mill and estates maintained up to date accident records in term of "Daftar Kemalangan, Kejadian

Berbahaya, Keracunan Pekerjaan dan Penyakit Pekerjaan" dated on 14 January 2012; which was 13 cases recorded including lost working time caused by the accidents.

The Mill and Estates have local OSH Committees where the last OSH meeting was held on 24 February 2012 attended by 12 participants in Swee lam Estate. There were recorded 47 accidents for 2012 with total 119 lost days during 2012.

All the workers are covered by the accident insurances where for Malaysian is covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial); while for foreign workers are covered by Foreign Workers Compensation Scheme in collaboration with RHB Insurance Berhad.

Inspections of the Mills and the Estates visited indicated that safe work practices were being implemented.

Follow up action from previous Observation 05: Company has now aware replace and fixed up the damage welder power lead insulation in Kahang Estate; and has carried out routine safety inspection for each workshop for the mill and estates.

Criterion 4.8: All staff, workers, smallholders and contractors are appropriately trained.

The Mill and Estates have a Training Programme that is based on a need assessment carried out at the operating unit level for each work-station. The programme includes the frequency of training/retraining on an annual basis. Training includes formal courses conducted using external resources and "on-the job" instruction. For example: Training programme of RSPO Supply Chain Standard for CPO Mills scheduled on April 2012 for all Mill staffs.

Interview with a contractor that they have undergone safety training before they start work on site and are required to attend safety briefings.

PRINCIPLE 5: Environmental Responsibility and Conservation of Natural Resources and Biodiversity

Criterion 5.1: Aspects of plantation and mill management, including replanting, that have environmental impacts are identified and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored to demonstrate continuous improvement.

The Mill and Estates carried out the annual review of environmental impacts in term of Environmental Impact Assessment management Action Plans and Continuous Improvement Plans with latest reviewed on February 2012. A list of Actions for Improvement of environmental performance has been revised for each of the significant impacts. For example: POME and EFB applications to the field; improvement on the washing floor of lubricant and CPO from marsh yard, ramp, CPO dispatching area, etc;

routine inspection of smoke emission; appropriate handling on domestic wastes, sewage, and garden.

Criterion 5.2: The status of rare, threatened or endangered species and high conservation value habitats if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and their conservation taken into account in management plans and operations.

At the time of the original development all of the land within the Estate leases was planted to oil palm except for a number of small Government Riparian Reserves and steep hillsides, such as at Swee Lam Estate. IOI has carried out an assessment of the possible presence of HCVs within and adjacent to the Estates.

IOI has prepared a Management Plan for protection of the Swee Lam reserve and other place in Mamor Estate that are based on habitat protection as well as enhancement of the reserve. Habitat protection includes prevention of disturbance by workers through awareness campaigns and regular patrols of the area. Enrichment planting has been commenced to increase the diversity of tree species. The Estates have installed signboards at prominent areas to prohibit hunting, disturbance of protected areas and the lighting of fires. Inspection of housing areas and interview of residents confirmed workers were aware of the company policy that prohibits hunting and collecting activities.

Follow up from previous Observation 06: IOI has now giving more awareness to all workers to not capture the birds from the estate area and keeps in the cage at the house as happened last year during ASA1 in Mamor estate. Interview with some workers now they have understood the company policy and rules related to hunting and gathering activities.

Criterion 5.3: Waste is reduced recycled, re-used and disposed of in an environmentally and socially responsible manner.

The Mill and Estates have identified waste products and sources of pollution in the Environmental Impact Assessment and Action Plan that was prepared in September 2008 with the latest update on February 2012.

Inspection to Unijaya and Swee Lam Estates confirmed solid wastes were well controlled, with consistent separation at source into recyclables and non-recyclables. Solid wastes that cannot be recycled are disposed in a small landfill that was appropriately located and management was consistent with guidelines for municipal waste disposal.

The company has continued managing scheduled waste stores at the Mill and each of the Estates not to less than 180 days in accordance with the requirements of the *Environmental Quality Act 1974 (Scheduled Wastes), Regulations, 2005*. For example: Disposal of 110 liters of

spent lubricant oil on 17 February 2012 to licensed facilitator (OLST Petro-Chemical Sdn Bhd). The IOI Pamol Group has engaged Kualiti Alam Sdn Bhd for collection and recycling of used chemical containers. Medical wastes, such as sharps, are collected by Pantai Medivest Sdn Bhd monthly and records are held on file.

There are complete sets of monitoring report on the scheduled waste that reported every 6 month to the related institution.

Criterion 5.4: Efficiency of energy use and use of renewable energy is maximised.

The Mill monitors and reports energy usage monthly to head office. The company has optimized the use of renewable energy since 2008 as sighted in report books. There was increased use of diesel fuel in 2010 to 2011 as back up due to the extended dry season and lower quantity of crop processed. In the mean time, the mill has taking into account to use power electricity from the government (Tenaga Nasional Berhad) for power supply during low production and the mill processing hour is lower.

Criterion 5.5: Use of fire for waste disposal and for preparing land for replanting is avoided except in specific situation, as identified in the ASEAN guidelines or other regional best practice.

Inspection to the replanted area at Unijaya Estate confirmed that palm residues were chipped and used for mulch and fire was not used.

IOI has implemented Zero burning policies in all workplace area at the Mill and estates.

However ***Minor nonconformity has raised against indicator 5.5.3 (reference number: A694301/2): in Swee lam estate housing complex, even though socialization toward zero burning has been carried out, however, inspection to the workers housing found evidence of burning waste. Company to conduct additional socialization session to raised workers awareness toward zero burning.***

Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases are developed, implemented and monitored.

The Mill and Estates Pollution Prevention Plan is documented in the Environmental Impacts Identification and Improvement Plan, prepared September 2008 with the latest reviewed on February 2012. Inspection confirmed the Mill and Estates have implemented appropriate controls for preventing pollution from point source emissions to air and discharges of wastewater, such as the mill monsoon drains.

Smoke emission quality test at the mill was done every 6 month in accordance to the Environmental Quality

(Clean Air) Regulation 1928. The test was conducted by the Environment Consultancy & Monitoring Services Sdn Bhd. The latest test was on semester two of 2011 where all parameters were complied with the standard requirements. E.g. dust, NOx, Sox, and Dark Smoke.

PRINCIPLE 6: Responsible Consideration of Employees and of Individuals and Communities by Growers and Millers

Criterion 6.1: Aspects of plantation and mill management, including replanting, that have social impacts are identified in a participatory way and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continuous improvement.

SIA was prepared on September 2008 with the participation of local community and updated annually. The social action plan was reviewed and updated on February 2012 based on input received during public consultation with external and internal stakeholders carried out on 09 February and 2 February 2012 respectively. The meeting was attended by 29 internal stakeholders (staffs and workers) while 28 participants of contractors, suppliers, NUPW, AMESU, neighbouring estates, as well as local kampong representative attended public consultation with external stakeholders. Record of meeting with attendance list and minute of meeting are available as attachment. In Swee Lam Estate updated SIA on February 2012; public consultation 16 February 2012 attended by 11 participant of external stakeholders.

However **Observation 05 has raised against indicator 6.1.1: SIA Action plan can be improved by reviewing the implementation and reduce the number of programme to the manageable level and easy monitoring; attention should be given to the most important issues.**

Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.

The Consultation and communication procedure for stakeholders is through IOI website: www.ioigroup.com otherwise for those who do not have Internet connection follow Stakeholders Request Procedure. Verbal request by phone call IOI Group General Line: +60389478888 or written request to Two IOI Square, IOI resort, 62502 Putrajaya, Malaysia. Written procedure held on file Management Plan point 10.0 Stakeholders Request Procedure.

Social Liaison Officer or Estate Manager (or Estate Manager) is the person responsible for communications with communities and other stakeholders.

A formal list of stakeholder has been prepared consisting of local communities, neighbouring estates, government offices, suppliers, contractors, workers, NGO, doctors,

consultants, banks, external auditors complete with address, contact number and persons in charge updated on February 2012. Records are held on file List of Stakeholders.

Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all parties.

A grievance procedure has been developed and included in the "Management Plan". Complaint and grievances have been recorded in "Complaint/Grievance Book" since July 2007. The "Grievance/Complaints" book is used to record all enquiries not only complaints and grievances. Inspection of the records indicated that the system resolved all disputes in a timely manner. For example, the last complaint was raised by employee over children safety when passed the road next to his house on 29 December 2011. Mill takes immediate action by installing railing between the road and the culvert on 18 January 2012.

Observation 06 has raised against indicator 6.3.1: At Unijaya Estate, the status for each complaint received from internal stakeholders need to be made clearer to show the progress of implementation. For example, Complaint and Grievance Book should record the status of complaint either in progress, or completed. The estate has taken an action by notifying the status for each particular complaint.

IOI has established and implemented ECC (Employment Consultative Committee) for resolving employment issues at local level. The ECC has meetings regularly with the representative of management and workers (including women and foreign workers).

There were no documented external disputes at the time of the audit. The ECC is open to external parties including foreign workers. It was confirmed during assessment that foreign workers have their representatives in ECC.

Criterion 6.4: Any negotiations concerning compensation for loss of legal or customary 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.

IOI has a procedure of "Grievance Procedure of Land Owner Issues" that is applicable for assessing legal and customary land issue. The procedures is available on "Group Social Impact Assessments and Management Action Plan" dated 25 January 2008.

IOI has purchase the Pamol Group in 2003 and there has been no land issue since then. Interview of local community and neighbouring estate confirmed that currently no outstanding land dispute in this property.

Criterion 6.5: Pay and conditions for employees and for employees of contractors always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.

Migrant workers from Indonesia make up the majority of the workforce, with smaller numbers from Myanmar, Nepal, and Bangladesh who are engaged on 2 or 3 year contracts. Pay and conditions are documented in the employment agreement between the company and workers and calculated in line with the current MAPA/NUPW award rate. Inspection of contracts of both local and foreign workers confirmed that pay and conditions are available in Bahasa Malaysia, with some of them in Myanmar, Nepal, and Bangladesh languages.

Observation 07 (6.5.2): *The company has just recently translating the pay slip from English to Bahasa Malaysia, Nepalese, and Bangladeshi. However interview of Indonesian harvester at Unijaya Estate found the he did not understand the payslip and wage structures this is indicated the socialization has not been sufficiently carried out. The estate manager has taken an action immediately on 02 March 2012 by providing socialization to the harvester.*

Follow up from previous Observation 07: Mill has carried out additional socialization in relation to the pay rate following commencement of the new rate as of February 2012 in 20 February 2012. Interview of mill workers confirmed understanding of the pay rate. Pamol Barat Estate has carried out additional socialization on pay rate. Beside that the most current price was announced during muster morning to all workers, for example the last socialization was held on 15 February 2012 attended by 10 workers.

Following shortage of FFB production, mill only process three days per week. Workers are keeps employed five days per week for maintenance works during mill off day. Review to pay record indicated there were no income differences between before and after FFB storage

Follow up on previous Observation 08: *Inspection to the housing by Labour Department – Johor Bahru on 15 June 2011 reference number (11) dlm.PTKJB/1010100739 indicated that estate housing were sub-standard including at Kahang Estate. The estate as forwarded upgrading plan of 4 blocks x 2 units workers quarters (Phase 1) at Swee Lam estate on 10 August 2011; while Unijaya Estate has just recently started to upgrade the workers housing. Those would be included repainting.*

Follow up on previous **Minor nonconformity against indicator 6.5.3 (reference number A542057/1):** *Permanent housing inspection and reporting system in both Bahasa English and Bahasa Malaysia has been developed (Appendix 1 - 4). Housing inspection to be conducted by respective line site block representative (Appendix 5) starts from 1st week of April 2011 and to be*

monitored by Social Liaison Officer. Estate has now implemented an Inspection and Reporting System to detect any damage to the workers house. Inspection was carried out monthly to observe damage that required reparation. Record indicated the new system work effectively to alert estate for follow up action. Minor repair was done by estate workers while major repair was done by contractor. For example, on 23 February 2012 there was damage to the culvert recorded on file of Mamor Estate Campsite Sanitation report; repair was done by contractor on 29 February 2012 which recorded on JCB documents. The Minor NC has now been closed on 2 March 2012.

Criterion 6.6: The employer respects the right 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.

At national level HQ held meeting with NUPW when required. At operating unit level NUPW representative meet regularly in Kluang office. NUPW Kluang representative has also been included in the public consultation as part of SIA Action Plan Review and Update.

Criterion 6.7: Children are not employed or exploited. Work by children is acceptable on family farms, under adult supervision and when not interfering with education programmes. Children are not exposed to hazardous working conditions.

Inspection to one of employee contract agreement confirmed that copy of ID or passport for foreign worker is held. During field visit children were not observed at any of the working place at both mill and estate.

Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation or age is prohibited.

An equal opportunity policy is displayed at notice board at muster in mill and estates. Interview of male and female workers confirmed understanding and awareness of the policy.

Criterion 6.9: A Policy to prevent sexual harassment and all other forms of violence against women and to protect their reproductive rights is developed and applied.

Top management has approved policy on prevention and elimination of sexual harassment in workplace on 04 January 2008. A female staff's member has been appointed as gender committee member at every location.

The company has developed specific grievance mechanism on sexual harassment and violence in Bahasa Malaysia on January 2008. Female workers interview confirmed understanding of the mechanism and no issue was raised during the audit.

The last gender committee meeting at Swee Lam Estate was held on 18 November 2011 attended by 10 participants. No issue raised. Record held on file "Gender Committee".

Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.

Mill only process FFB harvested from company estates. Interview confirmed that contractors/suppliers and workers understand contractual agreement and stated that the contract is transparent and fair. The company has standard term and condition of the contract agreement (in Nepalese and Myanmar Language for Nepal and Myanmar worker) which is explained prior to signing.

Interview of contractors and workers confirmed no delay in payment is occurred. Inspection to the "Grievance Book" indicated no complaint was raised in relation to processing of the payment. Interview also confirmed that the payment was made in a timely manner.

Criterion 6.11: Growers and millers contribute to local sustainable development wherever appropriate.

The company has cooperated with government to allow electricity transmission along estate concession totalling 10.74 ha. The estate has provided access to registered smallholders to pass through company road. Company make donation to local schools, assisted underprivileged student through purchase of teaching aids and supplies.

Principle 7: Responsible Development of New Plantings

Pamol Kluang Group has not carried out any new oil palm developments and there are no plans for expansion of plantings. Principle 7 is not applicable to this Assessment.

PRINCIPLE 8: Commitment to Continuous Improvement in Key Areas of Activity

Criterion 8.1: Growers and millers regularly monitor and review their activities and develop and implement action plans that allow demonstrable continuous improvement in key operations.

IOI has carried out an annual review of the environmental and social aspects of Pamol Kluang operations, with a view to identifying improvements. With point sources of pollutants well controlled, the company's Improvement Plan is to reduce the use of fossil fuels as much as practical through the use of the

steam turbine to generate electricity and optimisation of FFB transport.

The Social Action Plan has continued to work towards improving stakeholder relationship through engagement and dialogue.

3.2 Detailed Identified Nonconformities, Corrective Actions and Auditor Conclusions

Corrective actions with respect to one (1) nonconformity raised at the last assessment have been reviewed and found to be effectively implemented. During ASA2, two (2) Nonconformities and seven (7) Observations / Opportunities for improvement were identified. Pamol Kluang has prepared a Corrective Action Plan for addressing the identified Nonconformity. The Audit Team has reviewed and accepted the Pamol Kluang Corrective Action Plan. Implementation of corrective actions will be followed up during the next Surveillance Assessment (ASA3).

Major Nonconformity

No Major nonconformity was raised.

Minor Nonconformities

Two (2) Nonconformities were assigned against Minor Compliance Indicators 2.2.3.1 and 5.5.3. Pamol Kluang operations has prepared corrective action plan for addressing the non conformities which BSi has reviewed and accepted. Progress towards resolution on the action taken will be followed up at the subsequent surveillance assessment. The details of these Nonconformities are provided below:

A694301/1: (2.2.3.1) At Unijaya Estate, during field inspections found some of the boundary stones were not being located and visibly maintained. E.g. in Block PM90A and PR10A which are located nearby the smallholders area. Evidence observed by BSi was no programme is in place to monitor and maintaining the boundary stones within the estate.

A694301/2: (5.5.3) At Swee Lam Estate housing, even though socialization toward zero burning has been carried out, however, inspection to the workers housing found evidence of burning waste. Company to conduct additional socialization session to raised workers awareness toward zero burning.

Observation/Opportunity for improvement

There are Seven (7) Observations/Opportunities for improvements were identified. The progress with the Observations/Opportunities for Improvement will be checked at the next Annual Surveillance Assessment (ASA3). The Details are of below:

OBS1 (2.1.1): Company has not been routinely reporting

the water quality test results to SPAN as required by the permit.

OBS2 (2.1.1): Company need to follow up to the SPAN on the renewal of license for using water and treatment (expired on 31 Dec 2011). The renewal letter has sent to the SPAN on 21 Dec 2011.

OBS3 (2.1.1): It is found at Pamol Mill, the waste chemical were kept over than 180 days which are not comply with Environmental Quality (Schedule waste) regulation, 2005. Evidence observed by BSI, the waste chemical were kept since 10 May 2011 and disposed to the licensed facilitator Kualiti Alam Sdn Bhd on 03 February 2012.

OBS4 (4.6.2): There are 8 litres of monocrotophos have been stored in chemical store of Swee Lam Estate since 2005. At the time of assessment there was no programme to phase out the storage of monocropotophos. The last time using of monopocrotophos was before 2010.

OBS5 (6.1.1): SIA Action plan can be improved by reviewing the implementation and reduce the number of programme to the manageable level and easy monitoring; attention should be given to the most important issues.

OBS6 (6.3.1): At Unijaya Estate, the status for each complaint received from internal stakeholders need to be made clearer to show the progress of implementation. For example, Complaint and Grievance Book should record the status of compliant either in progress, or completed. The estate has taken an action by notifying the status for each particular complaint.

OBS7 (6.5.2): The company has just recently translating the payslip from English to Bahasa Malaysia, Nepalese, Bangladeshi. However interview of Indonesian harvester at Unijaya Estate found the he did not understand the payslip and wage structures. This is indicated the socialization has not been sufficiently carried out. The estate manager has taken an action immediately on 02 March 2012 by providing socialization to the harvester.

Noteworthy Positive Components

- ✓ Reinstatement of riparian buffer zones has been consistently implemented at replanting areas.
- ✓ The Mill has improved safety of access through the processing workstations by upgrading and clearly marking walkways and handrails of ladder-ways.
- ✓ The Mill has maximised the use of renewable fuel for generating electricity by running the steam turbine outside of processing hours.
- ✓ At the Estates the Company has a system whereby buffalos that are purchased by the company for

infield collection of FFB are then sold prior to completion of foreign worker contracts and the "sale proceeds" are distributed amongst the workers.

- ✓ Proceeds from the sale of "recyclables" collected from domestic waste are distributed to the residents.

3.3. Status of Nonconformities (Major and Minor) Previously Identified

Corrective Actions for a Nonconformity identified during the ASA1 has been effectively and consistently implemented and the nonconformity remains closed.

A542057/1: (6.5.3) At Mamor Estate Housing, Inspection of the housing at Mamor Estate found that the system for inspection and reporting of repairs that are required to be carried out was ineffective because broken windows, for example, had not been identified as requiring replacement.

ASA2 Findings: Permanent housing inspection and reporting system in both Bahasa English and Bahasa Malaysia has been developed (Appendix 1 - 4). Housing inspection to be conducted by respective linesite block representative (Appendix 5) starts from 1st week of April 2011 and to be monitored by Social Liaison Officer. Estate has now implemented an Inspection and Reporting System to detect any damage to the workers house. Inspection was carried out monthly to observe damage that required repair. Record indicated the new system work effectively to alert estate for follow up action. Minor repair was done by estate workers while major repair was done by contractor. For example, on 23 February 2012 there was damage to the culvert recorded on file of Mamor Estate Campsite Sanitation report, repair was done by contractor on 29 February 2012 which recorded on JCB documents. **The Minor NC has now been closed on 2 March 2012.**

Review of progress with Observations/Opportunities for improvement identified during Initial Certification assessment

OBS01 (2.1.1) Recent (February 2011) Nalco Laboratory tests of the Mamor Estate domestic water supply reported aluminium and oil and grease exceeded the Malaysia Drinking Water Quality Standard (2009). Mamor has requested Nalco to advise on the adjustment of the water treatment plant to correct this situation.

ASA2 findings: Mamor Estate took corrective action immediately by requesting Nalco to advice on the adjustment of the water treatment plant to correct this situation. The result on latest testing in late year of 2011 shown Alumunium levels has below the Malaysia Drinking Water Quality Standard (2009). This observation was considered to be effectively closed out.

OBS 02 (2.2.3) At Mamor Estate, the locations of boundary stones need to be updated on the map, in particular, the boundary with smallholders and the quarry where the stones have been reinstated.

ASA2 findings: Inspection to Mamor Estate, now map of boundary stones nearby smallholder's area was up to date; the some boundary stones have reinstated. This observation was considered to be effectively closed out.

OBS 03 (4.3.2) Field inspections indicated that groundcover vegetation needs to be improved at some areas, such as Block 03B at Kahang Estate.

ASA2 findings: Field inspection indicated that now IOI has maintaining groundcover vegetation in some areas within the blocks, such as Block 90D Swee Lam Estate and PR10A Unijaya Estate with good *Neprolephis* vegetations. This observation was considered to be effectively closed out.

OBS 04 (4.6.1) The accuracy of measuring the quantity of chemical for mixing with water could be improved by providing appropriate measuring devices.

ASA2 findings: Inspection to Unijaya Estate chemical Storage, now it is provided appropriate measuring device for ensuring the quantity of chemical mixing accurately.

OBS 05 (4.7.1) Inspection of the Kahang Estate Workshop found the electric-arc welder power lead insulation sheath was badly damaged, indicating inadequate workplace safety inspection. The Estate was advised that Nonconformity would be assigned. The welder was immediately removed from service and the faulty lead replaced the same day.

ASA2 findings: Company has now aware replace and fixed up the damage welder power lead insulation in Kahang Estate; and has carried out routine safety inspection for each workshop for the mill and estates.

OBS 06 (5.2.3) At Mamor Estate, two caged birds were kept at the housing area. One of the birds was a spotted dove *Streptopelia chinensis*, which is likely to have been captured in the Estate, indicating inadequate control of hunting and gathering activities.

ASA2 findings: IOI has now giving more awareness to all workers to not capture the birds from the estate area and keeps in the cage at the house as happened last year during ASA1 in Mamor estate. Interview with some workers now they have understood the company policy and rules related to hunting and gathering activities.

OBS 07 (6.5.2) Interview of foreign workers found that they did not understand that the reasons for fluctuation of their pays was because of the movements in the CPO market price.

ASA2 findings: Mill has carried out additional socialization in relation to the pay rate following

commencement of the new rate as of February 2012 in 20 February 2012. Interview of mill workers confirmed understanding of the pay rate. Pamol Barat Estate has carried out additional socialization on pay rate. Beside that the most current price was announced during muster morning to all workers, for example the last socialization was held on 15 February 2012 attended by 10 workers.

OBS 08 (6.5.3) The houses at Kahang Estate, in particular foreign worker houses, are badly in need of repainting.

ASA2 findings: Inspection to the housing by Labour Department – Johor Bahru on 15 June 2011 reference number (11) dlm.PTKJB/1010100739 indicated that estate housing were sub-standard including at Kahang Estate. The estate as forwarded upgrading plan of 4 blocks x 2 units workers quarters (Phase 1) at Swee Lam estate on 10 August 2011; while Unijaya Estate has just recently started to upgrade the workers housing. Those would be included repainting.

3.4 Issues Raised By Stakeholders and Findings with Respect To Each Issue

During this ASA2, the majority of stakeholders had positive comments about Pamol Kluang. For the situations where stakeholders raised issues, the company's response is stated. The detail of stakeholders comment has provided in each criterion as part of this summary report.

4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY

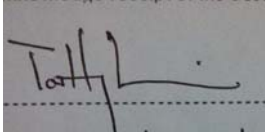
4.1 Date of Next Surveillance Visit

The next surveillance visit will be scheduled within twelve months of the ASA2.

4.2 Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings

Please sign below to acknowledge receipt of the assessment visit described in this report and confirm the acceptance of the assessment report contents including assessment findings.

Signed for on behalf of
IOI Corporation Bhd – Pamol Kluang



.....
Too Heng Liew
Head of Sustainability (Malaysia & Indonesia)
Date: 02/03/2012

Signed for on behalf of
BSi Group Singapore Pte Ltd



.....
Mr Aryo Gustomo
BSI RSPO Lead Auditor
Date: 02/03/2012

Appendix “A”

Supply Chain Certification Audits

Main Report Details

Standard: Supply Chain Certification requirement for CPO Mills – Module D Segregation

Location: Pamol Kluang Mill, Date: 29/02/2012

Total last transaction in UTZ system during March 2011 and February 2012 is 42,537 mt. This was checked refer to UTZ page with total up the quantity entered in the months stated above (*Pamol Kluang has no transaction using Green Palm*)

D.1. Documented procedures

D.1.1 The facility shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:

a) Complete and up to date procedures covering the implementation of all the elements in these requirements.

Complies – Procedures are current and include all elements of the Supply Chain for controlling the receipt, sale and dispatch of palm products. I.e. SOP number ISCC/SOP/COC/I dated 8 May 2011, Issue 1.

b) The name 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 to demonstrate awareness of the facilities procedures for the implementation of this standard. *Complies – The Mill Manager has responsibility for the Supply Chain aspects of FFB receipts, processing and shipping of palm products. Interview confirmed their knowledge of the RSPO Supply Chain requirements for the respective areas of the operations.*

D.1.2 The facility shall have documented procedures for receiving and processing certified and non-certified FFB.

Complies – the Mills Weighbridge SOP covers the receiving of FFB and recording details of the Supplier and Transporter. All deliveries of FFB are subject to verification of documentation and quality checks.

D.2. Purchasing and goods in

D.2.1 The facility shall verify and document the volumes of certified and non-certified FFBs received. *Complies – the Mill records tonnages received at the weighbridge and these are reported daily to Head Office.*

D.2.2 The facility shall inform the CB immediately if there is a projected overproduction. *Complies – the company has a mechanism for advising the CB of production variations, which are monitored internally.*

D.3. Record keeping

D.3.1 The facility shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these requirements. *Complies – Inspection of records at the Mill confirmed these were updated daily.*

D.3.2 Retention times for all records and reports shall be at least five (5) years. *Complies – Records are archived and stored for 10 years as per SOP..*

D.3.3 The facility shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO, PKO and palm kernel meal on a three-monthly basis. *Complies – these are updated every three month and reported to Head Office.*

D.3.4 The following trade names should be used and specified in relevant documents, e.g. purchase and sales contracts, e.g. *product name*/SG or Segregation. The supply chain model used should be clearly indicated. *Complies – The company uses the prefix MB on the Product Code. For example: Delivery Order dated 23 December 2011 to IOI Loaders Croklaan Procurement Company Sdn Bhd; it was indicated RSPO/SG on the commodity brand.*

D.4. Sales and good out

D.4.1 The facility shall ensure that all sales invoices issued for RSPO certified products delivered include the following information:

a) The name and address of the buyer;

b) The date on which the invoice was issued;

c) A description of the product, including the applicable supply chain model (Segregated or Mass Balance)

d) The quantity of the products delivered;

e) Reference to related transport documentation.

Complies – all of these items (a-e) are included in the company's invoices to buyers. For example: Delivery Order of RSPO/SG to IOI Loaders Croklaan Procurement Company Sdn Bhd dated on 23 December 2011, 19 January 2012, and 24 February 2012.

D.5. Processing

D.5.1 The facility shall assure and verify through clear procedures and record keeping that the RSPO certified palm oil is kept segregated from non certified material including during transport and storage and be able to demonstrate that it has taken all reasonable measures to ensure that contamination is avoided. The objective is for 100 % segregated material to be reached. The systems should guarantee the minimum standard of 95 % segregated physical material; up to 5 % contamination is allowed. *Complies – The company has owned mechanism on the processing facility in term of working instruction and procedure. Review and site visit confirms all mechanisms are available for each station in the mill, and most of the mill workers are aware.*

D.5.2 The facility shall provide documented proof that the RSPO certified palm oil can be traced back to only certified segregated material. *Complies – Pamol Kluang Mill has owned several procedure which might be easily traced back, e.g. Daily report, monthly progress report. The content of these documents showed FFB receipt and processed, CPO and PK produced.*

D.5.3 In cases where a mill outsources activities to an independent palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that: The crush operator conforms to these requirements for segregation; The crush is covered through a signed and enforceable agreement. *Not Applicable – The mill is not equipped with palm kernel crushing plant.*

D.6. Training

D.6.1 The facility shall provide the training for all staff as required to implement the requirements of the Supply Chain Certification Systems. *Complies – The company maintains records of training. For this Supply chain requirement, the company has just started to conduct training even though in general all staffs had been aware on due to ISCC certification last year (2011). Mill has a plan to carry out training on RSPO Supply Chain Standard scheduled on April 2012.*

D.7. Claims

D.7.1 The facility shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules for Communications and Claims. *Complies – As of the Assessor's knowledge, the company has not made claims outside of the RSPO rules for Communications an*

Appendix “B”

RSPO Certificate Details

IOI Corporation Berhad
 Level 8, Two IOI Square
 IOI Resort 62502 Putrajaya
 Malaysia
 Website: www.ioigroup.com

Certificate Number: SPO **547027**

Applicable Standards: RSPO Certification System June 2007 (revised March 2011) including Annex 4: Procedures for Annual Surveillance; RSPO P&C MY-NIWG 2010; and relevant element of Supply Chain requirements for CPO Mills; SCCS Standard Nov 2011 Module D - Segregation.

<i>Pamol Kluang Palm Oil Mill and Supply Base</i>			
Location Address		Kluang Johor Malaysia PO Box 1 86007 Kluang	
GPS Location		Longitude 103° 23' 24" Latitude 2° 6' 36"	
CPO Tonnage Total		55,025 mt	
PK Tonnage Total		12,878 mt	
Own estates FFB Tonnage		230,150 mt	
Non-company Suppliers FFB Tonnage		0 mt	
IOI estates	Mature (ha)	Immature (ha)	Annual FFB Production (mt)
1. Pamol Barat	1,985	207	39,630
2. Pamol Timur	1,617	558	29,260
3. Mamor	1,902	213	46,000
4. Unijaya	959	235	25,830
5. Swee Lam	1,920	367	29,940
6. Kahang	1,044	212	59,490
TOTAL	9,427	1,792	230,150

Appendix “C”

2nd Annual Surveillance Assessment Programme

Assessment Programme February 29th – March 2nd, 2012

Date	Time	Subjects	Aryo	Iman
Tuesday, February 28 th	13.55 – 16.35	Aryo and Iman are travelling from Jakarta to Changi airport of Singapore	√	√
	17.00 – 21.00	Meet and pick up by IOI at the Changi airport Team travelling to Pamol Kluang and Staying at the Pamol Kluang.	√	√
Wednesday, February 29 th	08.00 – 08.30	Opening Meeting e.g.: <ul style="list-style-type: none"> • Introduction • Presentation by the company representative (Estate and mill activities, Supply Chain related to the FFB supplied to the mill, progress of time bound plan). • Presentation by Audit Team Leader and confirmation on the assessment scope • Finalize Audit schedule (including stakeholders consultation) • Other business 	√	√
	08.30 – 12.00	Document review at the Pamol Kluang Mill (General Documentation e.g. Legal, Manual and Procedure, HCV identification, SEIA documents, Health and Safety, Time bound plan verification etc)	√	-
	08.30 – 12.00	Meeting and Interview with mill workers, female workers, contractors, suppliers, workers union representative.	-	√
	12.00 – 13.00	Break/lunch/pray	√	√
	13.00 – 17.00	Pamol Kluang Mill – Review on the documents, Inspection, warehouse, workshop, mill wastes, working safety, Supply chain for CPO mill, etc	√	-
	13.00 – 17.00	Phone Interview with local governments and NGO.	-	√
	Thursday, March 1 st	08.00 – 12.00	Estate 1 (Unijaya Estate) – Inspections e.g. Office, worker housing, Clinic, Landfill, Chemical store and mixing, Fertiliser, field spraying & harvesting, etc	√
08.00 – 12.00		Estate 2 (Swee Lam Estate) – Inspections e.g. Office, worker housing, Clinic, Landfill, Chemical store and mixing, Fertiliser, field spraying & harvesting, etc	-	√
12.00 – 13.00		Break/lunch/pray	√	√
13.00 – 17.00		Continuing visit to Estate 1 (Unijaya Estate) – Inspections e.g. Office, worker housing, Clinic, Landfill, Chemical store and mixing, Fertiliser, field spraying & harvesting, etc	√	-
13.00 – 17.00		Continuing visit to Estate 2 (Swee Lam Estate) – Inspections e.g. Office, worker housing, Clinic, Landfill, Chemical store and mixing, Fertiliser, field spraying & harvesting, etc	-	√
Evening		Auditor meeting	√	√
Friday, March 2 nd	08.00 – 12.00	Audit feedback meeting, verify other outstanding issues	√	√
	12.00 – 13.00	Break/lunch/pray	√	√
	13.00 – 15.00	Closing meeting preparation (Reports, etc)	√	√

Date	Time	Subjects	Aryo	Iman
	15.00 – 16.00	Closing meeting	√	√
Saturday, March 3 rd	06.00 – 10.00	Team travelling from Pamol Kluang to Changi Airport of Singapore	√	√
	12.25 – 13.15	Aryo and Iman are travelling from Changi Airport to Jakarta	√	√

Appendix “D”

Corrective Action Plan of the ASA2 findings

Pamol Kluang Region RSPO 2nd Surveillance audit by BSI

Corrective Actions by IOI Sustainability Team & Pamol Kluang Region Operating Units for *Non-conformities* and *Observations* raised.

Non-conformities	Corrective Action	Evidence Documents	Time Bound	Person In-charge
1) During field inspections found some of the boundary stones were not being located and visibly maintained. E.g. in Block PM90A and PR10A which are located nearby the smallholders area. Evidence observed by BSI was no programme is in place to monitor and maintaining the boundary stones within the estate. (Minor)	<p>Letter to Land Department to verify there is any state land or other reserves which required boundary stones are available.</p> <p>Consultation with the Land Department Officer regarding the above matters will be conducted by Sustainability Team together with Unijaya Estate Management.</p>	<p>Letter sent to Land department is available. (Refer attachment 1)</p> <p>However, the Sustainability Team and Unijaya Estate management have made appointment for consultation with Kluang Land Department Officer for further verification on the matters.</p> <p>(Any other supporting documents will be sent by next week)</p>	Appointment for consultation on 22/3/12	Unijaya Estate Sustainability Team
2) Even though socialization toward zero burning has been carried out, however, inspection to the workers housing found evidence of burning waste. Company to conduct additional socialization session to raised workers awareness toward zero burning. (Minor)	<p>No burning signboard will be erected at the workers quarters linesite to remind all the communities that strictly not allow to do any burning.</p> <p>Linesite Inspection by V.M.O. Doctor, Hospital Assistant and Social Liaison Officer has ensured that there is no any burning by the workers or</p>	<p>Photos of No Burning signboard (Attachment 2: Photos of signboard will be provided by next week)</p> <p>Record of V.M.O., H.A. and Social Liaison Officer linesite inspection book shall clearly stated their inspection on linesite to ensure there is no any burning conducted. The next scheduled linesite</p>	<p>Signboard will be erected by next week.</p> <p>Start from 15/3/12 and continue in practice.</p>	<p>Swee Lam Estate</p> <p>Swee Lam Estate</p>

	<p>estate communities.</p> <p>Training and educate the estate communities for not burning will be conducted.</p> <p>Memo to remind and warn all the estate communities that strictly not allowed any burning conducted in the estate has been issued and distributed.</p> <p>Consultation has been conducted to the respective workers who conduct the burning at the Surau. The respective worker has given his written commitment for not conducting any open burning in future.</p>	<p>inspection by H.A. will be conducted on 15/3/12. (Attachment 3: Evidence documents will be sent by next week)</p> <p>Training will be conducted on 16/3/12. (Attachment 4: Training record will be sent out by next week)</p> <p>Memo issued. (Refer attachment 5)</p> <p>Commitment letter has been submitted by the respective worker. (Refer attachment 6)</p>	<p>Training on 16/3/12; Records of training will be sent by next week</p> <p>Memo issued on 9/3/12</p> <p>Submitted on 6th March 2012</p>	<p>Swee Lam Estate</p> <p>Swee Lam Estate</p> <p>Swee Lam Estate</p>
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Observation	Corrective Action	Evidence Documents	Time Bound	Person In-charge
1) Company has not been routinely reporting the water quality test results to SPAN as required by the permit.	Water Quality Testing results by Jabatan Kesihatan has been sent to SPAN.	Memo attached with the water quality testing results sent to SPAN. (Refer attachment 7)	Already sent to SPAN on 5/3/12	Pamol Kluang Palm Oil Mill
2) Company need to follow up to the SPAN on the renewal of license for using water and treatment (expired on 31 Dec 2011). The renewal letter has sent to the SPAN on 21 Dec 2011.	HQ administration department and mill management already request for SPAN response on the progress of the license renewal. Following that, letter from the SPAN to inform the HQ regarding the progress on the license renewal for Pamol Kluang Oil Mill and estates already obtained.	Letter from SPAN received on 1 st March 2012. (Refer attachment 8)	Already done on 1/3/12	Pamol Kluang Palm Oil Mill HQ administration department
3) It is found at Pamol Mill, the waste chemical were kept over than 180 days which are not comply with Environmental Quality (Schedule waste) regulation, 2005. Evidence observed by BSI, the waste	The mill management has prepared a schedule to monitor the waste disposal and to ensure not store over 180 days. Mill Asst. Manager, En. Mohammad Saidani has	Chemical and schedule waste disposal program are available. (Refer attachment 9)	Done on 6/3/12	Pamol Kluang Palm Oil Mill

chemical were kept since 10 May 2011 and disposed to the licensed facilitator Kualiti Alam Sdn Bhd on 03 February 2012.	appointed by mill management as responsible person to monitor the disposal of schedule and chemical waste.			
4) There are 8 litres of monocrotophos have been stored in chemical store of Swee Lam Estate since 2005. At the time of assessment there was no programme to phase out the storage of monocropotophos. The last time using of monocrotophos was before 2010.	Collection Transportation Instruction from Kualiti Alam (Authorized contractor by DOE) for collection and disposal of the expired monocrotophos as chemical waste has been obtained.	Collection transportation Instruction from Kualiti Alam (Authorized contractor by DOE) (Refer attachment 10)	Evidence documents obtained on 7/3/12	Swee Lam Estate
5) SIA Action plan can be improved by reviewing the implementation and reduce the number of programme to the manageable level and easy monitoring; attention should be given to the most important issues.	The important issue will be highlighted again in next year stakeholders consultation for reviewing on the outcome from action taken. Only the upmost important issues raised in next year stakeholders consultation will be given attention for easier monitoring and implementation.	The improvement can be seen in next year 'Review Social Impact Assessment & Time bound action plan'.	On going	Pamol Kluang Region Estates and Palm Oil Mill Sustainability Team

<p>6) At Unijaya Estate, the status for each complaint received from internal stakeholders need to be made clearer to show the progress of implementation. For example, Complaint and Grievance Book should record the status of complaint either in progress, or completed. The estate has taken an action by notifying the status for each particular complaint.</p>	<p>The status for each particular complaints in the grievances book has been notify by proper explanation on action taken clearly stated in the book by estate management.</p>	<p>Details of action taken by the management on each grievance will be clearly stated in the Grievances Book. The evidence of improvement on grievances correspondence can be verified in next surveillance audit.</p>	<p>Already implemented on 3/3/12 and continue in practice.</p>	<p>Unijaya Estate</p>
<p>7) The company has just recently translating the payslip from English to Bahasa Malaysia, Nepalese, Bangladeshi. However interview of Indonesian harvester at Unijaya Estate found the he did not understand the payslip and wage structures This is indicated the socialization has not been sufficiently carried out. The estate manager has taken an action immediately on 02 March 2012 by providing socialization to the harvester.</p>	<p>The management has done a socialization session with the respective harvester and explained in details of the payslip and wage structure.</p>	<p>Records of meeting with the respective harvester together with the photos attached have been shown to the auditors during closing meeting.</p>	<p>Done on 3/3/12 and continue in practice.</p>	<p>Unijaya Estate</p>

Appendix “E”

List of Stakeholders Contacted

LIST OF STAKEHOLDERS CONTACTED

INTERNAL STAKEHOLDERS

<i>Pamol Kluang Mill</i> Mill manager and staffs 1 boiler operators 1 engine room operators 1 warehouse officer 1 chief of central workshop 2 Clinic/hospital assistants	<i>Unijaya Estate</i> Estate manager and staffs 2 field supervisor/mandor	<i>Swee Lam Estate</i> Estate manager and staffs 2 field supervisor/mandor
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EXTERNAL STAKEHOLDERS

<i>GOVERNMENT DEPARTMENTS</i> <ul style="list-style-type: none">• Johor Labour Department• Department of Safety and Health• Department of Environment	<i>NGOs and others</i> National Union of Plantation Workers - Kluang Branch AMESU Tenaganita	<i>Local Communities</i> Kampung Tereh Head Kampong Seri Tambak Representative
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Appendix “F”

Progress of Time Bound Plan

Schedule for Sustainability Auditing in IOI Group Mills and FFB Supplying Estates

Jan'08	Feb'08	Mar'08	Apr'08	May'08	Jun'08	Jul'08	Aug'08	Sep'08	Oct'08	Nov'08	Dec'08
--	--	--	--	Pamol Sabah Oil Mill (Covering 6 Estates)	--	--	--	--	--	Sakilan Oil Mill (Covering 3 Estates)	--
Jan'09	Feb'09	Mar'09	Apr'09	May'09	Jun'09	Jul'09	Aug'09	Sep'09	Oct'09	Nov'09	Dec'09
--	--	Pamol Kluang Oil Mill (Covering 6 Estates)	--	--	--	--	Gomali Oil Mill (Covering 11 Estates)	Baturong Oil Mill (Covering 4 Estates)	--	--	--
Jan'10	Feb'10	Mar'10	Apr'10	May'10	Jun'10	Jul'10	Aug'10	Sep'10	Oct'10	Nov'10	Dec'10
--	--	--	Bukit Leelau Region RSPO Main Audit (Covering 1 Oil Mill & 6 Estates)	--	--	Mayvin Grouping Main Audit (Covering 1 Oil Mill & 5 Estates)	--	--	--	--	Pukin Region RSPO Main Audit (Covering 1 Oil Mill & 4 Estates)
Jan'11	Feb'11	Mar'11	Apr'11	May'11	Jun'11	Jul'11	Aug'11	Sep'11	Oct'11	Nov'11	Dec'11
Sakilan & Pamol Sabah Grouping RSPO Surveillance Audit	--	Pamol Kluang Region RSPO Surveillance Audit	Syarimo Grouping RSPO Main Audit (Covering 1 Oil Mill & 9 Estates)	--	--	Gomali Region RSPO Surveillance Audit & Ladang Sabah Grouping RSPO Main Audit	--	Baturong Grouping RSPO Surveillance Audit	Bukit Leelau Region RSPO Surveillance Audit & Leepang Grouping RSPO Main Audit	--	Grouping RSPO Surveillance Audit & Morisem Grouping Main Audit (Covering 1 Oil Mill & 9 Estates)

						(Covering 1 Oil Mill & 8 Estates)			(Covering 1 Oil Mill & 7 Estates)		
Jan'12	Feb'12	Mar'12	Apr'12	May'12	Jun'12	Jul'12	Aug'12	Sep'12	Oct'12	Nov'12	Dec'12
--	--	--	Ladang Sabah Region RSPO Main Audit (Covering 8 estates) <i>*Audit date is depending on uplifting on suspension</i>	--	--	Syarimo Region RSPO Main Audit (covering 9 estates) <i>*Audit date is depending on uplifting on suspension</i>	--	Leepang Region RSPO Main Audit (covering 7 estates) <i>*Audit date is depending on uplifting on suspension</i>	--	--	--
Jan'13	Feb'13	Mar'13	Apr'13	May'13	Jun'13	Jul'13	Aug'13	Sep'13	Oct'13	Nov'13	Dec'13
Morisem Region RSPO Main Audit (covering 9 estates) <i>*Audit date is depending on uplifting on suspension</i>	--	--	--	--	--	--	--	--	--	--	--
Jan'14	Feb'14	Mar'14	Apr'14	May'14	Jun'14	Jul'14	Aug'14	Sep'14	Oct'14	Nov'14	Dec'14
--	--	--	--	--	IOI-Pelita RSPO Main Audit (covering 2 estates)	--	--	--	--	--	--

					<i>*Audit date is depending on uplifting on suspension</i>						
Jan'15	Feb'15	Mar'15	Apr'15	May'15	Jun'15	Jul'15	Aug'15	Sep'15	Oct'15	Nov'15	Dec'15
--	--	--	--	--	--	--	--	--	--	--	--
Jan'16	Feb'16	Mar'16	Apr'16	May'16	Jun'16	Jul'16	Aug'16	Sep'16	Oct'16	Nov'16	Dec'16
--	--	--	--	--	--	--	--	--	--	--	PT SKS & PT BNS RSPO ain Audit <i>*Audit date is depending on uplifting on suspension</i>