

**RSPO PRINCIPLE AND CRITERIA
2nd Annual Surveillance Assessment (ASA2_1)
Public Summary Report**

IOI Corporation Berhad
Head Office: IOI Corporation Berhad Level 8, Two IOI Square IOI Resort 62502 Putrajaya Malaysia
Pamol Kluang Palm Oil Mill and supply base Jalan Kluang – Mersing Kluang, Johor Malaysia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	2-0002-04-000-00	Date	Member since: 17/05/2004
Company Name	IOI Corporation Berhad		
Address	Head office : Level 8, Two IOI Square, IOI Resort 62502 Putrajaya, Malaysia Certification unit : Pamol Kluang Palm Oil Mill, P.O. Box 1 86007 Kluang, Johor, Malaysia		
Subsidiary of (if applicable)	Pamol Plantations Sdn. Bhd.		
Contact Name	Mr Dickens Mambu		
Website	www.ioigroup.com	E-mail	dickens.mambu@ioigroup.com
Telephone	03 - 89478888	Facsimile	03 8943 2266

2. Certification Information			
Certificate Number	RSPO 547027	Certificate Issued Date	16/03/2010
		Expiry Date	15/03/2020
Scope of Certification	Palm Oil and Palm Kernel Production from Pamol Kluang Palm Oil Mill and Supply Base (Pamol Barat Estate, Pamol Timur Estate, Mamor Estate, Unijaya Estate, Kahang Estate & Swee Lam Estate)		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-DE100-18122016	Renewable Energy Directive (RED) Certification system ISCC EU (International Sustainability and Carbon Certification)	SGS	25/09/2017

3. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS	
		Easting	Northing
Pamol Kluang Palm Oil Mill (60 mt/hr)	Pamol Kluang Oil Mill, Jalan Kluang – Mersing, 86000 Kluang, Johor	103° 23' 32.25"	2° 6' 39.49"
Pamol Timur Estate	Pamol Timur Estate, Jalan Kluang – Mersing, 86000 Kluang, Johor Kluang, Johor	103° 24 '6.18"	2° 7' 53.21"
Pamol Barat Estate	Pamol Barat Estate, Jalan Kluang-Paloh, 86000 Kluang, Johor	103° 20' 44.17"	2° 6'44.49"

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Mamor Estate	Mamor Estate, Jalan Kluang-Paloh, 86000 Kluang, Johor	103° 18' 58.93"	2° 9'51.73"
Unijaya Estate	Unijaya Estate, Batu 5, Sri Lalang, Jalan Batu Pahat, K.B. 511 8609 Kluang, Johor.	103° 17' 7.9"	1° 55' 36.73"
Kahang Estate	Kahang Estate, Peti Surat 14, 86700 Kahang, Johor.	103° 29' 51.83"	2° 19' 55.73"
Swee Lam Estate	Swee Lam Estate, K.B.107, 81000 Kulai, Johor Darul Takzim	103° 39'36.25"	1° 40'55.94"

4. Description of Supply Base							
Estate	Mature (ha)	Immature (ha)	Infras & Other (ha)	HCV (ha)	Total Planted (ha)	Total Hectarage	% of Planted
Pamol Timur Estate	1,571.00	532.00	198.94	2.30	2,103.00	2,304.24	91.27
Pamol Barat Estate	1,278.00	882.00	153.28	0.70	2,160.00	2,313.98	93.35
Mamor Estate	2,074.00	0	116.04	35.44	2,074.00	2,225.48	93.13
Unijaya Estate	865.00	307.00	88.50	<1	1,172.00	1,260.50	92.98
Kahang Estate	2,278.00	0	142.00	<1	2,278.00	2,420.00	94.13
Swee Lam Estate	1,066.00	183.00	36.00	<1	1,249.00	1,285.00	97.20
Total	9,132.00	1,904.00	734.76	38.44	11,036.00	11,809.20	

Note: Infras = infrastructure

5. Plantings & Cycle								
Estate	Age (Years)					Tonnage / Year		
	0 - 3* (Replanting Ha)	4 - 5* (Replanting Ha)	6 - 15 (Ha)	16 - 25 (Ha)	26 - 30 (Ha)	Estimated (Dec 2015 - Nov 2016)	Actual (Dec 2015 - Nov 2016)	Forecast (Dec 2016 - Nov 2017)
Pamol Timur Estate	532.00	845.00	622.00	104.00	0	26,300.00	30,095.03	33,235.00
Pamol Barat Estate	882.00	278.00	203.00	797.00	0	30,678.00	29,352.57	21,975.00
Mamor Estate	0	377.00	1,697.00	0	0	30,450.00	49,646.41	57,678.00
Unijaya Estate	307.00	277.00	272.00	316.00	0	21,643.00	19,895.45	25,682.00
Kahang Estate	0	738.00	1,540.00	0	0	69,370.00	62,416.18	69,680.00
Swee Lam Estate	183.00	139.00	483.00	357.00	87	25,400.00	23,072.95	28,500.00
Total	1,904.00	2,654.00	4,817.00	1,574.00	87	203,841.00	214,478.59	236,750.00

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6. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated (ASA1_1) (Dec 2015 – Nov 2016)	Actual (ASA1_1) (Dec 2015 – Nov 2016)	Forecast (ASA2_1) (Dec 2016 – Nov 2017)
Pamol Timur Estate	26,300.00	30,095.03	33,235.00
Pamol Barat Estate	30,678.00	29,352.57	21,975.00
Mamor Estate	30,450.00	49,646.41	57,678.00
Unijaya Estate	21,643.00	19,895.45	25,682.00
Kahang Estate	69,370.00	62,416.18	69,680.00
Swee Lam Estate	25,400.00	23,072.95	28,500.00
Total	203,841.00	214,478.59	236,750.00

7. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated (ASA1_1) (Dec 2015 – Nov 2016)	Actual (ASA1_1) (Dec 2015 – Nov 2016)	Forecast (ASA2_1) (Dec 2016 – Nov 2017)
Not applicable	N/A	N/A	N/A

8. Certified Tonnage									
Mill	Estimated (ASA2_1) (Dec 2015 – Nov 2016)			Actual (ASA2_1) (Dec 2015 – Nov 2016)			Forecast (ASA3_1) (Dec 2016 – Nov 2017)		
	FFB	CPO	PK	FFB	CPO	PK	FFB	CPO	PK
Pamol Kluang Palm Oil Mill	214,841.00	49,162.00	10,242.00	214,478.59	49,834.10	10,375.12	236,750	55,636.25	13,021.25
OER/KER		OER 22.88%	KER 4.77%		OER 23.23%	KER 4.84%		OER 23.50%	KER 5.50%

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: RSPO-ACC-19)
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
No. 8, Jalan Kerinchi
59200 Kuala Lumpur
Tel +603 2242 4211 Fax +603 2242 4218
Nicholas Cheong: Nicholas.Cheong@bsigroup.com
www.bsigroup.com

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 is ASI Accredited (RSPO-ACC-19) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia. BSI is accredited for RSPO Supply Chain Certification Systems (SCCS) and Principles & Criteria for Sustainable Palm Oil Production (P&C, Single Site & Group) certification Worldwide.

Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from 19 – 23 December 2016. The audit programme is included as Appendix D. 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 (Mamor Estate & Kahang Estate). A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The 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. RSPO Principles & Criteria 2013 (MYNI-2014) and RSPO Supply Chain Certification Standard 2014 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base. The estates sample were determined based on formula $N = 0.8\sqrt{y}$ where y is the number of estates.

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

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the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix E and the sampled smallholder (when applicable) is listed in Appendix J

All the previous nonconformities are remains closed. The assessment findings for the 2nd Annual Surveillance Assessment are detailed in Section 3.3.

This report is structured to provide a summary of assessment finding as attached in the Appendix A. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

This report was externally reviewed by RSPO approved Certification Reviewer prior to certification decision by BSI.

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

1. Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification)	Year 2 (ASA 1_1)	Year 3 (ASA 2_1)	Year 4 (ASA 3_1)	Year 5 (ASA4_1)
Pamol Kluang Palm Oil Mill	√	√	√	√	√
Pamol Timur Estate		√			
Pamol Barat Estate	√			√	
Mamor Estate			√		
Unijaya Estate		√			√
Kahang Estate			√		
Swee Lam Estate	√			√	

[Click here to enter a date.](#)

Tentative Date of Next Visit: December 19, 2017 – December 22, 2017

Total No. of Mandays: 12 mandays

BSI Assessment Team:

Hu Ning Shing – Trainee Lead Auditor

She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011. She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO and RSPO in her previous certification body. She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012 and Endorsed RSPO SCCS Lead Auditor Course in 2015. She had been involved in RSPO auditing since November 2015 in more than various companies in Malaysia. During this assessment, she assessed on the aspects of social. She is fluent in Bahasa Malaysia and English languages

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Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the RSPO P&C and SCCS standards and recently completed his RSPO P&C Lead Assessor training and has been involved in RSPO audits within Malaysia, Papua New Guinea and Solomon Islands. During assessment, he covered the mill and estate best practices, legal issues, social issues, workers consultation, stakeholder consultation, environmental and occupational safety & health. He is fluent in Bahasa Malaysia and English languages.

Mohamed Hidhir Zainal Abidin – Team Member

He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health, environmental and workers and stakeholders consultation.

Accompanying Persons: Daniel Francis - Observer

Section 3: Assessment Findings

3.1 Details of audit results

This assessment has been assessed using the following RSPO normative requirements. The assessment details are provided in Appendix A.

- IOI Corporation Berhad Time Bound Plan
- RSPO Group Certification Standard 2016 Checklist
- RSPO P&C for Smallholders TH-WG 2012 Checklist
- RSPO P&C GN-NIWG 2010 Checklist
- RSPO P&C INA-NIWG 2016 Checklist
- RSPO P&C PNG-NIWG 2016 Checklist
- RSPO P&C SI-NIWG 2010 Checklist
- RSPO P&C MY-NIWG 2014 Checklist
- RSPO P&C TH-WG 2011 Checklist
- RSPO Supply Chain Certification Checklist November 2014
- RSPO P&C 2013 Generic Checklist

3.2 Progress against Time Bound Plan

Time Bound Plan		
Requirement	Remarks	Compliance
Summary of the Time Bound Plan		
Does the plan include all subsidiaries, estates and mills?	Yes	Complied
Is the time bound plan challenging? <ul style="list-style-type: none"> • Age of plantations. • Location. • POM development • Infrastructure. • Compliance with applicable law. 	Yes	Complied
Have there been any changes since the last audit? Are they justified?	Pukin POM and supply base has undergone recertification in 2016. Besides, Initial Assessment has completed in October 2016 for Pamol Sabah region re-certification and awaiting issuance of RSPO certificate.	Complied
If there have been changes, what circumstances have occurred?	The changes are just recertification of existing plantations.	Complied
Have there been any stakeholder comments?	No	Complied

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Have there been any newly acquired subsidiaries?	Unico Desa POM-2 and Unico POM- 1 and its supply base has been acquired in 2014.	Complied
Have there been any isolated lapses in implementation of the plan?	No	Complied
Un-Certified Units or Holdings		
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	IOI has conducted and Internal audit on Uncertified Units to determine its compliance its compliance against clause 4.2.4 (Partial Certification). The Internal audit reports had identified the issues involved, on-going corrective actions and monitoring.	Complied
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	IOI has so far only completed HCV and SEIA for PT KPAM Indonesia which is a new concession land. The NPP will be conducted upon completion of all reports and will be posted on the RSPO for Public Consultation. The other three uncertified units under new concession land are PTSKS, PTBNS & PT BSS are still pending with the acquisition of Governmental 'Hak Guna Usaha' application which is still in progress. Besides, Update on the RSPO Suspension and complaint by Aidenvironment, IOI has submitted progress reports and RSPO has lifted the suspension on the 5 th of August 2016 the IOI has been declared RSPO certified effective 8th August 2016. The certification preparations are in progress for the units	Complied
Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	IOI has so far only completed HCV and SEIA for PT KPAM Indonesia which is a new concession land. The NPP will be conducted upon completion of all reports and will be posted on the RSPO for Public Consultation. The other three uncertified units under new concession land are PTSKS, PTBNS & PT BSS are still pending with the acquisition of Governmental 'Hak Guna Usaha' application which is still in progress.	Complied
Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	IOI Pelita Sarawak is pending resolution of land dispute and RSPO decision. There is no POM yet. Settlement Discussion with local community is presently still ongoing. A follow up dialogue and mediation session with LTK Community will be hold on 20th December 2016. RSPO Secretariat will attend as an observer. Some preliminary agreements between the parties have been reached. Meeting notes are being finalized.	Complied
Any Labor disputes are being resolved through a	IOI complies with the local legislation such as the Minimum Wages Order 2016 and Sabah Labour	Complied

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mutually agreed process, in accordance with RSPO criterion 6.3.	Ordinance 2016. IOI also engages with its workers through employee consultative meetings to ensure that labour disputes are being resolved mutually.	
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	IOI has conducted and Internal audit on Uncertified Units to determine its compliance its compliance against clause 4.2.4 (Partial Certification). The Internal audit reports had identified the issues involved, on-going corrective actions and monitoring.	Complied
Any Legal non- compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	No	Complied

3.3 Details of findings

The nonconformity is listed below. The summary report of the assessment by criteria is listed in Appendix A.

During the 2nd Annual Surveillance Assessment there was four (4) Major & two (2) Minor nonconformities raised. The Pamol Kluang Palm Oil Mill 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 Major Nonconformity(ies) has been verified for it effectiveness and closed accordingly.

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1420891M1	<p>Requirements Indicator 6.5.2 Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p> <p>Evidence of Nonconformity Kahang Estate: Contract of employment for all the contractors' workers (Contractor: JK and LCS) were not available.</p> <p>Statement of Nonconformity Contract of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) for the contractors' workers were not available.</p>	Major

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	<p>Corrective Actions Root Cause: As both the contractors expressed that they will comply with all the legal requirements with reference to the employment of workers, the estate management assumed that all the documents will be in order and therefore failed to verify them.</p> <p>Correction/ Immediate Action:</p> <ul style="list-style-type: none"> a. Kahang estate management personnel witnessed the Contractors issuing contract of employment to all their legal workers (those who have passports and permit) on 26/12/16. <p>Corrective Action:</p> <ul style="list-style-type: none"> a. To avoid this issue from recurring, operating centres are reminded to ensure that all workers – foreign, local and contract workers are issued with contracts of employment before they commence work. b. Ensuring that all workers (local, foreign and contractors’) are issued with contract of employment is included as one of the responsibilities in the Assistant Manager in-Charge of social matters appointment letter. 	
	<p>Assessment Conclusion Contract of employment for the contractor workers were seen and reviewed and it was found that the NC is effectively closed with the sufficient evidence of implementation on 7/2/2017. On site major NC close out is not required as the nature of NC is non-process related and can be verified with documented evidences. Effective implementation of the corrective action taken will be further verified in the next audit.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1420891M2	<p>Requirements RSPO SCCS Nov 2014 : Module D 4.2 The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p>	Major
	<p>Evidence of Nonconformity Overproduction of certified tonnage recorded for the period of December 2015 - November 2016. Projected FFB volume : 203, 841 mt Actual FFB volume : 214,478.59 mt Overproduction : 10,637.59 mt</p>	
	<p>Statement of Nonconformity CB has not been informed for the projected overproduction of certified tonnage.</p>	
	<p>Corrective Actions Root Cause: The mill management were not aware of this requirement as it was not stated in the Palm Oil Mill RSPO supply chain Standard Operating Procedures (SOP). This resulted in the management failing to notify the CB regarding the over production.</p> <p>Correction/ Immediate Action:</p>	

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	<p>The Projected FFB volume : 203, 841 mt was actually a mistake as the figure given was a projection for only 11 months and not for the 12 months from December 2015 to November 2016. Therefore with immediate effect all IOI mill managers and related staffs are instructed to be extra careful and all projected figures have to be verified by Senior Manager of mills before submission to auditors.</p> <p>Corrective Action: The Palm Oil Mill RSPO supply chain SOP has been revised to include the following: 3.1.6 Weighbridge personnel shall constantly monitor the actual FFB received against the total certified tonnage. The Management shall be alerted if the FFB received from estates reaches around 80% of the projection with more than 2 months to the expiry of certification period. The Mill shall notify the sustainability department immediately who shall then inform the Certification Body (CB) as required under RSPO SCCS Nov 2014, Module D 4.2.</p>	
	<p>Assessment Conclusion Based on the submitted evidence, it was found that the NC is effectively closed with the sufficient evidence of implementation on 24/1/2017. On site major NC close out is not required as the nature of NC is non-process related and can be verified with documented evidences. Effective implementation of the corrective action taken will be further verified in the next audit.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1420891M3	<p>Requirements Indicator 4.6.11 Annual medical surveillance programme for pesticides operator was not effectively demonstrated.</p> <p>Evidence of Nonconformity a. Record of medical surveillance was last done on 15/1/15 for sprayer/pre-mixer with employee ID KHE1005. b. No evidence of medical surveillance programme established for the new sprayers with employee ID (KHE1627, KHE 1702, KHE 1742 and KHE 1776)</p> <p>Statement of Nonconformity Annual medical surveillance programme for pesticides operator was not effectively demonstrated.</p> <p>Corrective Actions Root Cause: The medical surveillance for employee ID KHE 1005 (Sahin) – mandore / premixer was not done because he was on long leave and therefore unavailable when all the other workers were sent for the yearly medical surveillance. The Hospital Assistant completely forgot to send Sahin for medical surveillance when he returned to work after 3 months</p> <p>Correction/ Immediate Action: a. Kahang estate has managed to get an appointment with OHD Dr Helen (Klinik Rengam) to conduct medical surveillance for Sahin and other employees on 9th January 2017.</p>	Major

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	<p>Corrective Action:</p> <ul style="list-style-type: none"> a. The safety and health department has prepared a MEDICAL SURVEILLANCE REGISTER and distributed to all operating centres to keep track of all employees who are due for 12 monthly medical surveillance. 	
	<p>Assessment Conclusion</p> <p>Evidence of Medical Surveillance Record Books for the sampled workers dated 8/2/2017 were sighted. Based on the results, the workers were fit to work. Based on the submitted evidence, it was found that the NC is effectively closed with the sufficient evidence of implementation on 7/2/2017. On site major NC close out is not required as the nature of NC is non-process related and can be verified with documented evidences. Effective implementation of the corrective action taken will be further verified in the next audit.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1420891M4	<p>Requirements Indicator 2.1.1 Evidence of compliance with relevant legal requirements shall be available.</p> <p>Evidence of Nonconformity</p> <ul style="list-style-type: none"> a. Sampled contractors' workers where their passport or permit could not be shown during the audit as below: <ul style="list-style-type: none"> i. Contractor JK – Total 7 workers ii. Contractor LCS – Total 6 workers b. Sampled LCS contractor's workers were found that they did not achieve the Minimum Wage Order 2016 even though they have worked for more than 26 days through document review of the attendance sheet. Sampled workers as below: <ul style="list-style-type: none"> i. Erwin – RM 620 for November 2016 ii. Herianto – RM 422 for November 2016 iii. Muamar – RM 720 for October 2016 <p>Statement of Nonconformity</p> <ul style="list-style-type: none"> a. Passport and working permit for the contractors' workers were not available. b. Pay for the contractor's workers did not achieve the Minimum Wage Order 2016. <p>Corrective Actions</p> <p>Root Cause:</p> <ul style="list-style-type: none"> a. As both the contractors expressed that they will comply with all the legal requirements with reference to the employment of workers, the estate management assumed that all the workers had passports and permits. b. We investigated this issue and found that the contractor was not well versed with salary computation and payslips. The workers agreed that they actually earned more than the stated amount in the payslip and have already been paid. The workers agreed that they have the tendency to borrow from the contractor for their daily expenses. After recovering his loans to the workers, the Contractor keys in the balance as the Net Pay. <p>Correction/ Immediate Action:</p>	Major

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	<p>a. Kahang estate has told the contractors (JK and LCS) to immediately terminate the services of all workers who do not have passports or permits</p> <p>b. Kahang estate management explained and assisted LCS contractor to amend the payslips to correctly depict the earnings of each worker. LCS has been told to separate the actual earnings from the deductions made every month. LCS has also reimbursed the less paid amount to these 3 workers</p> <p>Corrective Action:</p> <p>a. Contractors have been instructed to submit a copy of workers' passports and permits to estate management before any new worker starts work. Estates are filing a copy of these documents. Management is also checking on the payslips every month to ensure all workers including contract workers achieve wages as per the Minimum Wage Order 2016.</p>	
	<p>Assessment Conclusion Document reviewed on the evidence of termination letter, show caused letters to and from the contractors and payslip submitted found that the NC is effectively closed with the sufficient evidence of implementation on 7/2/2017. On site major NC close out is not required as the nature of NC is non-process related and can be verified with documented evidences as well as the contractors were not permanently station in the compound. Effective implementation of the corrective action taken will be further verified in the next audit.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1420891N1	<p>Requirements: Indicator 4.4.1 An implemented water management plan shall be in place.</p> <p>Evidence of Nonconformity: Water Management Plan for Pamol Kluang Region reviewed on 21/11/2016.</p> <p>Statement of Nonconformity: Management plan for drinking water treatment and supply at Kahang Estate and Mamor Estate was not fully in place.</p> <p>Corrective Action: Root Cause: A Water Management Plan for Pamol Kluang Region is available collectively for all the estates and mill in this region. However, we overlooked to include the following requirements in the plan: i) Jabatan Tenaga Kerja (JTK)'s approval for the supply, process, filter, and treatment of drinking water as per Workers' Minimum Standards of Housing and Amenities Act 1990, Section 6(1)(a). ii) Analysis of Water Quality by Ministry of Health once a year or as stated in JTK permit. iii) Cleaning of Water storage tank at least once a year.</p> <p>Correction/ Immediate Action: The Water Management Plan for Pamol Kluang Region Mill and supply base will be reviewed and the exempted items will be included.</p>	Minor

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	<p>Corrective Action:</p> <p>i) Kahang, Mamor, Swee Lam and Unijaya Estates are instructed to obtain JTK permit as per Workers' Minimum Standards of Housing and Amenities Act 1990 Section 6(1)(a).</p> <p>ii) Kahang, Mamor, Swee Lam and Unijaya Estates have been instructed to Conduct Water Quality Analysis by Ministry of Health once a year or as stated in JTK permit.</p> <p>iii) All operating centres have been reminded to include Water tank cleaning in their annual program.</p>	
	<p>Assessment Conclusion: The continuous implementation of the corrective action will be verified during the next surveillance assessment.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1420891N2	<p>Requirements: Indicator 5.3.3 A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.</p> <p>Evidence of Nonconformity: Visit at Pamol Kluang Palm Oil Mill's scheduled waste store found that there was a potion of SW 429 that has been stored since 27/11/2015 and exceeded the allowable storage period limit of 180 days.</p> <p>Statement of Nonconformity: Waste management and disposal plan was not fully implemented.</p> <p>Corrective Action: Root Cause: As the chemicals found in the Schedule Waste store were obsolete and not written-off yet, the Person in Charge was reluctant to dispose the chemicals as schedule waste. As she assumed that internal audit department should verify obsolete chemicals before disposing, she kept the chemicals in the schedule waste store.</p> <p>Correction/ Immediate Action: The store keeper has been retrained on Schedule Waste Management and informed on the procedures to dispose obsolete chemicals.</p> <p>Corrective Action: The Mill has requested Top Management for approval to dispose the obsolete chemicals. They have also arranged for Kualiti Alam to collect the chemicals (SW 429) on 3rd January 2017.</p> <p>Assessment Conclusion: The continuous implementation of the corrective action will be verified during the next surveillance assessment.</p>	Minor

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Positive Findings	
PF #	Description
1	Good commitment from the management towards the certification.

Issues raised by Stakeholders

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 Palm Oil Mill 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. 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.

IS #	Description
1	Issues Officer from JTK – They informed that IOI Pamol Kluang complex has complied with the legal requirements. No pending complaints or compound from the company.
	Management Responses The management acknowledged and will continue to comply with any legal requirements.
	Audit Team Findings Document reviewed on the payslips found that no issue on the minimum wages.
2	Issues State's NUPW and Local NUPW representatives – They were requested to have restday on Sunday instead of Friday. They had sent letter to the management to respond. However, no response from the management.
	Management Responses The management has immediately conducted a meeting with local NUPW representatives on 21/12/2016 and they were agreed to have restday on Friday.
	Audit Team Findings Meeting minutes with acknowledgement from the NUPW representatives were sighted. No further issue.
3	Issues Contractors – They have signed contract agreement with the management and payment was made promptly.
	Management Responses The management continues to made the payment promptly.
	Audit Team Findings No further issue.
4	Issues Head of Local Community – No land dispute issue occurred. He requested the management to maintain the cleanliness of the downstream of the drain where the water flows from the village to the downstream

	<p>of the drain. This is due to the drain was blocked where during raining season, it will caused flooding in the village as the water cannot flow freely.</p> <p>Management Responses The management will inspect on the mentioned drain and take action accordingly.</p> <p>Audit Team Findings No further issue.</p>
5	<p>Issues Neighbouring Plantation – No land dispute. The management has maintained a boundary which separated from overlapping.</p> <p>Management Responses The management acknowledged and will continue to maintain the good relationship with the neighbouring estates.</p> <p>Audit Team Findings No further issue.</p>
6	<p>Issues School teacher – The management has good relationship with the school. They provided contribution whenever the school’s management requested for any donation.</p> <p>Management Responses The management will maintained good relationship and support whenever necessary.</p> <p>Audit Team Findings Document reviewed on the payment voucher found that the management has made contribution whenever requested by the school’s management.</p>
7	<p>Issues Chairwoman of Gender Committee – No sexual harassment case was reported. They will monitor if there is any issue during the meeting. They also understood the complaint procedure if there is any cases happened.</p> <p>Management Responses The management will monitor and ensure no issue has happened.</p> <p>Audit Team Findings No other issue.</p>
8	<p>Issues Forestry Department – No direct border to forest reserved/HCV within Pamol’s certification units. However, it is advised that the estate management to ensure no any encroach into nearby forest and not to allow any outsiders to use estate’s access to enter/exit the nearby forest.</p> <p>Management Responses Briefing to all relevant stakeholders including local community and villagers was done during every stakeholder’s meeting. Regular patrol by AP done at estate boundary and buffer area to monitor in case of any instance of encroachment.</p> <p>Audit Team Findings No further issue.</p>

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1279712M1	<p>Requirements: Indicator 2.1.1 Evidence of compliance with relevant legal requirements shall be available. Highly Toxic Pesticides Regulations 1996 – Regulation 4 : Maintenance of records</p> <p>Evidence of Nonconformity: Unijaya Estate: Class IA, Methamidophos was used for bagworm treatment. It was found that form I, II & III was not available for September and October 2015 application.</p> <p>Statement of Nonconformity: Evidence of compliance was not effectively implemented.</p> <p>Corrective Action: Identified Root Cause of NC: 1) Though “maintenance of records” is part of the training module which was used to train the personnel handling the Highly Toxic Pesticides, it was not included in the Safe Operating Procedures 2) As this was the first time Unijaya estate was using Highly Toxic Pesticides, the contractor and staff-in-charge overlooked the requirement to maintain records.</p> <p>Immediate Correction: 1) The Safe Operating Procedures (SaOP) for working with Highly Toxic Pesticides entitled “Prosedur Kerja Selamat Racun Makhluk Perosak Amat Berbisa” dated 01 August 2012 will be revised to include “maintenance of records” as per Pesticides (Highly Toxic Pesticides) Regulations 1996 Second Schedule. 2) The revised SaOP will be used to train all estate personnel who handle Highly Toxic Pesticides. 3) This SaOP will also be distributed to all estates together with Schedule 2 Form I, II and III: Form I-RECORD OF WORKERS INVOLVED IN USING OR HANDLING HIGHLY TOXIC PESTICIDES; Form II-RECORD OF THE USE OF AND TOTAL HOURS WORKED WITH HIGHLY TOXIC PESTICIDES; Form III-RECORD OF HIGHLY TOXIC PESTICIDES RECEIVED 4) As it is mandatory to keep records for at least 3 years, Unijaya estate will fill up the above forms for the treatment done in September and October 2015</p> <p>Corrective Action to eliminate Cause of NC: 1) An email has been sent to remind estates that use Highly Toxic Pesticides that it is mandatory to maintain records and forward a copy to the Sustainability Team. 2) Sustainability Team will audit the records during our annual audits</p> <p>The CAP was found appropriate and accepted. Evidence required has been submitted for satisfactory closure of Major NC. NC has been closed on 31/12/2015.</p>	Major

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	<p>Assessment Conclusion: ASA2_1: At both sampled estates, there was no bagworm outbreak recorded. The previous Major NC is remained closed.</p>	
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Non-Conformity		
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NCR #	Description	Category (Major / Minor)
1279712N1	<p>Requirements: Indicator 2.1.4 A system for tracking any changes in the law shall be implemented.</p> <p>Evidence of Nonconformity: Legal and other requirements (LORR) dated 23/8/15 did not include the latest revision of FMA, Person In- Charge Regulations 2014 and Industrial Code Of Practice 2010.</p> <p>Statement of Nonconformity: System for tracking any changes in the law was not effectively implemented.</p> <p>Corrective Action: Identified Root Cause of NC: 1) These changes in legislation were not updated into our Legal Requirements Register as we do not have a system to automatically alert us of changes in legislation 2) Secondly, the personnel who was tasked with updating the Legal Register resigned recently</p> <p>Immediate Correction: The Factories and Machinery (Person In-Charge) (Amendment) Regulations 2014 and Industry Code Of Practice For Safe Working In A Confined Space 2010 will be updated into the mechanism for tracking changes in law (IOI Legal Requirements Register)</p> <p>Corrective Action to eliminate Cause of NC: 1) Every 1st week of the month, the Sustainability Team will access the Malaysian Government Gazettes portal (e-Federal Gazette) to check whether there are any changes in legislation that are relevant to us. Relevant changes will then be updated into IOI's Legal Requirements Register and shared with operating centres. 2) The Legal Requirements Register will be discussed in our monthly meetings</p> <p>Immediate correction and corrective action taken deemed necessary for the closure of NC. Evidence and effectiveness of CAP taken will be verified during next visit.</p> <p>Assessment Conclusion: Latest updated Mill Legal Requirements Register reviewed on 26/11/2016 has been included with Factories and Machinery Act (Person In-Charge) (Amendment) Regulations 2014 and Industrial Code of Practice for Safe Working in a Confined Space 2010. The register also includes latest applicable legal requirements including Workers National Minimum Wage Order 2016.</p> <p>Nonconformity satisfactorily closed on 20/12/2016.</p>	Minor

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1279712N2	<p>Requirements: Indicator 4.1.3 Records of monitoring and any actions taken shall be maintained and available, as appropriate.</p> <p>Evidence of Nonconformity: Unijaya Estate: i) Water Management Plan for Pamol Region Report dated: 15/11/2015 2.2.1.9: Water for Domestic Use - Domestic water quality analysis for chemical and biological contamination shall be conducted every 6 months interval to ensure the quality of water is up to the mark and in accordance with National Drinking Water Quality Standard (NDWQS). ii) Records of Domestic Water Discharge Quality Monitoring by Env Consultancy & Monitoring Services Sdn. Bhd. for drinking water standard and analyzed by NM Laboratory (Johor) Sdn. Bhd. dated on November 2015</p> <p>Statement of Nonconformity: Records of monitoring of domestic water quality analysis for chemical and biological contamination not available every 6 months as per water management plan.</p> <p>Corrective Action: Identified Root Cause of NC: As maintenance work was being carried out at the water treatment plant, Unijaya estate Manager told ENV Consultancy & Monitoring Services Sdn. Bhd not to carry out the water analysis in May 2015. However, he forgot to request ENV to carry out the analysis once the maintenance work was completed. The next analysis was only carried out in November 2015</p> <p>Immediate Correction: An email has been sent to all estates that carry out their own water treatment to inform them to add Domestic Water quality analysis into their yearly safety and health programs with effect from January 2016. This is to ensure that analysis is done every 6 months to determine whether the quality is in accordance with the National Drinking Water Quality Standard (NDWQS)</p> <p>Corrective Action to eliminate Cause of NC: a) The service providers eg Env Consultancy & Monitoring Services Sdn. Bhd and Nalco have been told to carry out domestic water quality analysis at estates that carry out their own treatment without fail every 6 months. b) They have been told to forward a copy of the analysis reports to the Sustainability Team and also notify us if any of the estates refuses to allow them to carry out the analysis.</p> <p>Sustainability Team will audit the analysis records during our annual audits.</p> <p>Immediate correction and corrective action taken deemed necessary for the closure of NC. Evidence and effectiveness of CAP taken will be verified during next visit.</p>	Minor

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	<p>Assessment Conclusion: Records of drinking water sample analysis sighted available (Test Report # JWA1510-0123-1 dated 29/10/2015) for the immediate correction done. Visit in other site i.e. Kahang Estate and Mamor Estate with own domestic water treatment facility confirmed that sampling for drinking water analysis has been done accordingly based on the evidence records sighted.</p> <p>Nonconformity satisfactorily closed on 20/12/2016.</p>	
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3.3.2 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
CR01	Major	20/3/2009	Closed on 16/11/2009
CR02	Major	20/3/2009	Closed on 16/11/2009
CR03	Minor	20/3/2009	Closed on 16/11/2009
CR04	Minor	20/3/2009	Closed on 16/11/2009
A542057/1	Minor	8/3/2011	Closed on 2/3/2012
A694301/1	Minor	29/2/2012	Closed on 17/1/2013
A694301/2	Minor	29/2/2012	Closed on 17/1/2013
A834990/1	Minor	17/1/2013	Closed on 11/1/2014
A834990/2	Minor	17/1/2013	Closed on 11/1/2014
A834990/3	Minor	17/1/2013	Closed on 11/1/2014
A834990/4	Minor	17/1/2013	Closed on 11/1/2014
1012105N5	Minor	11/1/2014	Closed on 6/1/2015
1012105N6	Minor	11/1/2014	Closed on 6/1/2015
1143838M1	Major	9/1/2015	Closed on 2/4/2015
1143838M2	Major	9/1/2015	Closed on 2/4/2015
1143838M3	Major	9/1/2015	Closed on 2/4/2015
1143838N1	Minor	9/1/2015	Closed on 17/12/2015
1279712M1 – 2.1.1	Major	15/12/2015	Closed on 31/12/2015
1279712N1 – 2.1.4	Minor	15/12/2015	Closed on 20/12/2016
1279712N2 – 4.1.3	Minor	15/12/2015	Closed on 20/12/2016
1420891M1 – 6.5.2	Major	23/12/2016	Closed on 7/2/2017
1420891M2 – SCCS Module D 4.2	Major	23/12/2016	Closed on 7/2/2017
1420891M3 – 4.6.11	Major	23/12/2016	Closed on 7/2/2017
1420891M4 – 2.1.1	Major	23/12/2016	Closed on 7/2/2017
1420891N1 – 4.4.1	Minor	23/12/2016	"Open"
1420891N2 – 5.3.3	Minor	23/12/2016	"Open"

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Assessment Conclusion and Recommendation:

Based on the findings during the assessment Pamol Kluang Palm Oil Mill Certification Unit and supply base complies with the RSPO P&C 2013 (MY-NI 2014) , and the RSPO Supply Chain Certification Standard (Nov 2014) for CPO Mill. It is recommended that the certification of Pamol Kluang Palm Oil Mill Certification Unit is approved and continued.

Acknowledgement of Assessment Findings	Report Prepared by
Name: Ravi Tony	Name: Ms Hu Ning Shing
Company name: IOI Corporation Berhad Pamol Kluang Palm Oil Mill	Company name: BSI Services Malaysia Sdn Bhd
Title: Sustainability, Safety and Health Manager	Title: Trainee Lead Auditor
Signature:  Date: 17/3/2017	Signature:  Date: 15/3/2017

Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Commitment to Transparency			
Criterion 1.1: Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	Adequate information covering on environmental, social and legal issues which are relevant to RSPO Criteria and relevant to stakeholders is shared for effective participation and decision making. For example through internal and external stakeholders' meeting, ECC meeting, Gender Committee meeting and etc. Publicly available documents such as land title, OSH plan, HCV documents, negotiation and compensation procedures, complaint records, RSPO public summary reports, EIA and SIA, Management Plans & Continuous Improvement Plans and company policies are available.	Complied
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	All the mill and estates have maintained records of information request and response where it was recorded in the Complaint/ Grievances book, email and official letter. Besides, the stakeholders can browse through the Group's website to view the company's policies and procedures.	Complied
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.			
1.2.1	Publicly available documents shall include, but are not necessary limited to: • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). - Major compliance –	Publicly available management documents such as land titles, OHS plans, EIA, SIA, HCV documentation, pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, RSPO Public Summary Report, company policies and continual improvement plans. All operating units have individual documents and records to demonstrate compliance to this indicator. IOI Group documents are also accessible through their Group's website link: http://www.ioigroup.com .	Complied

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Criterion / Indicator	Assessment Findings	Compliance	
Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.			
1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. -Minor compliance	IOI Corporation Berhad has implemented Code of Business Conduct & Ethics dated 11/5/2015. The policy can be found at the IOI Group's website. They are committed to respect for fair conduct of business and prohibition of all forms of corruption, bribery and fraudulent use of funds and resources. All the workers were briefed on all the policies during induction training prior to work. The workers have acknowledged on the induction training form to show that they have attended the training.	Complied
Principle 2: Compliance with applicable laws and regulations			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			

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<p>2.1.1</p>	<p>Evidence of compliance with relevant legal requirements shall be available. - Major compliance -</p>	<p>Legal register covering the applicable local and international laws and regulations are available at Pamol Palm Oil Mill certification unit. Sample of permit and license sampled:</p> <p>Date of inspection: 18/1/16 & 18/4/16. List of UPV (unfired pressure vessel) and SB (steam boiler) inspected:</p> <ul style="list-style-type: none"> a. PMD 4520 – Water tube boiler b. JH PMT 2873 – Softener Vessel c. PMT 107343 JH – Sterilizer no.1 d. PMT 118834 – Sterilizer no.2 e. PMT 4395 – Sterilizer no.3 f. PMT 47885 – Sterilizer no.4 g. PMD126 – Water tube boiler h. JH PMT2869 – Back pressure receiver i. JH PMT15410 – Steam Separator <p>Competence person</p> <ul style="list-style-type: none"> a. Steam engineer: 042/2015 (2nd grade) sufficient based on running heating surface. Heating surface (m2) : B2 : 1586 m2 B1: 833.3 m2 b. Steam engine and boilerman certificate, grade 1(J44/85 & J47/93) c. Electrical charge man: A4, PJT-4-H-0207-2008 & PJT-4-B0134-2011. <p>Confined space competent person: AESP (NW-NJHR-AE-2187-M) valid until 12/8/16. Refresher training plan on 21/12/16 at NIOSH and will include other personnel for the confined space entry programme.</p> <p>AGT (NW-NJHR-AGT-0035-N) valid until 4/3/17.</p> <p>VE inspection by competent electrical engineer, PE-T-1-B0005-2001. Latest inspection 29/10/15.</p> <p>License and permit: Energy commission license, Serial# 6079/2016, installation# ST(SJB)P/S/JHR/00128 for 3400 kW avalid until 9/8/17.</p> <p>MPOB license, 500040104000 dated 31/3/17 for total of 288,000 mt. Diesel license, ref#BPGK/JH (KLU)0273SK for 18,000 liter dated 22/1/17.</p> <p>Pamol Kluang POM and its supply base has obtained and renewed license and permits as required by the law. Amongst the sampled licenses or permit viewed in the mill and estates were as following:</p> <ul style="list-style-type: none"> a. Mill DOE License/<i>Jadual Pematuhan</i> : JPKKS 001576 (validity period 1/7/2016 - 30/6/2017) for 60MT/hr and method of POME discharge is 70% water course (BOD limit <100ppm) and 30% land application (BOD limit <5000ppm) – current practice 100% discharge through land application b. Mill river water extraction (BAKAJ) license no.: 	<p>Major nonconformance</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>08/A/KLG/055 (validity period until 31/12/2016) by Director of Water Resources Johor for usage quantity of 1700m³/day</p> <p>c. Written approval by DOE effective from 4/9/2016 for 16 weeks for desludging of anaerobic pond no. 3 ref. no: AS(B)J: 31/152/000/048</p> <p>d. Kahang estate MPOB license no.: 502165302000 (validity period 1/2/2016 - 31/1/2017)</p> <p>e. Diesel permit ref. no.: BPGK JH (KLU)2154 SK, serial no.: J025288 capacity 18,090 litres valid until 19/7/2017</p> <p>f. Compressor certificate of fitness PMT no.: JH PMT 11257 valid until 17/7/2017</p> <p>g. Mamor estate MPOB license no.: 511691002000 (validity period 1/4/2016 - 31/3/2017)</p> <p>h. Mamor estate schedule controlled item permit ref. no.: BPKG JH(KLU) 1967SK; serial no.: J027596 (validity period 18/11/2016 – 17/11/2017) for storage capacity of <15,000liters diesel</p> <p>i. Labour Department Salary Advance Permit serial # PP2/34/0030 since 1/9/1999</p> <p>j. Mamor estate river water extraction license letter ref. no.: SUKJ.BAKAJ:334/300/05/07/07/3 (validity period until 31/12/2016) by Director of Water Resources Johor</p> <p>k. Compressor certificate of fitness PMT no.: JH PMT 130022 valid until 17/7/2017</p> <p>Competence person</p> <p>a. CePSWaM serial no.: CePSWaM/00651 dated 5/2/2015</p> <p>b. CePPOME serial no.: CePPOME/15094 valid from 1/12/2015-1/12/2016 (application to extend FTR submission done on 19/12/2016)</p> <p>a. Sampled contractors’ workers where their passport or permit could not be shown during the audit as below:</p> <p>i. Contractor JK – Total 7 workers</p> <p>ii. Contractor LCS – Total 6 workers</p> <p>b. Sampled LCS contractor’s workers were found that they did not achieve the Minimum Wage Order 2016 even though they have worked for more than 26 days through document review of the attendance sheet. Sampled workers as below:</p> <p>i. Erwin – RM 620 for November 2016</p> <p>ii. Herianto – RM 422 for November 2016</p> <p>iii. Muamar – RM 720 for October 2016</p> <p>Thus, a major non-conformance was raised.</p>	
2.1.2	<p>A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -</p>	<p>Mill Legal Requirements Register reviewed on 26/11/2016.</p> <p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance
2.1.3	A mechanism for ensuring compliance shall be implemented. - Minor compliance -	Evaluations of compliance were done by individual operating units. Complied
2.1.4	A system for tracking any changes in the law shall be implemented. - Minor compliance -	IOI subscribed to LexisNexis Research Product who alert on legal updates through an online system/email since early 2016. Complied
Criterion 2.2: The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.		
2.2.1	Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -	Land ownership such as land title and land lease documents is available. There is no change in the land ownership. All the land belongs to IOI. Pamol Mill title no.: 16590, lot 2429, 10 acres. Kahang Estate title no.: HS(D) 8577, lot not.: PTD 3302, 2419.9009ha. Sampled latest quit rent payment receipt no.: S137593 dated 16/5/2016. Maamor Estate title no.: HS(D) 23794, lot not.: PTD 3226, 5499e. Sampled latest quit rent payment receipt no.: S627558 dated 20/5/2016. During the field visit it was noted that legal boundaries are clearly demarcated and visibly maintained throughout the estate. Mill located inside Pamol Timur Estate and sharing the estate boundary. Complied
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	Kahang Estate: Legal boundaries were sighted clearly demarcated with pole and trenches as additional to government's land department boundary stone. Complied
2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	Disputes will be handle as per procedure sighted in Flowchart on Boundary Disputes Handling and Flowchart on Squatters Disputes Handling. Related procedures sighted in latest Social Impact Assessment & Management Action Plan dated 5/12/2016 including following: a. Grievance procedure for land owner issues b. IOI Peninsular Malaysia Land Use Compensation Procedures Flow Chart c. IOI Peninsular Malaysia Negotiation Procedure d. IOI Peninsular Malaysia Negotiation Procedure through Free, Prior & Informed Consent (FPIC) Complied
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	There is no land dispute in the Pamol Kluang certification unit at the time of audit. The land belongs to IOI and land ownership documents verified. Complied
2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	There is no land dispute in the Pamol Kluang certification unit at the time of audit. The land belongs to IOI and land ownership documents verified. Complied

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Criterion / Indicator	Assessment Findings	Compliance
2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	Complied
Criterion 2.3: Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.		
2.3.1	Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Major compliance -	Complied
2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for 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 company's title, concession or lease on the land. - Minor compliance -	Complied
2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance	Complied

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2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance	Complied
<p>Principle 3: Commitment to long-term economic and financial viability</p>		
<p>Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>		
3.1.1	A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -	Complied
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	Complied
<p>Principle 4: Use of appropriate best practices by growers and millers</p>		
<p>Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.</p>		
4.1.1	Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -	Complied

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4.1.2	A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -	Through periodical inspection visit by management and group sustainability team. Complied
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	<p><u>Mamor Estate</u> BAHS: Buffalo Assisted Harvesting System De-worming and vaccination was done twice per year by appointed Vet doctor. Buffalo health records were maintained for total of 45 buffalos.</p> <p>For harvester gang 98/99, 10 buffalos were last vaccinated on 23/5/16 and the next programme will be carried out on 23/11/16.</p> <p>Latest visit by SGM on 4/1/2016 at Pamol POM. Issues concerning OER and KER were highlighted including other mill performance related matters and legal compliance.</p> <p>Latest internal audit was conducted by Sustainability team on 23/5/2016.</p> <p>Latest visit by SGM at Kahang Estate was on 1/9/2016.</p> <p>Latest visit by Plantation Controller at Mamor Estate was on 19/4/2016.</p>
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	No FFB sourced from third-party. The FFB is from own company estates. Complied

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

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<p>4.2.1</p> <p>There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -</p>	<p>Good agriculture practices from the SOP are followed to manage soil fertility to ensure optimal and sustained yield through annual fertilizer application program. Beside in- organic fertilizer, organic fertilizer in the form of POME and EFB is applied as per recommendation from IOI Research Centre. Pamol Timor Estate was visited by the agronomist on 4/11/2016</p> <p>Documented procedure, Agriculture Policies dated July 2005 covers for all estate operations under specific section as per below:</p> <ol style="list-style-type: none"> 1.0 Land Clearing, Preparation and Planting 2.0 Nursery Practice 3.0 Planting Density and Technique 4.0 Soil Conservation and Terracing 5.0 Establishment and Maintenance of Legume Covers 6.0 Weeding: Weed Control 7.0 Ablation 8.0 Manuring 9.0 Pest and Disease 10.0 Roads 11.0 Pruning 12.0 Harvesting <p>Good agriculture practices from the SOP are followed to manage soil fertility to ensure optimal and sustained yield through annual fertilizer application program. Beside in-organic fertilizer, organic fertilizer in the form of POME and EFB is applied as per recommendation from IOI Research Centre.</p>	<p>Complied</p>
<p>4.2.2</p> <p>Records of fertiliser inputs shall be maintained. - Minor compliance -</p>	<p><u>Kahang Estate</u> Fertilizer recommendation based on agronomist report, ref# RD-F-1/KHE dated 19/6/16. Sample application PM05G – SA application converted (0.85) to AC application (1.91 kg/palm)</p> <p>Actual application : 175 bags x 50 kg/bag : 8.75 mt. Area coverage is 29 Ha.</p> <p><u>Mamor Estate</u> Fertilizer recommendation based on agronomist report, ref# RD-F-1/MME dated 19/6/16. Example: PR09C & D – SA application converted (0.85) to AC application (2.125 kg/palm) Actual application : 277 bags x 50 kg/bag : 13.85 mt. Area coverage is 39 Ha.</p>	<p>Complied</p>

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4.2.3 There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	<u>Kahang Estate</u> Soil and leaf sampling analysis carried out on annual basis. Fertilizer recommendation for 2016 is based on 2015 sampling which was carried out on February and March 2015. (2001 – 2009). List of programme for 2016 sample for field 05G: Feb: MOP (1.75 kg/palm) Mar: SA (2.5) Apr : Borate (0.15) May: KIE 1.25 Aug: MOP 1.75 Sept: SA 2.25 @ 1.91 AC Oct : RP 2.50 Latest soil sampling was done on 18 th October 2016 a few selected fields. Fertilizer recommendation for 2017 is available, full report of foliar and soil analysis is still in progress .	Complied
4.2.4 A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -	No EFB application programme for Kahang and Mamor Estate in 2016.	Complied
Criterion 4.3: Practices minimise and control erosion and degradation of soils.		
4.3.1 Maps of any fragile soils shall be available. - Major compliance -	Soil map available at Kahang Estate . Map incorporated in the agronomist report, RD-F-1/KHE dated 19/6/16. Majority of soil type is under Harimau and local alluvium. Soil map for Mamor Estate available. Majority of soil category is Rengam followed by Malacca series.	Complied
4.3.2 A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -	Management strategy for plantings on slope and steep hill documented under Group Environmental Impact Assessment and management plan, under 7.0: Soil erosion and prevention plan, sub clause 7.1.7: Planting on steep hills. Planting strategy on LCC planting is recommended and minimize damage on natural vegetation along the tarrace slope. Other guidance document : Group Standard Operating Procedures (StOPs) for Estate Operations under 2.0: Standard Procedure for Land Preparation for the New Planting and Replanting.	Complied
4.3.3 A road maintenance programme shall be in place. - Minor compliance -	Road maintainance programme available and incorporated under Environmental Impact Assessment, management action plan and continuous improvement plans (Nov 2015 – Nov 2020), revised on 21 st November 2016. Todate : 30-50% completion. <u>Mamor Estate</u> Road maintenance programme available. For October 2016, road grading programme has been completed for total of 2282.4 chain.	Complied

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4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance -	No fragile and problematic soil in the estates. Complied
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	No fragile and problematic soil in the estates. Complied
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance -	No fragile and problematic soil in the estates. Complied
Criterion 4.4: Practices maintain the quality and availability of surface and ground water.		
4.4.1	An implemented water management plan shall be in place. - Minor compliance -	Mill water management plan dated 21/11/2016. Mill rainfall Jul 2016 to date 762mm. Water Management Plan for Pamol Kluang Region reviewed on 21/11/2016 covered only Domestic Water Treatment for Pamol Kluang Palm Oil Mill missing the Kahang Estate. However, based on records of Water Management Plan for Pamol Kluang Region reviewed on 21/11/2016 signed, management plan for drinking water treatment and supply at Kahang Estate and Mamor Estate was not fully in place. Hence a minor noncompliance has been raised on this issue.
4.4.2	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. - Major compliance -	Kahang Estate: Latest water sample analysis record sighted: a. Domestic drinking water quality dated April 2016 Test Report # JWA1604-0058-1 dated 14/4/2016 by Eurofins NM Laboratory Sdn. Bhd. b. Water Quality Monitoring Report (SUST-WQI/sa – 028/2016 dated 17/8/2016 Mamor Estate: Latest water sample analysis record sighted: a. Domestic drinking water quality sampling analysis records report ref. # LKH/RWT/MAMOR/12/16 date 17/12/2016 by Nalco Industrial Serceies (M) Sdn. Bhd. b. Drinking water sampling by Health Office of Kluang letter ref. # (38) dlm PK.KLG.16.EH(L)/Ladang/2015 dated 7/12/2015 c. Water Quality Monitoring Report (SUST-WQI/sa – 024/2016 dated 12/7/2016

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4.4.3 Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -	Effluent monitoring records: Monthly Analysis of Effluent Samples report ref. PKPOM/14/11/2016(b) dated 14/11/2016 by IOI Research Centre, Gemencheh; parameter monitored-: pH, Total Alkalinity, VFA, BOD, COD, TS, SS, VSS, TN, AN, O&G. Samples were taken from each point of treatment in the system consist of raw pond, acid ponds, digester tanks and final pond before field application. BOD limit for land application <5000mg/L were met as well as all parameters that were within allowable limit. Annual monitoring of natural stream (Sungai Sembrong) was also conducted by the mill. Latest sampling done on 30/6/2015, Water Quality Monitoring Report SUST-WQI/sa-020/2016 dated 25/7/2016. Report shown that water samples from all points were within allowable limit of Class III/IV of INWQS accordingly.	Complied
4.4.4 Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	Water used for mill = 0.82m ³ /mt FFB processed. Kahang Estate rainfall for Jan – Dec 2015 = 2593.10mm. For Jan – Nov 2016 = 1384.50mm Mamor Estate rainfall for Jan – Dec 2015 = 2108.60mm. For Jan – Nov 2016 = 1384.50mm	Complied
Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.		
4.5.1 Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	Beneficial plants are continuously being planted at the ratio of 1dm per ha. Planting of beneficial plants such as Turnera subulata, Cassia cobanensis, and Antigonon leptopus, are a continuous practice in the estates visited. Current status and update at the visisted estates: <u>Kahang Estate</u> Beneficial plant strategy 60% Cassia, Antigonan 20%, Tunera 20% South Div: 3.5 ha/box, Occupancy Rate: 52% North Div: 4.2 ha/box , Occupancy Rate: 69% <u>Mamor Estate</u> BOB ratio is 1:10 Ha Occupancy rate : 81% (wooden and plastic) Rat baiting programme devided into 4 phases. Current baiting programme is for phase 1 (553 ha) and phase 4 (494 ha)	Complied
4.5.2 Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	Training of those involved in IPM implementation was verified during assessment. Sample of training records checked: <u>Kahang Estate</u> IPM training – Beneficial plant training 23/2/16 Barn owl training – 15/2/16 <u>Mamor Estate</u> IPM training on 13/7/16	Complied

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Criterion / Indicator	Assessment Findings	Compliance												
Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment														
4.6.1 Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance -	Justification of all pesticides used is in the SOPs and covers all agrochemicals use. The justification is appropriate for the operations in the estates. Refer to Agriculture Policies dated July 2005 under section 6.0 Weeding: Weed Control and 9.0 Pest and Diseases. Stated under table 6.2: general Guidelines of Herbicide Mixture for Circle and Path under Shade <table border="1" data-bbox="660 696 1161 1055"> <thead> <tr> <th>Target weed/pest/disease</th> <th>Active ingredients</th> </tr> </thead> <tbody> <tr> <td>Soft grasses</td> <td>Glyphosate</td> </tr> <tr> <td>Grasses, broad leaf LCC</td> <td>Glyphosate + Metsulfuron Methyl</td> </tr> <tr> <td>Volunteer Oil Palm Seedlings (VOPS)</td> <td>Manual @ uprooting,</td> </tr> <tr> <td>Rat damage</td> <td>Warfarin, brodifacoum, flocuomafen</td> </tr> <tr> <td>Bagworm</td> <td>Monocrotophos, methamidophos</td> </tr> </tbody> </table>	Target weed/pest/disease	Active ingredients	Soft grasses	Glyphosate	Grasses, broad leaf LCC	Glyphosate + Metsulfuron Methyl	Volunteer Oil Palm Seedlings (VOPS)	Manual @ uprooting,	Rat damage	Warfarin, brodifacoum, flocuomafen	Bagworm	Monocrotophos, methamidophos	Complied
Target weed/pest/disease	Active ingredients													
Soft grasses	Glyphosate													
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Rat damage	Warfarin, brodifacoum, flocuomafen													
Bagworm	Monocrotophos, methamidophos													
4.6.2 Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance -	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) was made available. Ai/Ha summary as follows: <u>Kahang Estate</u> Ai per Ha (todate Nov 16) Glyphosate: 0.03 Ai/Ha 2,4D-Amine: 0.01 Ai/Ha Tricopyl: 0.01 Ai/Ha Sodium Chlorate: 0.02 Ai/Ha <u>Mamor Estate</u> Ai per Ha (todate Nov 16) Glyphosate: 0.17 Ai/Ha 2,4D-Amine: 0.02 Ai/Ha Tricopyl: 0.13 Ai/Ha	Complied												
4.6.3 Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance -	All the estate's policy is to minimize the use of pesticides in accordance with IPM. No prophylactic use of pesticides noted during the field visit and records verification.	Complied												

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4.6.4	<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 used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances.</p> <p>- Minor compliance -</p>	<p>All estates eliminated the use of Paraquat. Alternatives agrochemicals such as Metsulfuron Methyl and Glyphosate Isopropylamine used to control weeds. During this audit there was class 1a and agrochemical usage sighted.</p> <p>Paraquat is totally banned in IOI estate. Refer to memo/letter by Group Plantation Director, dated 23/9/10 effective by 31/12/11.</p>	Complied
4.6.5	<p>Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7).</p> <p>- Major compliance -</p>	<p>Pesticide operators go through safe handling training and application of the pesticides. Inspections of the Mills and the Estates visited indicated that safe work practices were being implemented. The safety signage was installed at work stations and chemical store at the mill and estate. Workers are provided with appropriate safety equipment and protective equipments. Product MSDS are available and explained to applicators. Interview with workers reveal that they are aware of the agrochemical negative impacts and aware of precaution methods.</p>	Complied
4.6.6	<p>Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3).</p> <p>- Major compliance -</p>	<p>It was noted that chemical Stores in accordance with local regulation. Chemical storage area were visited during the site visit. Pesticide containers generated from the nursery site are triple rinsed and pierced to prevent misuse. There are times these empty containers used for storage of pre-mix agrochemical before transported to the application site. The remaining used chemical containers were disposed of by DOE approved empty container collectors.</p>	Complied
4.6.7	<p>Application of pesticides shall be by proven methods that minimise risk and impacts.</p> <p>- Minor compliance -</p>	<p>Pesticides had been applied through justifiable census using agriculture best practices that minimize risk and impacts as per the established policy.</p>	Complied
4.6.8	<p>Pesticides shall be applied arially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application.</p> <p>- Major compliance -</p>	<p>No aerial pesticides spraying in all IOI estates.</p>	Complied
4.6.9	<p>Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8).</p> <p>- Minor compliance -</p>	<p>Regular training and briefing on pesticide handling carried out includes provision of appropriate information materials, safety and health information and environment. Information on pesticides are displayed next to the pesticides in the store and at notice board.</p>	Complied

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4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -	Interview with management team and employees reveal that proper disposal of waste material is understood. There is no any issue of burning of waste materials. Waste recycling awareness in carried out by the operating units.	Complied
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -	<p><u>Mamor Estate</u></p> <p>Medical surveillance programme was established for the pesticides operator. Annual check was last carried out on 13/12/16 for 4 sprayers by DOSH registered OHD, HQ/08/DOC/00/597 under Klinik Rengam.</p> <p>a. AE3857951 b. AF6223013 c. AA6474177 d. AE2923958</p> <p><u>Kahang Estate</u></p> <p>No medical surveillance carried out for 5 sprayers at Kahang Estate. Thus, major NC was issued.</p>	Major nonconformance
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	Field inspections, records and interviews with internal and external reveal that no pregnant or breast-feeding woman had been offered work as pesticide operator. Pesticide operators are male.	Complied
<p>Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:</p>			

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<p>4.7.1</p>	<p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. - Major compliance -</p>	<p>All the operating units has maintained an approved Health and Safety Policy dated since 11 July 2011 signed by Group Plantation Director that is displayed prominently on notice boards in English and Bahasa Malaysia and approved by the IOI top management.</p> <p>The health and safety plan monitored by the Safety & Health (SH) Manager from the head office. The safety and health plan cover all the relevant activities in the mill and estate. The activities are recorded and implemented and monitored by the SH Manager.</p> <p>Documented Safety Management plan date review on 30/11/16 was evident. Revised on annual basis, validity Dec 14-Dec 19 for 5 years.</p> <p><u>Contractor Management</u> PTW implementation for hot work, Confined Space-sampled PTW dated 4/4/16, Mechmar Towler steam drum cleanin @overhaul. Issuance, cancellation and gas testing result done by competent person. Health declaration was available for the said task.</p> <p><u>LEV examination, inspection</u> Carried out on 24/2/16 by IHT II, JKPP HIE 127/171-3/2(171). Reading were above recommended value of ACGIH, face velocity: (0.75 m/s vs 0.5m/s) for gas. Duct velocity : 7.43 m/s vs 5 m/s</p> <p>Internal inspection, carried out on monthly basis by mill technician and lab supervisor. Latest inspection for December 2016 was verified.</p> <p><u>Personal and Area Chemical Exposure Monitoring (PCEM)</u> Area and personal CEM was carried out on 24 February 2016 for N-hexane exposure.</p> <p>Area: TWA8, PEL 50 mg/m3, result 4.53 ppm Personal: TWA8, PEL 50 mg/m3, result 5.75 ppm. Average results is compliance with the max PEL for N-hexane both (personnel and area exposure)</p> <p><u>Audiometric Testing</u> Last audiometric testing was done on 28/11/14 by Specialist Mobile Audiometry Services Sdn Bhd. For 2015, the audiometric testing was conducted on 24/11/15. Report was verified an found that 1 HI case recorded. 2016 programme was carried out on 20/11/16. Report dated 22/11/16 and found that 22(2) 2 HI , and STS (23) 4 pending for retest within 3 month after monitoring. Status will be further verified in the next audit.</p> <p><u>Medical Surveillance Programme</u> As per CHRA recommendation dated March 2014 by JKPP HIE 127/171-2 (316) medical surveillance programme has been carried out for those exposed to N-hexane, potassium chromate and welding fumes. Total of 40 workers send for annual check-up. The latest medical surveillance was carried</p>	<p>Complied</p>
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	<p>out on 20/3/16 by registered OHD, (HQ/08/DOC/00(468) under Poliklinik Intan. From the results, all workers sent for medical surveillance are fit to work with no detrimental of health based on USECHH3 & 4 issued by OHD.</p>		
<p>4.7.2</p>	<p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. - Major compliance -</p>	<p>Reviewed and updated of the health and safety risk assessments is carried out annually through HIRARC assessment assisted by the SH Manager. Latest review was conducted as per below:</p> <p><u>Pamol Palm Oil Mill</u> Latest HIRARC revision in January 2016 after accident occurrence in November 2015 related to workshop activity.</p> <p>CHRA dated March 2014 by registered assessor, JKPP HIE 127/171-2 (316). Recommendation : Medical surveillance: Boiler, cleaner, lab, Storekeeper, WTP, Technician. LEV inspection: Lab</p> <p><u>Kahang Estate</u> Annual HIRARC review was carried out on 9/5/16. All estate operations was captured in the register which involved medium and low risk activities. Noted some changes and revision of risk level due to occurrence of accident. Control measures have been determined for appropriate corrective action.</p> <p>CHRA dated March 2014 by registered assessor, JKPP HIE 127/171-2 (316). Recommendation for medical surveillance: pre- mixer and sprayer.</p> <p><u>Mamor Estate</u> Annual review for HIRARC was last updated on 9/5/16 after occurrence of accident. Lesson learned from other estate's fatal case was also incorporated in the HIRARC register and identified as high risk. Control measures has been determined i.e revised SOP (SOP for harvesting, rev:5 , appendix:4 dated 25/10/16) to prevent recurrence in future.</p> <p>CHRA dated March 2014 by registered assessor, JKPP HIE 127/171-2 (316). Recommendation medical surveillance: manuring, pre-mixer & sprayer, rat baiting, store keeper & tractor driver.</p>	<p>Complied</p>

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<p>4.7.3</p> <p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.</p> <p>- Minor compliance -</p>	<p>Safe working awareness training had been carried out and covers all work groups and contractors. Interview with employees and contractors reveal that all those involved had been adequately trained in safe working practices.</p> <p>Appropriate personal protective equipment (PPE) provided to cover all potentially hazardous operations such as pesticide application, machine operations, land preparation for replanting, harvesting, transport etc.</p> <p>PPE respirator : Organic vapor (3M 6003), Half mask respirator (3M 6200), dust respirator (N95), glove (nitrile rubber)</p>	<p>Complied</p>
<p>4.7.4</p> <p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded.</p> <p>- Major compliance -</p>	<p>The responsible person for the safety and health issues is the Manager and Assistant Manager. The management of the mill and estates conduct quarterly OSH committee as per schedule. During the OSH meeting health, safety and welfare issues discussed and worksite inspection was carried out.</p> <p>Minutes of meeting sampled at visited operating unit: OSH meeting (Pamol Mill) :, #1: 28/3/16, #2: 20/6/16,#3: 13/9/16. Ad-hoc/emergency meeting – for accident on 10/2/16.</p> <p>SHC Coordinator @ secretary under mill assistant manager responsibility. Refer to appointment letter dated 1/7/16.</p> <p><u>Kahang Estate</u> New SHC chairman appointment (estate manager), refer to letter dated 17/11/16. Minutes of meeting and workplace inspection records (workplace inspection form, appendix 4) were verified. Refer to minutes #4 28/11/16, #3: 6/8/16, #2: 13/5/16 & #1:26/2/16.</p> <p><u>Mamor Estate</u> New SHC chairman appointment (estate manager), refer to letter dated 15/11/16. Minutes of meeting and workplace inspection records (workplace inspection form, appendix 4) were verified. Refer to minutes #4: 9/11/16, #3: 21/8/16, #2: 17/5/16 & #1: 12/2/16.</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.5</p> <p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Accident and emergency procedures had been written in English and Bahasa Malaysia and briefed to staff, workers, contractors and visitors. List of documented ERP was reviewed in Decmeber 2016:</p> <ul style="list-style-type: none"> a. ERP for Chemical Spillage (Appendix F2) b. ERP for Crude Palm Oil and Lubricant Spill (Appendix F5) c. ERP for Fire Outbreak (Appendix F4) <p>ERP is communicated with the employees and field/mill supervisors. Interview with the employees and supervisors reveal that they understand the emergency procedures. ERP training such as firefighting training is conducted to test the emergency preparedness.</p> <p>The last fire evacuation was done on 30/7/16 for Pamol Palm Oil Mill. Workers trained in First Aiders were present in the mill and field operations and contact details are posted on the notice boards. First Aid Kits were available at worksites. Record of accident reported in using internal form, IOI Corporation Berhad (Accident/Incident Report Form) JKKP 6 and JKKP 8</p>	<p>Complied</p>
<p>4.7.6</p> <p>All workers shall be provided with medical care, and covered by accident insurance.</p> <p>- Minor compliance -</p>	<p>Insurance policy under Foreign Workers Compensation Scheme under MSIG insurance, policy number DL-09658444-FWC period of validity 1/10/16-30/9/17 covered for 51 workers at Pamol POM.</p> <p>Sample of workers insurance policy checked for:</p> <ul style="list-style-type: none"> a. M516658 b. A111468 c. M401705 d. MA367377 e. AR708932 <p><u>Kahang Estate</u></p> <p>Insurance coverage under MSIG, policy number DL-09658031-FWC, validity period 1/10/16-31/9/1, and DL-09428434-FWC validity 1/10/16- 30/9/17 and</p> <ul style="list-style-type: none"> a. KHE 1005 b. KHE 1627 c. KHE 1702 d. KHE 1742 e. KHE 1776 <p><u>Mamor Estate</u></p> <p>Insurance coverage under MSIG, policy number DL-09658145-FWC, validity period 1/10/16-30/9/17:</p> <ul style="list-style-type: none"> a. AT745905 b. AE3155550 c. AE3857951 d. AF6223013 e. AA6474177 f. AE2923958 	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance												
4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	Occupational injuries are recorded in Form JKPP 6 and JKPP 8. <table border="1"> <thead> <tr> <th>Year</th> <th>Pamol POM</th> <th>Kahang Estate</th> <th>Mamor Estate</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>27 (83 LTI)</td> <td>86 (68 LTI)</td> <td>44 (137 LTI)</td> </tr> <tr> <td>Todate 2016</td> <td>3 (54 LTI)</td> <td>34 (28 LTI)</td> <td>38 (87 LTI)</td> </tr> </tbody> </table> Long term medical leave (26 days recorded for worker with passport# M5166158. Verified compensation paid to the said worker, dated 5/8/16 (voucher# PMM 6892).	Year	Pamol POM	Kahang Estate	Mamor Estate	2015	27 (83 LTI)	86 (68 LTI)	44 (137 LTI)	Todate 2016	3 (54 LTI)	34 (28 LTI)	38 (87 LTI)	Complied
Year	Pamol POM	Kahang Estate	Mamor Estate												
2015	27 (83 LTI)	86 (68 LTI)	44 (137 LTI)												
Todate 2016	3 (54 LTI)	34 (28 LTI)	38 (87 LTI)												
Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.															
4.8.1	A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. - Major compliance -	Formal training program for the year 2017 was prepared in December 2016 for the new financial year. The training program covers all aspects of RSPO P&C including supply chain and traceability. Program for the 2015 have been implemented. Regular assessment of on-the-job training conducted to ensure understanding among the employees.	Complied												
4.8.2	Records of training for each employee shall be maintained. - Minor compliance -	Sampled training mill and estates: a. Emergency response drill 10/12/2016 b. Water treatment plant 3/8/2016 c. Confined space & working at heights 9/12/2016 Sampled training Kahang Estate: d. Interpretation of stream water quality for monitoring 11/10/2016 e. Buffalo farm harvesting 21/8/2016 f. SOP for Chemical Store & Scheduled Waste training 19/12/2016 g. Chemical sprayer training 19/12/2016 by sustainability Sampled training Mamor Estate: h. Buffer zone training 12/12/2016 i. Chemical premix training 5/12/2016 j. SOP for Chemical Store & Scheduled Waste training 5/12/2016 k. Chemical sprayer training 19/10/2016 l. PPE & SOP for sprayer training 20/7/2016 m. Fire Extinguisher/Demonstration Training – 30/7/16 n. Safe in the Use of Chemicals Training – 16-17/11/16 o. Hearing Loss Prevention and Audiometric Testing – 21-22/11/16 p. ERT and First Aid Box Training – 10/12/16 q. Payslip and Company Policy Training – 17/12/16 r. Loading Ramp Safety Training – 6/11/16 s. Sterilizer Training – 7/11/16. t. SaOP Chemical Store Management and Safe Handling - 20/7/16 u. SaOP for Sprayer and PPE Training – 20/7/16	Complied												

Principle 5: Environmental responsibility and conservation of natural resources and biodiversity

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Criterion / Indicator		Assessment Findings	Compliance
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 continual improvement.			
5.1.1	An environmental impact assessment (EIA) shall be documented. - Major compliance -	The IOI sustainability team has prepared the environmental aspect and impacts assessment in term of Environmental Impact Assessment, management Action Plans and Continual Improvement Plans from January 2015 till December 2015 for Pamol Kluang region. Annual review by operating units were done on 5/12/2016 which involved The review conducted through discussion with stakeholders on 15/11/2016. Environmental Policy signed on 4/1/2008 by Group Plantation Director sighted available. Kahang Estate: Environmental Impact Assessment, Management Action Plans And Continuous Improvement Plans for period from November 2015 to November 2020 was prepared on 27/11/2015 and reviewed on 21/11/2016. Mamor Estate: Environmental Impact Assessment, Management Action Plans And Continuous Improvement Plans for period from November 2015 to November 2020 was prepared on 27/11/2015 and reviewed on 21/11/2016.	Complied
5.1.2	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons. - Minor compliance -	No changes in the operation at the time of audit. However, the mill has planned to install biogas plant by 2017 to reduce the methane gas released from the POME. It also installed GreenTube to minimize solids to the minimum level and thus reducing the frequency of de-sludging for the ponds. The current identified impacts are prepared with management plan to mitigate negative impacts.	Complied

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<p>5.1.3</p>	<p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. - Minor compliance -</p>	<p>No changes in the operation at the time of audit. The plan is being reviewed on yearly basis with latest review was done on 5/12/2016.</p> <ul style="list-style-type: none"> • Effluent monitoring records: Monthly Analysis of Effluent Samples report ref. PKPOM/14/11/2016(b) dated 14/11/2016 by IOI Research Centre, Gemenchah; parameter monitored-: pH, Total Alkalinity, VFA, BOD, COD, TS, SS, VSS, TN, AN, O&G. Samples were taken from each point of treatment in the system consist of raw pond, acid ponds, digester tanks and final pond before field application. BOD limit for land application <5000mg/L were met as well as all parameters that were within allowable limit. • Annual monitoring of natural stream (Sungai Sembrong) was also conducted by the mill. Latest sampling done on 30/6/2015, Water Quality Monitoring Report SUST-WQI/sa-020/2016 dated 25/7/2016. Report shown that water samples from all points were within allowable limit of Class III/IV of INWQS accordingly. • Boiler stack sampling records: Isokinetic Stack & Air Emission Monitoring for Boiler No. 2 on 25/5/2016 by ENV Consultancy & Monitoring Services Sdn. Bhd. (Report ref. AEMR(J)/16-05/11; dated June 2016). Result shown the stack emissions are within limit at 21.3 mg/m³ for particulates, ND (<0.1) mg/m³ for SOx and 0.049 mg/m³ NOx. Analysis was done by Eurofins NM Laboratory for ENV Consultancy report. Next monitoring to be done on 22/12/2016 as per planning. • Latest Ambient Air Quality monitoring ref. LA/1216/048/01-04 dated 7-8/12/2016 by Env Consultancy & Monitoring Services Sdn. Bhd. where result shown the Total Suspended Particulate (TSP) readings at few locations within the mill was within the Malaysian Air Quality guidelines of below 260µg/m³ • Online scheduled waste inventory no.: 2016101415318FEX; DOE File no.: AS(B)JB1/152/000/048 – updated as of 14/10/2016. Visit at mill scheduled waste store found that there was a potion of SW 429 that has been stored since 27/11/2015 and exceeded the allowable storage period limit of 180 days...### • Latest Scheduled Waste disposal done on 22/10/2016, consignment # 14311 for SW 305, # 14312 (SW 306), # 14315 (SW 410) & # 14313 (SW 409) by OLST Petro-Chemical Sdn. Bhd. For category SW 109 (# 0098843); SW 429 (# 009844) and SW 312 (#0098845) were disposed on 25/10/2016 by Kualiti Alam Sdn. Bhd. • Kahang Estate latest Scheduled Waste disposal done on 7/12/2016 as per consignment # 0120114 for SW 404, # 0070428 (SW 410) dated 2/8/2016, # 0070429 (SW 409) & # 090892 (SW 305) • Mamor Estate latest Scheduled Waste disposal done on 18/12/2016 as per consignment # 0079943 for SW 410, # 	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance	
	0079944 (SW 312), # 0079945 (SW 305), # 0079946 (SW 409) & # 0120144 (SW 404)		
Criterion 5.2: The status of rare, threatened or endangered species and other 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 operations managed to best ensure that they are maintained and/or enhanced.			
5.2.1	Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). - Major compliance -	HCV assessment has been reviewed on November 2015 by the executive from the sustainability team who has attended HCV training. There were only HCV 6 has been identified in Pamol Timur Estate (worship place). Monitoring and maintenance for the HCV 6 has been planned and monitored. The "Bukit Dyne" covering an area of 2.3ha identified as HCV through the HCV assessment at Pamol Timur estate is continued to be maintained. HCV assessment Kahang Estate was reviewed on 29/11/2016. HCV assessment Mamor Estate was reviewed on 10/11/2016.	Complied
5.2.2	Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan. - Major compliance -	Kahang Estate Rare, Threatened and Endangered Species (RTE) Assessment was prepared on 21/11/2015 and reviewed on 29/11/2016. Established action plan for monitoring species within and surrounding estate compound including training programs for workers and illegal hunting prohibition with patrolling by carried out by security personnel. Since estates are located near township and surrounded by other plantations and villages, HCV 6 identified in Pamol Timur Estate (worship place) is maintained and managed by localised workers committee. Protected species such as monitor lizards were cited.	Complied
5.2.3	There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. - Minor compliance -	Habitat protection includes prevention of disturbance by workers through awareness campaigns and regular patrols of the area. The estates have installed signboards at prominent areas to prohibit illegal 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 illegal hunting and collecting activities. Latest wildlife training for workers in Kahang Estate was done on 15/12/2016. HCV management action plan meeting with stakeholders dated 14/5/2016.	Complied
5.2.4	Where a management plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. - Minor compliance -	IOI sustainability team has prepared a Management Plan for protection of the HCV area in Pamol Timur estates and at Mill housing site complex that is based on habitat protection as well as enhancement of the area. HCV/Conservation area checklist sighted being monitored on monthly basis.	Complied

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Criterion / Indicator	Assessment Findings	Compliance	
5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance -	The existing HCV is worship places at estates and "Bukit Dyne" at Pamol Timur estate. Local communities have access to the worship places.	Complied
Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.			
5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	Waste sources have been identified accordingly by both the mill and estates. Documentation was done as a waste management plan which was being reviewed by respective operating units on annual basis. Visits made to Pamol Kluang Mill together with Pamol Timur and Unijaya estates showed that all waste products and sources of pollution were identified and documented. The documentation and identification of all the waste products such as scheduled waste, domestic waste and recyclable waste such as metal, plastic, mill waste and polluting materials e.g. EFB, POME, Stack emissions and Boiler ashes were maintained and monitored at the Mill. Scheduled Waste identified included spent hydraulic oil (SW 305), spent lubricant oil (SW 306), used chemical containers / drums (SW 409), used filters SW 410) and used batteries (SW 102). Records on the usage and disposal were well recorded and documented. Appropriate secondary containment for the diesel skid tanks, chemical and scheduled waste storage areas was verified to be maintained accordingly. Waste management & source of pollution identification reviewed on 5/12/2016.	Complied
5.3.2	All chemicals and their containers shall be disposed of responsibly. - Major compliance -	Based on policy to reduce, reuse and recycle, the management of used chemicals and containers were done in accordance Scheduled Waste regulations. For estates, the empty pesticides container were collected in scheduled waste store after being triple rinsing and punctured at the bottom of the container. Stores for scheduled waste were inspected at audited sites in mill and estates and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment. The mill and estates also have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
5.3.3 A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -	<p>Waste management plan involved cooperation between the mill and estates which included the following:</p> <ul style="list-style-type: none"> • Waste reduction plan from palm oil mill including EFB application programs – for year 2016 supporting timely evacuation of EFB from mill for field application at a rate of 40mt/ha • Dried POME application on low productivity area at a rate of 4 bags/palm • Waste reduction plan for workshop, lubricant store and empty chemical drums – handling of scheduled waste <p>Visit at Pamol Kluang Palm Oil Mill's scheduled waste store found that there was a portion of SW 429 that has been stored since 27/11/2015 and exceeded the allowable storage period limit of 180 days. This shown that the waste management and disposal plan was not fully implemented.</p> <p>Hence a minor noncompliance has been raised on this issue.</p>	Minor nonconformance
<p>Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>		
5.4.1 A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -	<p>Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement.</p> <p>Apart from use of grid supply (TNB) for electricity, palm fibre and shells were also used to generate electricity through steam turbine and boiler. The use of energy in palm oil mill and line site was monitored monthly to compare the energy usage against the production of CPO. Electricity generation was through steam turbine and boiler where Palm fibre and PK shells were used as renewable energy/fuel on a 70:30 ratio basis respectively. Monthly records of energy consumption of non-renewable fuel per metric tonne of palm product at the mill sighted available as following:</p> <p>Fossil fuel vs renewable energy ratio 7:93</p>	Complied
<p>Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.</p>		
5.5.1 There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -	No burning activities during land preparation for replanting. Field visit confirmed that previous old palms are felled, shredded and stacked in the interrow	Complied

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5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance -	The operating units have adhered to the zero burning policy for replanting at the estates. There was also no evidence of any burning of domestic waste at the housing line sites and at the domestic landfills of the estates during on site field assessment.	Complied
Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.			
5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -	Based on the assessment done by Pamol Kluang Mill of all polluting activities as of the Environment Aspect and Impact assessment, identified source was boiler chimney. Current monitoring was through online boiler smoke density and alarm and six-monthly boiler stack monitoring of dust particulate. Boiler stack sampling records: Isokinetic Stack & Air Emission Monitoring for Boiler No. 2 on 25/5/2016 by ENV Consultancy & Monitoring Services Sdn. Bhd. (Report ref. AEMR(J)/16-05/11; dated June 2016). Result shown the stack emissions are within limit at 21.3 mg/m ³ for particulates, ND (<0.1) mg/m ³ for SO _x and 0.049 mg/m ³ NO _x . Analysis was done by Eurofins NM Laboratory for ENV Consultancy report. Next monitoring to be done on 22/12/2016 as per planning.	Complied
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	Main source of significant pollutants and greenhouse gas (GHG) identified was methane (CH ₄) emission through POME treatment. The company are in process of obtaining proposals to construct methane capture facilities in POME treatment pond. Project arrangement handled by HQ and the project expected to complete the construction of the biogas plant by 2017. Other less significant GHG emissions identified including CO _x , SO _x and NO _x from various sources including fossil fuel, chemical and fertilizer consumptions.	Complied
5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance -	Monitoring of the GHG quantity was done through its custom GHG calculator where annual quantification of all GHG sources was input into the calculator. Default values of emissions factor Calculation of the GHG emissions were derived from publicly available sources including World Resource Institute and BioGrace. These calculations were done in HQ level where GHG calculations were done separately between the mill and estates. Reporting of the GHG to RSPO ERWG has been implemented since Jan 2015. Sampled of the reporting was as following: Emailed to ERWG dated 16/12/2016 by Sustainability Department Executive on behalf of Pamol Kluang Palm Oil Mill. Recommendation to install methane capture and biogas plant in next year budget based on management review meeting 23/5/2016.	Complied

Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.

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Criterion / Indicator	Assessment Findings	Compliance	
Criterion 6.1: Aspects of plantation and mill management that have social impacts, including replanting, 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 continual improvement.			
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	SIA was conducted by the Sustainability Team on 15/11/2016 for the external stakeholders to cover the whole Pamol complex. The assessment report and attendant lists were sighted. The assessment was participated by the stakeholder such as local communities, government authorities, contractors, internal workers, neighbouring plantations and etc. The mill and estates have conducted an internal assessment for their internal stakeholders on 5/12/2016 for mill, 13/6/2016 for Kahang Estate and 10/12/2016 for Mamor Estate.	Complied
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	The relevant stakeholders were participated during the assessment. For the Pamol Region, the assessment was conducted on 15/11/2016 which involved the external stakeholders whereas for the mill's internal stakeholders, the assessment was conducted on 5/12/2016. All the invited parties were provided positive and negative comments towards the management. The management has recorded the comments and documented into the SIA report.	Complied
6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance -	The Sustainability team has developed a social management plan on 20/11/2016 for mill, 28/11/2016 for Kahang Estate and 5/12/2016 for Mamor Estate. The assessment report was valid for 5 years from January 2015 – November 2020. The management plan has incorporated impacts, action to be taken, person in charge and the time bound to completed the action.	Complied
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance -	The plan will be reviewed on yearly basis and the last reviewed was on 20/11/2016 for mill, 28/11/2016 for Kahang Estate and 5/12/2016 for Mamor estate.	Complied
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	No scheme smallholder was involved in the certification unit.	Not applicable
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.			

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6.2.1 Consultation and communication procedures shall be documented. - Major compliance -	IOI Corporation Berhad has implemented Stakeholder Request Procedure for corporate and mill/estate's level. The flowchart is detailing the process of any request or complaints from the stakeholders to the management. The stakeholders can browse the IOI Group's website for the consultation and communication procedures. For those who do not have internet access, call to the IOI Group General line or write in a formal letter to the group.	Complied
6.2.2 A management official responsible for these issues shall be nominated. - Minor compliance -	The mill Assistant Manager and estates' Assistant Manager have been appointed as Social Liaison Officer to handle the social issues raised by the stakeholders such as requests, grievances and etc with appointment letter sighted. The officer has to monitor if the system is open, transparent and multi stakeholder participatory.	Complied
6.2.3 A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance -	Stakeholder meeting for the external stakeholders was conducted on 15/11/2016 for the Pamol Complex. Meeting minutes and attendant list was sighted. The issues raised during the meeting was incorporated into the social management plan to mitigate the issue. Mill and the estates have developed stakeholder's list for Y2016 where contractors, suppliers, local communities, government authorities, neighbouring plantations and etc were included into the list. Internal stakeholder's meeting for Kahang Estate was conducted on 13/6/2016 and 10/12/2016 for Mamor Estate. Meeting minutes was sighted and issues raised during the meeting was incorporated into an action/management plan to rectify the issue.	Complied
Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.		
6.3.1 The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. - Major compliance -	IOI Corporation Berhad has developed and implemented Grievance Procedure. The grievances should be raised within 5 working days of problem arising. The grievance must be recorded and documented in the Grievance Record/ Grievance Book. The complaints were normally lodged by the internal workers related to work and housing issues. Recently there was complaint regarding blockage and dirty drainage. The management has taken action to clean the drainage. The complainant has acknowledged on the complaint book after the action has been taken.	Complied

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6.3.2 Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –	The mill and estates have established Employee Consultative Committee (ECC) which involved local and foreign workers. The purpose of this committee is to allow the workers to discuss any social issues or complaints to the management. Meeting was conducted once every two months. The committee was represented from different nationality such as Indonesian, Bangladeshi, Nepalese, Myanmar, Malaysian and Indian. The representatives were elected by the workers themselves through election on 22/10/2016 for the mill and 5/8/2016 for Kahang Estate. The election documents were sighted. The last meeting was conducted on 14/11/2016 for the mill, 5/11/2016 for Kahang Estate and 13/11/2016 for Mamor Estate. Meeting minutes was sighted and the management has monitored the issues raised by the members and proposed actions to be taken to rectify the issues.	Complied
Criterion 6.4: 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.		
6.4.1 A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	IOI Corporation Berhad has established Grievance Procedure for Land Owner Issues. The procedure has detailing every steps should be taken when there is any land dispute reported.	Complied
6.4.2 A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. - Minor compliance -	IOI Corporation Berhad has developed IOI Peninsular Malaysia Land Use Compensation Procedures Flowchart, IOI Peninsular Malaysia Negotiation Procedure and IOI Peninsular Malaysia Negotiation Procedure through Free Prior & Informed Consent (FPIC). These procedures has detailing the process of negotiation and compensation if there is any land dispute case. However, there is no any land dispute case reported in Pamol Kluang certification unit.	Complied
6.4.3 The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance -	No cases requiring any negotiation or compensation pertaining to these criteria. There have been no changes in this status as at the period of verification on site.	Complied
Criterion 6.5: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.		

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Criterion / Indicator	Assessment Findings	Compliance
<p>6.5.1 Documentation of pay and conditions shall be available. - Major compliance -</p>	<p>The management has detailing basic salary, allowance, overtime pay, number of working days, number of absence and etc into the payslip. The payslip also recorded if there is any deduction made. Sampled payslips were as below:</p> <ul style="list-style-type: none"> a. Employee No.: PMM1083 (Malaysia) b. Employee No.: PMM0180 (Myanmar) c. Employee No.: PMM0073 (Indonesia) d. Employee No.: PMM0054 (Bangladesh) e. Employee No.: PMM0116 (Nepal) f. Employee No.: KHE1603 (Nepal) g. Employee No.: KHE1686 (Bangladesh) h. Employee No.: KHE1313 (Indonesia) i. Employee No.: KHE0558 (Malaysia) j. Permit No.: PD 6456862 (LCS Contractor's worker) k. Permit No.: PD 6101430 (JK Contractor's worker) l. Employee No.: MME0052 (Malaysia) m. Employee No.: MME0967 (Nepal) n. Employee No.: MME1156 (Indonesia) o. Employee No.: MME1128 (India) p. Employee No.: MME0572 (Bangladesh) q. Permit No.: PD 4820664 (T&T Contractor's worker) r. Permit No.: PD 6509869 (AVR Contractor's worker) <p>All the sampled workers have achieved the Minimum Wage Order 2016 where the daily rate is RM 38.46/ day. The mill management has permit for deduction of salary from JTK dated 31/7/2013.</p> <p>Mamor Estate has made deduction of salary to the workers and the list of permit as below:</p> <ul style="list-style-type: none"> a. Advance payment – Series Number: PP2/34/0071 dated 1/10/2013 b. Buffalo Purchase payment – Reference No.: (8) dlm BHG. PU/9/129 Jld 21 dated 30/12/2015 s. Electricity deduction – Under application since 13/5/2016. Awaiting reply from JTK. 	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance
<p>6.5.2</p> <p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p> <p>- Major compliance -</p>	<p>Employment contract are available in language that understood by workers. During the induction training, the management will assigned translator with their mother tounge for those who could not understand English or Bahasa Malaysia. The contract has detailing the payments and employment conditions such as probation period, working hour, medical assistance, housing, daily rate of pay, public holiday and annual leave entitlement, period of notice and etc. The contract was signed by the workers and sampled contracts are as below:</p> <ul style="list-style-type: none"> a. Employee No.: PMM0131 (Myanmar) b. Employee No.: PMM0065 (Indonesia) c. Employee No.: PMM0053 (Bangladesh) d. Employee No.: PMM0121 (Nepal) e. Employee No.: KHE1351 (Nepal) f. Employee No.: KHE1052 (Bangladesh) g. Employee No.: KHE1296 (Indonesia) h. Employee No.: KHE0558 (Malaysia) i. Employee No.: MME0967 (Nepal) j. Employee No.: MME1161 (Indonesia) k. Employee No.: MME1103 (India) l. Employee No.: MME0572 (Bangladesh) m. Permit No.: PD 4820664 (T&T Contractor’s worker) n. Permit No.: PD 6509869 (AVR Contractor’s worker) <p>The workers have signed on a “Revised Minimum Wages” letter to informed regarding the Minimum Wage Order 2016 of RM 1000/ month or RM 38.46/ day. The other terms in the old contracts were still effective.</p> <p>However, employment contract for all the contractors’ workers (Contractor: JK and LCS) were not available.</p> <p>The new recruited workers have attended induction training prior to work. They were briefed on types of work in IOI, culture in Malaysia, pay and conditions, contract of employment, emergency response plan, grievance and complaint procedures, policies of the Group and etc. The workers were signed on the induction training form after completed the training.</p> <p>Thus, a major non-conformance was raised.</p>	<p>Major nonconformance</p>
<p>6.5.3</p> <p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.</p> <p>- Minor compliance –</p>	<p>Hospital Assistant has conducted weekly linesite inspection to check on the surrounding and condition of the houses. No issue was raised so far. The management has provided free medical assistant and housing to the employees. Water and electricity was supplied to the workers where they have to pay according to the bill.</p>	<p>Complied</p>
<p>6.5.4</p> <p>Growers and millers shall make demonstrable efforts to monitor and improve workers’ access to adequate, sufficient and affordable food.</p> <p>- Minor compliance –</p>	<p>Affordable price of foods and goods were found in the sundry shops and food shops in the mill and estates’ compound.</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
Criterion 6.6: The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	IOI Corporation Berhad has implemented Equal Opportunity Employment & Freedom of Association Policies dated 20/8/2009. The company is committed and treated all the workers equally regardless of race, colours, ethnics or national origin, belief and culture and etc. The employee is allowed to join any association which according to Labour Laws and Immigration Act of Malaysia.	Complied
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	A meeting between the management and the Union representatives from the mill management was conducted on 14/5/2016. There was an issue brought up during the meeting where it's related to the restday issue. This issue has brought up to State's NUPW and awaiting the solution from the management. There was no Union association in the estate. Therefore, ECC was established in Kahang Estate and Mamor Estate and the worker's representatives from each nationality were elected by all the workers themselves. The election documents were sighted. The last meeting was conducted on 5/11/2016 for Kahang Estate and 13/11/2016 for Mamor Estate with the participation of 20 persons where there were representatives from the management as well. There is no issue raised during the meeting.	Complied
Criterion 6.7: Children are not employed or exploited.			
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	IOI Corporation Berhad has developed Policy Statement for No Child Labour dated 5/11/2009. The management is committed not to engage, exploit and employ individual who is below 16 years in the core business and supply chain and support within the Children and Young Persons (Employment) Act 1966 (Act 350). Through document reviewed of the employee's list found that the youngest was 19 years old.	Complied
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.			
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	IOI Corporation Berhad has implemented Equal Opportunity Employment & Freedom of Association Policies dated 20/8/2009. The company is committed and treated all the workers equally regardless of race, colours, ethnics or national origin, belief and culture and etc. The policy is to ensure that employees are free from unlawful discrimination, harassment or victimization.	Complied

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Criterion / Indicator	Assessment Findings	Compliance	
6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -	All the foreign workers are recruited with 3years contract with additional 2 years of extension if both parties agreed. Local workers are on a long term employment. No any kind of discrimination was noted. Job opportunities and amenities such as free housing, water and electricity supplies, medical care are given to all employees without discrimination. During interview with the workers found that no discrimination based on nationality, gender and race from the employers and all of them were treated equally.	Complied
6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance -	The management recruited employees based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. No discrimination based on nationality, race, gender, age, caste and etc was sighted during the audit.	Complied
Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected.			
6.9.1	Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance -	IOI Corporation Berhad has implemented Policy on the Prevention and Eradication of Sexual Harassment in the Workplace dated 6/12/2006. The company is committed to providing a work environment which is conducive, safe, and free from sexual harassment. The policy has been briefed to the workers during their induction training.	Complied
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance -	The company has developed a Protection of Reproductive Rights Policy dated 2/7/2015. The management provided equality and equity for men and women to enable the individuals to make free and informed choices in all spheres of life, free from discrimination based on gender. The policy has been briefed to the workers during their induction training.	Complied
6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. - Minor compliance -	The mill and estates have established a Gender Committee. The purpose of the committee is to monitor and discuss if there is any sexual harassment or other issues occurred. The meeting was conducted twice a year for the mill where the last meeting was conducted on 26/11/2016. In Kahang Estate, the last meeting was conducted on 3/7/2016 whereas in Mamor Estate, the meeting was conducted on 2/12/2016. Through interview with the Chairwoman and document reviewed of the meeting minutes and sexual harassment complaint logbook found that no sexual harassment case reported so far. Besides, the Group has developed Sexual Harassment flowchart detailing the procedure to handle if there is any sexual harassment cases. The flowchart was displayed on the notice board in the office compound. The grievance and complaint procedures have been briefed to the workers during their induction training.	Complied
Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.			
6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance -	Pamol Kluang Palm Oil Mill processes FFB from company owned estates only. No FFB purchased from out-growers or smallholders.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). - Major compliance -	Pamol Kluang Palm Oil Mill processes FFB from company owned estates only. No FFB purchased from out-growers or smallholders.	Complied
6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance -	The contractors have signed an agreement with the management prior work. Sampled contract agreements are as below: <ul style="list-style-type: none"> a. Contract No.: PMM/012-16/17 for grass cutting activity in mill compound. The agreement is valid from 1/8/2016 to 30/6/2017. b. Contract No.: KHE/002-16/17 for harvesting FFB at PM01/03/06/07 which valid from 1/7/2016 to 30/6/2017. c. Contract No.: KHE/004-16/17 for transporting and loading of FFB which valid from 1/7/2016 to 30/6/2017. d. Contract No.: MME/005-16/17 for transporting and loading of FFB which valid from 1/7/2016 to 30/6/2017. 	Complied
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	The payment was made on every month before 7 th . Payment records were sighted.	Complied
Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate.			
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –	The mill management has organized activities such as family day which involved all the workers. Besides, the management has made donation to the school upon request. In addition, the mill has subsidized RM 16/ person for the bus transportation fee for the students. The estate has organized activities such as sport day together with the workers, sponsored of shuttlecock for badminton and etc. Besides, they also provide van to send the students to school.	Complied
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance –	No scheme smallholders was involved in the certification unit.	Not applicable
Criterion 6.12: No forms of forced or trafficked labour are used.			

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Criterion / Indicator	Assessment Findings	Compliance
<p>6.12.1</p> <p>There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -</p>	<p>IOI Corporation Berhad has implemented Policy on Foreign Workers dated 20/8/2009 where they recruited foreign workers within the framework of Employment Act 1955, Sabah Labour Ordinance 2005, Immigration Act 1959/63 and Workmen’s Compensation Act 1952. All the local and foreign workers were hold a valid identification card and passports prior to work.</p> <p>Sampled workers below possessed valid working permit:</p> <ul style="list-style-type: none"> a. Permit No.: PD 5218685 which valid until 21/5/2017 (PMM) b. Permit No.: PD 6543459 which valid until 10/2/2017 (PMM) c. Permit No.: PD 5425907 which valid until 2/6/2017 (PMM) d. Permit No.: PD 6016932 which valid until 7/9/2017 (PMM) e. Permit No.: PD 5575550 which valid until 24/7/2017 (KHE) f. Permit No.: PD 6457612 which valid until 29/10/2017 (KHE) g. Permit No.: PD 6554782 which valid until 24/11/2017 (KHE) h. Permit No.: PD 5560547 which valid until 11/7/2017 (KHE LCS Contractor’s worker) i. Permit No.: PD 6101414 which valid until 21/9/2017 (KHE JK Contractor’s worker) j. Permit No.: PD 6530909 which valid until 12/11/2017 (MME) k. Permit No.: PD 6386668 which valid until 24/8/2017 (MME) l. Permit No.: PD 5233294 which valid until 19/5/2017 (MME) m. Permit No.: PD 6554775 which valid until 25/11/2017 (MME AVR Contractor’s worker) n. Permit No.: PD 4820664 which valid until 3/3/2017 (MME T&T Contractor’s worker) <p>Passport of the foreign workers were kept by the management where it stated in the employment contract Clause 20 for safety purpose. The workers had signed on the contract.</p>	<p>Complied</p>
<p>6.12.2</p> <p>Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –</p>	<p>No contract of substitution was noted.</p>	<p>Complied</p>
<p>6.12.3</p> <p>Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -</p>	<p>Equal opportunity policy is implemented. No temporary workers. Migrant workers are treated equally as per the locals. They will be provided with free housing and medical assistance as what locals have.</p>	<p>Complied</p>
<p>Criterion 6.13: Growers and millers respect human rights.</p>		

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Criterion / Indicator	Assessment Findings	Compliance	
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	IOI Corporation Berhad has implemented Sustainability Policy Statement dated 15/12/2014 where they respect and support the Universal Declaration of Human Rights and treat all employees fairly. Besides, the Group also established Respecting Human Rights Policy dated 11/5/2015 signed by the Head of Sustainability. The company will avoid infringing on the human rights of others in the course of its operations. The policy has been briefed to the workers during their induction training.	Complied
<p>Principle 7: Responsible development of new plantings Pamol Kluang Palm Oil Mill Certification unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this annual surveillance. The immature areas are replanted area as verified during site visit. Document reviewed on the land title and area statement of planting cycle confirmed that no new plantings activities since November 2005.</p>			
<p>Principle 8: Commitment to continual improvement in key areas of activity</p>			
<p>Criterion 8.1: Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.</p>			
8.1.1	<p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); <ul style="list-style-type: none"> • Optimising the yield of the supply base. <p>- Major compliance -</p>	<p>The Sustainability Team has developed a continual improvement plan from August 2016 to July 2017 which covered all the operating units in plantation department. The plan as below:</p> <ol style="list-style-type: none"> a. To ensure that only mixtures stated on pesticide labels or in IOI Standard Operating Procedures are used for weeding purposes. This has been covered in Bukit Leelau region, Mamor Estate, Swee Lam Estate, Pamol Barat Estate, Unijaya Estate, Pamol Timur Estate, Kahang Estate and Pamol POM. b. Payslip of the workers will be randomly checked every month to ensure no discrepancies or underpaid wages or unlawful deductions. The team has covered for Merchong, Mekassar, Regent, Sagil, Unijaya, Tambang, Bahau, Gomali, Pamol Timur, Mamor and Kahang estates. 	Complied

Appendix B: Approved Time Bound Plan

No.	Operating Unit	Certification Status	Updated information for Partial (Clause 4.2.4)
1	Pamol POM, Sabah	Recertification completed in 2014	No outstanding issues
2	Sakilan POM	Recertification completed in 2015	No outstanding issues
3	Pamol Kluang POM	Recertification completed in 2015	No outstanding issues
4	Gomali POM	Recertification completed in 2015	No outstanding issues
5	Baturong POM	Recertification completed in 2015	No outstanding issues
6	Bukit Leelau POM	Recertification completed in 2015	No outstanding issues
7	Mayvin POM	Recertification completed in 2015	No outstanding issues
8	Pukin POM	Certified in 2012	No outstanding issues
9	Leepang POM	Certified in 2013	No outstanding issues
10	Syarimo POM	Certified in 2013	No outstanding issues
11	Ladang Sasbah POM	Certified in 2013	No outstanding issues
12	Morisem POM	Certified in 2013	No outstanding issues
13	IOI Pelita , Sarawak	Uncertified – planned 2019 (New certification for IOI-Pelita (Sarawak) is pending resolution of land dispute and RSPO decision. No POM yet)	Settlement discussion and resolution with local community is presently still on-going. RSPO has been briefed on the 17 September 2015 and 27 October 2015 about IOI- Pelita Mediation Plans. There have been 2 meetings between IOI - Pelita and the LTK community since IOI's discussion with RSPO on the 9 November 2015 and another one on 1 December 2015 – where RSPO has attended the latter as an observer together with local expert from Sarawak) Law Professor specializing in the Rights of Indigenous Community) during the discussions. Next meeting dates are planned on 30 December 2015 or 12 January 2016 subject to receiving confirmation from all parties.
14	Unico POM-1, Sabah	Uncertified – Planned 2018 (Acquired in 2014. OP was planted before 2005. Supply base do consist of external / independent smallholders)	Certification preparation in progress. Delay is expected due to further monitoring of implementation of RSPO requirements with regards to the external FFB suppliers. Therefore, the external audit has been planned in 2018
15	Unico Desa POM-2, Sabah	Uncertified – Planned 2017 (Acquired in 2014. OP was planted before 2005. Supply base comprise of own supply base only).	Certification preparation in progress.
16	PT SKS, Indonesia	Uncertified – Planned 2016 (Acquired in 2009 - new concession land). POM was commission in February 2015 and Governmental (HGU): "Hak Guna Usaha" application in progress.	Certification preparation in progress. Delay expected on the HGU. Note: NPP issue was considered resolved in May 2012 via letter from RSPO.

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17	PT BNS, Indonesia	Uncertified – Planned 2017 (Acquired in 2009 - new concession land). POM was commission in February 2015 and Governmental (HGU): "Hak Guna Usaha" application in progress.	Certification preparation in progress. Pending the issuance of HGU.
18	PT BS, Indonesia	Uncertified – Planned 2019 (Acquired in 2009 - new concession land). No POM yet. Governmental (HGU): "Hak Guna Usaha" application in progress.	Certification preparation in progress. Pending the issuance of HGU. NPP for on-going planting was completed and posted on RSPO website. Note: Discussion with RSPO on compensation for the accidentally cleared HCV is in progress. The alternative option of rehabilitation and restoration is also being planned.
19	PT KPAM, Indonesia	Uncertified – Planned 2020 (Acquired in 2010 - new concession land). No POM planned yet. Re-application of expired Governmental "izin lokasi" in progress and development planned in 2017.	HCV assessment completed. SEIA in progress. NPP notification will be follow once the HCV and SEIA assessments reports are completed and reviewed. Earliest expected in 2017.

Appendix C: Certification Unit RSPO Certificate Details

IOI Corporation Berhad
Pamol Plantations Sdn Bhd
Pamol Kluang Palm Oil Mill
P.O. Box 1 86007
Kluang, Johor, Malaysia
Website : www.ioigroup.com
RSPO membership number: 2-0002-04-000-00

BSI RSPO Certificate No. : RSPO 547027
Date of Initial Certificate Issued: 16/03/2010
Date of Expiry: 15/03/2020
Applicable Standards: RSPO P&C MYNI-2014; RSPO Supply Chain Certification Standard November 2014 Module D – CPO Mills: Identity Preserved)

Pamol Kluang Palm Oil Mill and Supply Base					
Location Address	Pamol Kluang Palm Oil Mill, P.O. Box 86007 Kluang, Johor, Malaysia				
GPS Location	103° 23' 32.5" E ; 2° 06' 39.49" N				
CPO Tonnage Total	55,636.25 mt				
PK Tonnage Total	13,021.25 mt				
CPO Claimed for Certification*	55,636.25 mt				
PK Claimed for Certification *	13,021.25 mt				
Own estates FFB Tonnage	236,750.00 mt				
Scheme Smallholder FFB Tonnage	-				
Estates	Production Area		Other use (ha)	Certified Area / Total land lease (ha)	Annual FFB Production (mt)
	Mature (ha)	Immature (ha)			
Pamol Timur Estate	1,571.00	532.00	201.24	2,304.24	33,235.00
Pamol Barat Estate	1,278.00	882.00	153.98	2,313.98	21,975.00
Mamor Estate	2,074.00	0.00	151.48	2,225.48	57,678.00
Unijaya Estate	865.00	307.00	<89.50	1,260.50	25,682.00
Kahang Estate	2,278.00	0.00	<143.00	2,420.00	69,680.00
Swee Lam Estate	1,066.00	183.00	<37.00	1,285.00	28,500.00
TOTAL	9,132.00	1,904.00	<776.20	11,809.20	236,750.00

Appendix D: Assessment Plan

Date	Time	Subjects	Hu NS	Hidhir	Hafri	Daniel (Observer)
Monday 19/12/2016	AM	Audit team traveling to site	√	√	√	√
	PM	Stakeholder consultation (Government Authorities)	√	√	√	√
Tuesday 20/12/2016 Pamol Kluang Palm Oil Mill	0830 - 0900	Opening Meeting <ul style="list-style-type: none"> Opening presentation by Audit Team Leader Confirmation of assessment scope and finalize audit plan (including stakeholder's consultation) 	√	√	√	√
	0900 - 1200	Pamol Kluang Palm Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	√	√	√	√
	1000 - 1100	Meeting with stakeholders (village rep, smallholders, Union Leader, contractor etc)	√	√	√	√
	1200 -1300	Lunch	√	√	√	√
	1300 - 1630	Pamol Kluang Palm Oil Mill Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc Verify previous nonconformities	√	√	√	√
	1630 -1700	Interim Closing briefing	√	√	√	√
Wednesday 21/12/2016 Mamor Estate	0830 - 1200	Mamor Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc	√	√	√	√
	1200 -1300	Lunch	√	√	√	√
	1300 - 1630	Mamor Estate (Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√	√

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Date	Time	Subjects	Hu NS	Hidhir	Hafri	Daniel (Observer)
	1630 - 1700	Interim Closing briefing	√	√	√	√
Thursday 22/12/2016 Kahang Estate	0830 - 1200	Kahang Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√	√
	1200 - 1300	Lunch	√	√	√	√
	1300 - 1630	Kahang Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√	√
	1630 - 1700	Interim Closing Briefing	√	√	√	√
Friday 23/12/2016	0830 – 0930	Prepare for closing meeting	√	√	√	√
	0930 – 1030	Closing meeting	√	√	√	√
	AM	Audit team traveling back to KL	√	√	√	√

Appendix E: Stakeholders Contacted

Internal Stakeholders

Pamol Kluang Mill	Mamor Estate	Kahang Estate
Mill manager and staffs Clinic/hospital assistants Union and Gender Representative Foreign worker representative	Estate manager and staffs Field supervisor/mandore Harvesters Sprayers Union and Gender Representative Foreign worker representative	Estate manager and staffs Field supervisor/mandore Harvesters Sprayers Union and Gender Representative Foreign worker representative

External Stakeholders

Government Departments	NGOs and others	Local Communities
Labour Department Department of Forestry	National Union of Plantation Workers - Kluang Branch Contractors Suppliers	Village representative

Appendix F: CPO Mill Supply Chain Assessment Report (Module D: Identity Preserved)

Requirements	Compliance
D.1 Definition	
<p>D.1.1 A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from its own supply base certified to the RSPO Principles and Criteria (RSPO P&C). 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. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. If a mill processes certified and uncertified FFB without physically separating the material then only Module E is applicable.</p>	<p>The Pamol Kluang mill only receives certified FFB. Therefore qualifies for the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products</p>
D.2 Explanation	
<p>D.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil 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 estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p>
<p>D.2.2 The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>	<p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>
D.3 Documented procedures	
<p>D.3.1 The site 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:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements in these requirements;</p> <p>b) 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 to demonstrate awareness of the site’s procedures for the implementation of this standard.</p>	<p>Latest written documented procedures The details include all elements of the Supply Chain for controlling the receipt, sale and dispatch of palm products. Refer to revised SOP , SCFFB, CSPO & CSPK Traceability System for Estate/Farms, Palm Oil Mill, Warehouse and Trading Companies, RSPO/SOP/COC/2, issue:5 dated 5th October 2016 for the chain of custody is with Identity Preserved (IP) model covering all the RSPO Supply Chain Certification Standard and Traceability for handling certified and non-certified FFB. This developed based on the RSPO SCCS 21 November 2014. The previous SOP was for SG. The mill manager has the responsibility to ensure implementation assisted by the on-site compliance executive.</p> <p>The IP model is used because only certified FFB from own supply base. The mill manager and assistant manager have awareness of the supply chain system eventhough the system being monitored by marketing personnel in HQ. The manager has overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements.</p>
<p>D.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	<p>Pamol Kluang Palm Oil mill has documented procedures (as per above in D 3.1) for the incoming FFB, processing and outgoing palm products (CPO and PK).</p>

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	The procedure covers receiving and processing certified and non-certified FFBs
D.4 Purchasing and goods in	
D.4.1 The site shall verify and document the tonnage and sources of certified and non-certified FFBs received.	Similar to last assessment daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit. Pamol Kluang mill have system to verify at the weighbridge.
D.4.2 The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	Overproduction of FFB recorded for the period of December 2015 to November 2016. Certificate volume : 203, 841 mt Actual FFB volume received: 214,478.59 mt Overproduction : 10,637.59 mt Thus, major NC was issued.
D.5 Record keeping	
D.5.1 The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis	All the inventory records are maintained and updated on daily basis and monthly report shows monthly inventory. Computerized system in place. No PKO and Palm kernel meal at Pamol Kluang Palm Oil mill. PK is sold to external independent kernel crushing plants. Daily records are prepared at the entry point at the weighbridge. Daily summary and three-monthly summary documented for all the FFB received. Records of certified FFB received verified during annual surveillance. Records verified by internal and external audit
D.6 Processing	
D.6.1 The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept segregated from non- certified material including during transport and storage.	During this assessment it was confirmed that only certified source of FFB from own plantation is processed. This ensures that there is no possibility of mixing during processing. No non-certified FFB received.
D.6.2 The objective is for 100 % segregated material to be reached.	Processing and storage records can trace back to only certified segregated FFB and finish product (CPO and PK) through traceability records such as weighbridge records. This ensures that 100% segregated materials are reached.

Actual Certified Palm Production – December 2015 – November 2016 (ASA2 1)

Mill	Processing Capacity	CPO	PK
Pamol Kluang Palm Oil Mill	60 mt/hr	32,557.97 mt	7,000.98 mt

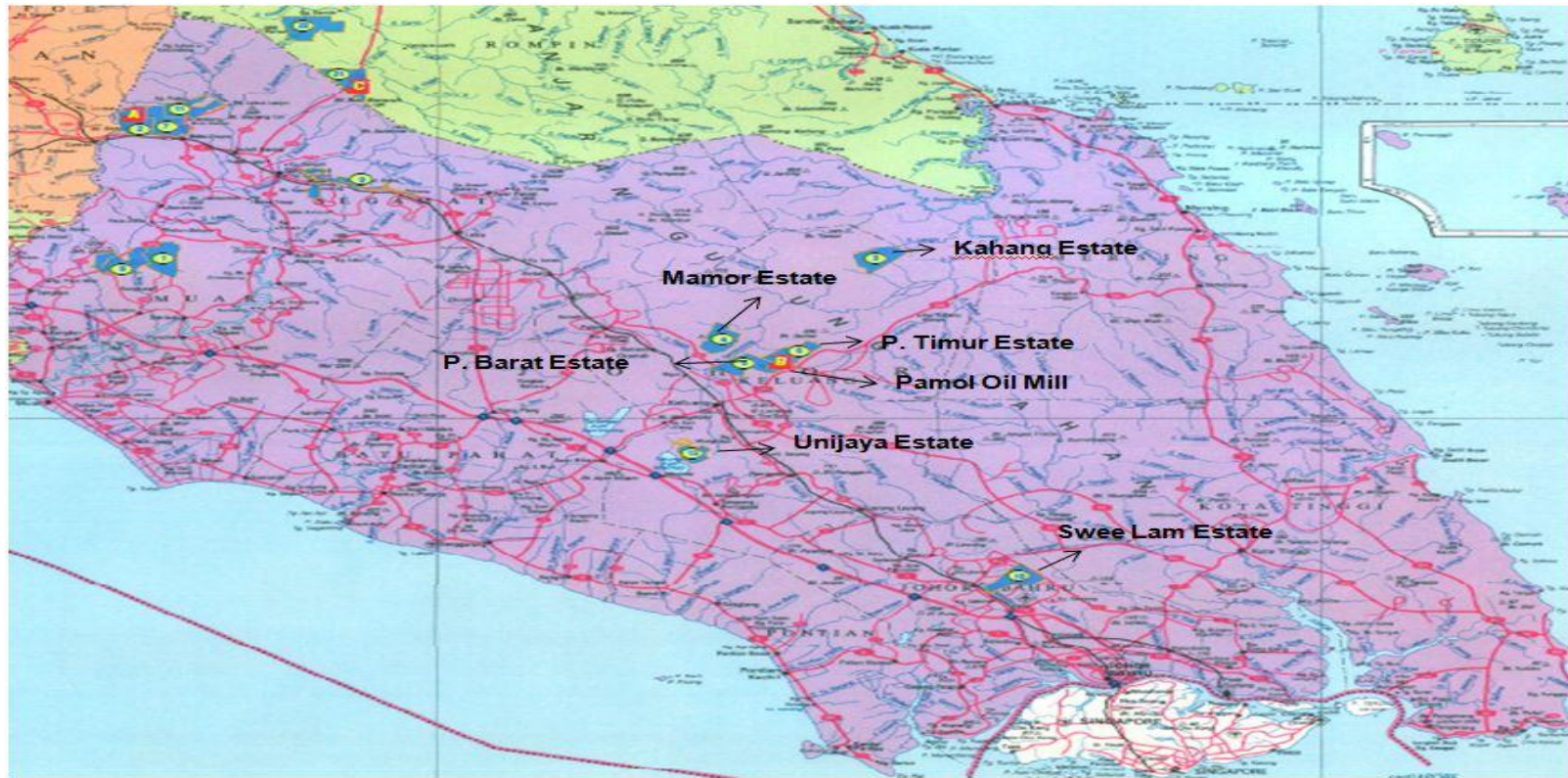
Actual Sales of Certified Palm Products – December 2015 – November 2016 (ASA2 1)

Mill	CPO (Certified)	PK (Certified)	Remarks
Pamol Kluang Palm Oil Mill	25,797.42MT	7000.98MT	All CSPK is sold as credits under the GreenPalm system (CPKO sold in GP = 3220.45MT)

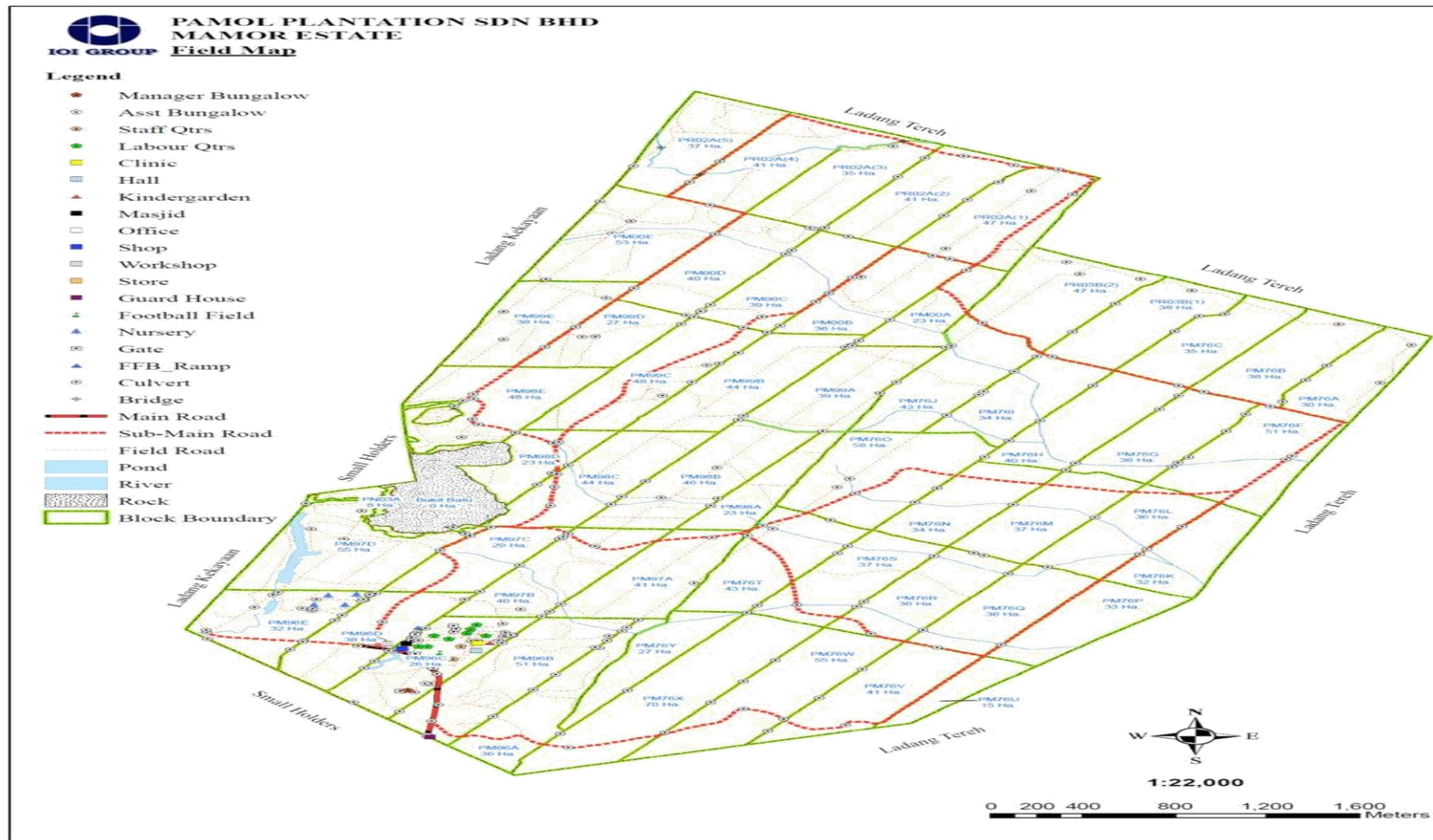
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Month	Certified Supply Base (from own certificate scope) (mt)						Total FFB/Month (mt)
	Pamol Timur Estate	Pamol Barat Estate	Mamor Estate	Unijaya Estate	Swee Lam Estate	Kahang Estate	
Dec 2015	1,595.59	2,272.09	3,807.75	1,195.85	1,659.47	5,921.65	16,452.4
Jan 2016	1,566.65	1,865.83	3,134.00	8,36.09	1,303.23	3,394.69	12,100.49
Feb 2016	1,799.06	2197.97	2,978.06	1,084.90	1,399.02	2,760.78	12,219.79
Mar 2016	2,116.51	2,826.20	3,001.83	1,017.59	1,522.49	2,680.52	13,165.14
Apr 2016	2,051.00	2,373.73	3,202.85	1,319.27	1,512.21	3,101.46	13,560.52
May 2016	2,585.42	2,722.66	3,304.24	1,464.94	1,566.79	4,325.30	15,969.35
June 2016	3,147.38	2,892.06	4,071.51	2,066.93	2216.06	5,574.05	19,967.99
July 2016	3,440.44	3,011.00	4,789.47	2,316.85	2,421.88	6,147.98	22,127.62
Aug 2016	3,366.47	2,533.17	5,489.81	2,295.24	2,380.77	6,919.48	22,984.94
Sept 2016	3,336.28	2,334.78	5,642.84	2,433.35	2,565.78	7,411.26	23,724.29
Oct 2016	2,618.25	2,200.46	4,904.07	2,064.20	2,269.84	7,831.38	21,888.2
Nov 2016	2,471.98	2,122.62	5,319.98	1,800.24	2,255.41	6,347.63	20,317.86
Total	30,095.03	29,352.57	49,646.41	19,895.45	23,072.95	62,416.18	214,478.59

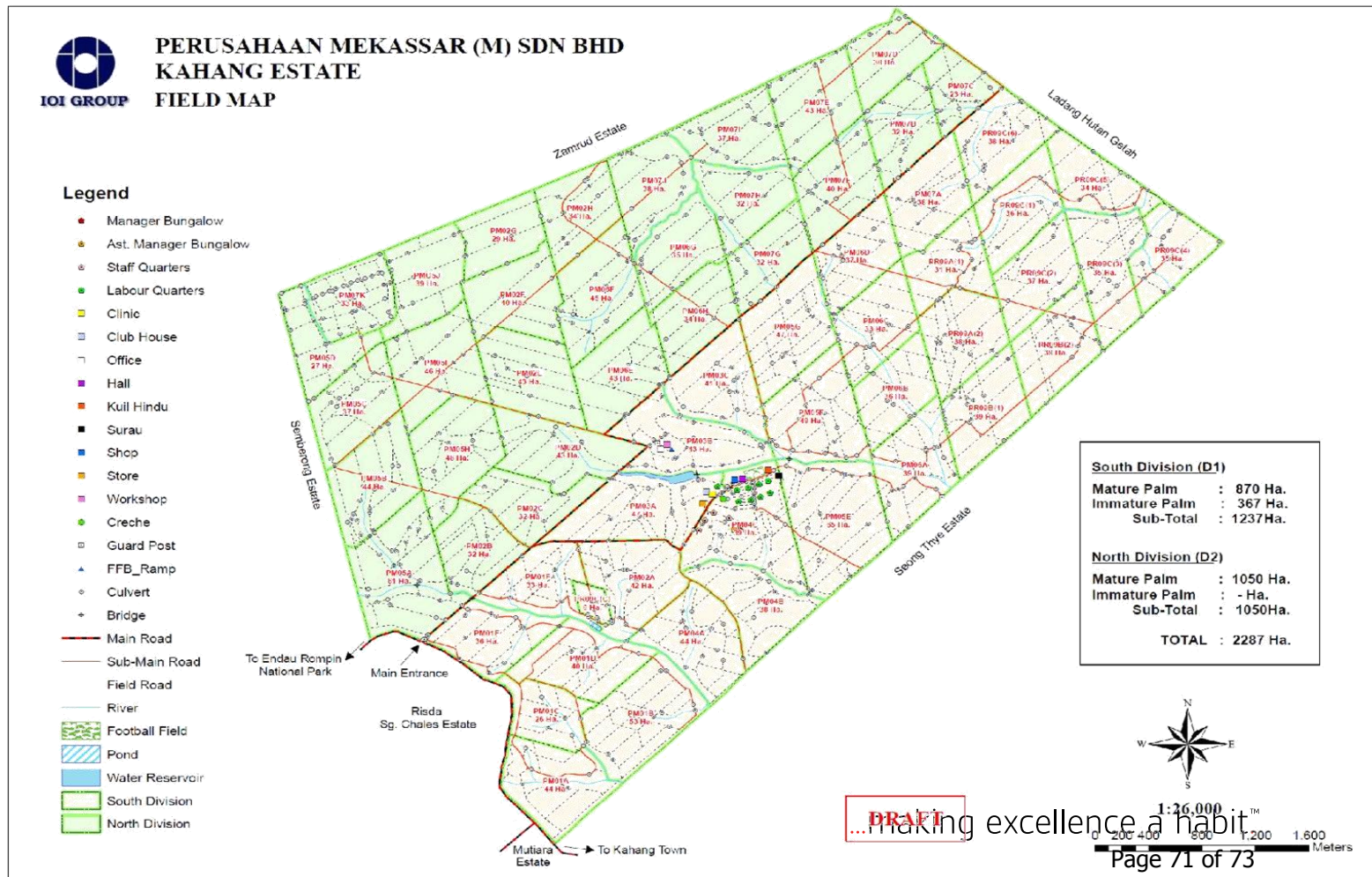
Appendix G: Location Map of Pamol Kluang Palm Oil Mill Certification Unit and Supply bases



Appendix H: Mamor Estate Field Map



Appendix I: Kahang Estate Field Map



Appendix J: List of Smallholder Sampled

- Not applicable -

Appendix K: List of Abbreviations Used

ASA	Annual Surveillance Assessment
BOD	Biological Oxygen Demand
CHRA	Chemical Health Risk Assessment
CIP	Continual Improvement Plan
CPO	Crude Palm Oil
DOE	Department of Environment
DOSH	Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
EIA	Environmental Impact Assessment
EMS	Environmental Management System
ERP	Emergency Response Plan
FFB	Fresh Fruit Bunch
HCV	High Conservation Value
HIRARC	Hazard Identification, Risk Assessment and Risk Control
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
JTK	Jabatan Tenaga Kerja
KER	Kernel Extraction Rate
MPOA	Malaysian Palm Oil Association
MPOB	Malaysian Palm Oil Board
MSDS	Material Safety Data Sheet
MSPO	Malaysian Sustainable Palm Oil
MY-NI	Malaysian National Interpretation
NGO	Non Governmental Organisation
OER	Oil Extraction Rate
OSH	Occupational Safety & Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RED	Renewable Energy Directive
RSPO	P&C Roundtable on Sustainable Palm Oil Principle & Criteria
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SHO	Safety and Health Officer
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
TBP	Time Bound Plan
WTP	Water Treatment Plant