

**MALAYSIAN SUSTAINABLE PALM OIL
- ANNUAL SURVEILLANCE ASSESSMENT 1
Public Summary Report**

IOI Corporation Berhad
Client company Address: IOI Plantation Services Sdn Bhd Level 8, Two IOI Square, IOI Resort 62502 Putrajaya, Malaysia
Certification Unit: Pamol Kluang Palm Oil Mill & estates Location of Certification Unit: 8 1/2 Miles, Jalan Mersing Road, 86007 Kluang Johor Darul Ta'zim, Malaysia

Report prepared by:
Elzy Ovktafia (Lead Auditor)

Report Number: 9673659

Assessment Conducted by:
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Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
MPOB License	Pamol Kluang POM: 500040104000 (Validity: 1/4/2019 - 31/3/2020) Pamol Timur Estate: 504178602000 (Validity: 1/6/2019 - 31/5/2020) Pamol Barat Estate: 504177802000 (Validity: 1/6/2019 - 31/5/2020) Mamor Estate: 511691002000 (Validity: 1/4/2019 - 31/3/2020) Unijaya Estate: 504524202000 (Validity: 1/8/2019 - 31/7/2020) Kahang Estate: 502165302000 (Validity: 1/2/2019 - 31/1/2020 & 1/2/2020 - 31/1/2021) Swee Lam Estate: 617329002000 (Validity: 1/5/2019 - 30/4/2020)		
Company Name	Pamol Kluang Palm Oil Mill		
Address	8 1/2 Miles, Jalan Mersing Road, 86007 Kluang, Johor Darul Ta'zim, Malaysia		
Group name if applicable:	IOI Corporation Berhad – IOI Plantation Services Sdn Bhd		
Subsidiary of (if applicable)	Pamol Plantations Sdn Bhd		
Contact Person Name	Mr Mohd Saidani bin Dandan Satia		
Website	www.ioigroup.com	E-mail	pmm@ioigroup.com
Telephone	+603-89478888 +607-787 5171	Facsimile	03-8947 8888

1.2 Certification Information			
Certificate Number	Pamol Kluang Palm Oil Mill : MSPO 700801 Pamol Kluang Estates : MSPO 700802		
Issue Date	31/12/2018	Expiry date	31/12/2023
Scope of Certification	Mill: Production of Sustainable Palm Oil and Palm Oil Products Estate: Production of Sustainable Oil Palm Fruits		
Stage 1 Date	N/A		
Stage 2 / Initial Assessment Visit Date (IAV)	26-29/11/2018		
Continuous Assessment Visit Date (CAV) 1	25-28/11/2019		
Continuous Assessment Visit Date (CAV) 2	-		
Continuous Assessment Visit Date (CAV) 3	-		
Continuous Assessment Visit Date (CAV) 4	-		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date

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RSPO 547027	RSPO P&C MYNI 2014	BSI Services Malaysia Sdn Bhd	15/03/2020
MSPO 720913	MSPO Supply Chain Certification Standard, dated 1 October 2018	BSI Services Malaysia Sdn Bhd	22/12/2024

1.3 Location of Certification Unit

Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of the site office	
		Longitude	Latitude
Pamol Kluang Palm Oil Mill	Pamol Kluang Oil Mill, Jalan Kluang-Mersing, 86000 Kluang, Johor, Malaysia	103° 23' 32.25" E	2° 6' 39.49" N
Pamol Timur Estate	Pamol Timur Estate, Jalan Kluang-Mersing, 86000 Kluang, Johor, Malaysia	103° 23' 08.3" E	2° 6' 43.01" N
Pamol Barat Estate	Pamol Barat Estate, Jalan Kluang-Paloh, 86000 Kluang, Johor, Malaysia	103° 20' 38.0" E	2° 6' 46.9" N
Mamor Estate	Mamor Estate, Jalan Kluang-Paloh, 86000 Kluang, Johor, Malaysia	103° 18' 21.5" E	2° 8' 43.1" N
Unijaya Estate	Unijaya Estate, Batu 5, Sri Lalang, Jalan Batu Pahat, K.B. 511 86009 Kluang, Johor, Malaysia	103° 16' 41.5" E	1° 56' 26.1" N
Kahang Estate	Kahang Estate, Peti Surat 14, 86700 Kahang, Johor, Malaysia	103° 29' 51.83" E	2° 19' 55.73" N
Swee Lam Estate	Swee Lam Estate, K.B. 107, 81000 Kulai, Johor, Malaysia	103° 39' 13.6" E	1° 40' 29.0" N

1.4 Plantings & Cycle

Estate	Age (Years) - ha				
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30
Pamol Timur Estate	192	1459	442	0	0
Pamol Barat Estate	689	1466	0	0	0
Mamor Estate	0	95	1439	540	0
Unijaya Estate	95	581	269	221	0
Kahang Estate	0	364	1914	0	0
Swee Lam Estate	0	497	432	0	169
Total (ha)	976	4,462	4,496	761	169

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1.5 FFB Production (Actual) and Projected (tonnage) - (Nov 18-Oct 19)			
Producer Group	Estimated (Dec 18 – Nov 19)	Actual (Nov 18-Oct 19)	Forecast (Nov 19-Oct 20)
Pamol Timur Estate	33,600.00	43,765.07	44393.00
Pamol Barat Estate	26,875.00	28,796.76	26223.00
Mamor Estate	62,687.00	59,351.99	60964.00
Unijaya Estate	29,850.00	25,472.91	25342.00
Kahang Estate	72,640.00	69,185.30	62637.00
Swee Lam Estate	26,280.00	29,136.45	26950.00
Total	251,932.00	255,708.08	246,509.00

1.6 Certified CPO / PK Tonnage			
Mill	Estimated (Dec 18 – Nov 19)	Actual (Nov 18-Oct 19)	Forecast (Nov 19-Oct 20)
Pamol Kluang Palm Oil Mill 60 MT/hr	FFB	FFB	FFB
	251,932.00	255,708.08	246,509.00
	CPO (OER: 23.50 %)	CPO (OER: 24.17%)	CPO (OER: 23.50%)
	59,204.02	61,806.99	57,929.62
	PK (KER: 5.00 %)	PK (KER: 4.70%)	PK (KER: 4.75%)
	12,596.60	12,026.715	11,709.18

1.7 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Pamol Timur Estate	2,093.00	7.19	195.92	2,296.11	91.15
Pamol Barat Estate	2,155.00	9.37	145.95	2,310.32	93.28
Mamor Estate	2,074.00	44.26	107.22	2,225.48	93.19
Unijaya Estate	1,166.00	7.63	86.87	1,260.50	92.50
Kahang Estate	2,278.00	9.29	132.61	2,419.90	94.14
Swee Lam Estate	1,098.00	11.45	51.51	1,160.96	94.58
Total	10,864.00	89.19	720.06	11,673.27	93.07

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Note: The HCV identification revision has been made where its include more streams and riparian reserves based on RSPO Manual on Best Management Practices (BMPs) for the Management and Rehabilitation of Riparian Reserves, Endorsed by the RSPO Biodiversity and High Conservation Values Working Group on 04/04/17.

1.8 Details of Certification Assessment Scope and Certification Recommendation:

BSI Services Malaysia Sdn Bhd has conducted the Initial Certification Assessment of IOI Pamol Kluang Palm Oil Mill, located in Kluang, Johor comprising 1 mill and 6 estates and infrastructure.

The assessment was conducted onsite to assess the compliance of the certification unit against the MS 2530-3:2013 MSPO Part 3: General principles for oil palm plantations and organized smallholder and MS 2530-4:2013 MSPO Part 4: General principles for palm oil mills.

The onsite assessment was conducted on 25-28/11/2019.

Based on the assessment result, Pamol Kluang Palm Oil Mill and supply bases complies with the MS 2530-3:2013 MSPO Part 3: General principles for oil palm plantations and organized smallholder and MS 2530-4:2013 MSPO Part 4: General principles for palm oil mills and recommended for certification.

Section 2: Assessment Process

Certification Body:

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BSI is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems.

Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from 25-28/11/2019. The audit programme is included as Appendix A. The approach to the audit was to treat the IOI Pamol Kluang Palm Oil Mill & supply bases as a MSP0 Certification Unit. 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. MS 2530-3:2013 MSP0 Part 3: General principles for oil palm plantations and organized smallholder and MS 2530-4:2013 MSP0 Part 4: General principles for palm oil mill 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 estates or smallholders sample were determined based on formula $N = 1.0\sqrt{y}$ where y is the number of estates while when applicable, the smallholders sample were determined following the MSP0 Certification Requirement. The sampling of smallholders were based on the formula $(1.0\sqrt{y}) \times (z)$; where 1.0 is the risk factor (may defer to 1.2 and 1.4 depending on risk), where y is total number of group members and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix C.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the MSP0 requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings. Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix B. The assessment findings for the initial assessment are detailed in Section 4.2. This report is structured to provide a summary of assessment finding as attached in the Section 3. The assessment was based on random samples and therefore nonconformities may exist that have not been identified. This report was externally reviewed by MSP0 approved Peer Reviewer prior to certification decision by BSI. The comments made by external stakeholders were also taken into account in the assessment where the stakeholder notification was made through BSI website: <https://www.bsigroup.com/en-MY/RSP0-MSP0-Certification/MSP0-clients-and-reports1/>

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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 / Plantation / Group smallholders)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Pamol Kluang Palm Oil Mill	√	√	√	√	√
Pamol Timur Estate	√		√		√
Pamol Barat Estate	√		√		√
Mamor Estate		√		√	
Unijaya Estate	√		√		√
Kahang Estate		√		√	
Swee Lam Estate		√		√	

Tentative Date of Next Visit: November 23, 2020 – November 26, 2020

Total No. of Mandays: 8 mandays

BSI Assessment Team:

Elzy Ovktafia - Lead Assessor

She graduated from Universiti Putra Malaysia in Diploma of Agriculture while Licentiate Diploma and Advanced Diploma from the Incorporated Society of Planters. She involve in audits and technical reviews works mainly for Sustainability Programme includes RSPO and MSPO for more than 3 years in more than 11 countries. She is a qualified Lead Auditor/Auditor for MSPO, RSPO P&C, RSPO NEXT, RSPO SCC, ISO 9001:2015, ISO 14001:2015 and Social Compliance Audit by Verite. Prior to that, she was the Agronomist in R&D Department for 5 years in Oil Palm Plantation where her task involved in all Oil Palm Plantation Operations such as conducting experimental trials on Research & Development with technical paper publications, Crop Forecast, Leaf & Soil Sampling Collection, Fertilizer Recommendation, Pest and Diseases Training, Quality Control as well as special project namely Yield Intensification Project and Food for Palm Project for estates. During assessment, she covers the legal issues, land use rights, stakeholder consultation, worker’s welfare and social issues.

Daniel Francis – Team Member

Daniel Francis is a fulltime employee with BSI Services Malaysia. He holds a Bachelor of Applied Science Degree in Food Science, graduated from Charles Sturt University, Australia. He has over 8 years of working experience in the oil and gas industry and 3 years in the food & beverage industry. He is an experienced auditor for several management system standards including ISO 9001, ISO 14001, OHSAS 18001 and Integrated Management System. He had completed the ISO 9001:2015 Lead Auditor Course and RSPO SCC Lead Auditor Course. He had been involved in the RSPO & MSPO audits with various companies in Malaysia. During assessment, he covers the legal issues and occupational safety and health.

Accompanying Persons: -

Section 3: Assessment Findings

3.1 Details of audit results

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

- MSPO MS 2530-2:2013 – General Principles for Independent Smallholders
- MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders
- MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills

3.2 Details of Nonconformities and Opportunity for improvement

Finding Reference	1855284-201911-M1	Certificate Reference	MSPO 700801
Certificate Standard	MS 2530:2013 Part-4	Clause	4.3.1.1 (Part 4)
Category	Major		
Area/Process:	IOI Pamol Kluang POM & Supply Bases		
Statement of non conformance:	Some of legal compliance in Kluang POM is not effectively implemented.		
Clause requirements	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.		
Objective Evidence	<p>In Pamol Kluang POM, it was found out that K. Sunthara Devi (Weighbridge Operator) has worked overtime after 10 pm as below:</p> <p>September 2019:</p> <ol style="list-style-type: none"> 1. 17/09/2019: 6.30 AM – 10.55 PM 2. 22/09/2019: 6.31 AM – 10.40 PM 3. 27/09/2019: 6.28 AM – 11.14 PM 4. 30/09/2019: 6.29 AM – 12.18 AM <p>June 2019:</p> <ol style="list-style-type: none"> 1. 10/06/2019: 6.41 AM – 11.12 PM 2. 24/06/2019: 6.25 AM – 10.45 PM <p>January 2019:</p> <ol style="list-style-type: none"> 1. 01/01/2019: 6.41 AM – 11.09 PM 2. 26/01/2019: 6.48 AM – 10.57 PM <p>According to JTK Permit: Pengecualian Daripada Sekatan Kerja Malam Bagi Pekerja-</p>		

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	<p>Pekerja Wanita Di Bawah Seksyen 34 Akta Kerja 1955, dated 15/03/2019, the management need to provide the shift allowance for the female worker and she must be given continuous 11 hours break before start to work again.</p> <p>Verification been made during interview session with K. Sunthara Devi, her pay slips for Jan, June and Sept 2019 as well as the employment contract seen, there is no evidence of the shift allowance been provided from the employer and she worked at 6.30 am on the next day (6-8 hours break only).</p> <p>It is crossed reference with the JTK Kluang Officer (Mr. Rahim) on telephone conversation on 28/11/2019, the shift allowance is applied for all types of job including shift or overtime, as long as the female worker worked at nightshift after 10 pm.</p>
<p>Cause</p>	
<p>i) Not receiving 11 hours continuous rest The normal working hours for K. Sunthara Devi are from 7.00am to 4.00pm. However, she worked without 11 hours of continuous rest on the days mentioned above when the male weighbridge operator who is supposed to work from 2.00pm to end of shift suddenly takes emergency leave/medical leave. As there are no other persons to replace him, K. Sunthara Devi has to work until the end of the shift sometimes until 11.00pm (end of shift). As she reports for work at 7.00am on the next day, she only has about 8 hours continuous rest.</p> <p>ii) Not receiving shift allowance The employee in question was not given shift allowance because she was replacing the other weighbridge operator and the extra hours worked were calculated and paid as Overtime Work</p>	
<p>Correction/containment</p>	
<p>i) Not receiving 11 hours continuous rest The mill management has immediately arranged for K. Sunthara Devi to only work on day shift (7.00am to 4.00pm). Another staff who was previously working as weighbridge operator is kept on standby to take over the duties in case the afternoon shift operator suddenly takes leave on short notice. This is to ensure that K. Sunthara Devi has at least 11 hours continuous rest.</p> <p>ii) Not receiving shift allowance The shift allowance which was unpaid for a total of 11days (RM51.70) was paid to K. Sunthara Devi on 24th December 2019 via Petty Cash voucher No. PMM 7940 (see Appendix 1). This amount will be shown in K. Sunthara Devi's January 2020 payslip.</p>	
<p>Corrective action</p>	
<p>i) Not receiving 11 hours continuous rest Mill management is actively looking to recruit an additional employee for the weighbridge operations. With 3 employees, mill management will rotate them on shift basis to ensure that all employees get adequate rest as per JTK requirement.</p> <p>ii) Not receiving shift allowance Mill management is paying shift allowance for all second shift/evening shift work effective immediately.</p>	
<p>Assessment Conclusion</p>	
<p>Audit team have reviewed the evidence submitted on 21/02/2020 and the major NC is satisfactorily closed on 21/02/2020. Continuous implementation of corrective action taken will be further verified in the next assessment visit.</p>	

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Evidence reviewed:

1. Agreement on shift allowance payment.
2. Payable of Shift Allowance K Sunthara Devi.
3. K. Sunthara Devi's January 2020 Payslip
4. Offer letter for newly recruited weighbridge operator.
5. Agreement on day shift arrangement for K. Sunthara Devi dated 01/12/2019.
6. Memorandum of CA Between IOI Group of Companies and NUPW for Palm Oil Mill Employees, 2020.
7. IOI Group of Companies-AMESU Agreement 2018.

Finding Reference	1855284-201911-M2	Certificate Reference	MSPO 700801
Certificate Standard	MS 2530:2013 Part-3	Clause	4.3.1.1 (Part 3)
Category	Major		
Area/Process:	MSPO MS:2530 - Part 3		
Statement of non conformance:	Compliance to the applicable national laws and regulations was not effectively implemented.		
Clause requirements	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.		
Objective Evidence	In Kahang Estate, there is no evidence of an approval from the Energy Commission for constructing or using an electric fence as per the Energy Commission issued directives and circulars on the requirements and methods of installation of electric fences on October 22, 2008 (Circular No. 3/2008).		
Cause			
Estate has misunderstanding regarding the approval of electric fencing installation. Estate management thought that low voltage of current fencing does not need any approval.			
Correction/containment			
As the contractor who installed the electric fencing does not have the necessary competency, the Energy Commission has informed us that they can only approve our application if the fencing is installed by a competent electric fence contractor. Therefore, the estate has decided to dismantle the electric fence pending appointment of a competent contractor and approval from the Energy Commission			
Corrective action			
Estate management has confirmed with the Energy Commission on the requirements and process of obtaining approval to install electric fencing. As they have yet to obtain approval, they have dismantled the fencing for now. They will only reinstall the electric fencing if they obtain approval from the Energy Commission. In future the estate will check on legal requirements before proceeding with any projects Please refer to:			

Appendix 2 – Memo on Uninstall Electric Fencing Kahang Estate
 Appendix 3 – Photos of Uninstallation Electric Fencing in Kahang Estate

Assessment Conclusion

Audit team have reviewed the evidence submitted on 21/02/2020 and the major NC is satisfactorily closed on 21/02/2020. Continuous implementation of corrective action taken will be further verified in the next assessment visit.

Evidence reviewed:

1. Memo on instruction for uninstallation of electric fencing in Kahang Estate.
2. Photos of uninstallation of electric fencing in Kahang Estate.
3. Mechanism for tracking the changes in law.

Noteworthy Positive Comments

- | | |
|---|----------------------------------|
| 1 | Good cooperation among the team. |
| 2 | Good document retrieval. |

3.3 Status of Non-conformities Previously Identified and OFI

There is no non-conformities raised in the previous initial audit.

3.4 Issues Raised by Stakeholders

IS #	Description
1	<p>Issues:</p> <ol style="list-style-type: none"> 1. Contractors informed that operating costs have increased over the past years, but contract price has not increased proportionately. This has led to reduced profit margins. 2. Positive feedback: payments are received within 15 days of date of invoice.
	<p>Management Responses: Negotiation on terms of contracts are handled by the headquarters and is beyond the control of estate management.</p>
	<p>Audit Team Findings: Negotiations where parties agree on the terms of the contract are held between the contractors and the IOI HQ. Once parties agree on the terms, the IOI HQ will prepare the contract. Essentially when the contracts are signed, parties are assumed to have agreed to the contents.</p>
2	<p>Issues: Sundry shop operator at Pamol Barat Estate suggested a rental waiver. Currently the rental is RM150 per month since 2003. This excludes electricity and water bills.</p>
	<p>Management Responses: Management informed that canteen operator has signed a contract with Pamol Barat Estate where the amount of rental is clearly stipulated. The rent has not been increased since 2003. In addition, the Estate also attends to repair works, and the Estate gardener also comes to clean the surrounding area and dispose of rubbish free of charge. Any changes to the payment of rent can only be discussed after the expiry of the existing contract.</p>
	<p>Audit Team Findings: Verified the existence of a valid 2-year contract dated 1 Jan 2018 between Pamol Plantations Sdn Bhd and Lee Hock Yam and Juang Haufor for canteen operation at Pamol Barat Estate. This contract will expire on 31 Dec 2019. The contract also specifies the rental at RM150 per month. There is no provision on rental reduction in the contract.</p>

<p>3</p>	<p>Issues: Sekolah Kebangsaan Pengkalan Tereh comment the positive cooperation given by Pamol Barat Estate. The Estate had, in previous years, been generous in extending financial assistance. However, this has reduced since 2019. For example, in early 2019, the school requested in writing for palm seedlings but has only received a verbal response that the Estate cannot supply as requested.</p> <p>Management Responses: Management of Pamol Barat Estate confirmed that it responded verbally to inform the school that it could not supply the seedlings. Future communications will be done in writing.</p> <p>Audit Team Findings: There is no written response to the school’s request for palm seedlings.</p>
<p>4</p>	<p>Issues: Representative from Kg Pengkalan Tereh informed that:</p> <ul style="list-style-type: none"> a. Pamol Barat Estate used to help to cut the grass at the common field in Kg Pengkalan Tereh. However, this has stopped. Request that the grass mowing re-commence. b. The common access road used by villagers and school is in need of repair. An application to tar the road has been approved, but work has not started. Would like to know when this would be done. c. The Pamol Barat Estate does not seem to enforce its own rules on mandatory use of motorcycle safety helmets via its “Notis Pemakaian Topi Keledar”. Many of the estate workers can be seen riding their motorbikes without safety helmets. d. Request for Pamol Barat Estate to cut grass near Ladang Pakloh. <p>Management Responses:</p> <ul style="list-style-type: none"> a. Grass cutting: There is no fixed schedule for grass cutting. This is only carried out upon request. b. Common road access: This is a government initiative. The Estate has no objection using the access road, but the commencement of road repairs is not within its purview. c. Motorcycle helmet: Training has been given to workers on the rules to wear helmets when riding the motorbike. The Auxillary Police (AP) also conduct checks to enforce the rule. However, maybe the AP may have missed one or two motorcyclists. d. The estate will send someone with a rotor slasher to clear the undergrowth near Ladang Pakloh. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> a. There has been no request for grass cutting from the villagers of Kg Pengkalan Tereh. b. Although the road is within the Pamol Kluang premises, the repair works are not within the Estate’s purview. c. Awareness briefing on the use of motorcycle helmet was done on 22 Feb 2019 by the Assistant Manager at muster ground. This was attended by local and foreign workers of Pamol Barat Estate. d. The estate would arrange for a grass cutter to be sent to clear the undergrowth near Padang Pakloh.

3.5 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1855284-201911-M1	Major	28/11/2019	Closed on 21/02/2020
1855284-201911-M2	Major	28/11/2019	Closed on 21/02/2020

3.6 Summary of the findings by Principles and Criteria

Malaysian Sustainable Palm Oil Part 4: General Principles for Palm Oil Mills.

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	Policy for the implementation of MSPO shall be established. - Major compliance -	IOI Group has the Sustainable Palm Oil Policy signed by Dato’ Lee Yeow Chor, Group Chief Executive Officer and Dr. Surina Ismail, Group Head of Sustainability, revised on March 2018.	Yes
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. - Major compliance -	The policy mentioned that IOI group is committing towards sustainable production of palm oil and its continuous improvement as outlined in the Malaysian Sustainable Palm Oil (MSPO) guidelines.	Yes
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	SOP on Sustainability, SOP 1.7 issue/rev: 1/1, date 03.05.2018. Frequency for audit is conducted regularly based on non-conformances, complexity and maturity of the processes.	Yes
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to	The sustainability, safety & health department (peninsular) has conducted the internal audit on 26.09.2019. There were 7 NCs raised.	Yes

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Criterion / Indicator		Assessment Findings	Compliance
	implement the necessary corrective action. - Major compliance -		
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	The internal audit report is available during the audit and the outcomes were discussed during the management review on 15.11.2019.	Yes
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	Management review has been conducted on 15.11.2019 at Pamol Mill Meeting Room attended by management team representative (6 people). The agenda discussed the results of audits, customer feedback, status of preventive and corrective actions, follow-up actions from management reviews, changes that could affect the management system and recommendations for improvement.	Yes
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company. - Major compliance -	Pamol Kluang POM has establish an action plan for its continuous improvement plan with consideration for both social and environmental impact. There are action plans to achieve it, target to be completed and person in charge appointed accordingly. Among the sampled document reviewed:	Yes

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Criterion / Indicator		Assessment Findings	Compliance
		1. Environmental Impact Assessment – Continuous Improvement Plan (Reviewed on November 2019) 2. Safety & Health Management Plan – Continuous Improvement (Prepared on 21 October 2019) 3. Social Impact Assessment, Management Plans and Continuous Improvement Plans – Continuous Improvement Plan (Reviewed on 12 November 2019)	
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. - Major compliance -	Pamol Kluang POM as a group has a new project namely : 1. Conventional desludging for cooling pond no.1, 2 and 3. 2. Conventional desludging for anaerobic pond no.2, facultative pond no.3 and algae pond no.7. 3. Installation of Biogas plant (expected completion in June 2020).	Yes
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms. - Major compliance -	Management has conducted the annual stakeholder meeting, disseminate the information through website: www.ioigroup.com , establishing the complaint/grievance book for internal complaint and external stakeholder’s file. For stakeholder request, the SOP Stakeholder Request Procedure, SOP 1.0, Appendix 4, issue/rev: 1/0 date 16/01/2018 mentioned the flowchart of the request and SOP for Stakeholder Complaint Procedure SOP 1.0, appendix 5, issue/rev: 1/0 explain the	Yes

Criterion / Indicator		Assessment Findings	Compliance
		complaint process which takes 5 days for action taken by the management.	
4.2.1.2	The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. - Major compliance -	The management able to show the documents during the audit, ie: company policies, communication records, minutes of meeting, internal audit reports, etc.	Yes
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	For stakeholder request, the SOP Stakeholder Request Procedure, SOP 1.0, Appendix 4, issue/rev: 1/0 mentioned the flowchart of the request and SOP for Stakeholder Complaint Procedure SOP 1.0, appendix 5, issue/rev: 1/0 date 16/01/2018 explain the complaint process which takes 5 days for action taken by the management.	Yes
4.2.2.2	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . - Minor compliance -	Management has appointed Mr. Fernandez Samy, Assistant Manager as the Social Liaison Officer as per appointment letter dated 10.11.2017. His responsibility covers welfare and social needs of stakeholders, periodic visits to neighbouring stakeholders, maintenance and monitoring of grievance issues and facilitate feedback mechanism, etc.	Yes
4.2.2.3	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained. - Major compliance -	The stakeholder list November 2019 for Pamol Kluang Palm Oil Mill is available and updated accordingly. The stakeholders comprise of government bodies, non-govt. organization (NGO's), contributing estates/supply base estates, neighbouring villages, suppliers,	Yes

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Criterion / Indicator		Assessment Findings	Compliance
		<p>contractors, transporters, schools, mill management, JCC members and worshipping areas.</p> <p>The latest stakeholder minutes meeting available dated 20.11.2019 (internal) and 13.11.2019 (external). All positive and negative issues captured in the SIA management plan.</p>	
Criterion 4.2.3 – Traceability			
4.2.3.1	<p>The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability.</p> <p>- Major compliance -</p>	<p>IOI group has the SOP title: MSPO Supply Chain – Oil Mill: Segregation (SG), doc. No: MSPOSC/SOP/SG/1, revision: 02 dated 01.09.2019.</p>	Yes
4.2.3.2	<p>The management shall conduct regular inspections on compliance with the established traceability system.</p> <p>- Major compliance -</p>	<p>The traceability of the FFB, PK, CPO and PKO are inspected through the internal audit conducted as per 4.1.2.2</p>	Yes
4.2.3.3	<p>The management shall have identified and assign suitable employees to implement and maintain traceability system.</p> <p>- Minor compliance -</p>	<p>As per SOP title: MSPO Supply Chain – Oil Mill: Segregation (SG), doc. No: MSPOSC/SOP/SG/1, revision: 02 dated 01.09.2019, the mill manager has an overall responsibility and authority over the implementation of the procedure, requirements and compliances with all the applicable MSPO supply chain certification standard (MSPO SCCS). The manager shall be assisted by the assistant managers, engineers and technical executives.</p>	Yes
4.2.3.4	<p>Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.</p>	<p>Pamol Kluang are using millcomp system and SAP to monitor the daily and monthly incoming FFB and outgoing CPO and PKO. During the site visit, it was evident that the system able to show the</p>	Yes

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p>traceability for certified FFB and CPO/PKO. However, the traceability demonstration has been shown through certificate number and certified product.</p> <p>Seen the below samples:</p> <ol style="list-style-type: none"> 1. FFB weighbridge ticket no: FB19003918 dated 24/11/2019, 39,690 kg and supplier: Swee Lam Estate, MSPO Cert No: MSPO 700801. Grading chit: A/C 80000WNSL, Supplier: Swee Lam Estate. FFB consignment note: 894894, date 24/11/2019 field no PM 14C, PM91C and PM10E. 2. PK weighbridge ticket no: PK19000060 dated 11/11/2019, 41,460 kg and customer: Sang Kee Edible Oils Sdn Bhd, MSPO Cert No: MSPO 700801. MSPO supply chain model: SG. CPO & Kernel gate pass no: 40142, dated 11/11/2019, lorry/tanker no: JTF 9828 & TBF125, 4146 MT. Palm Kernel dispatch chit, contract no: 2031000648 	
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	<p>All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.</p> <p>- Major compliance -</p>	<p>Mill continued to comply with legal requirements as per the indicator. Compliance to each applicable law and regulation is monitored by the Operating Units and Sustainability team. The CU had obtained and renewed license and permits as required by the law.</p> <p>The licenses/permit viewed among others were:</p>	Major non-conformity

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Criterion / Indicator		Assessment Findings			Compliance
		No	License / Permit / Regulatory Requirement	Issued date/ Validity Period	
		1	MPOB license no: 500040104000 (288,000mt)	01/04/2019 – 31/03/2020	
		2	DOE license no: 004723 (60 FFB/MT/hr)	01/07/2019 – 30/06/2020	
		3	BAKAJ License no: 08/A/Klg/055; File no: BAKAJ/334/300/05/07/08/18 (1700m3/day)	31/12/2019	
		4	Energy Commission installation no: ST9SJB)P/S/JHR/00128; Serial no: 007320/2019 (3400kW)	10/08/2019	
		5	KPDNKK Diesel permit ref: BPGK JH (KLU) 0273 SK; Serial no: P:J/KLU000058 (18,000L)	28/03/2019 – 27/03/2020	
		6	Competent person CePSWaM – 910709-04-5437	-	
		7	Competent person CePPOME – 850219-01-6711	-	
		<p>The licenses/permit viewed among others were:</p> <ol style="list-style-type: none"> JTK Permit: Pengecualian Daripada Sekatan Kerja Malam Bagi Pekerja-Pekerja Wanita Di Bawah Seksyen 34 Akta Kerja 1955, dated 15/03/2019 for Pamol Kluang POM. 			

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Criterion / Indicator	Assessment Findings	Compliance
	<p>2. JTK Permit: Permohonan had Kerja Lebih Masa Di Bawah Seksyen 60A(4)(a) Akta Kerja 1955, dated 26/02/2019 for Pamol Kluang POM.</p> <p>3. JTK Permit: Potongan Upah Di Bawah Seksyen 24 Akta Kerja 1955 for Potongan Gaji Pekerja bagi Pembayaran Tabungan Kuil sebanyak RM 10.00 dan Masjid sebanyak Rm 10.00 seorang setiap Bulan dated 07 January 2019.</p> <p>4. JTK Permit: Potongan Upah Di Bawah Seksyen 24 Akta Kerja 1955 for Potongan Gaji Pekerja bagi pembayaran bil air setelah ditolak subsidi tidak melebihi RM 5.00 dan bil elektrik setelah subsidi tidak melebihi RM 10.00 bagi setiap Bulan dated 17 February 2019 & & January 2019.</p> <p>However, in Pamol Kluang POM, it was found out that K. Sunthara Devi (Weighbridge Operator) has worked overtime after 10 pm as below:</p> <p>September 2019:</p> <ol style="list-style-type: none"> 1. 17/09/2019: 6.30 AM – 10.55 PM 2. 22/09/2019: 6.31 AM – 10.40 PM 3. 27/09/2019: 6.28 AM – 11.14 PM 4. 30/09/2019: 6.29 AM – 12.18 AM <p>June 2019:</p> <ol style="list-style-type: none"> 1. 10/06/2019: 6.41 AM – 11.12 PM 2. 24/06/2019: 6.25 AM – 10.45 PM 	

Criterion / Indicator		Assessment Findings	Compliance										
		<p>January 2019:</p> <ol style="list-style-type: none"> 1. 01/01/2019: 6.41 AM – 11.09 PM 2. 26/01/2019: 6.48 AM – 10.57 PM <p>According to JTK Permit: Pengecualian Daripada Sekatan Kerja Malam Bagi Pekerja-Pekerja Wanita Di Bawah Seksyen 34 Akta Kerja 1955, dated 15/03/2019, the management need to provide the shift allowance and provide transportation for the female worker who work nightshift. If the female worker wants to come to work by her own, the transportation allowance should be provided. Verification made during interview session with K. Sunthara Devi, her pay slips for Jan, June and Sept 2019 as well as the employment contract seen, there is no evidence of the shift allowance, transportation provision or transportation allowance been provided from the employer. Hence, a Major non-conformity raised.</p>											
4.3.1.2	<p>The management shall list all relevant laws related to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>The Legal Requirement Register was established to cover all legal Acts, Regulations and other requirement related to Pamol Kluang POM.</p> <p>The Legal Requirements Register which was reviewed on 11/06/2019 comprises of the following among others;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Laws/Regulations</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Minimum Wages Order 2016 – wef 02/03/2019</td> </tr> <tr> <td>2</td> <td>Employees Social Security Act 1969 – wef 02/03/2019</td> </tr> <tr> <td>3</td> <td>Occupational Safety and Health Act 1994 – wef 02/05/2019</td> </tr> <tr> <td>4</td> <td>Factories and Machinery Act 1967 – wef 02/05/2019</td> </tr> </tbody> </table>	No	Laws/Regulations	1	Minimum Wages Order 2016 – wef 02/03/2019	2	Employees Social Security Act 1969 – wef 02/03/2019	3	Occupational Safety and Health Act 1994 – wef 02/05/2019	4	Factories and Machinery Act 1967 – wef 02/05/2019	Yes
No	Laws/Regulations												
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4	Factories and Machinery Act 1967 – wef 02/05/2019												

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Criterion / Indicator		Assessment Findings	Compliance
4.3.1.3	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p>	<p>The mechanism used for tracking changes in laws/regulations is made through the following methods;</p> <ul style="list-style-type: none"> a) Subscribed to Lexis-Nexis Malaysia b) News release through daily newspaper. c) Law change tracked by book publisher (MDC Book Publications). d) Circulars from relevant association (eg. MPOA, MPOB, MAPA). e) Internet (e-federal gazette, www.lawnet.com.my, www.e-warta.com.my) <p>The IOI Legal Department from headquarters alerts all operating units on legal updates via email and also through management meetings.</p>	Yes
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.</p> <p>- Minor compliance -</p>	<p>Assistant Manager, Chua Seng Wei is assigned as a Legal Liaison Officer to monitor compliance and to track update the changes in regulatory requirements via an appointment letter dated 10/05/2018. The letter was sighted and verified.</p>	Yes
Criterion 4.3.2 – Lands use rights			
4.3.2.1	<p>The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.</p> <p>- Major compliance -</p>	<p>No land disputes reported at Pamol Kluang POM complexes. It is verified during the stakeholder’s meeting and land titles record.</p>	Yes
4.3.2.2	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land.</p>	<p>Land ownership such as land title and land lease documents is available. There is no changes in the land ownership since the last audit. All the land belongs to IOI.</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	Pamol Kluang POM operates on a land of legal ownership having details of follows: No <i>hak milik</i> 88881 <i>Cukai tahunan</i> RM 200 No Lot: 2429 Luas lot; 4.0974 ha agriculture No plan: 15085 No fail; CLM 722/1928.	
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	Pamol Kluang POM is located in the sister estate i.e. Pamol Timur Estate and separated by means of fencing to demarcate the separation of management.	Yes
4.3.2.4	Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	No land disputes reported at Pamol Kluang POM complexes. It is verified during the stakeholder’s meeting and land titles record.	Yes
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	No land disputes reported at Pamol Kluang POM complexes. It is verified during the stakeholder’s meeting and land titles record.	Yes

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Criterion / Indicator		Assessment Findings	Compliance
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	No land disputes reported at Pamol Kluang POM complexes. It is verified during the stakeholder’s meeting and land titles record.	Yes
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	No land disputes reported at Pamol Kluang POM complexes. It is verified during the stakeholder’s meeting and land titles record. However, management has the SOP for FPIC, SOP 2.0 & 6.0 Appendix 3, Issue/Revision: 1/0, dated 17.01.2017 and Land Use Compensation Procedure, SOP: 2.0 & 6.0 Appendix 5, Issue/Revision: 1/0 dated 17.01.2017.	Yes
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	Pamol Kluang POM has the Social Impact Assessment, management action plans and continuous improvement plans 2015-2020 prepared by sustainability team and approved by Acting Mill Manager in charge on 12.11.2019 (date of 4 th reviewed).	Yes
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	IOI group has the SOP for Stakeholder Complaint Procedure SOP 1.0, appendix 5, issue/rev: 1/0 explain the complaint process which takes 5 days for action taken by the management and Whistleblowing Policy revised October 2019 to provide a transparent and confidential process for dealing with concerns.	Yes

Criterion / Indicator		Assessment Findings	Compliance
4.4.2.2	<p>The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties.</p> <p>- Major compliance -</p>	<p>As per policy, the whistleblowing channels were divided into:</p> <ol style="list-style-type: none"> 1. Email: whistleblowing@ioigroup.com 2. Whistleblowing secretariat-group internal audit, fax to +603-89478958 and Tel: +60389478888 (Ext 8941). 3. In person to the respective Head of Business/Operating Unit, or is head of Human Resource/ 4. In writing to IOI group. 5. Independent Non-Executive Chairman. <p>The complaint/grievances lodged been solved within the timeframe.</p>	Yes
4.4.2.3	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints.</p> <p>- Minor compliance -</p>	<p>Management has keep the complaint/grievance record for internal and external stakeholders. Apart from this, the external stakeholder shared their concerns and complaints through stakeholder's meeting.</p> <p>Sighted the complaint form titled 'breakdown report' used by the workers for the issues raised and grievance book (green book).</p>	Yes
4.4.2.4	<p>Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time.</p> <p>- Minor compliance -</p>	<p>The complaint/grievance method has been communicated through the stakeholders meeting, IOI website and introduction of complaint/grievance book.</p>	Yes
4.4.2.5	<p>Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request.</p>	<p>Complaint records are available since 2007 in the complaint/grievance book.</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
- Major compliance -			
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	<p>Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation.</p> <p>- Minor compliance -</p>	<p>IOI Pamol POM has contribute to local development in consultation with the local communities such as:</p> <ol style="list-style-type: none"> 1. Donation RM 100 for Majlis Anugerah Kecemerlangan 2019 on 17/11/2019 for SK Ladang Pamol. 2. Repair the piping system for SK Ladang Pamol 21/08/2019. 	Yes
Criterion 4.4.4: Employees safety and health			
4.4.4.1	<p>An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>IOI Plantation Occupational Safety, Health and Hygiene Policy has been established dated April 2019 signed by the Plantation Director.</p> <p>Among others the organization expressed commitment to the following;</p> <ol style="list-style-type: none"> i) Complying to all national laws and regulations. ii) Assessing all health and safety risks to work activities iii) Conducting regular inspection at workers houses. iv) Investigating and finding causes of accidents and take appropriate measures to prevent recurrence of such incidents. v) Preparing emergency procedures for major accidents/incidents. <p>An OSH Plan had been established and implemented.</p> <p><u>Baseline & Annual Audiometric Testing</u></p>	Yes

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	<p>Audiometric testing programme was scheduled for 10/12/2019 by Junpec Audiometry and Safety Services was sighted. Total 104 employees will be sent.</p> <p><u>Chemical Health Risk Assessment (CHRA)</u></p> <p>A review CHRA monitoring (Report no: HQ/04/ASS/00/193-2019/043) was conducted on 19 April 2019 by registered assessor, Zakaria Bin Abd Karim (HQ/04/ASS/00/193). Based on the CHRA, 13 findings/recommendations reported.</p> <p><u>Inspection, Testing and Assessment of Local Exhaust Ventilation System (Periodical)</u></p> <p>LEV inspection, testing and examination was conducted on 12/04/2019 by registered assessor Saw Wuan Hwa (HQ/18/JHII/00/00018). The LEV systems installed met the minimum required face velocity and duct transport velocity along the ducting and hoods.</p> <p>Monthly inspection and testing by the Mill management was also conducted and records verified by auditors.</p> <p><u>Airborne Contaminant for Chemical Hazardous to Health Monitoring</u></p> <p>Airborne contaminant for chemical hazardous to health monitoring (report no: IHT(JA)/19-04/14) was conducted on 29/04/2019 by Chai Jian Yeow (HQ/17/JHI/00/00011) of Eurofins NM Laboratory Sdn Bhd. The monitoring exercise has indicated that the exposure level of airbourne contaminants for the selected work areas did not exceed the permissible exposure limit as per DOSH requirement.</p>	

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Criterion / Indicator	Assessment Findings	Compliance																												
<p>4.4.4.2 The occupational safety and health plan should cover the following:</p> <ul style="list-style-type: none"> a) A safety and health policy, which is communicated and implemented. b) The risk of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: <ul style="list-style-type: none"> i. All employees involved are adequately trained on safe working practices; ii. All precautions attached to products should be properly observed and applied; d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements. g) The management shall conduct regular two-way communication with their employees where issues that affect their business 	<p>Safety & Health Management Plan – Pamol Kluang POM (December 2014 – December 2019) last reviewed on 29 October 2019 was available.</p> <ul style="list-style-type: none"> a) IOI Plantation Occupational Safety, Health and Hygiene Policy has been established dated April 2019 signed by the Plantation Director has been communicated and implemented. b) HIRARC for Pamol Kluang POM was reviewed on 05/11/2019. The significant and routine activities were adequately covered with details as follows: <table border="1" data-bbox="1088 770 1877 1070"> <thead> <tr> <th>No</th> <th>Areas/Activities</th> <th>No</th> <th>Areas /Activities</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>General /Visitor</td> <td>7</td> <td>Engine Room</td> </tr> <tr> <td>2</td> <td>Contractor servicing</td> <td>8</td> <td>Product storage /Despatch</td> </tr> <tr> <td>3</td> <td>Sterilizer</td> <td>9</td> <td>Laboratory</td> </tr> <tr> <td>4</td> <td>Threshing</td> <td>10</td> <td>Water treatment</td> </tr> <tr> <td>5</td> <td>Clarification / Oil Room</td> <td>11</td> <td>Effluent Treatment Pond</td> </tr> <tr> <td>6</td> <td>Boiler House</td> <td>12</td> <td>SW store</td> </tr> </tbody> </table> <p>Appropriate risk control measures were determined and implemented for the respective activities and operation. Most of the moving part and rotating machinery were installed with machine guarding and properly covered. Appropriate administrative controls such as safety signage were displayed at all work stations in the mill and estates office and workshop. In general, the control measures were appropriate to the identified risks.</p>	No	Areas/Activities	No	Areas /Activities	1	General /Visitor	7	Engine Room	2	Contractor servicing	8	Product storage /Despatch	3	Sterilizer	9	Laboratory	4	Threshing	10	Water treatment	5	Clarification / Oil Room	11	Effluent Treatment Pond	6	Boiler House	12	SW store	<p>Yes</p>
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Criterion / Indicator	Assessment Findings	Compliance
<p>such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept ant the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>c) Awareness training program was established and workers involved with chemical handling are trained. Chemicals are arranged and segregated accordingly in the chemical store. The CDS/SDS for chemicals available at point of use. In addition to specific training courses, safety briefings given during muster to reinforce awareness, such as correct wearing of PPE.</p> <p>d) Pamol Kluang POM has issued PPE to its employees for their protection at workplace. Records of PPE issued are maintained individually for all the employees. PPE issued to the workers is safety helmets, safety shoes. Special PPE for workers assigned to height, confined space. Safety shoes issued on a 6 monthly basis and recorded. During the site visit the staff/workers were noted to be equipped with their proper attire & PPE. Acknowledgement of receipt was recorded.</p> <p>e) The SOP for chemical handling elaborated in <i>SOP Bab 17 issue no 2</i> dated 01/08/2018. Therein the procedure containing the following;</p> <ul style="list-style-type: none"> a) A trained person to handle chemicals b) PPE adherence during such an activities c) Handlings details before and after are provided. d) Establishment of emergency situation procedures. <p>f) The Mill Manager, Mohammad Saidani Bin Dandan Satia is appointed as the person in charge for safety and environment</p>	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>through a letter dated 10/11/2019, role of which includes areas on safety & health of the staff/workers.</p> <p>g) The Mill Manager is appointed as the Chairman for the ESH committee duties among other to preside the ESH meetings. The appointment letter dated 10/11/2019 signed by the Mill Controller was sighted and verified.</p> <p>The Mill Manager subsequently assigned duties of OSH coordinator to the Assistants/Supervisors for the down line implementation of OSH practices in the mill. The Mill management conduct regular two-way communication with their employees through the quarterly OSH meeting. The minutes of meeting dated 03/01/2019, 03/04/2019, 28/06/2019 and 07/10/2019 respectively were sighted and verified.</p> <p>h) The procedures for accident and emergencies has been established. There is formation of ERP Team & ERP for all the identified incidences. In addition the procedures have been summarised in a chart flow form and displayed for information of all employees in the mill. The organization chart for the ERP team was established and displayed for information of the employees.</p> <p>i) ERT members will receive training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The trainings are conducted by an accredited or qualified organisation who can demonstrate their suitability to</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		<p>provide training. The trained personnel for the First Aid were among the employees working in the mill on shift. The first aid boxes were available at various points in the mill complex including laboratory, office, workshop, process control room etc.</p> <p>j) Records of all accidents kept and reviewed periodically at OSH meetings.</p> <p>The JKPP 8 sent to DOSH on 19/01/2019 showed that in 2018 there were 2 accident cases with a loss 19 workdays. JKPP 7 sent to DOSH on Permanent Standard Threshold Shift (04/01/2019, 14/01/2019, 15/01/2019 & 04/02/2019) and Noise Induced Hearing Loss (16/01/2019 & 31/01/2019). JKPP 6 for accidents that took place on 07/02/2019 (accident on 02/02/2019), 07/05/2019 (accident on 02/05/2019), 22/07/2019 (accident on 19/07/2019) and 31/10/2019 (accident on 30/10/2019) sent to DOSH sighted. The OSH committee had reviewed the HIRARC for any change if necessary.</p>	
Criterion 4.4.5: Employment conditions			
4.4.5.1	<p>The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.</p> <p>- Major compliance -</p>	<p>IOI Group has the Sustainable Palm Oil Policy signed by Dato' Lee Yeow Chor, Group Chief Executive Officer and Dr. Surina Ismail, Group Head of Sustainability, revised on March 2018.</p> <p>Under Human Rights and Workplace, management will respect and uphold the rights of all workers, including contract, temporary and migrant workers, in accordance with the Universal Declaration of</p>	Yes

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Criterion / Indicator		Assessment Findings	Compliance
		Human Rights, the International Labor Organization’s core conventions, United Nations Guiding Principles on Business and Human Rights and the principles of Free and Fair Labor in Palm Oil Production.	
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. - Major compliance -	IOI Group has the Sustainable Palm Oil Policy signed by Dato’ Lee Yeow Chor, Group Chief Executive Officer and Dr. Surina Ismail, Group Head of Sustainability, revised on March 2018. Under Human rights and Workplace, management will provide fair and equal employment opportunities for all employees, regardless of race, nationality, religion or gender. Based on the site visit, there is no discrimination occur within foreign workers and locals as well for the job given.	Yes
4.4.5.3	Management shall ensure that employees’ pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance -	There are 87 workers in Pamol Kluang POM (locals: 40, Indonesian: 4, Indian: 18 and Myanmar: 25). Sampled below workers’ pay slips for Jan, June and Sept 2019 and contracts comply with the Minimum Wage Order 2018 as below: i. Employee ID: 959 ii. Employee ID: 931 iii. Employee ID: 860 iv. Employee ID: 887 v. Employee ID: 876 vi. Employee ID: 855	Yes
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the	There is no contractor’s worker hired in Pamol Kluang POM. All workers are directly employed by Headquarters.	Yes

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Criterion / Indicator		Assessment Findings	Compliance
	employment contract agreed between the contractor and his employee. - Minor compliance -	All sampled workers in 4.4.5.3 has comply with the minimum wage order 2018.	
4.4.5.5	The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment. - Major compliance -	The overtime recorded in the thumb print system with full name, basic wages, work on rest day, public holiday, overtime, public holiday, etc. Sampled workers is as per 4.4.5.3. Wages and period of employment is extracted from Wages Summary on monthly basis by the checkroll clerk.	Yes
4.4.5.6	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records. - Major compliance -	Employment contracts are available and still valid during the audit, it is evident that the contract is also signed by both parties. Sampled workers is as per 4.4.5.3.	Yes
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers. - Major compliance -	The overtime recorded in the thumb print system with full name, basic wages, work on rest day, public holiday, overtime, public holiday, etc. Sampled workers is as per 4.4.5.3.	Yes
4.4.5.8	The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable.	The working hours and breaks are clearly mentioned in the employment contracts as below: Basic wage: RM 42.31/day	Yes

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	Overtime: Maximum 4 hours/day @ RM 7.93/hour. Working Hours: 8 hours/day. Shift hours will be flexible and fix by Employer. Working days: 6 days/week Rest day: one day/week (will be determined by the Employer).	
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance -	Wages and overtime in the pay slips adhered to the minimum wage order 2018 which is RM 1100/month or RM 42.31/day.	Yes
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings. - Minor compliance -	Management has provided the free medical service, free house, subsidize electric rate of RM 5.00/people. Apart from that, there were other social benefits provided such as: 1. VLP (Vacation Leave Pay) in year-end salary. 2. Annual Prayers (Muslim, Buddhist, Hindu and Cristian) (9 Jan 2019). 3. Family Day (26 April 2019).	Yes
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities. - Major compliance -	During site visit, sighted the linesite area are in good condition as per linesite inspection recorded by Hospital Assistant. The housing checking also been conducted on weekly basis. Since the houses were built before the Housing & Amenities Act was produced, company has budgeted to upgrade the residential building for workers (8 units) amounted RM 168,000.00 as seen in the Capital Expenditure Budget 2019-2020 (final).	Yes

Criterion / Indicator		Assessment Findings	Compliance
		Clean water is provided from SAJ with subsidize rate of RM 7.70 while electricity with subsidize rate of RM5.00 is provided by TNB.	
4.4.5.12	<p>The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.</p> <p>- Major compliance -</p>	<p>There is Policy on Harassment at Workplace signed by NB Sudhakaran, Plantation Director in June 2018 mention the grievance channel such as grievance hotline, employee consultative committee, joint consultative committee, gender consultative committee, via email or by post.</p> <p>Apart from that, management also established the Gender Committee Team and sighted the minutes of meeting in 2x/year (29.04.2019 and 12.10.2019). So far no sexual harassment occurred in IOI Pamol Kluang POM.</p>	Yes
4.4.5.13	<p>The management shall respect the right of all employees to form and join trade union and allow workers own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p>	<p>IOI Group has the Sustainable Palm Oil Policy signed by Dato' Lee Yeow Chor, Group Chief Executive Officer and Dr. Surina Ismail, Group Head of Sustainability, revised on March 2018.</p> <p>Under Human rights and Workplace, management will eliminate all forms of illegal, forced, bonded, compulsory or child labor and in particular, follow responsible recruitment practices including not charging recruitment related fees at any stage in the recruitment process, whether by us, our contractors, our agents or their sub-agents in receiving and sending countries.</p> <p>Based on the worker's master list and interview session with stakeholders and workers, there is no child labour hired.</p> <p>Under Human rights and Workplace, management will uphold the right to freedom of association and recognize the right to collective bargaining and allow trade unions to have access to our workers.</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
		Pamol Kluang POM has conducted the Joint Consultative Committee (JCC) with bimonthly basis. Latest minute of meeting sighted was on 16/11/2019 attended by 11 people. All issues raised were solved and captured in the SIA report.	
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. - Major compliance -	Under Human rights and Workplace, management will eliminate all forms of illegal, forced, bonded, compulsory or child labor and in particular, follow responsible recruitment practices including not charging recruitment related fees at any stage in the recruitment process, whether by us, our contractors, our agents or their sub-agents in receiving and sending countries. Based on the workers master list, there is no child labour hired.	Yes
Criterion 4.4.6: Training and competency			
4.4.6.1	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training. - Major compliance -	Pamol Kluang POM Safety and Health program for year 2019 has been established and significantly covers all aspects of the MSPO requirements. The training program also specified the target group of employees to be trained under the allocated subjects. The subjects for the training are issued and assisted by the Sustainability Unit. The following topics included in the training program among others are extracted below; <ul style="list-style-type: none"> a) OSH Act & regulations 1994. b) Environmental Quality Act 1974 c) Induction Program for new workers. d) OSH Committee and function. e) First Aid Training f) Scheduled waste training 	Yes

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> g) RSPO/MSPO/ISCC Principles h) HCV & Biodiversity training. i) Mechanical/electrical workshop j) Process stations SOP k) Supply chain <p>Records of training were sighted during this audit. Details are shown in 4.4.6.3.</p>	
4.4.6.2	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p>- Major compliance -</p>	<p>Mill recommended training needs (staff & workers) has been established and updated in January 2019. The details of the training needs include categories of knowledge, skill and awareness. Included in this program among others are subjects related to;</p> <ul style="list-style-type: none"> a) Environmental/safety & health policy/scheduled waste management / environmental responsibility, b) Building and structure c) Sustainability practices and guidelines d) Good mill practices - stations operations/control of process parameters e) Social program and other welfare activities. 	Yes

Criterion / Indicator		Assessment Findings	Compliance																																												
4.4.6.3	<p>A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure.</p> <p>- Minor compliance -</p>	<p>Training programs are made on annual basis. It is subject for review during the financial year should need arises. These training are made to ensure employees are trained in their job and on to update on current development adopted by the organisation.</p> <p>The training held by the mill during the period of review are shown below;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Date</th> <th>Subject</th> <th>No of attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>19/11/19</td> <td>Water Treatment Plant</td> <td>08</td> </tr> <tr> <td>2</td> <td>11/11/19</td> <td>PPE Training</td> <td>39</td> </tr> <tr> <td>3</td> <td>08/11/19</td> <td>First Aid Training</td> <td>35</td> </tr> <tr> <td>4</td> <td>22/10/19</td> <td>Shell Lubricant Training</td> <td>14</td> </tr> <tr> <td>5</td> <td>19/10/19</td> <td>Chemical Handling</td> <td>9</td> </tr> <tr> <td>6</td> <td>17/09/19</td> <td>Electrical Training</td> <td>5</td> </tr> <tr> <td>7</td> <td>29/07/19</td> <td>ERT Fire Drill & Fire Extinguisher Training</td> <td>64</td> </tr> <tr> <td>8</td> <td>19/07/19</td> <td>ERT Major Spillage</td> <td>9</td> </tr> <tr> <td>9</td> <td>19/07/19</td> <td>Chemical Store</td> <td>6</td> </tr> <tr> <td>10</td> <td>20/06/19</td> <td>Hearing Conservation Training (Shift A & B)</td> <td>66</td> </tr> </tbody> </table>	No	Date	Subject	No of attendees	1	19/11/19	Water Treatment Plant	08	2	11/11/19	PPE Training	39	3	08/11/19	First Aid Training	35	4	22/10/19	Shell Lubricant Training	14	5	19/10/19	Chemical Handling	9	6	17/09/19	Electrical Training	5	7	29/07/19	ERT Fire Drill & Fire Extinguisher Training	64	8	19/07/19	ERT Major Spillage	9	9	19/07/19	Chemical Store	6	10	20/06/19	Hearing Conservation Training (Shift A & B)	66	Yes
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4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services																																															
Criterion 4.5.1: Environmental Management Plan																																															
4.5.1.1	<p>An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.</p>	<p>The policy in relation to environmental is stated in the IOI Group – Sustainable Palm Oil Policy with the latest revision on March 2018.</p>	Yes																																												

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	The Policy is signed by the Group Chief Executive Officer and Group Head of Sustainability.	
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <p>a) An environmental policy and objectives;</p> <p>b) The aspects and impacts analysis of all operations</p> <p>- Major compliance -</p>	<p>a) The policy in relation to environmental is stated in the IOI Group – Sustainable Palm Oil Policy with the latest revision on March 2018. The Policy is signed by the Group Chief Executive Officer and Group Head of Sustainability.</p> <p>Among others the Policy emphasized on the Environmental Management to include the following;</p> <ul style="list-style-type: none"> • Identification & protection of HCV And HCS forest • Implementation of program to progressively reduce GHG emission, recycle /reuse of palm biomass • Enforcement of IOI of the NO OPEN BURNING POLICY. • Adopted no use of paraquat and pesticides categorized by WHO in class 1A or 1B. <p>b) 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 November 2015 to November 2020 for Pamol Kluang Palm Oil Mill.</p> <p>The list of the aspect and impacts had covered all the mill activities from the FFB reception to the CPO/CPK despatches. The waste and pollution treatment and management plans are also included.</p>	Yes
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.	Pamol Kluang POM has a planning for the following projects in its Future Continuous Improvement Plan.	Yes

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Criterion / Indicator		Assessment Findings				Compliance	
	- Major compliance -	The projects are also determined for the improvement for the effluent quality as described in 4.5.1.4 below:					
		No	Improvement Section	Plan	Positive Impacts		Timeline
		1	Boiler Station	To install boiler emission control system and comply with Ringelmann Chart 1	Reduction in black smoke emission		Dec 2019
		2	Biogas Plant	To install biogas plant and capture the biogas for flaring or other uses	Reduction in green house gas emissions into the atmosphere		Dec 2019
		3	Polishing Plant	To comply with DOE requirement as stated in "Jadual Pematuhan"	BOD limit reduced to 20 ppm for water discharge		Dec 2019
4	Effluent Pond System	To perform conventional desludging at	To remove solid content				

Criterion / Indicator		Assessment Findings			Compliance																				
			cooling pond 1,2,3	in cooling pond 1,2,3	Jan 2019																				
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	<p>The mill had identified new methods in improving the BOD level <100 mg/l for the water discharge.</p> <p>Under the improvement plan the mill had the flowing plan in relation to the effluent management improvement.</p> <ul style="list-style-type: none"> a) Biogas plant – reduction in GHG into the atmosphere b) Polishing plant – to comply to reduce BOD to 20 ppm for water discharge. c) Effluent pond system – to remove solid content in cooling pond under desludging program 			Yes																				
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives. - Major compliance -	<p>This is available in the annual training program under subject of;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Subjects</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>ESH Legal & Other requirements</td> </tr> <tr> <td>2</td> <td>Chemical handling</td> </tr> <tr> <td>3</td> <td>Emergency Respond Plan Training Chemical spill, Fire</td> </tr> <tr> <td>4</td> <td>Scheduled waste management</td> </tr> <tr> <td>5</td> <td>RSPO/ISCC/MSPO Training</td> </tr> <tr> <td>6</td> <td>HIRARC</td> </tr> <tr> <td>7</td> <td>Water Treatment Plant</td> </tr> <tr> <td>8</td> <td>Environmental Management Plan</td> </tr> <tr> <td>9</td> <td>CDS understanding</td> </tr> </tbody> </table>			No	Subjects	1	ESH Legal & Other requirements	2	Chemical handling	3	Emergency Respond Plan Training Chemical spill, Fire	4	Scheduled waste management	5	RSPO/ISCC/MSPO Training	6	HIRARC	7	Water Treatment Plant	8	Environmental Management Plan	9	CDS understanding	Yes
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4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.	Regular meetings made through the EPMC sessions held 4 times in a year.			Yes																				

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p>The dates held to date as recorded are 01/10/2019, 28/06/2019, 16/04/2019, 08/03/2019 (Emergency EPMC Meeting) and 11/01/2019.</p> <p>The agenda discussed comprises of the following issues;</p> <ul style="list-style-type: none"> a) SW discussion/EFB disposal/ b) Effluent/Drainage/GHG/ c) Compliance to the DOE's COMPETENT PERSON requirement 	
Criterion 4.5.2: Efficiency of energy use and use of renewable energy			
4.5.2.1	<p>Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period</p> <p>- Major compliance -</p>	<p>Pamol Kluang POM consistently monitors the following and tabulates the data monthly.</p> <ul style="list-style-type: none"> a) The consumption of non-renewable energy (diesel): Direct usage of diesel for the mill operations are recorded. The quantity in mt is divided over the mt CPO produced (ratio) during the month. The performance is measured by this ratio to indicate the level of performance. The data is compiled for comparison and control for future improvement with aim of gradual reduction of diesel. <p>There were measures as shown in the energy management plan to reduce and eliminate wastages among others as follows;</p> <ul style="list-style-type: none"> - To ensure optimum FFB ramp balance to commence processing 	Yes

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Criterion / Indicator		Assessment Findings	Compliance																																												
		<ul style="list-style-type: none"> - Timely servicing of vehicles to ensure efficient use of diesel & avoid leakages - Regular servicing of turbine for a better efficiency and to minimise running of gen-set - Educate employees on fuel saving practices. <table border="1"> <thead> <tr> <th>Month 19</th> <th>Diesel used/L</th> <th>CPO produced /mt</th> <th>Diesel/CP O</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>4819</td><td>5637.19</td><td>0.85</td></tr> <tr><td>Feb</td><td>4174</td><td>4525.23</td><td>0.92</td></tr> <tr><td>Mac</td><td>4088</td><td>4738.11</td><td>0.86</td></tr> <tr><td>April</td><td>4829</td><td>4531.82</td><td>1.07</td></tr> <tr><td>May</td><td>5128</td><td>5053.26</td><td>1.01</td></tr> <tr><td>June</td><td>4488</td><td>4353.07</td><td>1.03</td></tr> <tr><td>July</td><td>4784</td><td>4777.26</td><td>1.00</td></tr> <tr><td>Aug</td><td>3446</td><td>5538.33</td><td>0.62</td></tr> <tr><td>Sept</td><td>6981</td><td>5516.72</td><td>1.26</td></tr> <tr><td>Oct</td><td>5438</td><td>5486.84</td><td>0.99</td></tr> </tbody> </table> <p>The mill recorded a range of 0.62 to highest 1.26 for the entire 10 months.</p> <p>b) power production and allocation to the mill machinery and complex generated by steam turbine tabulated for the financial year 2019/20. It is calculated as electricity generated from turbine that produces power for the mill entire complex operation unit in kwh/mt FFB.</p>	Month 19	Diesel used/L	CPO produced /mt	Diesel/CP O	Jan	4819	5637.19	0.85	Feb	4174	4525.23	0.92	Mac	4088	4738.11	0.86	April	4829	4531.82	1.07	May	5128	5053.26	1.01	June	4488	4353.07	1.03	July	4784	4777.26	1.00	Aug	3446	5538.33	0.62	Sept	6981	5516.72	1.26	Oct	5438	5486.84	0.99	
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Criterion / Indicator		Assessment Findings	Compliance																																												
4.5.2.2	<p>The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.</p> <p>- Major compliance -</p>	<p>The mill records the following data and tabulated the ratio against the CPO produced to determine the efficiency of their operations;</p> <ul style="list-style-type: none"> a) all the diesel used (non-renewable) for the mill operations b) fibre/shell (renewable) <p>In this relation the following data were sighted and verified.</p> <ul style="list-style-type: none"> a) Non-renewable energy usage for 2019 for month of Jan 19 – Oct 19. b) Renewable energy usage for 2019 (Jan 19 - Oct 19) ratio shell/fibre mt /mt CPO average of 0.713. 	Yes																																												
4.5.2.3	<p>The use of renewable energy should be applied where possible.</p> <p>- Minor compliance -</p>	<p>The fibre and shell are used in the boiler for fuel recycled in the process system. Surplus quantity of shell/fibre are delivered to estates for multi purposes or sold to outside buyers. EFB is used in the estates for mulching.</p> <p>Details of renewable energy fibre/shell utilization are recorded below:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Shell & fibre /mt</th> <th>CPO produced mt</th> <th>Shell & fibre/CPO</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>4037.57</td><td>5637.19</td><td>0.72</td></tr> <tr><td>Feb</td><td>3211.25</td><td>4252.23</td><td>0.71</td></tr> <tr><td>Mac</td><td>3386.01</td><td>4738.11</td><td>0.71</td></tr> <tr><td>April</td><td>3283.76</td><td>4531.82</td><td>0.72</td></tr> <tr><td>May</td><td>3570.41</td><td>5053.26</td><td>0.71</td></tr> <tr><td>June</td><td>3100.60</td><td>4353.07</td><td>0.71</td></tr> <tr><td>July</td><td>3430.67</td><td>4777.26</td><td>0.71</td></tr> <tr><td>Aug</td><td>3926.49</td><td>5538.33</td><td>0.70</td></tr> <tr><td>Sept</td><td>3861.14</td><td>5516.72</td><td>0.70</td></tr> <tr><td>Oct</td><td>4033.52</td><td>5486.84</td><td>0.74</td></tr> </tbody> </table>	Month	Shell & fibre /mt	CPO produced mt	Shell & fibre/CPO	Jan	4037.57	5637.19	0.72	Feb	3211.25	4252.23	0.71	Mac	3386.01	4738.11	0.71	April	3283.76	4531.82	0.72	May	3570.41	5053.26	0.71	June	3100.60	4353.07	0.71	July	3430.67	4777.26	0.71	Aug	3926.49	5538.33	0.70	Sept	3861.14	5516.72	0.70	Oct	4033.52	5486.84	0.74	Yes
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Criterion / Indicator		Assessment Findings	Compliance																										
		In summary the total consumption of both shell and fibre over the CPO production is at an average of 0.713. When the renewable energy consumption is maximized the utilization of non-renewable is reduced.																											
Criterion 4.5.3: Waste management and disposal																													
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	All waste and pollution are identified and documented in the Waste Management Plan and Reduction Plan. The waste and pollution generated from the mill operations as shown below: <table border="1"> <thead> <tr> <th>No</th> <th>List of waste and pollutant</th> </tr> </thead> <tbody> <tr><td>1</td><td>Spent hydraulic & lubricants oil</td></tr> <tr><td>2</td><td>Spent contaminated rags, oil filters, oil containers</td></tr> <tr><td>3</td><td>POME palm oil mill effluent</td></tr> <tr><td>4</td><td>Stack emission – dust, CO2, SO2, dark smoke</td></tr> <tr><td>5</td><td>Oil & grease</td></tr> <tr><td>6</td><td>Empty Fruit Bunches</td></tr> <tr><td>7</td><td>Boiler Ash</td></tr> <tr><td>8</td><td>Domestic waste</td></tr> <tr><td>9</td><td>Chemical waste & chemical containers</td></tr> <tr><td>10</td><td>Spent batteries</td></tr> <tr><td>11</td><td>Scrap metal and tyres</td></tr> <tr><td>12</td><td>Sewage</td></tr> </tbody> </table>	No	List of waste and pollutant	1	Spent hydraulic & lubricants oil	2	Spent contaminated rags, oil filters, oil containers	3	POME palm oil mill effluent	4	Stack emission – dust, CO2, SO2, dark smoke	5	Oil & grease	6	Empty Fruit Bunches	7	Boiler Ash	8	Domestic waste	9	Chemical waste & chemical containers	10	Spent batteries	11	Scrap metal and tyres	12	Sewage	Yes
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4.5.3.2	A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for: a) Identifying and monitoring sources of waste and pollution.	The Waste Management Plan and Reduction Plan listed the waste generated from the mill operations among others as listed below;	Yes																										

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Criterion / Indicator		Assessment Findings				Compliance
	b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products. - Major compliance -	No	Type of waste	Description	Action to be taken	
		1	Industrial waste	EFB	Sent for mulching in the estates. To ensure and submit EFB disposal schedule and location every month To dispose EFB within 14 days upon storage To ensure no open burning activity on EFB and mill waste To design EFB storage area in ensuring no spillage of leachate into monsoon drain.	
				Scrap iron	Dispose as sale to assigned vendor by Regional office/Head Office. Recycle where appropriate for workshop maintenance	
				POME	Treated in effluent plant. The final discharge from the treatment plant is used for water discharge. Effluent quality monitoring on monthly basis. The monitoring of the effluent discharge is reported to DOE on monthly and quarterly basis.	

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Criterion / Indicator		Assessment Findings			Compliance
				<p>This practice is accordance with the requirements in the written approval issued by DOE. Review of the results revealed that the quality of the effluent discharge is in within the regulatory limit.</p>	
			Boiler ash	<p>Disposed to designated dumping site near holding pond Daily leveling monthly using machine.</p>	
		2	Scheduled Waste SW305/306 /102/410 /109/409 /410/322 /429	<p>Clean and tidy storage area Separation of type SW using labels 10cm x 10cm To ensure spillage trap functions effectively Monthly stock verification by executives Ensure inventory not exceeding 180 days / 20 mt Follow approved consignment note and update in ESWIS Provide training to the SW handlers.</p>	
		3	Domestic Waste Rubbish/ garden waste	<p>Disposal made 3x /week for both mill/estate on a different day. Encourage recycling program currently maintained by an</p>	

Criterion / Indicator		Assessment Findings			Compliance
				assigned employee. Disposal to Local Municipal Council landfill. Provide adequate dustbins line sites /office complex Weekly inspection by MA/executives Awareness on hygiene.	
			Sewage	Provide adequate washrooms/toilets at mill and line sites To ensure employees' quarters equipped with appropriate septic tank Cleaning/desludging septic tank done by appointed contractor.	
4.5.3.3	The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005 - Major compliance -	The SOP for chemical handling elaborated in <i>SOP Bab 17 issue no 2</i> dated 01/08/2018 compiled in the Group Standard Operating Procedures for Palm Oil Mill. Therein the procedure described the following requirement in details; <ul style="list-style-type: none"> a) Labeling b) Legal requirement c) Waste generator d) Training required e) DOE license 			Yes

Criterion / Indicator		Assessment Findings	Compliance												
		<p>Inventory of scheduled waste referred file no: AS(B)J31/152/000/048 dated 31/10/2019.</p> <p>Consignment note for scheduled waste available for SW109, SW305, SW409, SW410 and SW429.</p> <p>Latest disposal scheduled waste is on 25 September 2019 by Kualiti Alam Sdn Bhd (License no: 004992) validity period 01/05/2019 – 30/04/2020.</p>													
4.5.3.4	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.</p> <p>- Minor compliance -</p>	<p>The Pamol Timur Estate management handles the domestic waste management of Pamol Kluang POM. It is collected 2x/week and centralized prior to disposal to City Council disposal site.</p>	Yes												
Criterion 4.5.4: Reduction of pollution and emission															
4.5.4.1	<p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.</p> <p>- Major compliance -</p>	<p>The pollution identified from the mill activities as described below;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Black smoke</td> <td>Emission from Boilers</td> </tr> <tr> <td>2</td> <td>Odour & gases</td> <td>Activities from the effluent treatment</td> </tr> <tr> <td>3</td> <td>Leakage of lubricant</td> <td>Storage & vehicle maintenance</td> </tr> </tbody> </table> <p>Current monitoring was through online boiler smoke density and alarm and six-monthly boiler and stack monitoring of dust particulate. On top of the air emission monitoring, ambient air monitoring is required to be carried out on quarterly basis.</p>	No	Type of waste	Details	1	Black smoke	Emission from Boilers	2	Odour & gases	Activities from the effluent treatment	3	Leakage of lubricant	Storage & vehicle maintenance	Yes
No	Type of waste	Details													
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Criterion / Indicator		Assessment Findings	Compliance												
		<p>Sample of reports verified: <u>Boiler no. 2</u> Date of monitoring: 07/01/2019 Report no: AEMR(J)/19-01/04</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Results (mg/m3)</th> </tr> </thead> <tbody> <tr> <td>Total Particulate Matter</td> <td>62.6</td> </tr> <tr> <td>Sum of SO2 and SO3 expressed as SO2</td> <td>10.3</td> </tr> <tr> <td>Sum of NO and NO2 expressed as NO2</td> <td>2</td> </tr> <tr> <td>Dark Smoke</td> <td>Ringelman Chart No. 1</td> </tr> </tbody> </table> <p>The concentration of air impurities emitted did not exceed the limit value as set out in the Environment Quality (Clean Air) Regulations 2014.</p> <p><u>Boiler no. 2</u> Date of monitoring: 28/06/2019 Report no: AEMR(J)/19-06/16</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Results (mg/m3)</th> </tr> </thead> <tbody> </tbody> </table>	Parameter	Results (mg/m3)	Total Particulate Matter	62.6	Sum of SO2 and SO3 expressed as SO2	10.3	Sum of NO and NO2 expressed as NO2	2	Dark Smoke	Ringelman Chart No. 1	Parameter	Results (mg/m3)	
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Dark Smoke	Ringelman Chart No. 1														
Parameter	Results (mg/m3)														

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Criterion / Indicator		Assessment Findings		Compliance
		Total Particulate Matter	65.31	
		Sum of SO2 and SO3 expressed as SO2	16.3	
		Sum of NO and NO2 expressed as NO2	228	
		Dark Smoke	Ringelman Chart No. 0	
		<p>The concentration of air impurities emitted did not exceed the limit value as set out in the Environment Quality (Clean Air) Regulations 2014.</p> <p><u>Boiler no. 1</u></p> <p>Date of monitoring: 15/07/2019</p> <p>Report no: AEMR(J)/19-07/11</p>		
		Parameter	Results (mg/m3)	
		Total Particulate Matter	230.88	
		Sum of SO2 and SO3 expressed as SO2	60	
		Sum of NO and NO2 expressed as NO2	125	
		Dark Smoke	Ringelman Chart No. 2	

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Criterion / Indicator		Assessment Findings	Compliance												
		<p>The concentration of air impurities emitted did not exceed the limit value as set out in the Environment Quality (Clean Air) Regulations 2014 except for parameter Total Particulate Matter and Dark Smoke.</p> <p>Sighted violation license approval from DOE ref: (B)31/152/000/048Jld.6(21) dated 2 September 2019 validity period 05/06/2019 to 05/06/2020.</p>													
4.5.4.2	<p>An action plan to reduce identified significant pollutants and emissions shall be established and implemented.</p> <p>- Major compliance -</p>	<p>The action plan to reduce the pollutions are as follows;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Type of waste</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Black smoke</td> <td>To monitor the condition of dust cyclone in every 3 months. To carry out boiler furnace cleaning every week.</td> </tr> <tr> <td>2</td> <td>Odour & gases</td> <td>To maintain proper feeding into digestion process of effluent to prevent severe and unpleasant odour. Maintain 1:1 ratio of acidification process.</td> </tr> <tr> <td>3</td> <td>Leakage of lubricant</td> <td>Ensure SOP to be strictly followed. To place all lubricant oil drum on metal trays.</td> </tr> </tbody> </table> <p>All efforts and action plan for the identified pollutants and emission above is adequate to comply with the requirement.</p> <p>All identified issues have significant impacts to the environment.</p>	No	Type of waste	Action Plan	1	Black smoke	To monitor the condition of dust cyclone in every 3 months. To carry out boiler furnace cleaning every week.	2	Odour & gases	To maintain proper feeding into digestion process of effluent to prevent severe and unpleasant odour. Maintain 1:1 ratio of acidification process.	3	Leakage of lubricant	Ensure SOP to be strictly followed. To place all lubricant oil drum on metal trays.	Yes
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Criterion / Indicator		Assessment Findings					Compliance															
<p>4.5.4.3</p>	<p>Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.</p> <p>- Major compliance -</p>	<p>The treated mill effluent discharge is regularly monitored as prescribed in the "<i>Jadual Pematuhari</i>" license issued to the mill.</p> <p>The improvement program to achieve the BOD level is shown in 4.5.5.2. Regular monitoring is made on monthly basis and quarterly.</p> <p>In addition, daily site checking on the effluent ponds are made by the supervisory personnel and effluent attendants. Reports for the effluent parameters are submitted using "<i>Borang Penyata Suku Tahun</i>" to DOE for compliance.</p> <p>Sighted the quarterly return:</p> <p>1st quarter@1 January – 31 March 2019 dated 18/04/2019.</p> <p>2nd quarter@1 April – 31 June 2019 dated 30/07/2019.</p> <p>3rd quarter@1 July – 30 September 2019 dated 24/10/2019.</p> <p>Effluent final discharge analysis monitored on monthly basis by accredited 3rd party laboratory, Nalco Industrial Services Malaysia Sdn Bhd.</p> <p>Sighted the effluent results in the laboratory at random and all parameters comply to the DOE requirement. (Units in mg/l except for PH)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Parameters</th> <th>Standard</th> <th>09/07/2019</th> <th>16/08/2019</th> <th>12/09/2019</th> </tr> </thead> <tbody> <tr> <td>PH</td> <td>5-9</td> <td>7.70</td> <td>7.90</td> <td>7.30</td> </tr> <tr> <td>BOD</td> <td><5000</td> <td>3040.00</td> <td>176.00</td> <td>3500.00</td> </tr> </tbody> </table>					Parameters	Standard	09/07/2019	16/08/2019	12/09/2019	PH	5-9	7.70	7.90	7.30	BOD	<5000	3040.00	176.00	3500.00	<p>Yes</p>
Parameters	Standard	09/07/2019	16/08/2019	12/09/2019																		
PH	5-9	7.70	7.90	7.30																		
BOD	<5000	3040.00	176.00	3500.00																		

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Criterion / Indicator		Assessment Findings				Compliance	
		Suspended solids		30400.00	1263.00	42300.00	
		Oil & grease	50	116.00	32.00	148.00	
		Ammoniacal N	150	66.00	28.00	34.00	
		Total N	200	77.00	38.00	42.00	
		<p>Sighted permission letter from DOE ref: AS(B)J 31/152/00/048 Jilid 6(23) dated 4 September 2019 to extend the compliance period from 01/07/2019 to 31/12/2019.</p> <p>The mill had identified new methods in improving the BOD level <100 mg/l for the water discharge.</p> <p>Under the improvement plan the mill had the flowing plan in relation to the effluent management improvement.</p> <p>a) Biogas plant – reduction in GHG into the atmosphere</p> <p>b) Polishing plant – to comply to reduce BOD to 20 ppm for water discharge.</p> <p>Effluent pond system – to remove solid content in cooling pond under desludging program</p>					
Criterion 4.5.5: Natural water resources							
4.5.5.1	The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:	<p>The mill has established a water management plan. Among others the efforts and program associated are:</p> <p>a) Assessment of water usage and sources.</p>				Yes	

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Criterion / Indicator		Assessment Findings				Compliance
a) Assessment of water usage and sources. b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities. c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). - Major compliance -		Month	Water usage m3	CPO Mt	Water usage/CPO produced	
		Jan 19	20557.00	5637.19	3.65	
		Feb 19	17200.00	4525.23	3.80	
		Mac 19	19088.00	4738.11	4.03	
		April 19	17671.00	4531.82	3.90	
		May 19	20553.00	5053.26	4.07	
		June 19	18366.00	4353.07	4.22	
		July 19	18383.00	4777.26	3.84	
		Aug 19	17001.00	5538.33	3.06	
		Sept 19	18545	5520.50	3.36	
		Oct 19	19444	5486.84	3.54	
			b) The upstream and downstream water analysis of <i>Sg Sembrong</i> was made to monitor the negative impact resulted from the mill activities. Sighted results dated 13/09/2019. This requirement has also been stated in the <i>Jadual. Pematuhan</i> in The DOE license.			
		No	Item	OM1 Upstream	OM3 - downstream m	Std NWQS Class II
		1	PH	7.3	7.2	5.0-9.0
		2	BOD	17	<5	6
		3	COD	27	8	50
		4	Suspended solids	18	10	150
		5	Ammoniacal N	18.9	<1	0.9

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Criterion / Indicator		Assessment Findings				Compliance	
		6	Total solids	234	242	-	
		7	Oil & Grease	3	2	-	
		<p>All units in mg/L except for PH.</p> <p>c) The water management plan in the mill has been established focusing on the water pollution prevention and efforts in relation to the domestic usage.</p> <p>Among others the objectives are;</p> <ul style="list-style-type: none"> - To minimize impact of drought and floods to the POM and estate operations, - To minimize the impact of drought to the oil palm yield, - To optimize the use of rain water and fresh water from streams, - Maximizing use of pollutants and waste (eq. effluent and EFB from oil mill) <p>In addition, the Mill has installed 10 units of flow meter to record the daily water usage from Pamol Timur, Pamol Barat and mill's domestic and processing purpose. Water was pumped from Sg Sembrong daily.</p>					
4.5.5.2	<p>Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.</p> <p>- Major compliance -</p>	<p>Details of effluent treatment and report as provided in 4.5.4.3 above.</p> <p>The effluent is retained for treatment in a flow through several / multiple stage ponds before being discharged into the watercourse and land application at ratio of 70% and 30% respectively.</p>				Yes	

Criterion / Indicator		Assessment Findings	Compliance
		<p>The compliance requirement is provided in the DOE '<i>Jadual Pematuhari</i>' licensed to the mill. The final BOD is <100 mg/l for the water discharge.</p> <p>Under the improvement plan the mill had the flowing plan in relation to the effluent management improvement.</p> <ul style="list-style-type: none"> a) Biogas plant – reduction in GHG into the atmosphere b) Polishing plant – to comply to reduce BOD to 20 ppm for water discharge. c) Effluent pond system – to remove solid content in cooling pond under desludging program. 	
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Mill Management			
4.6.1.1	<p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p> <p>- Major compliance -</p>	<p>Pamol Kluang POM has adopted the following manual and SOP for the day-to-day operations</p> <ul style="list-style-type: none"> a) GROUP STANDARD OPERATING PROCEDURES FOR PALM OIL MILL dated Mac 2012 thereafter revised to include new work methods etc / others dated July 2018. All processing stations starting from FFB reception to dispatch and workshop/maintenance. laboratory operations b) Safe Operating Procedures and guidelines. 	Yes
4.6.1.2	<p>All palm oil mills shall implement best practices.</p> <p>- Major compliance -</p>	<p>The following reports are established to monitor the mill operations</p> <ul style="list-style-type: none"> a) Daily production report b) Progress report <ul style="list-style-type: none"> i. FFB quality / Extraction Ratios 	Yes

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> ii. Qualities issues/complaints iii. MPD analysis iv. Manpower v. Process control vi. Mill throughput /downtime vii. Water consumption viii. Processing cost /CAPEX. <ul style="list-style-type: none"> c) The Mill Controller visits the mill every 2 months. d) Unscheduled visits by the Plantation Director. 	
Criterion 4.6.2: Economic and financial viability plan			
4.6.2.1	<p>A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.</p> <p>- Major compliance -</p>	<p>Pamol Kluang POM have established and implemented its commitment to a long term sustainability and financial viability through an operating expenditure /capital expenditure planning.</p> <p>The mill has a budget for financial year 2019/2020 comprises of the following components;</p> <ul style="list-style-type: none"> a) Crop processed with anticipated extraction ratios including a 5-year forecast. b) Cost components include the following <ul style="list-style-type: none"> i) <i>General charges statement</i> <ul style="list-style-type: none"> - General charges - Cost of supervision - Cost of labour - Cost of other - Cost of RSPO/MSPO & Other Management system ii) <i>Capital expenditure statement</i> <ul style="list-style-type: none"> - Building, utilities, welfare - Plant & machinery 	Yes

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Office equipment - Furniture & fittings - Electrical installation iii) Plant Factory inclusive of manufacture cost/dispatch cost iv) Processing Cost The five years planning horizon 2018/19-2022/23 is available.	
Criterion 4.6.3: Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	Pamol Kluang POM only receive the FFB from own supply bases therefore no price is displayed in the mill.	Yes
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Pamol Kluang POM only receive the FFB from own supply bases therefore no agreement/contract for the products/service.	Yes
Criterion 4.6.4: Contractor			
4.6.4.1	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	In the agreement, there is additional requirements for contractor and service providers mentioned that contractors are to comply with all applicable local, national and ratified international laws and regulations including sustainability requirement (RSPO, MSPO, ISCC, etc). Evidence or related documents are to be available and presented to the Company for verification whenever necessary.	Yes

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Criterion / Indicator		Assessment Findings	Compliance
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Sampled agreement for transport of CPO for SP Shine Enterprise valid from 01.07.2019 – 30.06.2020. The details of work were tabled in was made clear and signed by both parties on 01.07.2019. Sighted the payment voucher; voucher no: 34000000317 dated 12.10.2019 cheque no: 432329 amount RM 11,855.19.	Yes
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance -	In the agreement, there is additional requirements for contractor and service providers mentioned that contractors are to comply with all applicable local, national and ratified international laws and regulations including sustainability requirement (RSPO, MSPO, ISCC, etc). Evidence or related documents are to be available and presented to the Company for verification whenever necessary.	Yes

Malaysian Sustainable Palm Oil Part 3: General principles for Plantations and Organized Smallholders

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	A policy for the implementation of MSPO shall be established. - Major compliance -	IOI Group has the Sustainable Palm Oil Policy signed by Dato’ Lee Yeow Chor, Group Chief Executive Officer and Dr. Surina Ismail, Group Head of Sustainability, revised on March 2018.	Yes
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	The policy mentioned that IOI group is committing towards sustainable production of palm oil and its continuous improvement as outlined in the Malaysian Sustainable Palm Oil (MSPO) guidelines.	Yes
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	SOP on Sustainability, SOP 1.7 issue/rev: 1/1, date 03.05.2018. Frequency for audit is conducted regularly based on non-conformances, complexity and maturity of the processes.	Yes
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	The sustainability, safety & health department (peninsular) has conducted the internal audit on 11/09/2019 (Mamor Estate), 19/09/2019 (Kahang Estate) and 12/09/2019 (Swee Lam). NCR raised for MSPO P&C were closed accordingly. Some pending issues were acted by phases and followed up by the Sustainability team through the verification audit 09/10/2019 (Mamor Estate), 06/11/2019	Yes

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Criterion / Indicator		Assessment Findings	Compliance
		(Kahang Estate) and 15/10/2019 (Swee Lam Estate) on the corrective action plan.	
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	The internal audit report is available during the audit and reviewed in the management review in clause 4.1.3.1.	Yes
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	Management review has been conducted in 2 stages which are estate level and complex level. In estate level, the management review has been conducted on 07.11.2019 attended by 14 people for Mamor Estate, 23.10.2019 attended by 4 people for Kahang Estate and 16.10.2019 attended by 11 people for Swee Lam Estate. The agenda discussed the results of audits, customer feedback, status of preventive and corrective actions, follow-up actions from management reviews, changes that could affect the management system and recommendations for improvement.	Yes
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company. - Major compliance -	All the estates has establish an action plan for its continuous improvement plan with consideration for both social and environmental impact. There are action plans to achieve it, target to be completed and person in charge appointed accordingly.	Yes

Criterion / Indicator	Assessment Findings	Compliance
	<p>Among the sampled document reviewed:</p> <p><u>Mamor Estate</u></p> <ol style="list-style-type: none"> 1. Environmental Management Plan – Continuous Improvement Plan (Reviewed on October 2019) 2. Safety & Health Management Plan – Continuous Improvement (Reviewed on 22 October 2019) 3. Social Impact Assessment, Management Plans and Continuous Improvement Plans – Continuous Improvement Plan (Reviewed on 20 November 2019) <p><u>Kahang Estate</u></p> <ol style="list-style-type: none"> 1. Environmental Management Plan – Continuous Improvement Plan (Reviewed on October 2019) 2. Safety & Health Management Plan – Continuous Improvement (Prepared on 14 November 2019) 3. Social Impact Assessment, Management Plans and Continuous Improvement Plans – Continuous Improvement Plan (Reviewed on 21 November 2019) <p><u>Swee Lam Estate</u></p> <ol style="list-style-type: none"> 1. Environmental Management Plan – Continuous Improvement Plan (Reviewed on November 2019) 2. Safety & Health Management Plan – Continuous Improvement (Reviewed on 6 November 2019) 	

Criterion / Indicator		Assessment Findings	Compliance
		3. Social Impact Assessment, Management Plans and Continuous Improvement Plans – Continuous Improvement Plan (Reviewed on 20 November 2019)	
4.1.4.2	<p>The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption.</p> <p>- Major compliance -</p>	<p>All the estates as a group has new projects namely:</p> <p><u>Mamor Estate</u></p> <ol style="list-style-type: none"> 1. Usage of dog hunting and increase number of barn owl boxes in the field to ratio 1 box/8 ha to reduce usage of pesticide used for baiting. 2. Water catchment built to capture rain water used for washing empty fertilizer bags. <p><u>Kahang Estate</u></p> <ol style="list-style-type: none"> 1. Rodent damage – to increase the amount of dogs by gang to reduce rodent damage at estate. 2. Solar energy – to increase the number of LED lamp that use solar energy to increase the use of solar energy as power supply. 3. Technology – to improve internet connection at the office to improve productive using technology. <p><u>Swee Lam Estate</u></p> <ol style="list-style-type: none"> 1. Solar and LED light – to increase use of solar and LED light to reduce the greenhouse gas. 2. Recycling bin – to increase the recycle bin for each point to ensure workers awareness regarding recycle waste. 	Yes

Criterion / Indicator		Assessment Findings	Compliance
		Bagworm – to planting beneficial plant for reduce bagworm infestation in field.	
4.1.4.3	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established. - Major compliance -	All the estates management is able to show the supporting documents during the audit, i.e: training, resources and progress reports on the business management plan.	Yes
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes. - Major compliance -	Management has conducted the annual stakeholder meeting, disseminate the information through website: www.ioigroup.com , establishing the complaint/grievance book for internal complaint and external stakeholder’s file. For stakeholder request, the SOP Stakeholder Request Procedure, SOP 1.0, Appendix 4, issue/rev: 1/0 date 16/01/2018 mentioned the flowchart of the request and SOP for Stakeholder Complaint Procedure SOP 1.0, appendix 5, issue/rev: 1/0 explain the complaint process which takes 5 days for action taken by the management.	Yes
4.2.1.2	Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.	The management able to show the documents during the audit, ie: company policies, communication records, minutes of meeting, internal audit reports, etc.	Yes

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	For stakeholder request, the SOP Stakeholder Request Procedure, SOP 1.0, Appendix 4, issue/rev: 1/0 mentioned the flowchart of the request and SOP for Stakeholder Complaint Procedure SOP 1.0, appendix 5, issue/rev: 1/0 date 16/01/2018 explain the complaint process which takes 5 days for action taken by the management.	Yes
4.2.2.2	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit. - Minor compliance -	Management has appointed Mr. Mohan Raj A/L Nagooru (Mamor Estate), Mr Abdul Razzaq (Kahang Estate) and Mr. Mohd Zul Aizat (Swee Lam Estate) as the Social Liaison Officer as per appointment letter dated 12/07/2017, 05/12/2018 and 20/07/2019 respectively. His responsibility covers welfare and social needs of stakeholders, periodic visits to neighbouring stakeholders, maintenance and monitoring of grievance issues and facilitate feedback mechanism, etc.	Yes
4.2.2.3	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained. - Major compliance -	The stakeholder list reviewed on 17 th Sept 2019 for Mamor Estate, 18 th Nov 2019 (Kahang Estate) and 2019 (Swee Lam Estate) are available and updated accordingly. The stakeholders comprise of government bodies, non-govt. organization (NGO's), contributing estates/supply base estates, neighbouring villages, suppliers, contractors, transporters, schools, mill management, JCC members and worshipping areas. The latest stakeholder minutes meeting available dated 06.11.2019-Mamor Estate (internal), 21/11/2019-Kahang Estate (internal) and 08/11/2019 (internal) while for external stakeholders were combined	Yes

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Criterion / Indicator		Assessment Findings	Compliance
		on 13/11/2019. All positive and negative issues captured in the SIA management plan.	
Criterion 4.2.3 – Traceability			
4.2.3.1	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s). - Major compliance -	IOI group has the SOP title: MSPO Supply Chain – Oil Mill: Segregation (SG), doc. No: MSPOSC/SOP/SG/1, revision: 02 dated 01.09.2019.	Yes
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	The traceability of the FFB, PK, CPO and PKO are inspected through the internal audit conducted as per 4.1.2.2	Yes
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	Mr. Mohan Raj A/L Nagooru (Mamor Estate) has been appointed as RSPO/MSPO/ISCC Supply Chain Officer for Mamor Estate on 23/10/2018. Mr. Abdullah Anas bin Ahmad Zawawi (Kahang Estate) has been appointed as RSPO/MSPO/ISCC Supply Chain Officer for Kahang Estate on 25/09/2019. Mr. Muhammad Akmal bin Haraza has been appointed as the RSPO/MSPO/ISCC Supply Chain Officer for Swee Lam Estate on 18/09/2019. Among the roles and responsibilities are:	Yes

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Criterion / Indicator		Assessment Findings	Compliance
		<ol style="list-style-type: none"> 1. Ensure supply chain controls from the plantation through to the certified end product according to the approved supply chain module by RSPO/MSPO/ISCC. 2. Ensure the general chain of custody system requirement apply throughout the supply chain. 3. Obtain documented procedures to ensure the implementation of all the elements specified in the Supply Chain System. 	
4.2.3.4	<p>Records of sales, delivery or transportation of FFB shall be maintained.</p> <p>- Major compliance -</p>	<p>Estates already used the SAP system to monitor the daily and monthly incoming FFB and outgoing CPO and PKO. During the site visit, it was evident that the system able to show the traceability for certified FFB and CPO/PKO. MSPO certificate number was auto-generated whenever weighbridge ticket issued by estate.</p> <p>Sampled below weighbridge ticket:</p> <ol style="list-style-type: none"> 1. Mamor Estate: Date: 25/11/2019, Vehicle: JJK17818. Product: FFB (CSFFB/IP), transporter: Sasaran Perentas (Abok), block no: 05C, 96B, 09D, transaction no: 61186, MSPO cert number: MSPO 700802 validities: 31/12/2018 – 30/12/2023. 2. Kahang Estate: Date: 26/11/2019, Vehicle: PGQ2757 Product: FFB (CSFFB/IP), transporter: T1 (T1), block no: 01B-02C-03B/C transaction no: 31682 MSPO cert number: MSPO 700802 validities: 31/12/2018 – 30/12/2023. 3. Swee Lam Estate: Date: 27/11/2019, Vehicle: BMG8707 Product: FFB (CSFFB/IP), transporter: T003, block no: PM13B transaction no: 65281 MSPO cert number: MSPO 700802 validities: 31/12/2018 – 30/12/2023. 	Yes

Criterion / Indicator	Assessment Findings	Compliance																
<p>4.3 Principle 3: Compliance to legal requirements</p>																		
<p>Criterion 4.3.1 – Regulatory requirements</p>																		
<p>4.3.1.1</p>	<p>All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.</p> <p>- Major compliance -</p>	<p>Estates continued to comply with legal requirements as per the indicator. Compliance to each applicable law and regulation is monitored by the Operating Units and Sustainability team. The CU had obtained and renewed license and permits as required by the law. The licenses/permit viewed among others were:</p> <p><u>Mamor Estate</u></p> <table border="1" data-bbox="1093 842 1832 1337"> <thead> <tr> <th>No</th> <th>License / Permit / Regulatory Requirement</th> <th>Issued date/ Validity Period</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>MPOB license no: 511691002000</td> <td>01/04/2019 – 31/03/2020</td> </tr> <tr> <td>2</td> <td>BAKAJ License no: 07/A/Klg/033; File no: BAKAJ/334/300/05/07/07/3 (120m3/day)</td> <td>31/12/2019</td> </tr> <tr> <td>3</td> <td>Certificate of Fitness – Air Receiver JH PMT 10634 (PMT-JH/19 88139)</td> <td>27/08/2019 – 25/11/2020</td> </tr> <tr> <td>4</td> <td>KPDNKK Diesel permit ref: BPGK JH (KLU) 1967 SK; Serial no: P:J/KLU000023 (Diesel 15,000L & Bio-Diesel B5 15,000L)</td> <td>31/01/2019 – 30/01/2020</td> </tr> </tbody> </table>	No	License / Permit / Regulatory Requirement	Issued date/ Validity Period	1	MPOB license no: 511691002000	01/04/2019 – 31/03/2020	2	BAKAJ License no: 07/A/Klg/033; File no: BAKAJ/334/300/05/07/07/3 (120m3/day)	31/12/2019	3	Certificate of Fitness – Air Receiver JH PMT 10634 (PMT-JH/19 88139)	27/08/2019 – 25/11/2020	4	KPDNKK Diesel permit ref: BPGK JH (KLU) 1967 SK; Serial no: P:J/KLU000023 (Diesel 15,000L & Bio-Diesel B5 15,000L)	31/01/2019 – 30/01/2020	<p>Major Non-Conformity</p>
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Criterion / Indicator		Assessment Findings	Compliance																					
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Criterion / Indicator	Assessment Findings	Compliance															
	<p><u>Swee Lam Estate</u></p> <table border="1" data-bbox="1093 544 1832 1070"> <thead> <tr> <th>No</th> <th>License / Permit / Regulatory Requirement</th> <th>Issued date/ Validity Period</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>MPOB license no: 617329002000</td> <td>01/05/2019 – 30/04/2020</td> </tr> <tr> <td>2</td> <td>BAKAJ License no: 07/A/JB/080; File no: BAKAJ/334/300/05/01/07/02 (60m3/day)</td> <td>31/12/2019</td> </tr> <tr> <td>3</td> <td>Certificate of Fitness – Air Receiver JH PMT 13143 (PMT-JH/19 94611)</td> <td>04/11/2019 – 28/01/2021</td> </tr> <tr> <td>4</td> <td>KPDNKK Diesel & Petrol permit ref: KPDNKK.J-JB/26/5A/11/262(P/D)(P11); Serial no: P J001234 (Diesel 13,600L & Petrol 100L)</td> <td>28/06/2019 – 27/06/2020</td> </tr> </tbody> </table> <p>Mamor Estate:</p> <ol style="list-style-type: none"> JTK Permit: Potongan Upah Di Bawah Seksyen 24 Akta Kerja 1955 for Potongan Bagi Pinjaman Pembelian Kerbau, dated 10 December 2015. JTK Permit: Pendahuluan Gaji for Pinjaman Peribadi tidak melebihi RM 2,000.00 tanpa faedah dan bayaran ansuran balik 	No	License / Permit / Regulatory Requirement	Issued date/ Validity Period	1	MPOB license no: 617329002000	01/05/2019 – 30/04/2020	2	BAKAJ License no: 07/A/JB/080; File no: BAKAJ/334/300/05/01/07/02 (60m3/day)	31/12/2019	3	Certificate of Fitness – Air Receiver JH PMT 13143 (PMT-JH/19 94611)	04/11/2019 – 28/01/2021	4	KPDNKK Diesel & Petrol permit ref: KPDNKK.J-JB/26/5A/11/262(P/D)(P11); Serial no: P J001234 (Diesel 13,600L & Petrol 100L)	28/06/2019 – 27/06/2020	
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Criterion / Indicator	Assessment Findings	Compliance
	<p>tidak melebihi RM 150.00/month ref no: PP2/34/0071 dated 01/10/2003</p> <p>3) JTK Permit: Potongan Upah Di Bawah Seksyen 24 Akta Kerja 1955 for Potongan gaji pekerja bagi pembayaran bil elektrik setelah ditolak subsidi yang diberikan hendaklah dijalankan sebanyak RM 5.00 seorang setiap Bulan (ref no: TK (NJ) U – 23 dated 28 June 2018.</p> <p>Kahang Estate:</p> <p>1) JTK Permit: Potongan Upah Di Bawah Seksyen 24 Akta Kerja 1955 for Potongan Bagi Pinjaman Pembelian Kerbau, dated 30 December 2015.</p> <p>Swee Lam Estate:</p> <p>1) JTK Permit: Potongan Upah Di Bawah Seksyen 24 Akta Kerja 1955 for bayaran penggunaan elektrik melalui TNB dan potongan tidak melebihi RM 50/Bulan (No siri: PP\$/29/111/2011) dated 04/11/2001.</p>	

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Criterion / Indicator		Assessment Findings	Compliance										
4.3.1.2	<p>The management shall list all laws applicable to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>The Legal Requirement Register was established to cover all legal Acts, Regulations and other requirement related to all the estates.</p> <p>The Legal Requirements Register which was reviewed on 13/06/2019 comprises of the following among others;</p> <table border="1" style="margin-left: 40px;"> <thead> <tr> <th>No</th> <th>Laws/Regulations</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Minimum Wages Order 2016 – wef 02/03/2019</td> </tr> <tr> <td>2</td> <td>Employees Social Security Act 1969 – wef 02/03/2019</td> </tr> <tr> <td>3</td> <td>Occupational Safety and Health Act 1994 – wef 02/05/2019</td> </tr> <tr> <td>4</td> <td>Factories and Machinery Act 1967 – wef 02/05/2019</td> </tr> </tbody> </table>	No	Laws/Regulations	1	Minimum Wages Order 2016 – wef 02/03/2019	2	Employees Social Security Act 1969 – wef 02/03/2019	3	Occupational Safety and Health Act 1994 – wef 02/05/2019	4	Factories and Machinery Act 1967 – wef 02/05/2019	Yes
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4.3.1.3	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p>	<p>The mechanism used for tracking changes in laws/regulations are through the following;</p> <ul style="list-style-type: none"> a) Subscription to Lexis-Nexis Malaysia b) News release through daily newspaper. c) Law change tracked by book publisher (MDC Book Publications). d) Circulars from relevant association (eg. MPOA, MPOB, MAPA) e) Internet (e-federal gazette, www.lawnet.com.my, www.e-warta.com.my) <p>The IOI Legal Department from headquarters alert all operating units on legal updates. Process flow for the Legal updating is shown in SOP reviewed dated May 2019.</p>	Yes										
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory</p>	<p>All the states has assigned one executive each for the PIC for compliance and changes in the regulatory requirement.</p>	Yes										

Criterion / Indicator		Assessment Findings	Compliance
	requirements. - Minor compliance -	<p><u>Mamor Estate</u> The PIC is the Assistant Manager, Mr Mohan Raj A/L Nagooru via Memo letter dated 04/11/2019 signed by the Estate Manager, Mr Lim Wei Kiat.</p> <p><u>Kahang Estate</u> The PIC is the Assistant Manager, Abdullah Anas Bin Ahmad Zawawi via Memo letter dated 25/09/2019 signed by the Estate Manager, Saravanan A/L Krishnasamy.</p> <p><u>Swee Lam Estate</u> The PIC is the Assistant Manager, Mohd Zul Aizat Bin Ramli via Memo letter dated 24/10/2019 signed by the Assistant Manager In-Charge, 24/10/2018.</p>	
Criterion 4.3.2 – Lands use rights			
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. - Major compliance -	No land disputes reported at Pamol Kluang POM complexes. It is verified during the stakeholder’s meeting and land titles record.	Yes
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land. - Major compliance -	Land ownership such as land title and land lease documents is available. There is no changes in the land ownership since the last audit. All the land belongs to IOI. All the estates operates on a land of legal ownership having details of follows:	Yes

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Criterion / Indicator	Assessment Findings	Compliance
	<p><u>Mamor Estate</u> No: H.S.(D) 23794 <i>Cukai tahunan</i> RM 200,340.00 No PT: PTD 3226 Luas lot: 2225.469 ha agriculture No fail: PTDK II/47/68; PTG (PS) 5/7/77.</p> <p><u>Kahang Estate</u> No: H.S.(D) 8577 <i>Cukai tahunan</i> RM 217,800.00 No PT: PTD 3302 Luas lot: 2419.9009 ha agriculture No fail: PHTK.IV/176/72; PTG 9/79-63</p> <p><u>Swee Lam Estate</u> No: H.S.(D) 406895 <i>Cukai tahunan</i> RM 31,200.00 No PT: PTD 86175 Luas lot: 207.1838 ha agriculture No fail: PTG.9/93-241 JLD.11; PTJB/AS:34/93</p> <p>No: H.S.(D) 406899 <i>Cukai tahunan</i> RM 62,550.00 No PT: PTD 86179 Luas lot: 416.6189 ha agriculture No fail: PTG.9/93-241 JLD.11; PTJB/AS:34/93</p> <p>No: H.S.(D) 406893 <i>Cukai tahunan</i> RM 13,050.00</p>	

Criterion / Indicator		Assessment Findings	Compliance																
		<p>No PT: PTD 86173 Luas lot: 86.7954 ha agriculture No fail: PTG.9/93-241 JLD.11; PTJB/AS:34/93</p> <p>Swee Lam estate had a total of 7 land title as sighted, hence the above records were taken based on random. However, the entire land title was checked and in compliance to the legislative requirement.</p>																	
4.3.2.3	<p>Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p> <p>- Major compliance -</p>	<p>Legal perimeter boundary marker is available. Boundary markers were installed at various points at the boundary areas.</p> <p>Sighted the following visited areas as shown below:</p> <table border="1"> <thead> <tr> <th>No</th> <th>Estate</th> <th>Boundary markers points</th> <th>Neighbouring</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Mamor</td> <td>PM08C</td> <td>KULIM - Tereh Estate</td> </tr> <tr> <td>2</td> <td>Kahang</td> <td>PM05A</td> <td>Semberong Estate</td> </tr> <tr> <td>3</td> <td>Swee Lam</td> <td>PM92A</td> <td>Kelam Estate</td> </tr> </tbody> </table>	No	Estate	Boundary markers points	Neighbouring	1	Mamor	PM08C	KULIM - Tereh Estate	2	Kahang	PM05A	Semberong Estate	3	Swee Lam	PM92A	Kelam Estate	Yes
No	Estate	Boundary markers points	Neighbouring																
1	Mamor	PM08C	KULIM - Tereh Estate																
2	Kahang	PM05A	Semberong Estate																
3	Swee Lam	PM92A	Kelam Estate																
4.3.2.4	<p>Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC).</p> <p>- Minor compliance -</p>	<p>No land disputes reported at Pamol Kluang POM complexes. It is verified during the stakeholder’s meeting and land titles record.</p>	Yes																
<p>Criterion 4.3.3 – Customary rights</p>																			

Criterion / Indicator		Assessment Findings	Compliance
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	No land disputes reported at Pamol Kluang POM complexes. It is verified during the stakeholder’s meeting and land titles record.	Yes
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	No land disputes reported at Pamol Kluang POM complexes. It is verified during the stakeholder’s meeting and land titles record.	Yes
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	No land disputes reported at Pamol Kluang POM complexes. It is verified during the stakeholder’s meeting and land titles record. However, management has the SOP for FPIC, SOP 2.0 & 6.0 Appendix 3, Issue/Revision: 1/0, dated 17.01.2017 and Land Use Compensation Procedure, SOP: 2.0 & 6.0 Appendix 5, Issue/Revision: 1/0 dated 17.01.2017.	Yes
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	Mamor Estate, Kahang Estate and Swee Lam Estate has the Social Impact Assessment, management action plans and continuous improvement plans 2015-2020 prepared by sustainability team and approved by Estate Manager in charge on 20.11.2019 (Mamor Estate), 21.11.2019 (Kahang Estate) and 20.11.2019 (Swee Lam Estate) date of 4 th reviewed) respectively. Only for Swee Lam Estate, the external stakeholder meeting was conducted on 11/11/2019 attended by 14 people.	Yes

Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	IOI group has the SOP for Stakeholder Complaint Procedure SOP 1.0, appendix 5, issue/rev: 1/0 explain the complaint process which stakeholder informed of outcome within 5 working days. IOI group also has the Grievance Procedure which come by stage 1 (Grievance submission), stage 2 (preliminary investigation-timeframe within 30 working days from grievance submission date) and stage 3 (further investigation/meeting with complainant – timeframe within 10 working days after preliminary investigation outcome). Additionally, whistleblowing Policy revised October 2019 to provide a transparent and confidential process for dealing with concerns.	Yes
4.4.2.2	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. - Major compliance -	As per policy, the whistleblowing channels were divided into: 6. Email: whistleblowing@ioigroup.com 7. Whistleblowing secretariat-group internal audit, fax to +603-89478958 and Tel: +60389478888 (Ext 8941). 8. In person to the respective Head of Business/Operating Unit, or is head of Human Resource/ 9. In writing to IOI group. 10. Independent Non-Executive Chairman. The complaint/grievances lodged been solved within the timeframe. Sampled below complaints: 1. Mamor Estate: 11/06/2018: Complainant (Md Rosli) on Kerosakan pada pintu bilik air, paip sinki dapur dan bumbung rumah. It was solved on 14/06/208. No complaint in 2019. 2. Kahang Estate: 18/07/2019: Complainant (Tuminah) on Longkang tersumbat di perumahan pekerja dan dipenuhi	Yes

Criterion / Indicator		Assessment Findings	Compliance
		<p>rumput-rumput. It was solved on 19/07/2019.</p> <p>3. Swee Lam Estate: 28/09/2019: Complainant (Majnah) on Masalah main plug, broken door and toilet. It was solved on 02/10/2019.</p>	
4.4.2.3	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.</p> <p>- Minor compliance -</p>	<p>Management has keep the complaint/grievance record for internal and external stakeholders. Apart from this, the external stakeholder shared their concerns and complaints through stakeholder’s meeting.</p> <p>Sighted the complaint form titled ‘breakdown report’ used by the workers for the issues raised and grievance book (green book).</p>	Yes
4.4.2.4	<p>Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.</p> <p>- Minor compliance -</p>	<p>The complaint/grievance method has been communicated through the stakeholders meeting, IOI website and introduction of complaint/grievance book.</p>	Yes
4.4.2.5	<p>Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request.</p> <p>- Major compliance -</p>	<p>Complaint records are available since 2007 in the complaint/grievance book.</p>	Yes
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	<p>Growers should contribute to local development in consultation with the local communities.</p> <p>- Minor compliance -</p>	<p>Estate has made contribution to local development in consultation with the local communities such as:</p> <p>1. Mamor Estate: Conducted Hari Keluarga Ladang Mamor on 27/04/2019 and Sukan Untuk Ladang Mamor (2019) on 25/04/2019 amounted RM 3550.30.</p>	Yes

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Criterion / Indicator		Assessment Findings	Compliance
		<p>2. Kahang Estate: Donation RM 100 for Mesyuarat Agung Tahunan PIBG dated 28/02/2019, RM100 for Sambutan Hari Polis 212 dated 26/03/2019, donation for buy fruit in Jamuan Hari Raya on 03/07/2019.</p> <p>3. Swee Lam Estate: Donation RM 150 for support & contribution for the Sri Nagakani Temple Annual Prayer on 30/04/2019 and water supply for monthly and annual prayer on 17/04/2019</p>	
Criterion 4.4.4: Employees safety and health			
4.4.4.1	<p>An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>IOI Plantation Occupational Safety, Health and Hygiene Policy has been established dated April 2019 signed by the Plantation Director. Among others the organization expressed commitment to the following;</p> <ul style="list-style-type: none"> • Complying to all national laws and regulations. • Assessing all health and safety risks to work activities • Conducting regular inspection at workers houses. • Investigating and finding causes of accidents and take appropriate measures to prevent recurrence of such incidents. • Preparing emergency procedures for major accidents/incidents. • An OSH Plan had been established and implemented. <p><u>Mamor Estate</u></p> <p><u>Chemical Health Risk Assessment (CHRA)</u></p> <p>A review CHRA monitoring (Report no: HQ/04/ASS/00/193-2019/003) was conducted on 13 March 2019 by registered assessor, Zakaria Bin</p>	Yes

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Criterion / Indicator	Assessment Findings	Compliance
	<p>Abd Karim (HQ/04/ASS/00/193). Based on the CHRA, 13 findings/recommendations reported.</p> <p><u>Medical Surveillance</u></p> <p>Annual medical surveillance conducted on 08/07/2019, 28/08/2019 & 03/10/2019 by Dr Helen Tan Kwai (HQ/08/DOC/00/597) was sighted. Total 19 employees will be sent and all were fit to work.</p> <p><u>Kahang Estate</u></p> <p><u>Chemical Health Risk Assessment (CHRA)</u></p> <p>A review CHRA monitoring (Report no: HQ/04/ASS/00/193-2019/052) was conducted on 28 August 2019 by registered assessor, Zakaria Bin Abd Karim (HQ/04/ASS/00/193). Based on the CHRA, 13 findings/recommendations reported.</p> <p><u>Medical Surveillance</u></p> <p>Annual medical surveillance conducted on 30/01/2019 & 04/07/2019 by Dr Helen Tan Kwai (HQ/08/DOC/00/597) was sighted. Total 10 employees will be sent and all were fit to work.</p> <p><u>Swee Lam Estate</u></p> <p><u>Chemical Health Risk Assessment (CHRA)</u></p> <p>A review CHRA monitoring (Report no: HQ/04/ASS/00/193-2019/016) was conducted on 20 March 2019 by registered assessor, Zakaria Bin Abd Karim (HQ/04/ASS/00/193). Based on the CHRA, 13 findings/recommendations reported.</p> <p><u>Medical Surveillance</u></p>	

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Criterion / Indicator		Assessment Findings	Compliance																
		Annual medical surveillance conducted on 11/07/2019 by Dr Helen Tan Kwai (HQ/08/DOC/00/597) was sighted. Total 10 employees will be sent and all were fit to work.																	
4.4.4.2	<p>The occupational safety and health plan shall cover the following:</p> <p>a) A safety and health policy, which is communicated and implemented.</p> <p>b) The risks of all operations shall be assessed and documented.</p> <p>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:</p> <ul style="list-style-type: none"> i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied <p>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p>	<p><u>Mamor Estate</u> Safety & Health Management Plans (November 2019 – November 2024) last reviewed on 22 October 2019 was available.</p> <p><u>Kahang Estate</u> Safety & Health Management Plans (December 2019 – December 2024) prepared on 14 November 2019 was available.</p> <p><u>Swee Lam Estate</u> Safety & Health Management Plans (November 2019 – November 2024) last reviewed on 6 November 2019 was available.</p> <ul style="list-style-type: none"> • IOI Plantation Occupational Safety, Health and Hygiene Policy has been established dated April 2019 signed by the Plantation Director has been communicated and implemented. • HIRARC for all the estates was reviewed on 27/02/2019. <p>The significant and routine activities were adequately covered with details as follows:</p> <table border="1"> <thead> <tr> <th>No</th> <th>Areas/Activities</th> <th>No</th> <th>Areas /Activities</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Chemical spraying</td> <td>7</td> <td>Electrical works</td> </tr> <tr> <td>2</td> <td>Collection – buffalo</td> <td>8</td> <td>Transporting FFB to mill</td> </tr> <tr> <td>3</td> <td>Harvesting</td> <td>9</td> <td>Tractor driving</td> </tr> </tbody> </table>	No	Areas/Activities	No	Areas /Activities	1	Chemical spraying	7	Electrical works	2	Collection – buffalo	8	Transporting FFB to mill	3	Harvesting	9	Tractor driving	Yes
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Criterion / Indicator	Assessment Findings	Compliance												
<p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<table border="1" data-bbox="1064 448 1859 550"> <tr> <td>4</td> <td>Chemical store</td> <td>10</td> <td>Fire outbreak</td> </tr> <tr> <td>5</td> <td>Pruning</td> <td>11</td> <td>Bag worm treatment</td> </tr> <tr> <td>6</td> <td>Road maintenance</td> <td>12</td> <td>Workshop operations</td> </tr> </table> <p>Appropriate risk control measures were determined and implemented for the respective activities and operation. Most of the moving part and rotating machinery were installed with machine guarding and properly covered. Appropriate administrative controls such as safety signage were displayed at all work stations in the mill and estates office and workshop. In general, the control measures were appropriate to the identified risks.</p> <ul style="list-style-type: none"> Awareness training program was established and workers involved with chemical handling are trained. Chemicals are arranged and segregated accordingly in the chemical store. The CDS/SDS for chemicals available at point of use. In addition to specific training courses, safety briefings given during muster to reinforce awareness, such as correct wearing of PPE. All the estates has issued PPE to its employees for their protection at workplace. Records of PPE issued are maintained individually for all the employees. PPE issued to the workers is safety helmets, safety shoes. Safety shoes issued on a 6 monthly basis and recorded. During the site visit the staff/workers were noted to be equipped with their proper attire & PPE. Acknowledgement of receipt was recorded. 	4	Chemical store	10	Fire outbreak	5	Pruning	11	Bag worm treatment	6	Road maintenance	12	Workshop operations	
4	Chemical store	10	Fire outbreak											
5	Pruning	11	Bag worm treatment											
6	Road maintenance	12	Workshop operations											

Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> • The SOP for chemical handling elaborated in <i>SOP Bab 17 issue no 2</i> dated 01/08/2018. Therein the procedure containing the following; <ul style="list-style-type: none"> e) A trained person to handle chemicals f) PPE adherence during such an activities g) Handlings details before and after are provided. h) Establishment of emergency situation procedures. • Mamor Estate - The Assistant Manager, Muhammad Mukhlis Bin Mukhtar is appointed as the person in charge for safety and health through a letter dated 21/01/2019, role of which includes areas on safety & health of the staff/workers. Kahang Estate - The Assistant Manager, Abdullah Anas Bin Ahmad Zawawi is appointed as the person in charge for safety and health through a letter dated 25/09/2019, role of which includes areas on safety & health of the staff/workers. Swee Lam Estate - The Assistant Manager, Muhammad Akmal Bin Haraza is appointed as the person in charge for safety and health through a letter dated 18/09/2019, role of which includes areas on safety & health of the staff/workers. • Mamor Estate - The Estate Manager is appointed as the Chairman for the OSH committee duties among other to preside the OSH meetings. The appointment letter dated 19/09/2019 signed by the Plantation Controller was sighted and verified. 	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>Kahang Estate - The Estate Manager is appointed as the Chairman for the OSH committee duties among other to preside the OSH meetings. The appointment letter dated 04/03/2019 signed by the Plantation Controller was sighted and verified.</p> <p>Swee Lam Estate - The Assistant Manager In-Charge is appointed as the Chairman for the OSH committee duties among other to preside the OSH meetings. The appointment letter dated 01/11/2019 signed by the Plantation Controller was sighted and verified.</p> <p>The Estate Manager subsequently assigned duties of OSH coordinator to the Assistants/Supervisors for the down line implementation of OSH practices in the estates. The estate management conduct regular two-way communication with their employees through the quarterly OSH meeting.</p> <p><u>Mamor Estate</u> The minutes of meeting dated 25/09/2019, 27/06/2019 and 12/03/2019 respectively were sighted and verified.</p> <p><u>Kahang Estate</u> The minutes of meeting dated 23/08/2019, 09/05/2019 and 22/02/2019 respectively were sighted and verified.</p> <p><u>Swee Lam Estate</u> The minutes of meeting dated 24/09/2019, 25/06/2019 and 26/03/2019 respectively were sighted and verified.</p>	

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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> The procedures for accident and emergencies has been established. There is formation of ERP Team & ERP for all the identified incidences. In addition the procedures have been summarised in a chart flow form and displayed for information of all employees in the estate. The organization chart for the ERP team was established and displayed for information of the employees. ERT members will receive training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The trainings are conducted by an accredited or qualified organisation who can demonstrate their suitability to provide training. The trained personnel for the First Aid were among the employees working in the estate. The first aid boxes were available at various points in the estate including workshop, office, workshop, store, field etc. Records of all accidents kept and reviewed periodically at OSH meetings. <p><u>Mamor Estate</u> The JKKP 8 sent to DOSH on 16/01/2019 showed that in 2018 there were 36 accident cases with a loss 216 workdays.</p> <p>JKKP 6 for accidents that took place on 09/10/2019 (accident on 02/10/2019) sent to DOSH sighted. The OSH committee had reviewed the HIRARC for any change if necessary.</p> <p><u>Kahang Estate</u></p>	

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Criterion / Indicator		Assessment Findings	Compliance
		<p>The JKKP 8 sent to DOSH on 15/01/2019 showed that in 2018 there were 34 accident cases with a loss 150 workdays.</p> <p>No accident to-date.</p> <p><u>Swee Lam Estate</u> The JKKP 8 sent to DOSH on 11/01/2019 showed that in 2018 there were 37 accident cases with a loss 95 workdays.</p> <p>JKKP 6 for accidents that took place on 19/08/2019 (accident on 10/08/2019) sent to DOSH sighted. The OSH committee had reviewed the HIRARC for any change if necessary.</p>	
Criterion 4.4.5: Employment conditions			
4.4.5.1	<p>The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.</p> <p>- Major compliance -</p>	<p>IOI Group has the Sustainable Palm Oil Policy signed by Dato' Lee Yeow Chor, Group Chief Executive Officer and Dr. Surina Ismail, Group Head of Sustainability, revised on March 2018.</p> <p>Under Human Rights and Workplace, management will respect and uphold the rights of all workers, including contract, temporary and migrant workers, in accordance with the Universal Declaration of Human Rights, the International Labor Organization's core conventions, United Nations Guiding Principles on Business and Human Rights and the principles of Free and Fair Labor in Palm Oil Production.</p>	Yes
4.4.5.2	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion,</p>	<p>IOI Group has the Sustainable Palm Oil Policy signed by Dato' Lee Yeow Chor, Group Chief Executive Officer and Dr. Surina Ismail, Group Head of Sustainability, revised on March 2018.</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
	<p>nationality, social origin or any other distinguishing characteristics.</p> <p>- Major compliance -</p>	<p>Under Human rights and Workplace, management will provide fair and equal employment opportunities for all employees, regardless of race, nationality, religion or gender.</p> <p>Based on the site visit, there is no discrimination occur within foreign workers and locals as well for the job given.</p>	
4.4.5.3	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p>- Major compliance -</p>	<p>There are 190 workers in Mamor Estate (locals: 22, Indonesian: 61, Indian: 13 and Nepalese: 8, Bangladeshi: 84). Sampled below workers' pay slips Jan, June and Sept 2019 and contracts comply with the Minimum Wage Order 2019 as below:</p> <p>Mamor Estate:</p> <ol style="list-style-type: none"> 1. Employee ID: MME 0621 (Zuliana) 2. Employee ID: MME 1115 (Ruman) 3. Employee ID: MME 1372 (Nata) 4. Employee ID: MME 1257 (Ali Mir Ekram) <p>Kahang Estate:</p> <ol style="list-style-type: none"> 1. Employee ID: KHE 1686 (Miah Rashid) 2. Employee ID: KHE 1982 (Yadav Dharendra Kumar) 3. Employee ID: KHE 1767 (I Wayan Purwata) 4. Employee ID: KHE 1482 (Limbu Mohan Kumar) 	Yes

Criterion / Indicator		Assessment Findings	Compliance
		<p>Swee Lam Estate:</p> <ol style="list-style-type: none"> 1. Employee ID: SLE 2383 (Samsudin) 2. Employee ID: SLE 3026 (Miah Emon) 3. Employee ID: SLE 3002 (Amin Faiq) 4. Employee ID: SLE 3161 (Babu Shankar) 	
4.4.5.4	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</p>	<p>There are contractor workers in Estates as below:</p> <p>Sampled below workers has the pay slips for Jan, June and Sept 2019:</p> <ol style="list-style-type: none"> 1. Mamor Estate: Passport no: B2900680 (Shone Epende Hj Hajahar). 2. Kahang Estate: Passport no: AT342149 (Saepol Saiban) – contractor: Jaya Kumar Enterprise and Passport no: AS029827 (Ustadul Munir). <p>No contractor workers hired in Swee Lam Estate.</p>	Yes
4.4.5.5	<p>The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>The overtime recorded in the manually in overtime requisition form with full name, month, division, work description, hours & time.</p> <p>The overtime records then transferred to the SAP checkroll Daily Record. Sampled workers is as per 4.4.5.3.</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
4.4.5.6	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records. - Major compliance -	Employment contracts are available and still valid (extension of contract) during the audit, it is evident that the contract is also signed by both parties. Sampled workers is as per 4.4.5.3.	Yes
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer. - Major compliance -	The overtime recorded in the manually in overtime requisition form or book with full name, month, division, work description, hours & time. The overtime records then transferred to the SAP Checkroll Daily Record. Sampled workers is as per 4.4.5.3.	Yes
4.4.5.8	The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement. - Major compliance -	The working hours and breaks are clearly mentioned in the employment contracts as below: Basic wage: RM 42.31/day Overtime: Maximum 4 hours/day @ RM 7.93/hour. Working Hours: 8 hours/day. Shift hours will be flexible and fix by Employer. Working days: 6 days/week Rest day: one day/week (will be determined by the Employer).	Yes
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance -	Wages and overtime in the pay slips adhered to the minimum wage order 2018 which is RM 1100/month or RM 42.31/day.	Yes

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<p>4.4.5.10 Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions.</p> <p>- Minor compliance -</p>	<p>Management has provided the free medical service, free house, subsidize electric rate of RM 5.00/people (Mamor Estate). Apart from that, there were other social benefits provided such as:</p> <ol style="list-style-type: none"> 1. VLP (Vacation Leave Pay) in year-end salary. 2. Family Day /Sports Day 3. Mamor Estate: Transportation for schoolchildren allowance RM14.40/head/month. 4. Kahang Estate: There is designated van provided for the school children to go to school (SK Ladang Mutiara) for free. 	<p>Yes</p>
<p>4.4.5.11 In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.</p> <p>- Major compliance -</p>	<p>During site visit, sighted the linesite area are in good condition as per linesite inspection recorded by Hospital Assistant. The housing checking also been conducted on weekly basis.</p> <p>Clean water is provided from treated water while electricity with subsidize rate of RM5.00 is provided by TNB.</p> <p>Seen the water analysis report for domestic usage as below:</p> <ol style="list-style-type: none"> 1. Mamor Estate: Pejabat Kesihatan Daerah Kluang on 12/06/2019 resulted 0 total coliform and e-coli and recommended safe for domestic consumption. 2. Kahang Estate: Lotus Laboratory Services (M) Sdn Bhd on 08/10/2019 resulted <2 total coliform (*maximum permitted is 10 by Malaysian Food Act 1983 Regulation 2012 25th A Schedule Standard for Water) and 0 e-coli. 	<p>Yes</p>

Criterion / Indicator		Assessment Findings	Compliance
		3. Swee Lam Estate: Jabatan Kimia Malaysia on 18/11/2019 resulted <1 (total coliform), <2 (e.coli MPN/100ml) and <1 (e.coli cfu/100ml).	
4.4.5.12	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	There is Policy on Harassment at Workplace signed by NB Sudhakaran, Plantation Director in June 2018 mention the grievance channel such as grievance hotline, employee consultative committee, joint consultative committee, gender consultative committee, via email or by post. Apart from that, management also established the Gender Committee Team and sighted the minutes of meeting (29/06/2019 in Mamor Estate, 18/10/2019 in Kahang Estate and 28/9/2019 in Swee Lam Estate). So far no sexual harassment occurred in Pamol Kluang complex.	Yes
4.4.5.13	The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. - Major compliance -	IOI Group has the Sustainable Palm Oil Policy signed by Dato' Lee Yeow Chor, Group Chief Executive Officer and Dr. Surina Ismail, Group Head of Sustainability, revised on March 2018. Under Human rights and Workplace, management will eliminate all forms of illegal, forced, bonded, compulsory or child labor and in particular, follow responsible recruitment practices including not charging recruitment related fees at any stage in the recruitment process, whether by us, our contractors, our agents or their sub-agents in receiving and sending countries. Based on the worker's master list and interview session with stakeholders and workers, there is no child labour hired.	Yes

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Under Human rights and Workplace, management will uphold the right to freedom of association and recognize the right to collective bargaining and allow trade unions to have access to our workers.</p> <p>Estates has conducted the Joint Consultative Committee (JCC) with bimonthly basis. Latest minute of meeting sighted was on 10/10/2019 (Mamor Estate) attended by 10 people, 17/09/2019 (Kahang Estate) attended by 12 people and 09/10/2019 (Swee Lam Estate) attended by 16 people. All issues raised were solved and captured in the SIA report.</p>	
4.4.5.14	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not have exposed to hazardous working conditions.</p> <p>- Major compliance -</p>	<p>Under Human rights and Workplace, management will eliminate all forms of illegal, forced, bonded, compulsory or child labor and in particular, follow responsible recruitment practices including not charging recruitment related fees at any stage in the recruitment process, whether by us, our contractors, our agents or their sub-agents in receiving and sending countries.</p> <p>Based on the workers master list, there is no child labour hired.</p>	Yes
Criterion 4.4.6: Training and competency			
4.4.6.1	<p>All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.</p> <p>- Major compliance -</p>	<p>All employees and contractors /vendors were provided with training by the management. The training among other covers all aspects of the MSPO requirements. There were also additional subjects including the estates operating procedures, parameters of FFB qualities vehicles maintenance etc.</p> <p>The training program also specified the target group of employees to be trained under the allocated subjects. The subjects for the training are issued and assisted by the Sustainability Unit.</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
		<p>The following topics included in the Estate Safety & Health Program for the year 2019 among others are extracted below;</p> <ol style="list-style-type: none"> 1) OSH Act & regulations 1994. 2) Environmental Quality Act 1974 3) Induction Program for new workers. 4) OSH Committee and function. 5) First Aid Training 6) Scheduled waste training 7) RSPO/MSPO/ISCC Principles 8) HCV & Biodiversity training. 9) Mechanical/electrical workshop 10) Process activities SOP 11) Supply chain <p>Records of training were sighted during this audit. Details are shown in 4.4.6.3</p>	
4.4.6.2	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p>- Major compliance -</p>	<p>The Estate Recommended Training Needs (Staff & Workers) has been established. The details of the training needs include categories of stations, subjects, and employees' group.</p> <p>Included in this program among others are subjects related to;</p> <ol style="list-style-type: none"> 1) Environmental/safety & health policy 2) Scheduled waste management / environmental responsibility, 3) Building and structure 4) Sustainability 5) Good agricultural practices–estates operations/control of parameters 6) Social program/welfare activities. 	Yes

Criterion / Indicator	Assessment Findings	Compliance																																																								
<p>4.4.6.3 A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.</p> <p>- Minor compliance -</p>	<p>Training details are planned and summarised in the Estate Safety And Health Program for the year 2019 and the Sustainability Program. Training program are made on annual basis. In addition it is subject for a review during the financial year should need arises.</p> <p>These training are made to ensure employees are trained in their job and on to update on current development adopted by the organisation.</p> <p><u>Mamor Estate</u></p> <table border="1" data-bbox="1066 719 1854 924"> <thead> <tr> <th>No</th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>20/11/19</td> <td>Fire Drill</td> <td>15</td> </tr> <tr> <td>2</td> <td>12/09/19</td> <td>First Aid Training</td> <td>11</td> </tr> <tr> <td>3</td> <td>12/07/19</td> <td>SaOP Chemical Management</td> <td>3</td> </tr> <tr> <td>4</td> <td>23/05/19</td> <td>Safety Training</td> <td>10</td> </tr> <tr> <td>5</td> <td>20/04/19</td> <td>SaOP Harvester Safety Training</td> <td>25</td> </tr> </tbody> </table> <p><u>Kahang Estate</u></p> <table border="1" data-bbox="1050 1023 1843 1257"> <thead> <tr> <th>No</th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>06/09/19</td> <td>Pre-mixer Training</td> <td>1</td> </tr> <tr> <td>2</td> <td>05/11/19</td> <td>Rat Baiting Training</td> <td>5</td> </tr> <tr> <td>3</td> <td>21/09/19</td> <td>First Aid Training</td> <td>17</td> </tr> <tr> <td>4</td> <td>17/07/19</td> <td>PPE Sprayer (Pam Spray)</td> <td>7</td> </tr> <tr> <td>5</td> <td>05/07/19</td> <td>Emergency Response Team & Fire Extinguisher Training</td> <td>17</td> </tr> </tbody> </table> <p><u>Swee Lam Estate</u></p> <table border="1" data-bbox="1050 1326 1843 1388"> <thead> <tr> <th>No</th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>29/07/19</td> <td>First Aid Training</td> <td>111</td> </tr> </tbody> </table>	No	Date	Subject	Attendees	1	20/11/19	Fire Drill	15	2	12/09/19	First Aid Training	11	3	12/07/19	SaOP Chemical Management	3	4	23/05/19	Safety Training	10	5	20/04/19	SaOP Harvester Safety Training	25	No	Date	Subject	Attendees	1	06/09/19	Pre-mixer Training	1	2	05/11/19	Rat Baiting Training	5	3	21/09/19	First Aid Training	17	4	17/07/19	PPE Sprayer (Pam Spray)	7	5	05/07/19	Emergency Response Team & Fire Extinguisher Training	17	No	Date	Subject	Attendees	1	29/07/19	First Aid Training	111	<p>Yes</p>
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Criterion / Indicator		Assessment Findings				Compliance
		2	05/07/19	Emergency/Fire Drill Training	123	
		3	18/06/19	First Aider Training	14	
		4	31/05/19	Chemical Handling/Storage/SDS /Spill Kit Training	2	
		5	14/05/19	Spraying Training	1	
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services						
Criterion 4.5.1: Environmental Management Plan						
4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. - Major compliance -	The policy in relation to environmental is stated in the IOI Group – Sustainable Palm Oil Policy with the latest revision on March 2018. The Policy is signed by the Group Chief Executive Officer and Group Head of Sustainability.				Yes
4.5.1.2	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations. - Major compliance -	The policy in relation to environmental is stated in the IOI Group – Sustainable Palm Oil Policy with the latest revision on March 2018. The Policy is signed by the Group Chief Executive Officer and Group Head of Sustainability. Among others the Policy emphasized on the Environmental Management to include the following; i. Identification & protection of HCV And HCS forest ii. Implementation of program to progressively reduce GHG emission, recycle /reuse of palm biomass iii. Enforcement of IOI of the NO OPEN BURNING POLICY. iv. Adopted no use of paraquat and pesticides categorized by WHO in class 1A or 1B.				Yes

Criterion / Indicator		Assessment Findings	Compliance									
		<p>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 November 2015 to November 2020 for all the estates.</p> <p>Aspects and impacts analysis of all operations during normal/abnormal/emergency situation identified.</p>										
4.5.1.3	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.</p> <p>- Major compliance -</p>	<p>All the estates documented a similar environmental improvement plan being having similar operations and work method throughout the region.</p> <p>The continual improvements plans are aimed to;</p> <p>a) prevent and reduce pollutant, b) prevent and reduce waste products release c) reduce chemicals comprising pesticides or fertilizer.</p> <table border="1"> <thead> <tr> <th>No</th> <th>Sources/objective & target</th> <th>Action steps</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Synergy support and planning between mill and estates</td> <td>A synergistic support and planning of the EFB and dried POME from the mill to the estates.</td> </tr> <tr> <td>2</td> <td>Management of biodiversity river reserve & buffer zone conservation</td> <td>To train/retrain sprayers/manuring gang to avoid any chemical-related works at such areas</td> </tr> </tbody> </table>	No	Sources/objective & target	Action steps	1	Synergy support and planning between mill and estates	A synergistic support and planning of the EFB and dried POME from the mill to the estates.	2	Management of biodiversity river reserve & buffer zone conservation	To train/retrain sprayers/manuring gang to avoid any chemical-related works at such areas	Yes
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Criterion / Indicator		Assessment Findings		Compliance	
		3	To monitor waste management plan for its suitability	SW & domestic waste disposal monitoring. Changes of internal disposal site to the local municipal.	
		4	To improve employees awareness on pollution prevention at housing complex including zero burning policy.	Continuous reminders and enforcement	
		5	To minimise spillage of oil/chemical onto the ground	Continuous training and use of spill trays	
		6	To review aspect identification & impact evaluation to identify significant critical points for control.	Review through EIA. Guidance also sourced from the chemical MSDS/CSDS.	
		7	Soil erosion prevention plans	Using palm trunk chip as part of ground mulch Planting of LCC for the ground covers No bare ground condition.	
		The monitoring is made through the daily supervision and visits by the higher management.			
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan.	The improvement plans were sighted. The estates identified the following activities and areas for Improvement plan;		Yes	

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Criterion / Indicator		Assessment Findings			Compliance
	- Minor compliance -	No	Activity	Areas of activity / Plan	
		1	Reduce water usage	washing bay, mixing chemical bay. Consumption of water is measured by mtl/mt FFB	
		2	Reduce diesel usage	through SOP of PMV (planned maintenance vehicle). FFB collection using buffalo system.	
		3	Reduce herbicide & pesticide usage	Initiative made through <i>nephrolepis</i> establishment, LCC establishment and growth of beneficial plant. Biological control using barn owl system. Grass cutting at path for the field upkeep. Application of EFB and stacked fronds to suppress weeds growth and enhance moisture.	
		Monitoring is made through data analysis and the daily field supervision.			
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives. - Major compliance -	This is available in the annual training program under subject of:			Yes
		No	Subjects		
		1	ESH Legal & Other requirements		
		2	Chemical handling		
		3	Emergency Respond Plan Training Chemical spill, Fire		
		4	Scheduled waste management		
		5	RSPO/ISCC/MSPO Training		

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Criterion / Indicator		Assessment Findings	Compliance								
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4.5.1.6	<p>Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.</p> <p>- Major compliance -</p>	<p>Regular meetings are made thorough the EPMC held 4x/year. The dates held to date as recorded below;</p> <p>The agenda discussed as follows;</p> <ul style="list-style-type: none"> i. SW discussion/EFB disposal/Effluent18, ii. Drainage/GHG/Competent Person. iii. RTE/Zero burning iv. Water management plan. v. Pesticide reduction plan vi. HCV/Land preparation & soil conservation vii. Continuous improvement plans. <p>Minutes were sighted and verified. Mamor Estate had meeting on 25/09/2019, 27/06/2019 & 12/03/2019. Kahang Estate had meeting on 23/08/2019, 09/05/2019 & 22/02/2019. Swee Lam Estate had meeting on 24/09/2019, 25/06/2019 & 26/03/2019.</p>	Yes								
Criterion 4.5.2: Efficiency of energy use and use of renewable energy											
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends	The estates consistently monitor the following and tabulate the data monthly. Direct usage of diesel for the estates operations are recorded.	Yes								

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<p>shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period.</p> <p>- Major compliance -</p>	<p>The quantity in mt is divided over the mt FFB produced (ratio) during the month. The performance is measured by this ratio to indicate the level of performance. The data is compiled for comparison and control for future improvement with aim of gradual reduction of diesel.</p> <p>There were measures as shown in the energy management plan to reduce and eliminate wastages among others as follows;</p> <ul style="list-style-type: none"> i. To ensure minimum balance FFB ramp balance to sustain the desired FFA at the mill. ii. Timely servicing of vehicles to ensure efficient use of diesel & avoid leakages iii. Regular servicing of gen-sets for a better efficiency iv. Educate employees on fuel/electricity saving practices. <p><u>Mamor Estate</u></p> <table border="1" data-bbox="1102 979 1818 1378"> <thead> <tr> <th>Month 19</th> <th>Diesel used/L</th> <th>FFB produced /mt</th> <th>Diesel/FF B</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>10350</td><td>6026.98</td><td>1.72</td></tr> <tr><td>Feb</td><td>7660</td><td>4719.96</td><td>1.62</td></tr> <tr><td>Mac</td><td>9420</td><td>4880.72</td><td>1.93</td></tr> <tr><td>April</td><td>9094</td><td>4755.03</td><td>1.91</td></tr> <tr><td>May</td><td>9180</td><td>4622.00</td><td>1.99</td></tr> <tr><td>June</td><td>8110</td><td>3711.22</td><td>2.19</td></tr> <tr><td>July</td><td>8280</td><td>3925</td><td>2.11</td></tr> <tr><td>Aug</td><td>7510</td><td>4809.90</td><td>1.56</td></tr> <tr><td>Sept</td><td>7420</td><td>4390.62</td><td>1.69</td></tr> <tr><td>Oct</td><td>9260</td><td>5224.88</td><td>1.77</td></tr> </tbody> </table>	Month 19	Diesel used/L	FFB produced /mt	Diesel/FF B	Jan	10350	6026.98	1.72	Feb	7660	4719.96	1.62	Mac	9420	4880.72	1.93	April	9094	4755.03	1.91	May	9180	4622.00	1.99	June	8110	3711.22	2.19	July	8280	3925	2.11	Aug	7510	4809.90	1.56	Sept	7420	4390.62	1.69	Oct	9260	5224.88	1.77	
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4.5.2.2	<p>The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.</p> <p>- Major compliance -</p>	<p>The 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>Consumption of electricity is also recorded mainly reading from the meters. Diesel utilisation is recorded at ratio vs the mt FFB. Graph is tabulated to see the trend of performance.</p> <p>The annual diesel and electricity estimates is provided in the annual budget.</p>				Yes																															
4.5.2.3	<p>The use of renewable energy should be applied where possible.</p> <p>- Minor compliance -</p>	There is no opportunity for the estates to capitalize the utilization of fibre/shell as part of their energy production in replacement of fossil fuel with the current technology limitation.				Yes																															
Criterion 4.5.3: Waste management and disposal																																					
4.5.3.1	All waste products and sources of pollution shall be identified	All waste and pollution are identified and documented in the Waste Management Plan 2019.				Yes																															

Criterion / Indicator		Assessment Findings	Compliance																				
	<p>and documented.</p> <p>- Major compliance -</p>	<p>The waste and pollution generated from the estates operations as shown below;</p> <table border="1"> <thead> <tr> <th>No</th> <th>List of waste and pollutant</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Spent hydraulic & lubricants oil</td> </tr> <tr> <td>2</td> <td>Spent contaminated rags, oil filters, oil containers</td> </tr> <tr> <td>5</td> <td>Oil & grease</td> </tr> <tr> <td>8</td> <td>Domestic waste</td> </tr> <tr> <td>9</td> <td>Chemical waste & chemical containers</td> </tr> <tr> <td>10</td> <td>Spent batteries</td> </tr> <tr> <td>11</td> <td>Scrap metal and bald tyres</td> </tr> <tr> <td>12</td> <td>Sewage</td> </tr> <tr> <td>13</td> <td>Clinical wastes</td> </tr> </tbody> </table>	No	List of waste and pollutant	1	Spent hydraulic & lubricants oil	2	Spent contaminated rags, oil filters, oil containers	5	Oil & grease	8	Domestic waste	9	Chemical waste & chemical containers	10	Spent batteries	11	Scrap metal and bald tyres	12	Sewage	13	Clinical wastes	
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<p>4.5.3.2</p>	<p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <p>a) Identifying and monitoring sources of waste and pollution</p> <p>b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products</p> <p>- Major compliance -</p>	<p>The details of the waste management plan is described below;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Type of waste</th> <th>Description</th> <th>Action to be taken</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Domestic waste</td> <td>Rubbish</td> <td>Collection/disposal min 2x /week externally Establish collection SOP Establish collection schedule & PIC Create awareness on hygiene Monitoring of line site</td> </tr> </tbody> </table>	No	Type of waste	Description	Action to be taken	1	Domestic waste	Rubbish	Collection/disposal min 2x /week externally Establish collection SOP Establish collection schedule & PIC Create awareness on hygiene Monitoring of line site	<p>Yes</p>												
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Criterion / Indicator		Assessment Findings				Compliance
		2	Industrial waste	Fertiliser bags	Inventory of bags, reuse for LF collection, sell to appointed contractor	
				Scrap metal	Inventory maintained, tender at zone level for sale to licensed contractor.	
				POME	Daily monitoring of application at designated fields a rate of 40mt/ha for mature areas.	
		3	Sewage waste	sewage	To monitor during housing inspection and residents' complaints Engagement with licensed contractor for sewage management.	
		4	Scheduled Waste	SW 404 Clinical waste	Inventory maintained. Storage in sharp bin in clinic. Disposal to Kualiti Alam Waste Management (licensed contractor) /VMO clinic.	
				SW rags, plastics, filters	Inventory maintained. Storage in scheduled waste store. Disposal to OLST Petro Chemical Sdn Bhd/Kualiti Alam registered with DOE	
				Spent lubricant & hydraulic oil	Collection by licensed vendor. Inventory maintained. Disposal to OLST Petro Chemical Sdn Bhd/Kualiti Alam registered with DOE	

Criterion / Indicator		Assessment Findings				Compliance
				Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW,	Inventory maintained. Storage in SW store. All containers are labelled. Empty containers collected by authorized vendor. Disposal to OLST Petro Chemical Sdn Bhd/Kualiti Alam registered with DOE	
4.5.3.3	<p>The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.</p> <p>- Major compliance -</p>	<p>The SOP for Scheduled Waste has been established and documented in <i>SOP Ref no IOI-OSH 3.2.2</i> dated 12/03/2018 compiled in the Group Standard Operating Procedures for the estates.</p> <p>Therein describing details relating to;</p> <ul style="list-style-type: none"> • Labeling • Legal requirement • Waste generator • Training required • DOE license <p><u>Mamor Estate</u> Inventory of scheduled waste referred file no: AS(B)KLG11/123/000/115 dated 06/11/2019.</p> <p>Consignment note for scheduled waste available for SW305, SW409 and SW410.</p>				Yes

Criterion / Indicator		Assessment Findings	Compliance
		<p>Latest disposal scheduled waste is on 18 October 2019 by OLST Petro-Chemical Sdn Bhd (License no: 002292) validity period 01/05/2019 – 30/04/2020.</p> <p><u>Kahang Estate</u> Inventory of scheduled waste referred file no: AS(B)J11/123/ 000/092 dated 09/11/2019.</p> <p>Consignment note for scheduled waste available for SW305, SW409 and SW410.</p> <p>Latest disposal scheduled waste is on 26 November 2019 by 5E Resources Sdn Bhd (License no: 003892) validity period 01/05/2019 – 30/04/2020.</p> <p><u>Swee Lam Estate</u> Consignment note for scheduled waste available for SW305, SW409 and SW410.</p> <p>Latest disposal scheduled waste is on 21 November 2019 by Kualiti Alam Sdn Bhd (License no: 004992) validity period 01/05/2019 – 30/04/2020.</p>	
4.5.3.4	<p>Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.</p> <p>- Major compliance -</p>	<p>Under the operational control procedure established as given in 4.5.3.3 above the guidelines and practices for handling empty pesticides are as follows;</p> <ul style="list-style-type: none"> a) All class 2 and above containers are tripled rinsed and hole punctured at the bottom only if the waste generator is to dispose as non-scheduled waste. b) Containers to be disposed as scheduled waste need not go the triple rinsing. 	Yes

Criterion / Indicator		Assessment Findings	Compliance														
		<p>c) Disposal made to OLST Petro-Chemical Sdn Bhd/Kualiti Alam Sdn Bhd/5E Resources Sdn Bhd registered with DOE.</p> <p>These guidelines are based on Department Of Agriculture ref: 91/120/038/014 dated 07/11/2002.</p>															
4.5.3.5	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p>- Minor compliance -</p>	<p>Under the action plan of the waste plan, and collection is 2x-3x/week by estate management.</p> <p>Recycled waste is separated while the domestic wastes are accumulated in a bin for further collection by M/s Mido Enterprise.</p> <p>Monitoring is made by an Executive/staff.</p>	Yes														
Criterion 4.5.4: Reduction of pollution and emission																	
4.5.4.1	<p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent.</p> <p>- Major compliance -</p>	<p>The details of the waste management plan is described below;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Type of waste</th> <th>Description</th> <th>Action to be taken</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Domestic waste</td> <td>Rubbish</td> <td>Collection/disposal min 2x /week externally Establish collection SOP Establish collection schedule & PIC Create awareness on hygiene Monitoring of line site</td> </tr> <tr> <td rowspan="2">2</td> <td rowspan="2">Industrial waste</td> <td>Fertiliser bags</td> <td>Inventory of bags, reuse for LF collection, sell to appointed contractor</td> </tr> <tr> <td>Scrap metal</td> <td>Inventory maintained, tender at zone level for sale to licensed contractor.</td> </tr> </tbody> </table>	No	Type of waste	Description	Action to be taken	1	Domestic waste	Rubbish	Collection/disposal min 2x /week externally Establish collection SOP Establish collection schedule & PIC Create awareness on hygiene Monitoring of line site	2	Industrial waste	Fertiliser bags	Inventory of bags, reuse for LF collection, sell to appointed contractor	Scrap metal	Inventory maintained, tender at zone level for sale to licensed contractor.	Yes
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Criterion / Indicator		Assessment Findings				Compliance
				POME	Daily monitoring of application at designated fields a rate of 40mt/ha for mature areas.	
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Criterion / Indicator		Assessment Findings				Compliance												
				chemicals, pesticides, SW	Sdn Bhd/Kualiti Alam registered with DOE													
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	Details as provided in 4.5.4.2 above.				Yes												
Criterion 4.5.5: Natural water resources																		
4.5.5.1	<p>The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities. c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate. 	<p>The Water Management Plan 2019 for the estates has been established. This is compiled on Group basis and amended to meet demands of specific issue in Operating Units. Included therein are the following documents which were sighted and verified:</p> <p>Contingency plan during water shortage:</p> <table border="1"> <thead> <tr> <th>No</th> <th>Area/incident</th> <th>Action steps</th> <th>PIC</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Water shortage/ prolonged dry season</td> <td>to obtain water from nearby source of water course to train/educate staff/workers to conserve water to seek assistance from SAJ - to obtain treated water supply from estates WTP</td> <td>Estate Asst.</td> </tr> <tr> <td>2</td> <td>Severe water pollution/ contamination</td> <td>to train/educate staff/workers to conserve water to seek assistance from SAJ</td> <td>Estate Asst.</td> </tr> </tbody> </table>				No	Area/incident	Action steps	PIC	1	Water shortage/ prolonged dry season	to obtain water from nearby source of water course to train/educate staff/workers to conserve water to seek assistance from SAJ - to obtain treated water supply from estates WTP	Estate Asst.	2	Severe water pollution/ contamination	to train/educate staff/workers to conserve water to seek assistance from SAJ	Estate Asst.	Yes
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Criterion / Indicator	Assessment Findings	Compliance																
<p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p>- Major compliance -</p>	<table border="1" data-bbox="1048 448 1872 539"> <tr> <td></td> <td></td> <td>- to obtain treated water supply from estates WTP</td> <td></td> </tr> </table> <p>Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Maintenance Of Riparian Reserve ref no 16.1 dated 20/12/11.</p> <p>The buffer zones established are as following:</p> <table border="1" data-bbox="1218 794 1704 999"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>> 40 meters</td> <td>50 meters</td> </tr> <tr> <td>40 meters</td> <td>40 meters</td> </tr> <tr> <td>10 - 20 meters</td> <td>20 meters</td> </tr> <tr> <td>5 - 10 meters</td> <td>10 meters</td> </tr> <tr> <td>< 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>As per the requirements to obtain the license from SPAN and permit from JTK, domestic water quality analysis for chemical and biological contamination is conducted every 6 months. It was found that the quality of domestic water supply in these estates is within the limits as per Malaysian Food Act 1983 Regulation 2012.</p> <p>Stream Water Quality Index (WQI) test is conducted once a year by IOI Research Centre.</p> <p><u>Mamor Estate</u></p> <p>IOI Research Centre ref: MME/09/08/2018 dated 09/08/2018 of test results of samples from 5 stream water (18W/195 AMM-2, 18W/196</p>			- to obtain treated water supply from estates WTP		River width	Buffer zone	> 40 meters	50 meters	40 meters	40 meters	10 - 20 meters	20 meters	5 - 10 meters	10 meters	< 5 meters	5 meters	
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Criterion / Indicator		Assessment Findings	Compliance
		<p>AMM-3, 18W/197 BMM-1, 18W/198 BMM-2 & 18W/199 BMM-3) points verified.</p> <p>Lotus Laboratory Services (M) Sdn Bhd ref: LS/W/H5886/19 dated 02/07/2019 of test results of samples from before and after treatment verified.</p> <p><u>Kahang Estate</u></p> <p>IOI Research Centre dated 17/07/2018 of test results of samples from 2 natural stream water (AKH-1/AKH-AKH-3) & (BKH-1/BKH-2/BKH-3) points verified.</p> <p>Lotus Laboratory Services (M) Sdn Bhd ref: LS/W/H9168/19 dated 08/10/2019 of test results of samples from before and after treatment verified.</p> <p><u>Swee Lam Estate</u></p> <p>IOI Research Centre dated 20/07/2018 of test results of samples from 1 stream water (SWL-1, SWL-2 & SWL-3) points verified.</p> <p>ENV Consultancy & Monitoring Services Sdn Bhd ref: LP/0319/1720(1),(2)&(3) dated 20/03/2019 of test results of samples from before and after treatment verified.</p>	
4.5.5.2	<p>No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p> <p>- Minor compliance -</p>	<p>All the estates complies to this requirement. This requirement is also audited internally by the Sustainability Unit.</p> <p>During the field visit no construction of such obstruction was observed.</p> <p>There is no major river flowing in all the estates audited.</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
4.5.5.3	<p>Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles).</p> <p>- Minor compliance -</p>	<p>During the site visit practices of water harvesting are noted as available in the SOP.</p> <p>Road side pits were available at every 3 palm rows, to divert in event of water overflowing and also to benefit the nearest palm at the pit end to obtain additional moisture.</p> <p>Amendments of intervals of this construction are made to suit the infrastructure /terrain of estate.</p>	Yes
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value			
4.5.6.1	<p>Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:</p> <p>a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.</p> <p>b) Conservation status (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities.</p> <p>- Major compliance -</p>	<p>High Conservation Value (HCV) Assessment 2019 was sighted for all the estates, prepared in September 2014 and reviewed in November 2019.</p> <p>Therein describing details relating to;</p> <p>a) Objectives</p> <ul style="list-style-type: none"> - To identify RTE species surrounding the estate. - To identify the status of species identified - To develop action plan to maintain/enhance the species - Educate workforce - To ensure no individual capture <p>b) Protection of wildlife Act 1972/wildlife conservation Act 2010.</p> <p>c) List of important bird areas IBAs for Malaysia</p> <p>d) Protection Animals and others under wildlife protection act 1972 (fauna)</p> <p>e) Protected mammals/aquatic/protected animals/protected birds</p> <p>f) Statement of commitment</p>	Yes

Criterion / Indicator		Assessment Findings	Compliance
		g) Action plan for monitoring RTE within and surrounding estate compound h) Mechanism for monitoring and reviewing outcomes of monitoring i) Contact no of local authorities.	
4.5.6.2	<p>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <p>a) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p>- Major compliance -</p>	<p>This has been elaborated in 4.5.6.2 above.</p> <p>Signboards and training are also displayed and provided to the employees on such a requirement.</p> <p>Training in relation to RTE is shown in 4.4.6.3</p>	Yes
4.5.6.3	<p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p>- Major compliance -</p>	<p>A monitoring checklist maintained by the AP during their rounds in the fields.</p> <p>In addition, the supervisory personnel are also given task to inform the management of any sighting of RTE in the property. This is recorded in the RTE species recording.</p> <p>The formatting for monitoring and maintaining RTE as formatted under Action plan, monitoring & continuous improvement program, documents to be reviewed, management reviews comments & time bound and the Person in charge.</p> <p>Document was sighted and verified.</p>	Yes

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.5.7: Zero burning practices			
4.5.7.1	<p>Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice.</p> <p>- Major compliance -</p>	<p>The Group policy of "Zero Burning Policy" is enforced ever since the industry practiced such a ruling. The Policy was last reviewed on May 2018 and signed by The Plantation Director.</p> <p>Among others the Policy stated the following commitment;</p> <ul style="list-style-type: none"> a) Commitment towards zero burning practices across the estates as part of effort in protecting the environment and combating haze problem. b) Open burning is defined as any fire, combustion or smoldering that occurs in the open air and as by law, no person shall cause or allow open burning on any premises and subjected to legal action. c) IOI will provide training to its workers on fire prevention and techniques to put out fire, and inform the Contractors and smallholders on this Policy <p>The operating units adhered to the policy of "Zero open burning" for any replanting.</p> <p>From field visits and interviews with the workers there is no open burning being practiced in all the estates.</p> <p>This is the measures taken by the organization to pledge towards zero open burning.</p>	<p>Yes</p>
4.5.7.2	<p>A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop.</p> <p>- Major compliance -</p>	<p>The management maintained zero open burning and opted for other option in case of potential significant risk of disease spread for the continuation of other crop.</p> <p>Hence this requirement is not used in the estate practices.</p>	<p>Yes</p>

Criterion / Indicator		Assessment Findings	Compliance
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. - Major compliance -	The management maintained zero open burning.	Yes
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	This is in practice whenever the estate commences land preparation for its replanting works.	Yes
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Site Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	All the SOP for the estates operations in a document "SaOPs For Estates Operations". Therein containing details for all the estates activities among others as listed below; a) Seeds production/planting density/nursery b) Land clearing/planting techniques/LCC planting c) Manuring/weeding/pest and disease d) Harvesting & collection e) Road maintenance/buffalo healthcare/ f) Foliar sampling/beneficial plant	Yes
4.6.1.2	Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and	The estates construct terraces at slope area of more than 6 degree.	Yes

Criterion / Indicator		Assessment Findings	Compliance
	<p>waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.</p> <p>- Major compliance -</p>	<p>Planting of cover crop are made to retain the soil structure and conservation. Road side pit are made to divert water at slope areas to prevent road erosion and surface damage. Terraces are constructed inclined towards the terrace wall. Slope of more than 25 degrees are avoided in the planting areas due to the Policy of the Company forecasting several issues during the crop recovery on maturity.</p>	
4.6.1.3	<p>A visual identification or reference system shall be established for each field.</p> <p>- Major compliance -</p>	<p>All fields are marked and identified. Information like year planting (field no) and the total hectare is shown in all markers. There are both stencilled at the palm trees and also displayed in signage at the boundary/corners of every field. This is observed during the field visit in the estates.</p>	Yes
Criterion 4.6.2: Economic and financial viability plan			
4.6.2.1	<p>A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.</p> <p>- Major compliance -</p>	<p>All the estates audited possessed a similar budget format. Inclusive there is also a 5-year budget/forecast financial plan 2018/19 - 2022/23 allocating categories among others;</p> <ul style="list-style-type: none"> a) Area statement. <ul style="list-style-type: none"> - Year of planting - Total mature areas - Total immature areas. b) Crop FFB monthly breakdown c) 10 years replanting program d) Summary replanting program by field e) Detail replanting program by field f) Executives/staff/workers requirement g) Mature oil palm costing statement - Upkeep & cultivation 	Yes

Criterion / Indicator		Assessment Findings	Compliance																								
		<ul style="list-style-type: none"> - Harvesting & collection h) General charges statement <ul style="list-style-type: none"> - General charges - Cost of supervision - Cost of labour - Cost of other - Cost of RSPO i) Capital expenditure statement <ul style="list-style-type: none"> - Building, utilities, welfare - Plant & machinery - Office equipment - Furniture & fittings - Electrical installation - New roads & bridges <p>The five years planning horizon 2018/19 - 2022/23 is available.</p>																									
4.6.2.2	<p>Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years.</p> <p>- Major compliance -</p>	<p>All the estates in the Pamol Kluang complex maintained records of replanting for a horizon minimum of 5 years. Details as shown below. All figures in ha otherwise stated.</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>2021/22</th> <th>2022/23</th> <th>2023/24</th> <th>2024/25</th> <th>2025/26</th> </tr> </thead> <tbody> <tr> <td>Mamor</td> <td>183ha</td> <td>169ha</td> <td>188ha</td> <td>196ha</td> <td>190ha</td> </tr> <tr> <td>Kahang</td> <td>Nil</td> <td>Nil</td> <td>Nil</td> <td>Nil</td> <td>Nil</td> </tr> <tr> <td>Swee Lam</td> <td>Nil</td> <td>Nil</td> <td>Nil</td> <td>Nil</td> <td>Nil</td> </tr> </tbody> </table>	Estate	2021/22	2022/23	2023/24	2024/25	2025/26	Mamor	183ha	169ha	188ha	196ha	190ha	Kahang	Nil	Nil	Nil	Nil	Nil	Swee Lam	Nil	Nil	Nil	Nil	Nil	Yes
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4.6.2.3	<p>The business or management plan may contain:</p> <p>a) Attention to quality of planting materials and FFB</p> <p>b) Crop projection: site yield potential, age profile, FFB yield trends</p>	<p>This requirement i.e. crop material, crop projection, yield, production cost is available.</p> <p>It is provided in the business management plan shown in item 4.6.2.1 above.</p>	Yes																								

Criterion / Indicator		Assessment Findings	Compliance
	c) Cost of production : cost per tonne of FFB d) Price forecast e) e) Financial indicators : cost benefit, discounted cash flow, return on investment - Major compliance -	The estates had a format and guideline to calculate the returns on the field operations i.e. Income=sale of FFB (with award of CPO/CPK from the mill) less the expenditure (fixed and direct cost). The main document is handled by the higher management based in Head Office.	
4.6.2.4	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. - Major compliance -	The estates performance is recorded in the monthly progress report. Details on the actual vs budget i.e. crop production, fixed and direct cost are shown therein. The management also provides variance report on the performance and reviewed monthly. The supervisory personnel maintained a daily cost for the field operations. The regional meetings involving the Managers sit monthly with the Plantation Controller for the performance review.	Yes
Criterion 4.6.3: Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	In Kahang Estate, sighted the LCS Agro Enterprise for transporting & loading FFB (PM01-PM09) and Jayakumar Maju Enterprise, the contract agreement signed on 01 st July 2019 were having the details of payment of RM 5.10/MT for loading FFB however, it was found out that the payment for FFB loading on October 2019 is RM 5.20/MT. Estate management has informed that they were aware with the error and will charge the overpaid amount in the November payment. Sighted the letter sent to the contractor dated 15/11/2019 and	Yes

Criterion / Indicator		Assessment Findings	Compliance
		<p>confirmed the acknowledgment with the contractors through telephone interview.</p> <p>In Swee Lam Estate, sighted Sasaran Perentas Sdn Bhd for transporting and delivering of Oil Palm FFB, the contract agreement was signed on 01st Sept 2019 valid until 31st Aug 2022. The agreed rate was sighted in the contract and reflected in the invoice no: 00001459 dated 30/09/2019, amounted all RM 34,167.67 and RM 35,049.30.</p>	
4.6.3.2	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p>- Major compliance -</p>	<p>The contracts were available, and the payment will be made not later than 30 days of invoice date or completion of work to the company's satisfaction.</p>	Yes
Criterion 4.6.4: Contractor			
4.6.4.1	<p>Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information.</p> <p>- Major compliance -</p>	<p>Sampled contract agreement no: MME/001-19/20 for Tea & T Estate Contractor for loading & transporting FFB to ramp valid from 01.07.2019 – 30.06.2020 (Mamor Estate), KHE/002-19/20 for LCS Agro Enterprise for transporting & loading FFB (PM01-PM09) valid from 01.07.2019 – 30.06.2020 (Kahang Estate) and Sasaran Perentas Sdn Bhd for transporting and delivering of Oil Palm FFB, the contract agreement was signed on 01st Sept 2019 valid until 31st Aug 2022.</p> <p>The details of payment for internal transport FFB and loading FFB-all block was made clear and signed by both parties on 01.07.2019 (Mamor Estate and Kahang Estate) and 01.09.2019 (Swee Lam Estate), as below:</p>	Yes

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Criterion / Indicator		Assessment Findings	Compliance
		<ol style="list-style-type: none"> Under the additional requirements for Contractors and Service Providers, it is agreed that the contractors are to be aware and comply with all applicable local, national and ratified international laws and regulations including sustainability requirements (RSPO, RSPO NEXT, MSPO, ISCC etc.). Details of work: contractors are also requested to oblige to all ISCC & RSPO & MSPO requirements as mentioned in the ISCC & RSPO & MSPO standards. 	
4.6.4.2	<p>The management shall provide evidence of agreed contracts with the contractor.</p> <p>- Major compliance -</p>	<p>Mamor Estate: Sampled contract agreement no: MME/001-19/20 for Tea & T Estate Contractor & AVR Machinery Works & Enterprise for loading & transporting FFB to ramp valid from 01.07.2019 – 30.06.2020. The details of payment from Mamor Estate for internal transport FFB and loading FFB-all block was made clear and signed by both parties on 01.07.2019.</p> <p>Kahang Estate: Sampled contract agreement no: KHE/002-19/20 for LCS Agro Enterprise for transporting & loading FFB (PM01-PM09) valid from 01.07.2019 – 30.06.2020. The details of payment from Mamor Estate for internal transport FFB and loading FFB-all block was made clear and signed by both parties on 01.07.2019.</p> <p>Swee Lam Estate: Sampled contract agreement no: Sasaran Perentas Sdn Bhd for transporting and delivering of Oil Palm FFB, the contract agreement was signed on 01st Sept 2019 valid until 31st Aug 2022. The details of payment from Mamor Estate for internal transport FFB and loading FFB-all block was made clear and signed by both parties on 01.09.2019.</p>	Yes

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Criterion / Indicator		Assessment Findings	Compliance
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	Sampled contract agreement no: MME/001-19/20 for Tea & T Estate Contractor for loading & transporting FFB to ramp valid from 01.07.2019 – 30.06.2020. The details of payment from Mamor Estate, Kahang Estate and Swee Lam Estate for internal transport FFB and loading FFB-all block was made clear and signed by both parties on 01.07.2019, under the additional requirements for Contractors and Service Providers, it is agreed that the contractors are to be aware and comply with all applicable local, national and ratified international laws and regulations including sustainability requirements (RSPO, RSPO NEXT, MSPO, ISCC etc.).	Yes
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted. - Major compliance -	The management has the summary of job completion after assessing the contractor's progress works for the payment preparation. Sighted Internal Transport & Loading to Ramp Oct 2019 contractor: Tea & T Estate and AVR Machinery Works & Enterprise (Mamor Estate) and KHE/002-19/20 for LCS Agro Enterprise for transporting & loading FFB (PM01-PM09) (Kahang Estate).	Yes
4.7 Principle 7: Development of new planting			
Criterion 4.7.1: High biodiversity value			
4.7.1.1	Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A

Criterion / Indicator		Assessment Findings	Compliance
4.7.1.2	No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia’s National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A
Criterion 4.7.2: Peat Land			
4.7.2.1	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A
Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)			
4.7.3.1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A
4.7.3.2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A



Criterion / Indicator		Assessment Findings	Compliance
	external stakeholders. - Major compliance -		
4.7.3.3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A
4.7.3.4	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed. - Minor compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A
Criterion 4.7.4: Soil and topographic information			
4.7.4.1	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A

Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.7.5: Planting on steep terrain, marginal and fragile soils			
4.7.5.1	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A
4.7.5.2	Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A
Criterion 4.7.6: Customary land			
4.7.6.1	No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A

Criterion / Indicator		Assessment Findings	Compliance
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A
4.7.6.3	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A
4.7.6.4	The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A

Criterion / Indicator		Assessment Findings	Compliance
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A
4.7.6.8	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. - Minor compliance -	There is no NEW PLANTING for all the visited estates within the CU. Hence the criterion is not relevant.	N/A

Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings	
Based on the findings during the assessment IOI Corporation Berhad- Pamol Kluang POM Certification Unit complies with the MS 2530-3:2013 or MS 2530-4:2013 . It is recommended that the certification of IOI Corporation Berhad- Pamol Kluang POM Certification Unit is approved and/or continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: Ravi Tony	Name: Elzy Ovktafia Chairul
Company name: IOI Plantation Services Sdn. Bhd.	Company name: BSI Services Malaysia Sdn. Bhd.
Title: Manager - Sustainability, Safety & Health	Title: Client Manager
Signature:  IOI PLANTATION SERVICES SDN BHD Company No: 1050782-T Sustainability, Safety & Health Dept RAVI TONY MANAGER JKKP IS 127/438/2/1596 Date: 22/02/2020	Signature:  Date: 21/02/2020

Appendix A: Assessment Plan

Date	Time	Subjects	EO	DF
Sunday 24.11.2019	PM	Audit team traveling to Kluang and check in at Kluang Container Hotel	√	√
Monday 25.11.2019	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, meeting stakeholders etc. Visit to laboratory, weighbridge and palm product storage area.	√	√
	1200-1300	Lunch	√	√
	1300-1630	Pamol Kluang Palm Oil Mill Document Review P1 – P8: SOPs. 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	√	√
Tuesday 26.11.2019	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.	√	√
	1000-1200	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor 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).	√	√
	1630-1700	Interim Closing Briefing	√	√
Wednesday 27.11.2019	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	√	√

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Date	Time	Subjects	EO	DF
		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	√	√
Thursday 28.11.2019	0830-1200	Swee Lam 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	Swee Lam 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	Preparation of Closing Meeting and Closing Meeting for MSPO P&C	√	√
Friday 29.11.2019	0830-1300	Pamol Kluang Palm Oil Mill Documentation: Business Overview/Functions/Org Chart 5.1 Sustainability Policy 5.2. Management Representative 5.3 Record Keeping 5.4. Procedures 5.5. Internal Audit 5.6. Management Review 6.1 Competency and Training 7.0 Traceability 8.0 Supply chain models (Mass Balance – Fix/Continuous inventory) 9.0 Outsourced Activities 10.0 Claims 11.0 Complaints and Grievances 12.0 IT Platform	√	-
	1300-1400	Lunch	√	-
	1400-1630	Site tour to mill (<i>not limited to</i>): a) Weighbridge Station b) Reception Station c) Fruit Handling Station d) Sterilisation Station e) Threshing Station f) Pressing Station g) Clarification Station h) Depericarping Station i) Product Storage and Despatch j) Outsourcing activities (if any)	√	-
	1630-1700	Finalization of audit findings and report preparation.	√	-
	1700-1730	Closing Meeting for MSPO SCC.	√	-

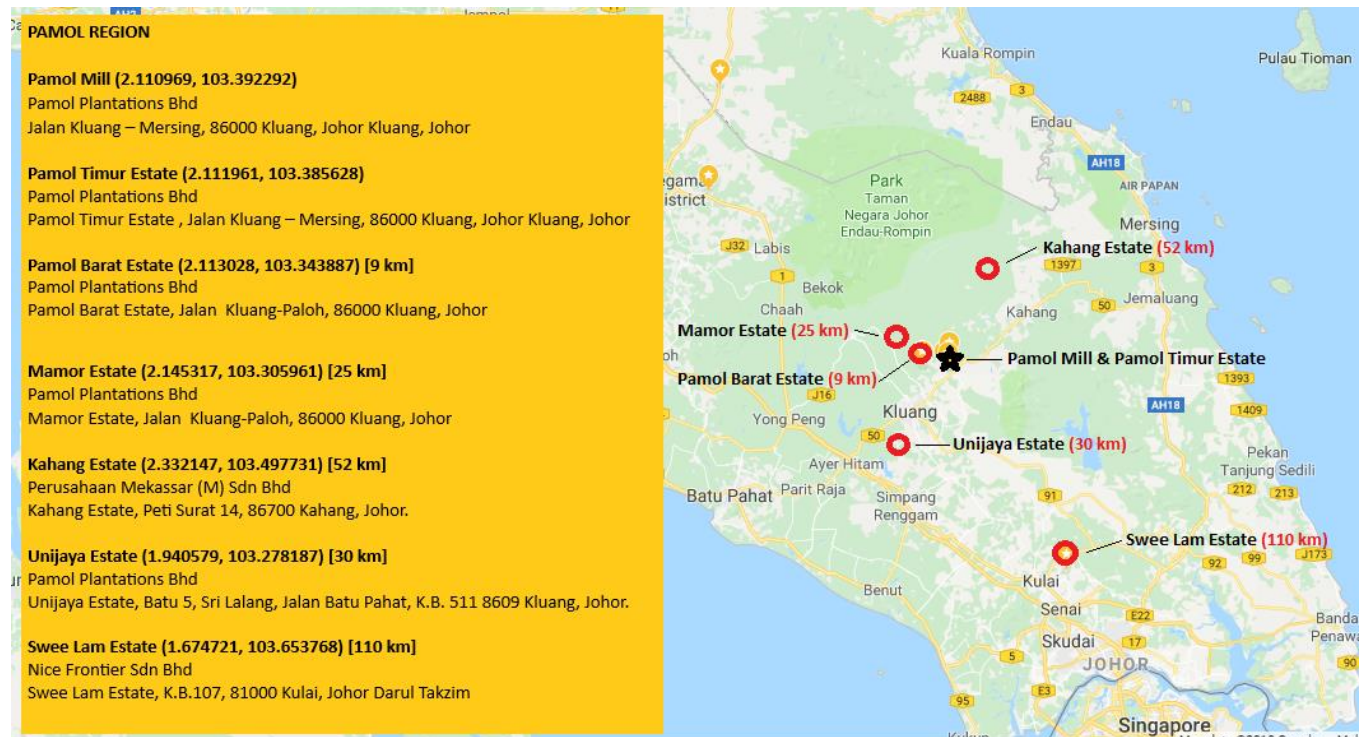
Appendix B: List of Stakeholders Contacted

<p>Government Bodies: SK Pengkalan Tereh Jabatan Tenaga Kerja Kluang</p>	<p>Internal Stakeholders: Workers Representatives (Foreign Worker) Gender Committee Representative Medical Assistant (Kahang Estate)</p>
<p>Communities: Kampung Pengkalan Tereh Temple Representatives (Mamor Estate)</p>	<p>Contractors: Sundry Shop at Pamol Barat Estate Chit Sun Contractor Sdn Bhd Nanyang Zugg Works FFB Transporter at Pamol Barat Estate Tea & T Contractor Jaya Kumar (Maju Jaya)</p>

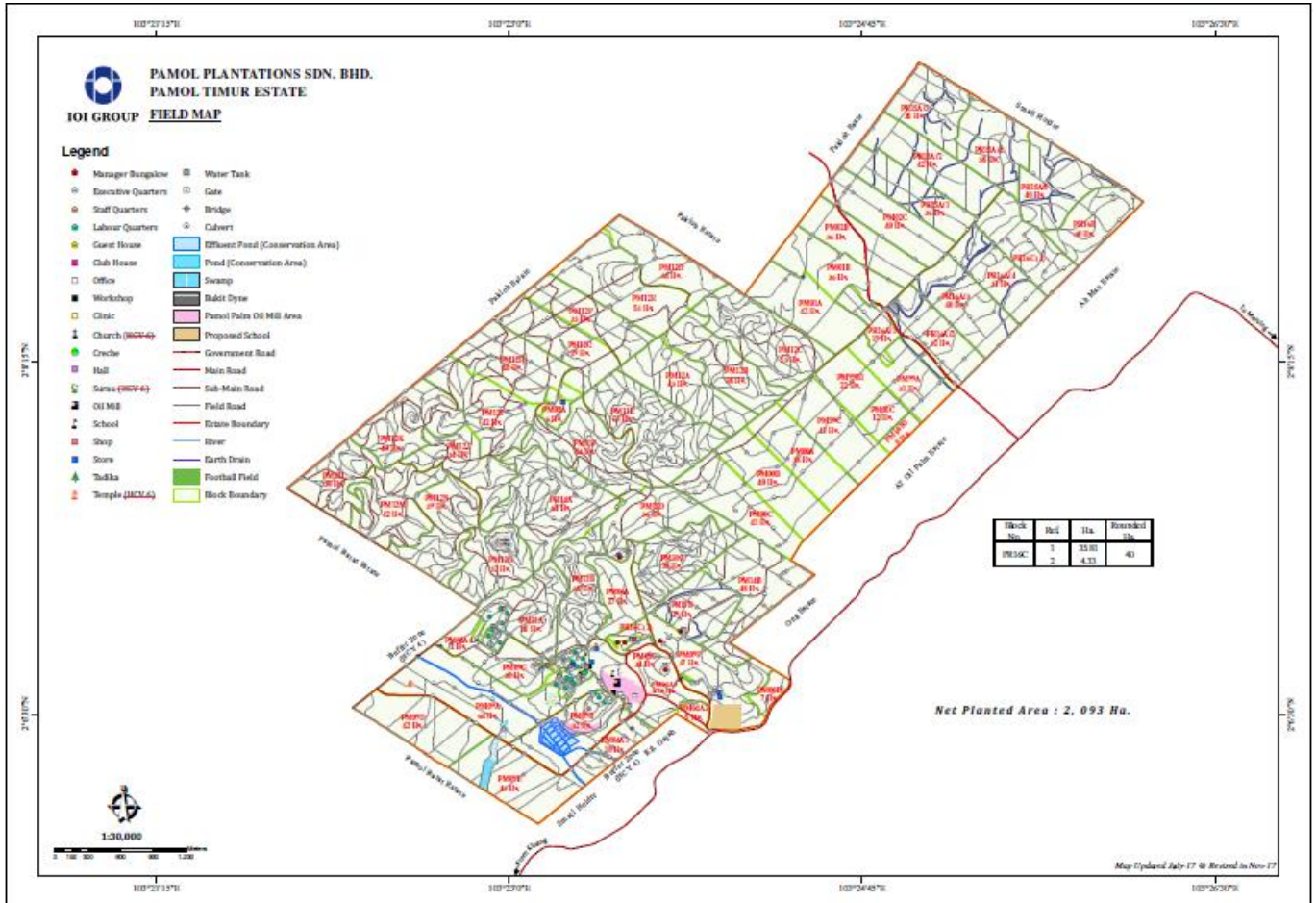
Appendix C: Smallholder Member Details

No	Name of smallholder	Year Planted	Land Area (ha)	Forecast FFB (Mt/ha/year)
1	Not applicable as no smallholder's scheme involved in the scope of certification.			
2				
3				
4				
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23				
TOTAL				

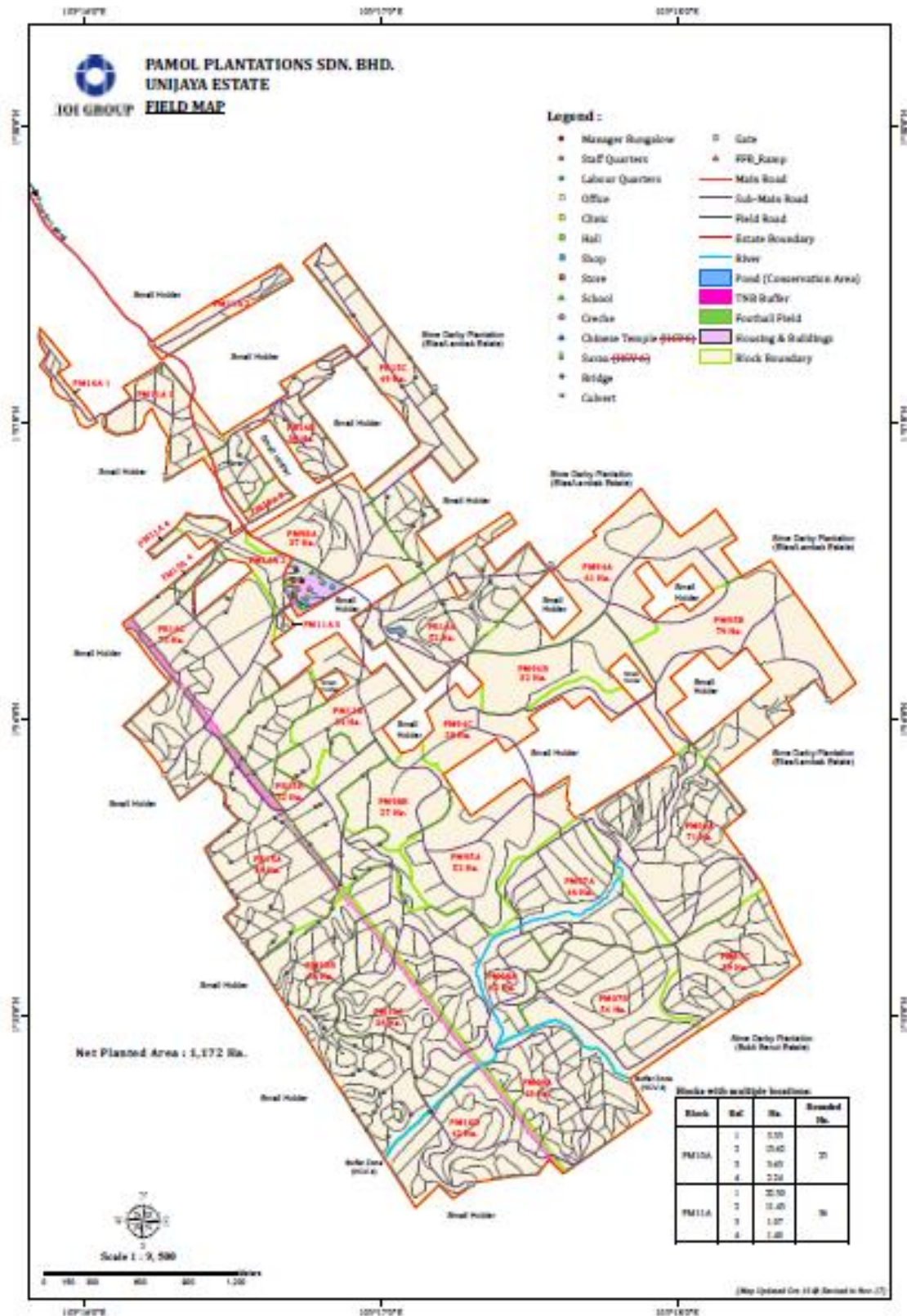
Appendix D: IOI Pamol Kluang Palm Oil Mill Location & Field Map



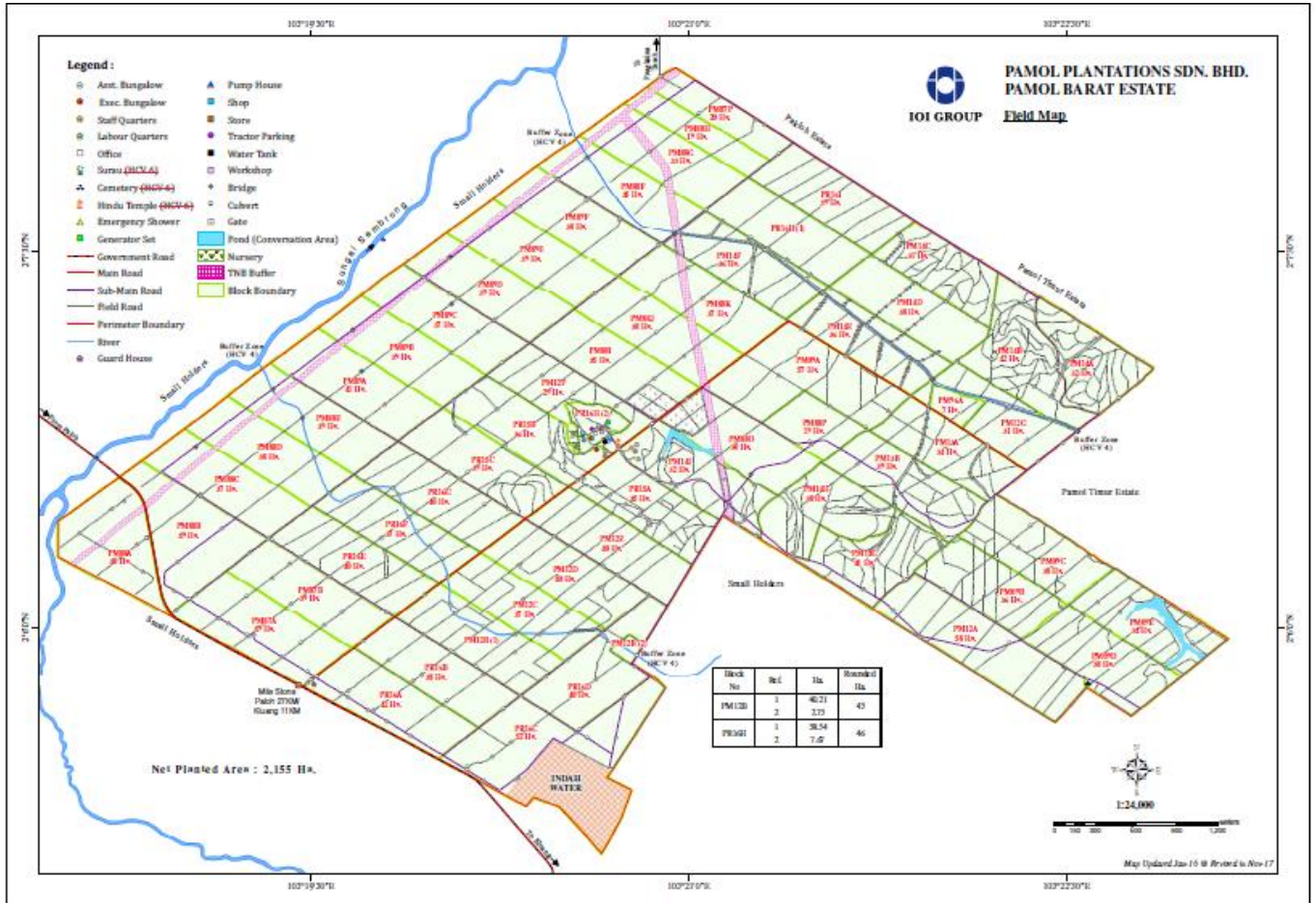
Appendix E: Pamol Timur Estate Field Map



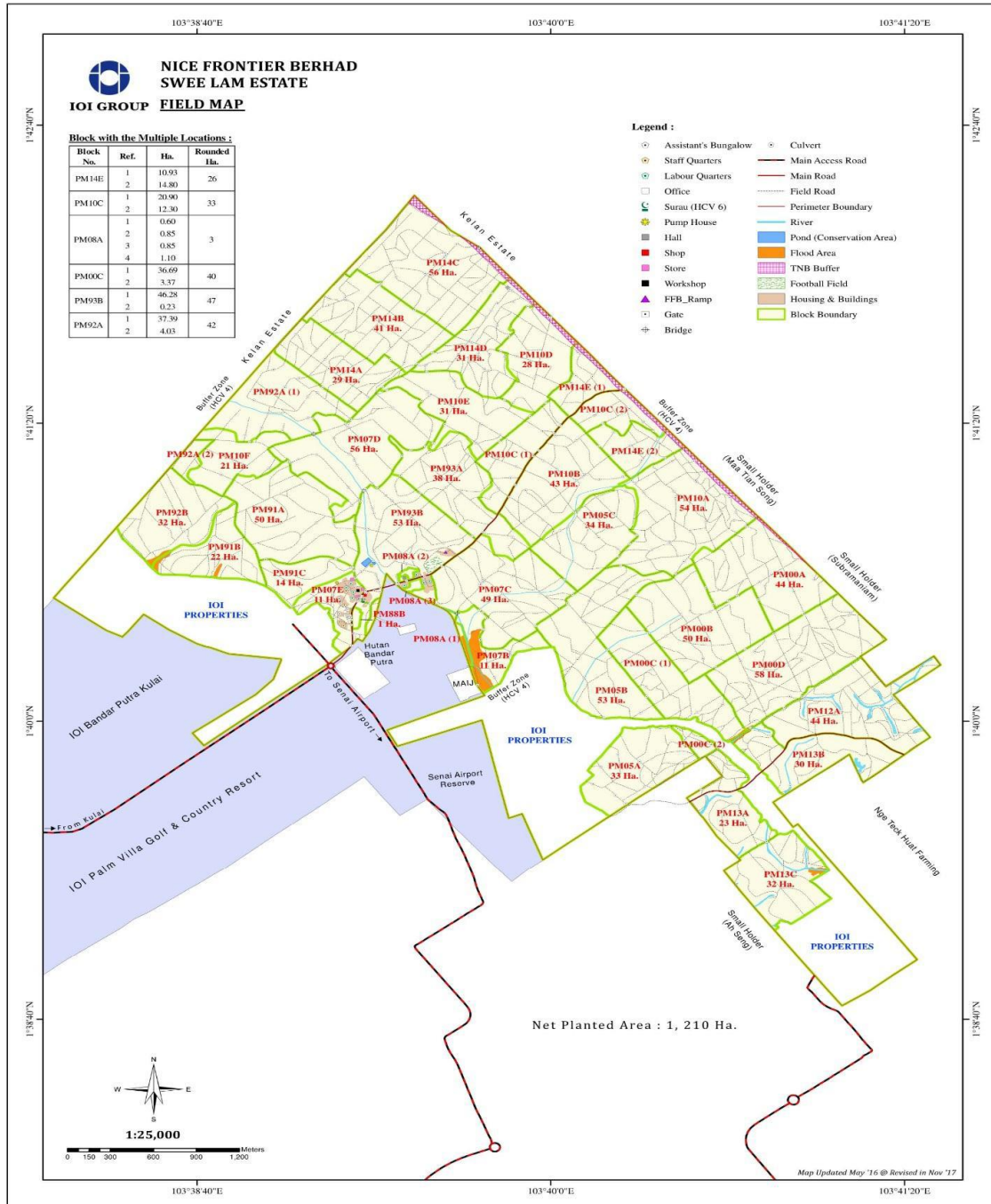
Appendix F: Unijaya Estate Field Map



Appendix G: Pamol Barat Estate Field Map



Appendix H: Swee Lam Estate Field Map



Appendix I: List of Abbreviations

BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MSPO	Malaysian Sustainable Palm Oil
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RTE	Rare, Threatened or Endangered species
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure