

**MALAYSIAN SUSTAINABLE PALM OIL
3rd ANNUAL SURVEILLANCE ASSESSMENT (ASA3)
Public Summary Report**

IOI CORPORATION BERHAD

Client company Address:
Level 29, IOI City Tower 2, Lebuhr IRC,
IOI Resort City, 62502 Putrajaya, Malaysia

Certification Unit:
Dynamic Plantations Bhd - Gomali Palm Oil Mill & Plantations
Gomali Estate, Paya Lang Estate, Tambang Estate, Sagil Estate, Regent Estate,
Bahau Estate, Kuala Jelei Estate, Bertam Estate, Jasin Lalang Estate and Bukit
Dinding Estate

Location of Certification Unit:
Gomali Palm Oil Mill, 5th Mile, Jalan Gemas-Batu Anam
K.B. No. 102, 85100 Segamat, Johor, Malaysia

Report prepared by:
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Report Number: 3293255

Assessment Conducted by:
BSI Services Malaysia,
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Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
Company Name	IOI Corporation Berhad		
Mill/Estate	MPOB License No.	Expiry Date	
	Gomali POM: 500117204000	31/01/2022	
	Gomali Estate: 502164502000	31/01/2022	
	Paya Lang Estate: 586873002000	30/06/2021	
	Tambang Estate: 586869002000	30/06/2021	
	Sagil Estate: 586841002000	30/06/2021	
	Regent Estate: 586619002000	30/06/2021	
	Bahau Estate: 586370102000	30/06/2021	
	Kuala Jelei Estate: 586620002000	30/06/2021	
	Bertam Estate: 509491002000	31/12/2021	
	Jasin Lalang Estate: 611934002000	31/05/2022	
	Bukit Dinding Estate: 501850402000	30/09/2021	
Address	Head Office: IOI City Tower 2, Lebuhr IRC, IOI Resort City, 62502 Putrajaya, Malaysia Certification Unit: Gomali Palm Oil Mill, 5 th Mile, Jalan Gemas-Batu Anam, K.B. No. 102, 85100 Segamat, Johor, Malaysia		
Certification Unit	Dynamic Plantations Bhd - Gomali Palm Oil Mill		
Contact Person Name	Kesavan Manohar		
Website	www.ioigroup.com	E-mail	gmm@ioigroup.com
Telephone	+607-9498245	Facsimile	+607-9498245

1.2 Certification Information			
Certificate Number	Part 4 (Mill): MSPO 727189	Part 3 (Estate): MSPO 727190	
Issue Date	10/09/2018	Expiry date	09/09/2023
Scope of Certification	Mill: Production of Sustainable Palm Oil and Palm Oil Products Estate: Production of Sustainable Oil Palm Fruits		
Standard	Mill: MS 2530-4:2013 Part 4: General principles for palm oil mills Estate: MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholders		
Stage 1 Date	N/A (transfer from other CB)		
Stage 2 / Initial Assessment Visit Date (IAV)	N/A (transfer from other CB)		

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Continuous Assessment Visit Date (CAV) 1	N/A (transfer from other CB)
Continuous Assessment Visit Date (CAV) 2	29/06/2020 - 03/07/2020
Continuous Assessment Visit Date (CAV) 3	14/06/2021 - 18/06/2021
Continuous Assessment Visit Date (CAV) 4	TBC

Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 727112	RSPO P&C 2018 (MYNI 2019); Palm Oil and Palm Kernel Production	BSI Services Malaysia Sdn. Bhd.	22/08/2025
MSPO 727219	MSPO Supply Chain Certification Standard (MSPO SCCS) 1 October 2018	BSI Services Malaysia Sdn. Bhd.	28/08/2024
EU-ISCC-Cert-DE100-17192019	ISCC EU	SGS Germany GmbH	31/08/2021

1.3 Location of Certification Unit			
Name of the Certification Unit (Palm Oil Mill/ Estate)	Site Address	GPS Reference of the site office	
		Longitude	Latitude
Gomali POM	5 th Mile, Jalan Gemas-Batu Anam, K.B. No. 102, 85100 Segamat, Johor, Malaysia	102.67943	2.61068
Gomali Estate	Jalan Gemas-Batu Anam, K.B. No. 102, 85100 Segamat, Johor, Malaysia	102.67333	2.61158
Paya Lang Estate	Batu Anam, 85100 Segamat, Johor, Malaysia	102.70766	2.58238
Tambang Estate	Tambang Estate, Batu Anam, 85100 Segamat, Johor, Malaysia	102.71641	2.63197
Sagil Estate	8 Milestone, Jalan Tangkak-Segamat, 84900 Tangkak, Johor, Malaysia	102.63469	2.31502
Regent Estate	2 nd Mile, Jalan Batang Melaka, 73200 Gemencheh, Negeri Sembilan, Malaysia	102.40466	2.51405
Bahau Estate	Batu 5, Jalan Bahau-Rompin, 72100 Bahau, Negeri Sembilan, Malaysia	102.44872	2.80905
Kuala Jelei Estate	5KM, Jalan Tampin, 72109 Bahau, Negeri Sembilan, Malaysia	102.3897	2.77455
Bertam Estate	Flora Horizon Sdn Bhd, Bertam Estate, 76100 Durian Tunggal, Melaka, Malaysia	102.30155	2.30402
Jasin Lalang Estate	5KM from 15 Miles Air Merbau, Jalan Jasin Bemban, Jasin, Melaka, Malaysia	102.42119	2.25469

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Bukit Dinding Estate	1 ½ Miles, Jalan Mentakab, 28600 Karak, Pahang, Malaysia	102.07549	3.39125
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1.4 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Gomali Estate	2171.00	3.99	380.76	2555.75	84.95
Paya Lang Estate	1986.00	0.75	480.50	2467.25	80.49
Tambang Estate	1875.00	5.57	130.13	2010.7	93.25
Sagil Estate	1912.00	34.68	558.31	2504.99	76.33
Regent Estate	2135.00	2.90	162.37	2300.27	92.82
Bahau Estate	2631.00	4.61	205.8	2841.41	92.59
Kuala Jelei Estate	634.00	2.68	42.58	679.26	93.34
Bertam Estate	411.00	0	37.80	448.8	91.58
Jasin Lalang Estate	694.00	0.76	55.99	750.75	92.44
Bukit Dinding Estate	1447.00	47.53	165.90	1660.43	87.15
Total	15,896.00	103.47	2,220.14	18,219.61	87.25

Note:

Gomali Estate:

1. Reclassification 0.06Ha of Infrastructure to HCV due to GIS Adjustment.

Paya Lang Estate:

1. Total planted increased by 15ha due to conversion from rubber to oil palm.

Tambang Estate:

1. Variance 4.66ha in HCV/conservation due to wrongly declare swamp as conservation area. Reclassified under Infrastructure & others.

Sagil Estate:

1. Reclassification of total planted area to Infrastructure & others of 40ha due to replanting conversion from oil palm to coconut.
2. Total area reduced by 160.67 (HCV & Infrastructure and others), the land area currently was managed by Bukit Serampang Estate (the area was included in Bukit Serampang Estate)

Regent Estate:

1. Total planted reduced 2ha due to new road construction.
2. Variance of 9.79ha HCV/conservation area after remapping done by our GIS Department.

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Bahau Estate:

1. Increased by 2ha of total planted due to replanting in 2019 after GIS adjustment.
2. Total area variance 2.76ha due to re-demarcation of river boundary shown in UAV Imagery by GIS and new land title area after GIS adjustment.

Kuala Jelei estate:

1. Reduction 1.20ha in HCV/conservation due to wrongly declare swamp as conservation area. Reclassified under Infrastructure and others.

Jasin Lalang Estate:

1. Total planted, HCV, total hectarage, infrastructure and others (813.14ha) decreased due to land acquisition by Scientex Heights Sdn Bhd.

1.5 Plantings & Cycle

Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Gomali Estate	129	545	666	826	5	2042	129
Paya Lang Estate	15	870	344	757	0	1971	15
Tambang Estate	182	405	553	726	9	1693	182
Sagil Estate	558	146	415	793	0	1354	558
Regent Estate	456	487	689	239	264	1679	456
Bahau Estate	639	686	1019	141	146	1992	639
Kuala Jelei Estate	0	38	469	127	0	634	0
Bertam Estate	0	0	411	0	0	411	0
Jasin Lalang Estate	0	221	0	126	347	694	0
Bukit Dinding Estate	53	321	970	103	0	1394	53
Total (ha)	2032	3719	5536	3838	771	13864	2032

1.6 Certified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Sept 2020 - Aug 2021)	Actual (June 2020 - May 2021)	Forecast (Sept 2021 - Aug 2022)
Gomali Estate	49,940.00	44480.22	38,220.00
Paya Lang Estate	39,100.00	41889.44	37,260.00
Tambang Estate	26,851.00	27458.95	26,851.00
Sagil Estate	29,130.00	24834.60	33,671.00
Regent Estate	36,494.00	38394.03	34,152.00

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Bahau Estate	40,919.00	44807.70	43,970.00
Kuala Jelei Estate	14,220.00	17403.97	14,860.00
Bertam Estate	12,330.00	13068.90	11,410.00
Jasin Lalang Estate	31,950.00	22686.97	13,770.00
Bukit Dinding Estate	37,950.00	34331.68	37,776.00
Sembilan Tani Estate	-	208.15	-
Bukit Serampang Estate	-	21296.41	-
Shahzan 1 Estate	-	861.90	-
Shahzan 2 Estate	-	799.21	-
Segamat Estate	-	9684.30	-
Kahang Estate	-	6591.90	-
Swee Lam Estate	-	19647.34	-
Total	318,884.00	368,445.67	291,940.00

1.7 Uncertified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Sept 2020 - Aug 2021)	Actual (June 2020 - May 2021)	Forecast (Sept 2021 - Aug 2022)
N/A			

1.8 Certified Tonnage

Mill Capacity: 120 MT/hr	Estimated (Sept 2020 - Aug 2021)	Actual (June 2020 - May 2021)	Forecast (Sept 2021 - Aug 2022)
	FFB	FFB	FFB
	318,884.00	368,445.67	291,940.00
SCC Model: SG	CPO (OER: 21.79%)	CPO (OER: 21.79 %)	CPO (OER: 20.25 %)
	69,484.82	80,301.43	59,117.85
	PK (KER: 5.00%)	PK (KER: 4.71 %)	PK (KER: 4.65 %)
	15,944.20	17,349.67	13,575.21

1.9 Actual Sold Volume (CPO) - (June 2020 - May 2021)

CPO (MT)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
80,301.43	-	4,853.71	70,956.21	-	75,809.92

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1.10 Actual Sold Volume (PK) - (June 2020 - May 2021)					
PK (MT)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
17,349.67	-	-	16,548.96	-	16,548.96

Section 2: Assessment Process

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 190 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 remote assessment was conducted from 14-18/06/2021. The audit programme is included as Section 2.3. The approach to the audit was to treat the mill and estates as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities.

This remote audit has been conducted using Information and Communication Technologies including Microsoft Teams, WhatsApp and Google Drive. The planned audit objectives have been achieved, and there were no connectivity issues which adversely effected the audit.

The methodology for collection of objective evidence included virtual 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 and MS 2530-4:2013 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 sample were determined based on formula $S = r\sqrt{n}$ where n is the number of estates while when applicable, the smallholders sample were determined following the MSPO Certification Requirement. The sampling of smallholders was based on the formula $(r\sqrt{n})$; where r is the risk factor (may defers 1, 1.5 and 2 depending on risk), where n is total number of group members. 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 MSPO 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 remotely in the mill and the estates via remote telecommunication. Fieldworkers were interviewed informally in small groups in the field via remote telecommunications as well. 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.

All the previous nonconformities are remains closed. 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 MSPO approved Peer Reviewer prior to certification decision by BSI.

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

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)
Gomali POM	NA	NA	✓	✓	✓
Gomali Estate	NA	NA	-	✓	-
Paya Lang Estate	NA	NA	-	✓	-
Tambang Estate	NA	NA	-	✓	-
Sagil Estate	NA	NA	-	✓	-
Regent Estate	NA	NA	-	-	✓
Bahau Estate	NA	NA	✓	-	✓
Kuala Jelei Estate	NA	NA	✓	-	-
Bertam Estate	NA	NA	✓	-	-
Jasin Lalang Estate	NA	NA	✓	-	✓
Bukit Dinding Estate	NA	NA	-	-	✓

Tentative Date of Next Visit: June 6, 2022 - June 10, 2022

Total No. of Mandays: 19 Mandays

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2.1 BSI Assessment Team

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Vijay Kanna Pakirisamy	Team Leader	He holds a bachelor’s degree in Agribusiness Science Management with Honours from University Utara Malaysia in 2010. He gained his working exposure in the plantation sector, serving as an Assistant Manager with KL Kepong and IOI Plantations and as a Sr. Assistant Manager with United Plantations Berhad. Throughout his 10-year tenure in the oil palm industry, he has been part of the operations team that implements standards within the estate such as RSPO and MSPO. He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in November 2019, endorsed RSPO P&C Lead Auditor Course in October 2019 and endorsed MSPO Lead Auditor Course in November 2019. During this assessment, he assessed on the Environmental, Safety and Health aspects and estate best practises. He is fluent in Bahasa Malaysia and English languages.
Muhamad Naquiddin Mazeli	Team Member	He graduated with Bachelor of Science Horticulture at University Putra Malaysia. He started his career in 2009 as Researcher at Sime Darby Research Seed Centre and manage for Quality control for seed production for paddy, chilli and corn with collaboration with Malaysian Agricultural Research and Development Institute (MARDI) for 4 years. During the period, he was also involved with Nestle project on Red Rice production. He later joins the Sime Darby Plantation Berhad Sustainability Team in 2013 as Sustainability Executive. Joining the sustainability team, he managed, implemented and monitored the RSPO, ISCC, MSPO and ISO 9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also supports in providing training and internal audits related to RSPO, MSPO and other certifications where applicable to the operations within Sime Darby Plantation. He is a trained Safety Officer and he managed the Occupational Safety and Health of Northern Region Sime Darby Plantation Berhad operations. During this assessment, he assessed the aspects of social, legal, workers & stakeholders’ consultation.

2.2 Accompanying Persons

No.	Name	Role
-	-	-

2.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment (attached assessment plan).

Date	Time	Subjects	(VKP)	(MNM)	IT Platform
Friday, 04/06/2021	1000 - 1100	Proposed preparatory/test call between client and BSI auditor via Microsoft Teams. Communication on document preparation for remote/ICT audit	✓	✓	Microsoft Teams
Monday, 14/06/2021 Gomali Estate	0900 - 0930	Opening Meeting <ul style="list-style-type: none"> • Presentation by BSI Lead Auditor - introduction of team member and assessment agenda • Confirmation of assessment scope and finalizing audit scope 	✓	✓	Microsoft Teams
	0930 - 1230	Document Review (MS2530:2011 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6 : Best practices Best practices, P7: Development of New Planting	✓	✓	Microsoft Teams, WhatsApp, and Shared Drive
	1230 - 1330	Lunch break	✓	✓	-
	1330 - 1630	Document Review (MS2530:2011 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6 : Best practices Best practices, P7: Development of New Planting	✓	✓	Microsoft Teams, WhatsApp, and Shared Drive
	1630 - 1700	Interim closing meeting	✓	✓	Microsoft Teams

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Date	Time	Subjects	(VKP)	(MNM)	IT Platform
Tuesday, 15/06/2021 Tambang Estate	0900 - 1230	Document Review (MS2530:2011 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6 : Best practices Best practices, P7: Development of New Planting	✓	✓	Microsoft Teams, WhatsApp, and Shared Drive
	1230 - 1330	Lunch break	✓	✓	-
	1330 - 1630	Document Review (MS2530:2011 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6 : Best practices Best practices, P7: Development of New Planting	✓	✓	Microsoft Teams, WhatsApp, and Shared Drive
	1630 – 1700	Interim closing meeting	✓	✓	Microsoft Teams
Wednesday, 16/06/2021 Paya Lang Estate	0900 - 1230	Document Review (MS2530:2011 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6 : Best practices Best practices, P7: Development of New Planting	✓	✓	Microsoft Teams, WhatsApp, and Shared Drive
	1230 - 1330	Lunch break	✓	✓	-
	1330 - 1630	Document Review (MS2530:2011 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6 : Best practices Best practices, P7: Development of New Planting	✓	✓	Microsoft Teams, WhatsApp, and Shared Drive
	1630 - 1700	Interim closing meeting	✓	✓	Microsoft Teams

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Date	Time	Subjects	(VKP)	(MNM)	IT Platform
Thursday, 17/06/2021 Sagil Estate	0900 - 1230	Document Review (MS2530:2011 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6 : Best practices Best practices, P7: Development of New Planting	✓	✓	Microsoft Teams, WhatsApp, and Shared Drive
	1230 - 1330	Lunch break	✓	✓	-
	1330 - 1630	Document Review (MS2530:2011 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6 : Best practices Best practices, P7: Development of New Planting	✓	✓	Microsoft Teams, WhatsApp, and Shared Drive
	1630 - 1700	Interim closing meeting	✓	✓	Microsoft Teams
Friday, 18/06/2021 Gomali POM	0900 - 1230	Document review (MS2530:2011 Part 4): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6 : Best practices,	✓	✓	Microsoft Teams, WhatsApp, and Shared Drive
	1230 - 1330	Lunch break	✓	✓	-
	1330 - 1600	Document review (MS2530:2011 Part 4): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6 : Best practices,	✓	✓	Microsoft Teams, WhatsApp, and Shared Drive
	1600 - 1630	Assessment team discussion and preparation	✓	✓	-
	1630 - 1700	Closing Meeting	✓	✓	Microsoft Teams

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

The nonconformity is listed below.

During the Certification Assessment there were One (1) Minor nonconformities raised. The IOI – Gomali POM and Supply Base Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment.

Major/Minor Nonconformities:		
Ref: 2066225-202106-N1	Area/Process: IOI - Sagil Estate	Clause: 4.5.5.1 (Part 3)
	Issue Date: 18/06/2021	Due Date: Next Surveillance Assessment
Requirements:	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: a. Assessment of water usage and sources of supply.	
Statement of Nonconformity:	Water Contingency Plan for Domestic Water Usage was not available.	
Objective Evidence:	The request for JTK License (Kebenaran Menggunakan Bekalan Air Persedirian Di bawah Seksyen 6(1)(a) Akta Standard- Standard Minimum Perumahan Dan Kemudahan Pekerja (1990) has been rejected by JTK due to the sampling done by KKM resulting in Offspecs results. There was no action plan available in the Water Management Plan to address situations such as this.	
Corrections:	Water Management Questionnaire to be amended by including water contingency plan for water shortage due to factors like water cut, burst pipes, scheduled and unscheduled maintenance, water contamination, drought, and suspension of license. The handing over is carried out to the PIC and briefed on the status of the permit renewal and will follow up on this issue to obtain the necessary documents. The estate management has sent a purchase order dated 25/06/2021 to an accredited water treatment consultant Qwatso Chemical Sdn Bhd, to provide the Jar Test Analysis, installation and calibration of automatic dosing pump. The appointed consulted shall perform water treatment training to personnel handling Sagil Estate's water treatment.	

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	<p>After that, estate management shall contact Lotus Laboratory Services Sdn Bhd an accredited laboratory and Ministry of Health to analyse the domestic drinking water quality. Upon receiving the positive analysis report, management shall apply the following permit and license:</p> <p>SPAN – Lesen Kelas Bagi Sistem Bekalan Air Persendirian</p> <p>Jabatan Tenaga Kerja (JTK) - Kebenaran Untuk Menggunakan Sumber Bekalan Air Persendirian Di Bawah Seksyen 6 (1) (a) Akta Standard-Standard Minimum Perumahan Dan Kemudahan Pekerja 1990.</p> <p>In addition, the frequency of water quality sampling is increased to every month via jar test until the permit and licenses are obtained.</p>
<p>Root cause analysis:</p>	<ol style="list-style-type: none"> 1. Management were unaware of the requirement to have a Water Contingency Plan should there be any delay in approval of license and permits from government bodies. 2. Changes of PIC in the management led to the new PIC being unaware of the counter measures that should be taken should there be any delay in approval of license and permits from government bodies. The new PIC was unaware of the whole process and therefore staggered the permit and license application. 3. Reapplication of the necessary permits for domestic water usage (JTK Permit) and SPAN License were carried out since February 2020. However due to COVID-19 Pandemic, the process was staggered for a long period.
<p>Corrective Actions:</p>	<ol style="list-style-type: none"> 1. Estates will be required to fill in their own action plans to address water cut/shortage. 2. Procedure on application of license and permit will be established to give clear overview to newly join personnel. 3. Should there be any delay for the permit and license approval from government bodies, estate is required to send a letter to Jabatan Tenaga Kerja, Muar Johor to request for temporary water usage since the location of the estate is interior and is not accessible for SAJ piping. Estate is to submit necessary documents to JTK before continuing water supply to workers in between the process of JTK permit and SPAN license availability. 4. Water treatment for domestic supply will be monitored closely every month to ensure the quality of the water supply be within the KKM parameters to ensure the permit and license renewal to be in smooth progress. This process must be carried out through monthly jar test or whenever necessary every month. 5. A training plan must be introduced to estate using natural water extraction to ensure all personnel in charge in monitoring the domestic water supply process is updated before the permit renewal expires. 6. All documents related to permit renewal must be monitored closely annually by the person in charge. 7. Counter actions in case of water cut off, burst pipe, contamination, suspension of license, technical issue, and drought must have an alternative for the continuous water supply for domestic usage. Eg: diversion of water from Bukit Serampang Estate using alternative piping and water tanks, supplying clean water from door to door at linesite using portable water tanks. Continuous training will be conducted for all workers using domestic water to ensure they boil water before consumption.
<p>Assessment Conclusion:</p>	<p>The corrective action plan is deemed to be sufficient to address the minor non-conformity raised. The effectiveness of the corrective action plan will be assessed during the next annual surveillance assessment.</p>

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Opportunity For Improvement		
Ref:	Area/Process:	Clause:
Objective Evidence:	-	

Noteworthy Positive Comments	
1	Good commitment and corporation from the management.
2	Generally, well implementation of Good Agricultural Practices (GAP).

3.3 Status of Nonconformities Previously Identified and OFI

Major/Minor Nonconformities:		
Ref: 1928783-202006-M1	Area/Process: IOI-Gomali POM & Supply Bases	Clause: 4.3.1.1 (Major)
	Issue Date: 03/07/2020	Due Date: 09/09/2020
Requirements:	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.	
Statement of Nonconformity:	Compliance to the Labour Act was not effectively implemented.	
Objective Evidence:	<p>1. In Gomali POM, pay slip and thumb print records was sampled for the weighbridge clerk for March, Apr and May 2020, it was found that Sharini Maya (Employee ID: GMM2128- Weighbridge Clerk) has worked overtime after 10 pm as below:</p> <p style="margin-left: 40px;"><u>MAY 2020</u></p> <p style="margin-left: 40px;">a. 04/05/2020: 7.29 AM – 10.54 PM & 05/05/2020: 07.24 AM – 03.32 PM</p> <p style="margin-left: 40px;">b. 06/05/2020: 7.28 AM – 11.20 PM & 07/05/2020: 07.23 AM – 02.46 PM</p> <p style="margin-left: 40px;">c. 16/05/2020: 2.11 PM – 11.05 PM & 17/05/2020: 7.42 AM – 03.36 PM</p> <p style="margin-left: 40px;">d. 22/05/2020: 02.07 PM – 10.50 PM & 23/05/2020: 09.46 AM & 10.27 PM</p> <p style="margin-left: 40px;">e. 30/05/2020: 02.16 PM – 10.47 PM & 31/05/2020: 07.35 AM – 04.28 PM</p> <p style="margin-left: 40px;"><u>APRIL 2020</u></p> <p style="margin-left: 40px;">a. 04/04/2020: 02.13 PM – 10.33 PM & 05/04/2020: 07.49 AM – 04.17 PM</p> <p style="margin-left: 40px;">b. 08/04/2020: 07.22 AM – 10.47 PM & 09/04/2020: 07.33 AM – 03.27 PM</p> <p style="margin-left: 40px;">c. 14/04/2020: 02.09 PM – 10.50 PM & 15/04/2020: 07.29 AM – 10.52 PM</p> <p style="margin-left: 40px;">d. 18/04/2020: 02.16 PM -10.28 PM & 19/04/2020: 07.37 AM – 04.25 PM.</p> <p style="margin-left: 40px;"><u>MARCH 2020</u></p> <p style="margin-left: 40px;">a. 11/03/2020: 07.21 AM – 11.44 PM & 12/03/2020: 07.23 – 3.30 PM.</p> <p style="margin-left: 40px;">b. 16/03/2020: 02.05.08 – 11.23 PM & 17/03/2020: 08.28 AM – 11.44 PM.</p> <p style="margin-left: 40px;">c. 21/03/2020: 02.07 PM – 12.05 AM & 22/03/2020: 07.46 AM – 04.36 PM.</p>	

	<p>d. 25/03/2020: 07.25 AM – 12.08 AM & 26/03/2020: 07.23 AM – 03.43 PM</p> <p>Also, she has worked on her rest day on 13/03/2020, 20/03/2020, 10/04/2020, 24/04/2020, 08/05/2020 and 22/05/2020. According to JTK Permit: Pengecualian Daripada Sekatan Kerja Malam Bagi Pekerja-Pekerja Wanita Di Bawah Seksyen 34 Akta Kerja 1955, dated 02/01/2019:</p> <ol style="list-style-type: none"> a. The female worker must be given continuous 11 hours break before start to work again. b. The female worker work at night shift must be given weekly rest day not less than 30 hours continuously. <p>2. Interview session with person in charge, it was confirmed that the container containing lubricant used for the genset however, there is no label in the container. This is not in accordance to the USECHH Regulations 2000</p>
<p>Corrections:</p>	<ol style="list-style-type: none"> 1. The female worker must be given continuous 11 hours break before start to work again. Weighbridge operators’ work schedule has been revised to ensure that female weighbridge operators are given at least continuous 11 hours break before start to work again. Mill management have been reminded to strictly follow all the requirements in the JTK Permit: Pengecualian Daripada Sekatan Kerja Malam Bagi Pekerja-Pekerja Wanita Di Bawah Seksyen 34 Akta Kerja 1955, dated 02/01/2019 to avoid future non-compliances. 2. The female worker work at night shift must be given weekly rest day not less than 30 hours continuously. Weighbridge operators’ work schedule has been revised to ensure that female weighbridge operators are given weekly rest day of not less than 30 hours continuously. Mill management have been reminded to strictly follow all the requirements in the JTK Permit: Pengecualian Daripada Sekatan Kerja Malam Bagi Pekerja-Pekerja Wanita Di Bawah Seksyen 34 Akta Kerja 1955, dated 02/01/2019 to avoid future non-compliances. 3. Interview session with person in charge, it was confirmed that the container containing lubricant used for the genset however, there is no label in the container. Gomali Mill has re-labelled all containers that are used to transfer lubricants and chemicals from their original containers.
<p>Root cause analysis:</p>	<ol style="list-style-type: none"> 1. The female worker must be given continuous 11 hours break before start to work again. As some transport (lorries/tractors) arrive late, the night shift operators have to work until the cut off time of 12.00a.m. Any work after 10.00 pm is considered as overtime. 2. The female worker work at night shift must be given weekly rest day not less than 30 hours continuously. When one of the weighbridge operators is absent (Emergency leave, Annual Leave, MC etc), the other operator had to cover by *working on rest day. 3. Interview session with person in charge, it was confirmed that the container containing lubricant used for the genset however, there is no label in the container. As there was no routine inspection being carried out on the management of chemical / lubricants in the pump house, the operator did not notice that there was no label on the container.

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Corrective Actions:	<ol style="list-style-type: none"> 1. The female worker must be given continuous 11 hours break before start to work again. An office staff will cover the absent operator whenever one the weighbridge operator is absent. This staff was previously weighbridge clerk before being promoted to office clerk. 2. The female worker work at night shift must be given weekly rest day not less than 30 hours continuously. An office staff will cover the absent operator whenever one the weighbridge operator is absent. This staff was previously weighbridge clerk before being promoted to office clerk. 3. Interview session with person in charge, it was confirmed that the container containing lubricant used for the genset however, there is no label in the container. <ul style="list-style-type: none"> • Persons in Charge of stations have been reminded to ensure that workers label all containers whenever they transfer lubricants and chemicals from original containers. They are also required to use the attached checklist to check on requirements related to chemicals, lubricants and SW storage and labelling every month. • A training will be conducted for all storekeepers and Assistant in Charge regarding chemical and scheduled waste management.
Assessment Conclusion:	<p>Evidence submitted:</p> <ol style="list-style-type: none"> 1. Appendix 4.3.1.1 (1) – Duty roster weighbridge operator. 2. Appendix 4.3.1.1 (2) – Photo before and after labelled the lubricant containers. 3. Appendix 4.3.1.1 (5) – Appointments letter as weighbridge clerk. 4. Appendix 4.3.1.1 (6) – Appointments letter as office clerk. 5. Appendix 4.3.1.1 (3) – Monthly Workplace Inspection Form (Mill). 6. Appendix 4.3.1.1 (4) & 4.5.3.2 (5) – Training Record on Updates on HIRARC and Store Best Safety Practice dated 25th August 2020. 7. Appendix 4.3.1.1 (5) & 4.5.3.2 (6) – Salient Points on Scheduled Waste dated 25th August 2020. <p>The corrective action and evidence found to be adequate to close the NCR. Therefore the Major Non-conformity was effectively closed on 09/09/2020.</p>
Verification Statement	<p><u>ASA 3 Verification</u></p> <p>During the assessment it was verified that:</p> <ol style="list-style-type: none"> 1. Female workers were given continuous 11 hours break before start to work again. 2. Female workers that work during night shift are given weekly rest day. 3. Training has been conducted for all storekeepers and Assistant in Charge regarding chemical and scheduled waste management at all operating units. <p>The corrective action plan has been effectively implemented therefore the major non-conformity remains closed.</p>

Major/Minor Nonconformities:		
Ref: 1928783-202006-M2	Area/Process: IOI-Gomali POM & Supply Bases	Clause: 4.4.5.1 (Major)
	Issue Date: 03/07/2020	Due Date: 09/09/2020

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Requirements:	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.
Statement of Nonconformity:	The new policy is yet to be communicated.
Objective Evidence:	IOI-Gomali POM has yet to communicate the new Group Sustainable Palm Oil Policy revised May 2020 to the workers.
Corrections:	Mill has conducted training for their workers using the revised Group Sustainable Palm Oil Policy dated May 2020.
Root cause analysis:	As there was a recent revision of SPOP by IOI Corporate Sustainability in May 2020 but only distributed to all O.C's in early June 2020.
Corrective Actions:	IOI HQ Corporate shall be informed to send all updated Company policies directly to O.C's without delay. Sustainability, Safety and Health Department has reminded O.C's to carry out all future trainings without delay. Checking will be carried out during our internal audits
Assessment Conclusion:	Evidence submitted: 1. Appendix 4.4.5.1-Part 4 (1) – Training records using the latest Group Sustainable Palm Oil Policy revised May 2020 (Gomali Mill). 2. Appendix 4.4.5.1-Part 4 (2)– Email to O.Cs. 3. Appendix 4.4.5.1-Part 4 (3)– Internal audit checklist. The corrective action and evidence found to be adequate to close the NCR. Therefore the Major Non-conformity was effectively closed on 09/09/2020.
Verification Statement	<u>ASA 3 Verification</u> The training on the revised Group Sustainable Palm Oil Policy dated May 2020 has been conducted in the Mill on 26/04/2021 attended by workers and staff trained by Mr. Fernandez. The record was available for verification. The corrective action plan has been effectively implemented therefore the major non-conformity remains closed.

Major/Minor Nonconformities:

Ref: 1928783-202006-M3	Area/Process: IOI-Gomali POM & Supply Bases	Clause: 4.4.5.1 (Major)
	Issue Date: 03/07/2020	Due Date: 09/09/2020
Requirements:	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.	
Statement of Nonconformity:	The new policy is yet to be communicated.	
Objective Evidence:	Bertam Estate, Jasin Lalang Estate & Kuala Jelei Estate has yet to communicate the new Group Sustainable Palm Oil Policy revised May 2020 to the workers.	
Corrections:	All Operating Centre's have conducted training for their workers using the Group Sustainable Palm Oil Policy revised dated May 2020.	

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Root cause analysis:	As there was a recent revision of SPOP by IOI Corporate Sustainability in May 2020 but only distributed to all Operating Centre's in early June 2020.
Corrective Actions:	IOI HQ Corporate shall be informed to send all updated Company policies directly to Operating Centre's without delay. Sustainability, Safety and Health Department has reminded Operating Centre's to carry out all future trainings without delay. Checking will be carried out during our internal audits
Assessment Conclusion:	<p>Evidence submitted:</p> <ol style="list-style-type: none"> Appendix 4.4.5.1-Part 3(1a) – Training records using the latest Group Sustainable Palm Oil Policy revised May 2020 (Jasin Lalang Estate). Appendix 4.4.5.1-Part 3(2b) – Training records using the latest Group Sustainable Palm Oil Policy revised May 2020 (Bertam Estate). Appendix 4.4.5.1-Part 3(3c) – Training records using the latest Group Sustainable Palm Oil Policy revised May 2020 (Kuala Jelei Estate). 4.4.5.1-Part 3 (2)– Email to O.Cs. Appendix 4.4.5.1-Part 3 (3)– Internal audit checklist. <p>The corrective action and evidence found to be adequate to close the NCR. Therefore the Major Non-conformity was effectively closed on 09/09/2020.</p>
Verification Statement	<p><u>ASA 3 Verification</u></p> <p>The training on the revised Group Sustainable Palm Oil Policy dated May 2020 and SPOP has been conducted in the sampled estate and attended by workers and staff. The record was available for verification as below: -</p> <ol style="list-style-type: none"> Gomali Estate: 24/04/2021 Tambang Estate: 24/03/2021 Paya Lang Estate: 28/04/2021 Sagil Estate: 07/05/2021 <p>The corrective action plan has been effectively implemented therefore the major non-conformity remains closed.</p>

Major/Minor Nonconformities:		
Ref: 1928783-202006-M4	Area/Process: IOI-Gomali POM & Supply Bases	Clause: 4.4.5.6 (Major)
	Issue Date: 03/07/2020	Due Date: 09/09/2020
Requirements:	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.	
Statement of Nonconformity:	The employment contract for employees is not transparent.	
Objective Evidence:	In Bertam Estate & Jasin Lalang Estate, sighted the employees with the working permit under IOI [Saripudin (AT 980219), Hapis Apriandi (AT941652), Mistam (B1260553)] has been deemed as contractor workers (CK Permai Enterprise). Their employment contract and pay slip are provided by CK Permai instead of IOI Plantation Berhad.	

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Corrections:	CK Permai’s workers using IOI’s work permit shall be absorbed by Jasin Lalang and Bertam estates and these workers shall be issued with IOI’s contract of employment with the same benefits, privileges and conditions currently enjoyed by other IOI’s workers once CK Permai and IOI Plantation’s management sign a mutual agreement.
Root cause analysis:	The owner of CK Permai Enterprise is using IOI’s quota to hire or legalize some foreign workers and manage them on a contract basis solely to provide harvesting services for 2 IOI plantations (Jasin Lalang estate and Bertam estate). This is because he is unable to obtain approval from Immigration department to hire or legalize foreign workers as he does not have his own plantations
Corrective Actions:	IOI Plantations has decided all permits issued by Immigration to IOI shall only be used by IOI’s plantations with immediate effect. However, due to the MCO and COVID-19 pandemic, IOI Management has decided that they may still need to use contractors and of course they will use their own quota workers during peak crop periods. The contractor shall be complying with contractor’s contract agreement and additional requirement for contractors.
Assessment Conclusion:	<p>Evidence submitted:</p> <ol style="list-style-type: none"> 1. Appendix 4.4.5.6 (1a) Contract agreement Saripudin. 2. Appendix 4.4.5.6 (1b) Contract agreement Hapis Ariandi. 3. Appendix 4.4.5.6 (1c) Contract agreement Mistam 4. Appendix 4.4.5.6 (2a) Contract Agreement between CK Permai and Jasin Lalang Estate. 5. Appendix 4.4.5.6 (2b) Contract Agreement between CK Permai and Bertam Estate 6. Appendix 4.4.5.6 (3a) Additional requirement for contractors (Jasin Lalang Estate) 7. Appendix 4.4.5.6 (3b) Additional requirement for contractors (Bertam Estate). <p>The corrective action and evidence found to be adequate to close the NCR. Therefore the Major Non-conformity was effectively closed on 09/09/2020.</p>
Verification Statement	<p><u>ASA 3 Verification</u></p> <p>The sampled contractors’ workers at the estates were no longer using IOI’s work permit. Workers with IOI Permit previously employed under the contractor has been absorbed into the estates checkroll and these workers were issued with IOI’s contract of employment. The corrective action plan has been effectively implemented therefore the major non-conformity remains closed.</p>

Major/Minor Nonconformities:		
Ref: 1928783-202006-M5	Area/Process: IOI-Gomali POM & Supply Bases	Clause: 4.5.3.1 (Major)
	Issue Date: 03/07/2020	Due Date: 09/09/2020
Requirements:	All waste products and sources of pollution shall be identified and documented.	
Statement of Nonconformity:	Schedule waste not properly identified.	
Objective Evidence:	During the site visit, the audit team found an empty paint container dump in a bin. Empty paint container is schedule waste and must be disposed in a mannerly way.	

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	Document review confirms that the mill management did not identified the empty paint container in their waste management plan.
Corrections:	Waste management plan for all OCs shall be reviewed carefully by management and changes made accordingly based on actual waste generated and how they are managed.
Root cause analysis:	The Assistant manager who assisted in preparing the management plan failed to identify and highlight to the sustainability department regarding empty paint containers that were recently used in the biogas plant area as he was still new and have yet to attend any training on waste identification.
Corrective Actions:	Regional meeting cum training on waste management was held on 10th July 2020 by Manager Sustainability, Safety and Health (CePSWaM) to train management of OCs to identify and manage all the waste generated by their respective O.Cs. Management to continuously monitor the waste disposal via environment meeting (3 month once) and the person in charge will be Environment Liaison Officer and store clerk.
Assessment Conclusion:	<p>Evidence submitted:</p> <ol style="list-style-type: none"> 1. Appendix 4.5.3.1 (1) – Gomali Mill Waste Management Plan. 2. Appendix 4.5.3.1 (2) – Regional meeting minutes & waste training records. 3. Appendix 4.5.3.1 (3) – Environment meeting minutes template. <p>The corrective action and evidence found to be adequate to close the NCR. Therefore the Major Non-conformity was effectively closed on 09/09/2020.</p>
Verification Statement	<p><u>ASA 3 Verification</u></p> <ol style="list-style-type: none"> 1. IOI Certification Unit management to have continuously monitored the waste disposal via environment meeting. 2. Environment Liaison Officer were appointed for all estates and mill. 3. The Waste Identification and Waste Management and Prevention Plan were available for all operating units. 4. Disposal of all waste were in accordance to the legal requirements. <p>The corrective action plan has been effectively implemented therefore the major non-conformity remains closed.</p>

Major/Minor Nonconformities:		
Ref: 1928783-202006-M6	Area/Process: IOI-Gomali POM & Supply Bases	Clause: 4.5.3.2 (Major)
	Issue Date: 03/07/2020	Due Date: 09/09/2020
Requirements:	A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for: <ol style="list-style-type: none"> a. Identifying and monitoring sources of waste and pollution. b. Improving the efficiency and recycling potential of mill by-products by converting them into value-added products. 	
Statement of Nonconformity:	Empty paint container and empty chemical container not properly disposed.	

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Objective Evidence:	<p>During the site visit, audit team found 2 schedule wastes which was not properly handled such as below:</p> <ol style="list-style-type: none"> a. Empty paint container dumped in bin b. Empty chemical container left near a store building. According to the regulation, both wastes must be disposed in a proper way.
Corrections:	<p>Gomali Mill has immediately transferred and labelled the empty paint and chemical containers to scheduled waste store. They also updated the SW inventory.</p>
Root cause analysis:	<ol style="list-style-type: none"> a. As the worker who painted the outside of the scrubber was only recently hired, he has yet to be trained on proper scheduled waste disposal. b. Empty chemical containers were packed and left outside the scheduled waste store as the authorized contractor promised to pick it up for disposal on the day before the audit. However, he failed to turn up and the mill's person in charge of SW disposal forgot to return the containers into the scheduled waste store.
Corrective Actions:	<ol style="list-style-type: none"> a. Persons in Charge of stations have been reminded to ensure that workers label all SW containers, whether for temporary or permanent period. They are also required to use the attached checklist to check on requirements related to chemicals, lubricants and SW storage and labelling every month. b. A training will be conducted for all storekeepers and Assistant in Charge regarding chemical and scheduled waste management.
Assessment Conclusion:	<p>Evidence submitted:</p> <ol style="list-style-type: none"> 1. Appendix 4.5.3.2 (1) - Photo before and after empty paint containers are transferred to scheduled waste store. 2. Appendix 4.5.3.2 (2) - Photo before and after chemical containers are labelled in scheduled waste store. 3. Appendix 4.5.3.2 (3) – SW inventory. 4. Appendix 4.5.3.2 (4) – Monthly Workplace Inspection Form (Mill). 5. Appendix 4.3.1.1 (4) & 4.5.3.2 (5) – Training Record on Updates on HIRARC and Store Best Safety Practice dated 25th August 2020. 6. Appendix 4.3.1.1 (5) & 4.5.3.2 (6) – Salient Points on Scheduled Waste dated 25th August 2020. <p>The corrective action and evidence found to be adequate to close the NCR. Therefore the Major Non-conformity was effectively closed on 09/09/2020.</p>
Verification Statement	<p><u>ASA 3 Verification</u></p> <ol style="list-style-type: none"> 1. IOI Certification Unit management to have continuously monitored the waste disposal via environment meeting. 2. Environment Liaison Officer were appointed for all estates and mill. 3. The Waste Identification and Waste Management and Prevention Plan were available for all operating units. 4. Disposal of all waste were in accordance to the legal requirements. <p>The corrective action plan has been effectively implemented therefore the major non-conformity remains closed.</p>

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Opportunity For Improvement		
Ref: 1928783-202006-I1	Area/Process: IOI-Gomali POM & Supply Bases	Clause: 4.4.5.13
Objective Evidence:	Kuala Jelei Estate & Jasin Lalang Estate: The JCC meeting was conducted is not as per Social Implementation Plan recommended (bi-monthly).	
Ref: 1928783-202006-I2	Area/Process: IOI-Gomali POM & Supply Bases	Clause: 4.3.1.1
Objective Evidence:	The land hectarage declared in MPOB license is more than the land title total hectarage in Bahau Estate and Kuala Jelei Estate	

3.4 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
EC-01	Major	31 May 2019	Closed on 30 July 2019
EC-02	Major	31 May 2019	Closed on 30 July 2019
SH-01	Major	31 May 2019	Closed on 30 July 2019
SH-02	Major	31 May 2019	Closed on 30 July 2019
AL-01	Major	31 May 2019	Closed on 30 July 2019
1928783-202006-M1	Major	03 July 2020	Closed on 09 Sept 2020
1928783-202006-M2	Major	03 July 2020	Closed on 09 Sept 2020
1928783-202006-M3	Major	03 July 2020	Closed on 09 Sept 2020
1928783-202006-M4	Major	03 July 2020	Closed on 09 Sept 2020
1928783-202006-M5	Major	03 July 2020	Closed on 09 Sept 2020
1928783-202006-M6	Major	03 July 2020	Closed on 09 Sept 2020
2066225-202106-N1	Minor	18 June 2021	"Open"

3.5 Issues Raised by Stakeholders

IS #	Description
1	Feedbacks: Rajan Excavator & GN Murni Enterprise (Contractor) Working co-operations with IOI is good. There is no holding of payment.
	Management Responses: Noted on the information.
	Audit Team Findings: No other issue.

2	<p>Feedbacks: Norimah (JCC PLE) The management commitment was good, no issue from JCC and MEC pending at this moment. The committee also have good awareness.</p>
	<p>Management Responses: Noted on the information.</p>
	<p>Audit Team Findings: No other issue.</p>
3	<p>Feedbacks: EFB Contractor Relation between EFB contractor and management was good, no issue needs to be raised. EFB transporter almost 11 year working in the estate. No payment delayed and always payment after 30 days.</p>
	<p>Management Responses: Noted on the information.</p>
	<p>Audit Team Findings: No other issue.</p>
4	<p>Feedbacks: Anata Trading The relation between management and shopkeeper in estate was good. No issue since the shopkeeper already stay 20 year in estate. They know how to conduct the complaint and always join stakeholder meeting.</p>
	<p>Management Responses: Noted on the information.</p>
	<p>Audit Team Findings: No other issue.</p>

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 – Gomali POM and Supply Base Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of IOI – Gomali POM and Supply Base Certification Unit is approved and continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: RAVI TONY	Name: VIJAY KANNA PAKIRISAMY
Company name: IOI PLANTATION SERVICES SDN. BHD.	Company name: BSI SERVICES (M) SDN BHD
Title: MANAGER - SUSTAINABILITY, SAFETY & HEALTH	Title: CLIENT MANAGER
Signature: 	Signature: 
Date: 7th JULY 2021	Date: 01 st JULY 2021

Appendix A: Summary of the findings by Principles and Criteria

Malaysian Sustainable Palm Oil Part 3: General Principles for Oil Palm 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 Corporation Berhad has documented the Group Sustainable Palm Oil Policy (SPOP) revised October 2020 signed by Dato Lee Yeow Chor (Group Managing Director & Chief Executive Officer and Dr Surina Ismail (Group Head of Sustainability).	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	The policy had also clearly stated the company’s commitment which included continual improvement in the overall aspects of plantation management and community development. Example as below: 1. Environmental management. 2. Human rights and workplace. 3. Community development and social impact. 4. Traceable supply chains. 5. Transparency and wider engagement.	Complied
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 -	There is a documented procedure for conducting Internal audit. Audit was planned on to be held on annual basis which is conducted by the Sustainability Team. The planning record was available as per email record dated 12/4/2021. Internal audit was done annually by sustainability group.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
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 -	A procedure for internal audit was established and documented, i.e. SOP 8 Issue 1 Rev 1 (03/05/2018). Internal audit was conducted in Gomali estate on 11/03/2020. There were 20 nonconformity and 25 OFI raised and closed. Audit results were evaluated, and corrective actions taken on the non-conformances. Another sampling in Paya Lang estate, internal audit conducted on 10-15/2/2021 by Sustainability, safety and Health department team. From the internal audit record found 31 finding, the action plan was available and sampling one of the finding status verified during audit.	Complied
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	The audit reports were documented and made available for Management review (refer indicator 4.2.3.1)	Complied
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 for Gomali certification unit was conducted on 13/04/2020 and minutes of meeting maintained. The status of the implementation of MSPO was noted to be discussed. In Paya Lang estate the management review meeting conducted on 12/3/2021. This management review meeting discusses as per followed: - <ul style="list-style-type: none"> • Audit outcome result • Customer feedback • Process performance • Status preventive action and CAP • Follow up issue • Recommendation and others. • Customer complaint or other complaint 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> Improvement Resource needed 	
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	<p>The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.</p> <p>- Major compliance -</p>	<p>Continuous improvement plan for the estates were verified and documented under long range budget and CAPEX. The coverage is mainly on the estate operation and safety related budget. Among the plan schedule for year 2021 are as below:</p> <p><u>Gomali Estate</u></p> <ol style="list-style-type: none"> To reduce bagworm infestation in Field PR20 and Mature Area. To reduce waste from office such as paper. To ensure Water Stream Quality is complied with. To reduce usage of Diesel & Petrol. To precise the application of fertilizer. To encourage the use of organic fertilizer. <p><u>Tambang Estate</u></p> <ol style="list-style-type: none"> To upgrade staff living standards to provide new furniture such as requested. To refurbish the sports activity places such as football field and badminton court. To make sure workers house are in good condition. To paint balance linesite (Block H, J, P, I and K) Sanitization of the Linesite and to provide sanitizer at the Linesite. To reduce bagworms infestation in PM Field 99F. Establish barn Owl Box at 1:20 ha ratio. 	Complied

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		<p>7. To ensure all recycle items generated from household usage to be recycled.</p> <p><u>Paya Lang Estate</u></p> <ol style="list-style-type: none"> To improve piping and drainage system at workers linesite. To improve cleanliness at the workers linesite. To build a futsal court. To refurbish staff quarters. To reduce purchase and generation of excessive 20L empty chemical containers. Retest the water quality until the results comply to the requirements <p><u>Sagil Estate</u></p> <ol style="list-style-type: none"> To establish barn owl box according to good agricultural practices. To reduce office wastes such as paper. To ensure natural water stream is not polluted. To maintain the buffer zone. To ensure there are no activities done at the buffer zone by monitoring and keep reminding workers during the rollcall. To reduce usage of diesel and petrol by retaining buffalo assisted harvesting system. To reduce dependents on electricity. To encourage usage of organic fertilizer by increasing application of EFB at immature and mature palms. 	
4.1.4.2	The company shall establish a system to improve practices in line with new information and techniques or new industry	The estate management has developed training programs which cover the safety & health and sustainability aspect for year 2021. This	Complied

Criterion / Indicator		Assessment Findings	Compliance
	standards and technology (where applicable) that are available and feasible for adoption. - Major compliance -	program is based on the training needs analysis that was established in the beginning of the year. Systems to improve practices were also adopted. Verified the introduction of improvement practices as below: 1. Introduction of Grabber System for FFB Evacuation in the estates. 2. Introduction of new Management Reporting System - Transition from Pinfosys System to SAP System.	
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 -	Training program is part of the action plan to provide the necessary knowledge or skills to implement new techniques or new standard where applicable. Recourses for implementation of new technology is available through the yearly budget and CAPEX.	Complied
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 -	The management has adopted an open and transparent method of communication and consultation when dealing with relevant parties e.g. its workers, government agencies, contractors, neighboring plantations by personal invitation to attend the internal and external stakeholders’ consultation meetings. Languages used in written communications are in Bahasa Malaysia and English and verbally done for foreign workers via their workers representatives/ leaders for their respective nationalities and native dialects such as Hindi, Nepalese & Bangladeshi. For external stakeholder such as shopkeeper, contractor and other was done on 10/05/2021.	Complied

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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. - Major compliance -	Management documents such as Policies, Stakeholder consultation processes, Financial Annual Reports are available upon request and at the IOI website: http://www.ioigroup.com/Content/S/S_Policy Any commercially confidential information will need special request before being provided.	Complied
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 -	The management had established procedures and mechanisms to conduct stakeholders’ consultations, handle complaints and grievances through stakeholders’ meetings, Women Empowerment Committee (WEC), Employee Consultative Committees (ECC), Safety & Health Committees (SHC). The procedure been established by IOI management IOI/P/GP/001 Rev No:1 dated 20/1/2020. The procedure already been communicated during stakeholder meeting dated 10/05/2021.	Complied
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 -	The respective Estates Manager is overall responsible for any issues raised by local communities and other affected or interested parties regarding Estate operations. Social Liaison Officers are also nominated to coordinate activities of the stakeholders, WECs, ECCs and SHCs. Appointments letters as issued to the respective Social Liaison Officers. Sighted the letters as below: 1. Gomali Estate Mr. Muhamad Zharif Bin Abu (Assistant) on 07/01/2019. 2. Tambang Estate Mr. Gobinath Iyakannoo (Assistant) on 12/11/2018.	Complied

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		3. Sagil Estate: Mr Mohan Raj (Sr Assistant) on 23/10/2020	
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 -	Latest stakeholders list sighted at the Gomali Supply Base estates was updated till 01/04/2021. Records of consultation and communication included attendance lists, minutes of the meetings, photographs of the meetings and meeting notes. Minutes of meetings had noted deliberation of the issues raised and recommendations of actions to be taken and the follow-up. Sighted samples as below: <u>Gomali Estate</u> 1. Internal Stakeholder Meeting - 15/06/2020 2. External Stakeholder Meeting - 10/05/2021 <u>Sagil Estate</u> 1. Internal Stakeholder Meeting - 30/9/2020 2. External Stakeholder Meeting - 30/12/2020	Complied
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 -	The IOI Group has established, implemented, and maintained a procedure for traceability of FFB from the estates to the CPO and PK produced by the POM. Documented SOP on Traceability: SOP/COC/3 Issue No. 05 dated 01/01/2018.	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Compliance with the traceability system determined via regular inspections, checking of records and internal audits. Internal audit was conducted in Gomali estate on 11/03/2020. There were 20 nonconformities and 25 OFI raised and closed.	Complied

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Criterion / Indicator		Assessment Findings	Compliance															
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	<p>The Palm Oil Mill and Estates Organization Charts and job responsibilities of employees (Mill Manager, Estate Managers, Assistant Manager, Engineers, Assistant Engineers, Technicians, Security Officer, Weighbridge Operator, Laboratory Chemist and clerks) have been suitably defined for the implementation and maintenance of the traceability procedure.</p> <p><u>Tambang Estate</u> En. Muhamad Musta'inuddin been assign to responsibility to traceability in estate as per appointment letter dated 12/11/2018 (2018/RSPO/001)</p> <p><u>Paya Lang Estate</u> Mr Selvaraju A/L S. Kalipan been assign to responsibility to traceability in estate as per appointment letter dated 01/04/2021.</p>	Complied															
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	<p>The record sales and transportation from estate to mill was available as per record weighbridge below: -</p> <table border="1"> <thead> <tr> <th>Description</th> <th>Tambang Estate</th> <th>Paya Lang Estate</th> </tr> </thead> <tbody> <tr> <td>WB ticket No</td> <td>FB20001961</td> <td>FB21007297</td> </tr> <tr> <td>Date</td> <td>07/11/2020</td> <td>12/06/2021</td> </tr> <tr> <td>Vehicle No</td> <td>JTS6171</td> <td>JTW614</td> </tr> <tr> <td>Nett Weight (Kgs)</td> <td>9,880</td> <td>7,940</td> </tr> </tbody> </table>	Description	Tambang Estate	Paya Lang Estate	WB ticket No	FB20001961	FB21007297	Date	07/11/2020	12/06/2021	Vehicle No	JTS6171	JTW614	Nett Weight (Kgs)	9,880	7,940	Complied
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4.3 Principle 3: Compliance to legal requirements																		
Criterion 4.3.1 – Regulatory requirements																		

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.3.1.1 All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.</p> <p>- Major compliance -</p>	<p>IOI Gomali Supply Base estates continued to comply with legal requirements. Sampled permit and licenses were verified as below:</p> <p><u>Gomali Estate</u></p> <ol style="list-style-type: none"> 1. MPOB License; License Number: 502164502000; Estate Area: 2358 Ha; License Validity Period: 01/02/2021 – 31/01/2022. 2. Permit Barang Kawalan Berjadual; Reference Number: JH(SGT)0136/07 PSK; P Series Number: J002453; Description: Diesel; Storage Quantity: 32,000 Litres; License Validity Period: 10/07/2020 – 09/07/2021. 3. Air Receiver License; Registration Number: JH PMT 10716; License Expiry Date: 10/05/2022. <p><u>Tambang Estate</u></p> <ol style="list-style-type: none"> 1. MPOB License; License Number: 586869002000; Estate Area: 2018.62 Ha; License Validity Period: 01/07/2020 – 30/06/2021. 2. Permit Barang Kawalan Berjadual; Reference Number: JH(SGT)0141/08 PSK; P Series Number: J000712; Description: Diesel; Storage Quantity: 18,000 Litres; License Validity Period: 24/03/2021 – 23/03/2022. 3. Air Receiver License; Registration Number: PMT-JH/21 133172; License Expiry Date: 10/05/2022 <p><u>Paya Lang Estate</u></p> <ol style="list-style-type: none"> 1. MPOB License; License Number: 586873002000; Estate Area: 1396.9 Ha; License Validity Period: 01/07/2020 – 30/06/2021. 	<p>Complied</p>

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	<p>2. SPAN License; Class License Number: SPAN/EKS/(PT)/800-4(2)/14/09; License Validity Period: 15/01/2020 – 14/01/2023.</p> <p>3. Permit Barang Kawalan Berjadual; Reference Number: JH(SGT)0041/98 PSK; P Serial Number: J 002493; License Validity Period: 23/09/2020 – 22/09/2021</p> <p>4. Air Compressor License; License Registration Number: JH PMT 12497; License Expiry Date: 10/05/2022.</p> <p><u>Sagil Estate</u></p> <p>1. MPOB License; License Number; 586841002000; Estate Area: 2671.7 Ha; License Validity Period: 01/07/2020 – 30/06/2021.</p> <p>2. MPOB License (Nursery); License Number: 589204011000; License Validity Period: 01/10/2020 till 30/09/2021.</p> <p>3. Air Receiver Certificate; Registration Number: JH PMT 12495; Certificate Expiry Date: 14/12/2021.</p> <p>4. Permit Barang Kawalan Berjadual; Reference Number: MR/PD/SK-0622 @ SKS 367; P Serial Number: J 002796; Description: Diesel; Storage Capacity: 18,000 Liters; License Validity Period: 30/04/2021 – 29/04/2024.</p>	
<p>4.3.1.2</p>	<p>The management shall list all laws applicable to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>IOI Gomali Certification Unit has established and updated list of applicable laws and regulations that are applicable for the estates. The legal register is prepared by Sustainability Unit (SU) Department. Verified the document 'list of revision' which includes the following:</p> <ol style="list-style-type: none"> 1. National Wage Consultative Council Act 2011, Minimum Wages Order 2020 2. Section 22(A), Emergency (Prevention and Control of Infectious Diseases) Amendment – Ordinance 2021

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Criterion / Indicator		Assessment Findings	Compliance
		3. Workers' Minimum Standards of Housing and Amenities Regulations 1990 – Amendment 4. Employees Minimum Standards of Housing, Accommodations and Amenities (Accommodation and Centralised Accommodations) Regulation 2020	
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>Document titled Mechanism for Tracking Changes in Law; revised on 30/01/2020 was available for verification. IOI Sustainability Unit Team will update the legal register if any new regulation or if there is amendment in the legal and will distribute it to each operating unit.</p> <p>The changes in law are monitored via methods as below:</p> <ol style="list-style-type: none"> 1. Subscribed to Lexis-Nexis Advance Malaysia. 2. News release through printed and online newspaper 3. Law change tracked by book publisher (MDC Book Publications) and Federal Government Gazette. 4. Circulars from relevant associations. e.g. MPOA, MPOB, MAPA, SOCSO, EPF, DOE, DOSH Headquarters etc. <p>The sustainability team then issues the changes to all operating units to update existing records. Then the estate management implements applicable changes in law accordingly. The sustainability team monitors the implementation/updating of information via RSPO, MSPO & ISCC Internal Audits.</p>	Complied
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.</p> <p>- Minor compliance -</p>	<p>Tracking systems were available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Sustainability Unit Team.</p>	Complied

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	<p>Interviews with office personnel and records verification indicates that the system is appropriate to the operations. Tracking system on any changes in the law was well implemented.</p> <p><u>Gomali Estate</u> The management has appointed the Assistant Manager, Mr. Ahmad Shahel Rizaihan Bin Mohamad on 03.09.2020 as the Legal Liaison Officer in Gomali Estate to monitor any changes on the laws related to the operating centre and update the management on the day to day compliance as stated in the appointment letter undersigned by the estate manager.</p> <p><u>Tambang Estate</u> The management has appointed the Assistant Manager, Mr. Mohammad Naim bin Md Nasir on 11.04.2019 as the Legal Liaison Officer in Tambang Estate to monitor any changes on the laws related to the operating centre and update the management on the day to day compliance as stated in the appointment letter undersigned by the estate Assistant Manager In-Charge.</p> <p><u>Paya Lang Estate</u> The management has appointed the Sr. Assistant Manager, Mr. Selvaraju A/L S.Kaliapan on 01.04.2021 as the Legal Liaison Officer in Paya Lang Estate to monitor any changes on the laws related to the operating centre and update the management on the day to day compliance as stated in the appointment letter undersigned by the Sr. Assistant Manager In-Charge.</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		<p><u>Sagil Estate</u></p> <p>The management has appointed the Assistant Manager, Mr. Izzam Nor Alif Bin Sapri on 19.03.2020 as the Legal Liaison Officer in Sagil Estate to monitor any changes on the laws related to the operating centre and update the management on the day to day compliance as stated in the appointment letter undersigned by the estate Senior Manager.</p>	
Criterion 4.3.2 – Lands use rights			
4.3.2.1	<p>The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.</p> <p>- Major compliance -</p>	<p>Communities surrounding the Gomali POM can move freely without any issues or problems. Verified during site inspection that no such limitations had occurred.</p>	Complied
4.3.2.2	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.</p> <p>- Major compliance -</p>	<p>The management were able to provide documented evidence that shows legality of land ownership such as land title and land history.</p> <p>In Tambang estate there are total of 19 Land titles recorded with total 2018.62 Ha sampling as per below:-</p> <ol style="list-style-type: none"> 1. GN81248 land title holder IOI Corporation Berhad 2. GN 81250 land title holder IOI Corporation Berhad 3. MKG 00000590 land title holder IOI Corporation Berhad <p>For Sagil Estate there were a total of 9 land title with an area of 2671.70 ha. However total area was reduced by 160.67ha, the land area currently was managed by Bukit Serampang Estate.</p>	Complied
4.3.2.3	<p>Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p>	<p>IOI Gomali Certification Unit estates have established maps indicating the boundary stones available in each estate. Evidence of boundary stones were available and verified via photos during the audit. The</p>	Complied

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	- Major compliance -	estate maintained a monthly boundary stone monitoring checklist. Areas without boundary stones were demarcated with security trenching, red and white painted pegs/poles and boundary fences.	
4.3.2.4	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). - Minor compliance -	There were some borders of the estates immediately adjacent to local villages. However, there has been no land disputes reported or recorded. As such, the process of fair compensation and FPIC is currently not required to be applied. IOI also established procedure regarding to land disputes, under Land Use Compensations Procedure SOP: 6.11 Appendix 8.0; Rev: 1A; Dated 17/01/2017.	Complied
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 -	Not applicable as the lands are titled lands which are not encumbered by customary rights.	Not Applicable
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	Appropriate landscape maps with latitude & longitudes showing the legal boundary and neighbouring / surrounding areas of the estates were available and maintained. The lands at Gomali Grouping are legally owned or leased by IOI Group and it is verified that there were no other users or affected parties in the land areas.	Complied
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	Not applicable as the titled lands are not encumbered by customary rights.	Not Applicable

Criterion / Indicator	Assessment Findings	Compliance	
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 –	Social Impact Assessment, Management Action Plans and Continuous Improvement Plan (2021-2026) for the Estates was available for verification. The SIA contains inputs from external and internal stakeholders' consultation. Most issues came from JCC, WEC and safety meetings. Verified the Stakeholder meeting for Gomali Estate dated 10/05/2021 found that there were no issues raised by the stakeholders.	Complied
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 -	The management had established the following grievances SOP/guideline: 1. SIA (8.5 Grievance Procedure). 2. Guidelines for Implementation Women and Empowerment Committee (WEC) Doc Ref: IOI/G/SE/001 Rev no: 01, issue date: 17/02/2020 Appendix B: Internal Grievances Standard of Procedure. 3. Grievance procedure Do ref: IOI/P/GP/001 Rev No: 1, Rev date: 20/01/2020.	Complied
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 -	The procedure and flowchart outlined the mechanism whereby all complaints or grievances will be received and be acted upon by the Social Liaison Officers who will investigate the matter and resolve with the affected parties. Furthermore, the process requires the compliant	Complied

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		<p>and grievance to be resolved within 24 hours (acknowledge), 30 working days (investigate) and 10 working days (meet up).</p> <p>No complaints related to sexual harassment received so far, but the procedures stated such issues will be handled with the utmost privacy and confidentiality by the GCC. Verified that there were not any instances of any serious disputes. Sampled one complaint regarding to housing area, the complaint has been logged on 12/10/2020 and action been taken on 15/10/2020.</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>Employees and affected stakeholders can make complaints by recording in the Complaints & Grievance Book kept at the Estate offices.</p>	Complied
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 Management informed the workers and surrounding communities at the internal and external Stakeholders consultations regarding them complaint/grievance procedure and feedback mechanism.</p> <p>External stakeholders' consultation with the local communities and employees. Participation of external stakeholders were verified, including participants from contractors, suppliers, government agencies, police, neighbouring estate, etc.</p> <p>The presentation during the stakeholder consultation was reviewed and confirm that such briefing was provided during the stakeholder consultation meeting.</p> <p>The complaint and grievances can be submitted through the following channels established by the POM and estates are:</p> <ul style="list-style-type: none"> - In the Complaint/Grievance book located at the respective mill or estate office. - Email: grievance@ioigroup.com 	Complied

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		<ul style="list-style-type: none"> - Telephone: 603-8947 XXXX - In writing to, IOI Corporation Bhd: Attention to Sustainability Department (Grievance Coordinator) 	
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - Major compliance -	The Complaint and Grievance Books that recorded the nature of complaints and the resolutions had been maintained and available for the past 3 years. Sampling in Paya Lang Estate, complaint been logged on 10/10/2019 by HA regarding to roof for clinic was available and the action plan with evidence also available for verification.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - Minor compliance -	Main contribution of the estates to the local development was demonstrated in the provision of facilities and monetary contributions, where feasible. The contribution provided from estate as sampled below: - <u>Tambang Estate</u> As per evidence letter dated 03/06/2021, CSR to Sekolah Kebangsaan Tambang for 1 lorry of Soil, 5 liter of hand sanitizer and A4 Paper boxes. <u>Paya Lang Estate</u> The estate has supplied food and water on 06/06/2021 and 08/06/2021 for workers that were quarantined due to the COVID-19 outbreak.	Complied
Criterion 4.4.4: Employees safety and health			
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.	IOI Plantation have established the Occupational Safety, Health and Hygiene Policy (Reference Number: IOIPD-PL- SH-003) signed by the Plantation Director, Mr. N B Sudhakaran on April 2019. The policy has	Complied

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<p>- Major compliance -</p>	<p>been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice boards within the estates.</p> <p>Verified the Communication of the Occupational Safety, Health and Hygiene Policy as below:</p> <ul style="list-style-type: none"> a. Gomali Estate: 30/12/2020 b. Tambang Estate: 24/03/2021 c. Paya Lang Estate: 28/04/2021 d. Sagil Estate: 07/05/2021 	
<p>4.4.4.2 The occupational safety and health plan shall cover the following:</p> <ul style="list-style-type: none"> a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: <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 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 	<p>The Occupational Safety and Health Plan for the year 2021 were available for all the sampled estates. The Safety and Health Plan covered the implementation among others as below:</p> <ul style="list-style-type: none"> a. IOI Plantation have established the Group Policy on Occupational Safety, Health and Hygiene Policy (Reference Number: IOIPD-PL-SH-003) signed by the Plantation Director, Mr. N B Sudhakaran on April 2019. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice boards within the estates. <p>Verified the Communication of the Occupational Safety, Health and Hygiene Policy as stated in 4.4.4.1.</p> b. IOI Gomali Certification Unit estates have conducted risk assessments for all the operations and documented in the Hazard Identification, Risk Assessment, and Risk Control (HIRARC). The HIRARC is guided by the document Occupational, Safety and Health Management System – Hazard Prevention and Control Measures; Doc Reference Number: IOI – OSH 3.3.4; Document 	<p>Complied</p>

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<p>1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <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>	<p>Date: 01/08/2012. The assessment covers all main operations and support operations.</p> <p><u>Gomali Estate</u></p> <ul style="list-style-type: none"> - Verified the HIRARC for the newly implemented operation, FFB Evacuation – Grabber System. Review Date: 19/05/2020. - Sighted HIRARC available for other operations as well such as Harvesting (Review Date: 19/05/2021), Chemical Spraying (19/05/2021) and Manuring (19/05/2021). - Chemical Health Risk Assessment (CHRA) was conducted to assess the hazards associated with the hazardous chemicals used in the estate. The latest CHRA review for Gomali Estate was conducted on 24/04/2019 by ENV Consultancy & Monitoring Services Sdn Bhd (DOSH Registration: HQ/04/ASS/00/193). The CHRA Report (Report Number: HQ/04/ASS/00/193 – 2019/039) was available for verification. - Medical Surveillance was conducted for 19 workers on 3/02/2020, 10/02/2021 and 12/03/2021 as per OSHA-USECHH 2000 requirements. The medical surveillance was conducted by Klinik Segamat (Occupational Health Doctor: HQ/08/DOC/00/545). The Medical Surveillance Report (Report Number: 006/OHD/2021 & 025/OHD/2021) stated that all 19 workers passed the medical program and were fit to work. - Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety & Health (Noise Exposure) Regulations 2019 in the estates. The NRA was conducted by ETOSH Consult & Engineering Plt (DOSH Reg Number: JH/03/04/125) on 30/07/2020. The Baseline Noise Risk 	

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	<p>Assessment Report (Report Number: HQ/LPROYKPEB/20/00232) was available for verification.</p> <ul style="list-style-type: none"> - Audiometric test was conducted for 13 workers identified by the estate as recommended in the NRA at Kelinik Raja on 10/08/2020. The results indicated that 6 workers had normal hearing, 5 workers with moderate hearing loss and 2 workers with severe hearing loss. The report states that 5 of the wirers are to be reassessed in June 2021 and the rest in April 2022. <p><u>Tambang Estate</u></p> <ul style="list-style-type: none"> - HIRARC was used to assess all risks associated with the operations in the estate. The HIRARC register was available for verification and recently reviewed on 19/05/2021 for all operations. - Chemical Health Risk Assessment was conducted as per OSHA USECHH Regulations 2000 to assess the risks associated with hazardous chemicals used in the estate. The CHRA was conducted on 23/04/2019 by ENV Consultancy & Monitoring Services Sdn Bhd (DOSH Registration: HQ/04/ASS/00/193). The CHRA Report (Report Number: HQ/04/ASS/00/193 – 2019/030) was available for verification. - Medical Surveillance was conducted for 24 estate workers involved in rat baiting work, chemical handling and workshop works. The medical surveillance was done at Klinik Segamat by DOSH registered Doctor (DOSH Reg Number: HQ/08/DOC/00/545) on 23/01/2021 and 08/04/2021. The report stated that all 24 workers passed the medical surveillance program and were fit to work. 	

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	<ul style="list-style-type: none"> - Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety & Health (Noise Exposure) Regulations 2019 in the estate. The NRA was conducted by ETOSH Consult & Engineering Pt (NRA Reg Number: HQ/16/PEB/00/158) on 22/06/2020. The Baseline Noise Risk Assessment Report (Report Number: HQ/LPROYKPEB/20/00231) was available for verification. - Audiometric Test was conducted for 20 workers identified to be exposed to excessive noise in the estate at KPJ Bandar Maharani Specialist Hospital on 26/04/2021, 28/04/2021 and 29/04/2021. The results showed that 6 workers had normal hearing, 8 workers had mild or moderate hearing loss and 6 workers had hearing impairments. A medical Examination and Audiogram Review was conducted for the 6 workers with hearing impairment at Klinik Segamat on 26/05/2021. DOSH has been informed via JKKP 7 submitted by the estate. <p><u>Paya Lang Estate</u></p> <ul style="list-style-type: none"> - HIRARC was used to assess all risks associated with the operations in the estate. The HIRARC register was available for verification and recently reviewed on 19/05/2021 for all operations. Sampled the HIRARC for Harvesting and Chemical Spraying. - Chemical Health Risk Assessment was conducted as per OSHA USECHH Regulations 2000 to assess the risks associated with hazardous chemicals used in the estate. The CHRA was conducted on 02/10/2018 by ENV Consultancy & Monitoring Services Sdn Bhd (DOSH Registration: HQ/04/ASS/00/193). 	

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	<p>The CHRA Report (Report Number: HQ/04/ASS/00/193 – 2018/076) was available for verification.</p> <ul style="list-style-type: none"> - Medical Surveillance was conducted for 20 estate workers involved in fogging, chemical handling and workshop works. The medical surveillance was done at Klinik Segamat by DOSH registered Doctor (DOSHS Reg Number: HQ/08/DOC/00/545) on 27/01/2021 to 29/01/2021. The report stated that all 20 workers passed the medical surveillance program and were fit to work. - Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety & Health (Noise Exposure) Regulations 2019 in the estate. The NRA was conducted by ETOSH Consult & Engineering Pte (NRA Reg Number: HQ/16/PEB/00/158) on 08/08/2020. The Baseline Noise Risk Assessment Report (Report Number: HQ/LPROYKPEB/20/00266) was available for verification. - Audiometric Test was conducted for 7 workers identified to be exposed to excessive noise in the estate at Klinik Raja on 26/04/2021, 28/04/2021 and 10/08/2020. The results showed that 4 workers had normal hearing and 3 workers had mild or moderate hearing loss. <p><u>Saqil Estate</u></p> <ul style="list-style-type: none"> - HIRARC was used to assess all risks associated with the operations in the estate. The HIRARC register was available for verification and recently reviewed on 19/05/2021 for all operations. Sampled the HIRARC for Biological hazard, 	

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	<p>reviewed on 01/06/2021 due to an accident that occurred in the estate.</p> <ul style="list-style-type: none"> - Chemical Health Risk Assessment was conducted as per OSHA USECHH Regulations 2000 to assess the risks associated with hazardous chemicals used in the estate. The CHRA was conducted on 21/05/2019 by ENV Consultancy & Monitoring Services Sdn Bhd (DOSH Registration: HQ/04/ASS/00/193). The CHRA Report (Report Number: HQ/04/ASS/00/193 – 2019/046) was available for verification. - Medical Surveillance was conducted for 27 workers on 12/03/2021 and 11/02/2021 as per OSHA USECHH Regulations 2000. The medical surveillance was conducted at Klinik Segamat by DOSH registered Doctor (DOSH Reg Number: HQ/08/DOC/00/545). The report stated that all 27 workers passed the medical surveillance program and were fit to work. - Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety & Health (Noise Exposure) Regulations 2019 in the estate. The NRA was conducted by ETOSH Consult & Engineering PIt (NRA Reg Number: HQ/16/PEB/00/158) on 04/06/2020. The Baseline Noise Risk Assessment Report (Report Number: HQ/LPROYKPEB/20/00230) was available for verification. - Audiometric Test was conducted for 4 workers identified to be exposed to excessive noise in the estate at KPJ Bandar Maharani Specialist Hospital on 20/04/2021. The results showed that 1 worker had normal hearing and 3 workers had mild hearing loss. 	

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	<p>c. IOI Gomali Certification Unit estates have established training programs for management team, workers and contractors including pesticides applicator, programmed throughout the year. The trainings were conducted by those with knowledge in chemical handling.</p> <p><u>Gomali Estate</u></p> <ul style="list-style-type: none"> - Chemical Usage Training – 15/02/2021 - Empty Chemical Container Management – 16/02/2021 - Chemical Storage and Handling Training – 16/02/2021 <p><u>Tambang Estate</u></p> <ul style="list-style-type: none"> - SOP on Chemical Handling Training – 21/05/2021 - Premixer Training – 20/05/2021 - Chemical Storage and Handling Training – 11/03/2021 - Pest & Diseases Training – 10/03/2021 <p><u>Paya Lang Estate</u></p> <ul style="list-style-type: none"> - Chemical Handling Training – 20/02/2021 - Chemical Storage and Handling Training – 02/03/2021 <p><u>Sagil Estate</u></p> <ul style="list-style-type: none"> - Chemical Storage and Handling Training – 27/05/2021 - Spraying SOP Training – 16/02/2021 <p>d. Appropriate PPE is provided by the estate’s management based on</p>	

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	<p>the job scope to the workers without any charges. Verified the Borang Pemberian Alat Pelindung Diri (Individu) available for each estate which records the PPE issuance for each worker.</p> <p>e. Standard Operating Procedures for Handling of Chemicals were available in several documents such as:</p> <ul style="list-style-type: none"> - Occupational Safety & Health Management System: Prosedur Kerja Selamat Penggunaan Bahan Kimia, dated on 06.01.2020, Rev No: 05, Doc Reference: IOI-OSH 3.2.2. - Occupational Safety & Health Management System: Prosedur Kerja Selamat Penyimpanan dan Pengurusan Stor Bahan Kimia, dated 06/01/2020, Rev No: 5, Doc Reference: IOI-OSH 3.2.2. - Occupational Safety & Health Management System: Prosedur Kerja Selamat Pembancuh Bahan Kimia, dated 06/01/2020, Rev No: 4, Doc Reference: IOI-OSH 3.2.2. <p>Pesticides were found stored in the estate’s Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. At the entrance door, signage requiring donning of PPE were visibly posted as verified from the pictures provided. The Chemical Store signage with required Hazard Symbols were available at the entrance. The up-to-date chemical register, trade and generic names, and their Safety data Sheet were available for verification.</p> <p>f. IOI Gomali Certification Unit estates have appointed Safety Officers in their respective estates as the person responsible for all</p>	

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	<p>safety and health issues within the operating unit.</p> <p><u>Gomali Estate</u></p> <ul style="list-style-type: none"> - The Assistant Manager Mr. Ahmad Shahel Rizaihan Bin Mohamad has been appointed as the Safety & Health Coordinator for Gomali Estate as stated in the appointment letter dated 03/09/2020 undersigned by the Estate Manager. <p><u>Tambang Estate</u></p> <ul style="list-style-type: none"> - The Senior Assistant Manager In-Charge, Mr. Chia Wee Loong has been appointed as the Chairman of the Osh Committee in Tambang Estate as stated in the appointment letter dated 22/02/2021 undersigned by the Plantation Controller. <p><u>Paya Lang Estate</u></p> <ul style="list-style-type: none"> - The Sr. Assistant Manager, Mr. Selvaraju A/L S.Kaliapan has been appointed as the Safety & Health Coordinator in Paya Lang Estate as stated in the appointment letter dated 01/04/2021 undersigned by the Sr. Assistant Manager In-Charge. <p><u>Sagil Estate</u></p> <ul style="list-style-type: none"> - The Assistant Manager, Mr. Mohan Raj A/L Nagooru has been appointed as the Safety & Health Coordinator in Sagil Estate as stated in the appointment letter dated 08/06/2021 undersigned by the Sr Manager. <p>g. IOI Gomali Certification Unit estates conducted regular OSH</p>	

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	<p>committee meetings on quarterly basis and when necessary due to accidents that occur. The meeting discussed issues on employees' safety, health and welfare such as operational risks and health achievement report, estate security, safety compliance by contractors, workplace inspection, legal compliance, safety and health training. Sighted the latest OSH Meeting Minutes dated as follows:</p> <p><u>Gomali Estate</u></p> <ul style="list-style-type: none"> • Year 2021 - 29/01/2021 • Year 2020 - 21/12/2020, 18/09/2020, 11/05/2020 and 05/03/2020 <p><u>Tambang Estate</u></p> <ul style="list-style-type: none"> • Year 2021 – 15/03/2021 • Year 2020 - 07/12/2020, 24/09/2020, 23/07/2020 and 22/05/2020 <p><u>Paya Lang Estate</u></p> <ul style="list-style-type: none"> • Year 2021 – 07/04/2021 • Year 2020 – 09/06/2020, 30/09/2020, 21/10/2020 and 15/12/2020 <p><u>Sagil Estate</u></p> <ul style="list-style-type: none"> - Year 2021 – 10/03/2021 - Year 2020 – 14/12/2020, 30/11/2020 and 03/06/2020. 	

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	<p>h. Emergency Response Plan Flow Charts were available to address emergencies such as Chemical Spillage (Field), Vehicle Accident, Fire Outbreak at Office/Store/Housing, Fire in Field/Peat Areas in Own or Neighbouring Estate, Storekeeper/Bagworm Treatment Workers/ Other Workers and Control & Prevention of COVID-19 Infection at the estates.</p> <p>The estates have established Emergency Response Team lead by the Estate Managers. The ERT chart and Fire Extinguisher Map were available for verification. Sighted the ERP trainings as below:</p> <p><u>Gomali Estate</u></p> <ul style="list-style-type: none"> - Emergency Response Team Training – 04/04/2021 - Fire Drill – 17/04/2021 <p><u>Tambang Estate</u></p> <ul style="list-style-type: none"> - Fire Drill & Emergency Response Procedure – 21/05/2021 <p><u>Paya Lang Estate</u></p> <ul style="list-style-type: none"> - Fire Drill Training – 20/05/2021 <p><u>Sagil Estate</u></p> <ul style="list-style-type: none"> - Fire Drill Training – 26/02/2020 - Emergency Response Team Training – 05/05/2021 <p>i. First aiders were stationed at all workstation/operations at the estates. The first aiders were responsible for first aid box at each workstation/operation assigned to them by the management. The first aid boxes are frequently replenished with to replace used</p>	

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		<p>items and expired items. The first aid box holders are regularly trained, and the training records were verified as below:</p> <ul style="list-style-type: none"> - Gomali Estate: 27/05/2021 - Tambang Estate: 25/02/2021 - Paya Lang Estate: 27/04/2021 - Sagil Estate: 31/12/2020 <p>j. Records of accidents were maintained by all estates and updated to the HQ on a monthly basis. Accidents that occur are also discussed in the quarterly held JKPP Meetings.</p> <p><u>Gomali Estate</u></p> <ul style="list-style-type: none"> - The estate management has submitted the JKPP 8 form for the year ending 2020 to the Department of Safety & Health on 07.01.2021, Reference No: JKPP8/65110/2020. There was a total of 10 accident cases reported for the year with a loss of 133 days. - There were no accident cases reported for the year 2021 as of the audit date. <p><u>Tambang Estate</u></p> <ul style="list-style-type: none"> - The estate management has submitted the JKPP 8 form to DOSH for the year ending 2020 on 08/01/2021, Reference No: JKPP 8/64944/2020. There was a total of 39 accident cases reported for the year with a loss of 55 days. - There were no accident cases reported for the year 2021 as of the audit date. The estate has submitted the JKPP 7 form to 	

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		<p>DOSH due to the audiometric test conducted on 7 of their workers showing severe hearing loss.</p> <p><u>Paya Lang Estate</u></p> <ul style="list-style-type: none"> - The estate management has submitted the JKKP 8 form to DOSH for the year ending 2020 on 08/01/2021, Reference Number: JKKP 8/65148/2020. There was a total of 26 accident cases reported for the year 2020 with a loss of 35 days. - There were 8 accident cases reported for the year 2021 as of the audit date with a loss of 9 days. The estate has submitted the JKKP 7 form to DOSH due to the audiometric test conducted on one of their workers showing moderate hearing loss. <p><u>Sagil Estate</u></p> <ul style="list-style-type: none"> - The estate management has submitted the JKKP 8 form to DOSH for the year ending 2020 on 09/01/2021, Reference No: JKKP 8/64805/2020. There was a total of 17 accident cases reported for the year with a loss of 66 days. - For the year 2020 there were 2 accident cases reported in the estate. The JKKP 6 form has been submitted to DOSH accordingly and available for verification. 	
Criterion 4.4.5: Employment conditions			
4.4.5.1	The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The	The management had established the "Group Sustainable Palm Oil Policy" in Oct 2020 signed by Group Managing Director & CEO, Dato'	Complied

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<p>policy shall be signed by the top management and effectively communicated to the employees.</p> <p>- Major compliance -</p>	<p>Lee Yeow Chor which covered the necessary aspects of human rights related issues. This policy can be accessed at IOI Group’s website link https://www.ioigroup.com/Content/S/S_Enquiries</p> <p>There also policy on Equal Opportunity Employment & Freedom of Association Policies dated Oct 2017. The awareness already been conducted by management to workers dated 24/04/2021.</p> <p>The induction training been given to the new workers, verification on training record in Paya Lang Estate dated 03/06/2020 for local workers was available for reviewed.</p>	
<p>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.</p> <p>- Major compliance -</p>	<p>The management had established the Equal Opportunity Employment & Freedom of Association Policies where the commitments included:</p> <ol style="list-style-type: none"> 1. In line with ILO Core Conventions. 2. All workers will receive equal treatment 3. The company respect freedom of association and collective bargaining as part of our commitment to support the fair and equitable treatment of our workers; 4. The workers have the right to join or form trade unions of their own choosing. 5. Trade unions have access to the company estates and will not interfere with the organizing of activities of workers. 6. The freedom of association shall be instituted according and within the Trade Union Act 1959, Industrial Relations Act 1967 and Immigration Act 1956/63 7. The workers can submit their grievances through the Employees Consultative Committee (ECC). 8. The purpose of these policies is to ensure that workers of the company is recruited and provided an environment which is free 	<p>Complied</p>

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		<p>from unlawful discrimination, harassment or victimization and that we are implementing the Group’s commitment to equal opportunities, freedom of association and collective bargaining at all times.</p> <p>The policy was last reviewed on October 2017 and signed by Mr. N.B Sudhakaran, Plantation Director. Employment records showed that this policy had been implemented and maintained.</p> <p>The awareness been given to workers through training, verified as per record dated 24/03/2021 at Tambang estate.</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>Documentation and conditions of pay for foreign workers hired in the estates are available. Employment agreement with foreign workers, who are Indian, Bangladesh, Nepalese and Indonesian, stated all statutory fringe benefits and eligible incentives, e.g. working hours, overtime, leave and medical benefits, maternity leave for women, insurance coverage, deductions, resignation notice period and company rules. Company procedures require the employment contract to be explained by management to potential migrant workers before contracts are signed.</p> <p>Pay slips are available for verification showed the workers were able to earn living wage that meet the Minimum Wage Order 2020. For those workers employed before the Minimum Wage Order 2020, New/Amended Terms and Conditions of Employment Contract was signed by the workers on the new Minimum Wage Order 2020.</p> <p>Sampled of pay slip March, June and Nov 2020 for workers as below:</p>	Complied

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	<p><u>Gomali Estate</u></p> <ol style="list-style-type: none"> 1. Employee id: 1PDP/IOI/1115/23418 2. Employee id: 1PDP/IOI/0909/23364 3. Employee id: 1PDP/IOI/0319/23383 4. Employee id: 1PDP/IOI/0516/23554 <p><u>Tambang Estate</u></p> <ol style="list-style-type: none"> 1. Employee id: 1PIP/IOI/0208/24735 2. Employee id: 1PIP/IOI/1219/24437 3. Employee id: 1PIP/IOI/0118/24214 4. Employee id: 1PIP/IOI/1013/24436 5. Employee id: 1PIP/IOI/1115/24195 <p><u>Paya Lang Estate</u></p> <ol style="list-style-type: none"> 1. Employee id: 1PIP/IOI/1110/25164 2. Employee id: 1PIP/IOI/0914/25190 3. Employee id: 1PIP/IOI/0118/25257 4. Employee id: 1PIP/IOI/0910/25344 <p><u>Sagil Estate</u></p> <ol style="list-style-type: none"> 1. Employee id: 1PIP/IOI/1115/22387 2. Employee id: 1PIP/IOI/0285/22446 3. Employee id: 1PIP/IOI/0418/22440 	

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		4. Employee id: 1PIP/IOI/0120/22520	
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>The management ensured that employees of contractors are paid based on Minimum Wage Order 2020 by monitoring salary payment and interviewing the contractor’s employees.</p> <p>The wage slips were review for the month of March, April and May 2020. The wages paid were calculated based on the official pay slip received by the workers and noted in compliance with the current practices.</p> <p>Sampled of pay slip for contractor’s worker as below:</p> <p><u>Paya Lang Estate</u></p> <p>En Tirovalar (EFB Transporter Contractor) has 1 worker as per verification. The pay slip was available, and their workers are paid based on Minimum Wage Order 2020. It was noted that the estate management are monitoring the contractor’s workers salary payment as confirmed by the worker during the interview.</p> <p><u>Sagil Estate</u></p> <p>Verification on contractor’s workers from Metallic Milestone Sdn Bhd, the pay slip sampled dated March and April 2021 showed that the workers were paid based on Minimum Wage Order 2020.</p>	Complied
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 management maintained a master-list of employees that recorded the employee identification number, full names, identification number or passport number, gender, date of birth, age, date joined, and job assignment.</p>	Complied

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		<p>A brief description of the work that the foreign workers will be performing is written into the Offer of Employment as Plantation Worker.</p> <p>Full job descriptions are documented for senior positions, such as Managers, Social Liaison Officer, and Safety & Health Officer with official appointment letter etc.</p>	
4.4.5.6	<p>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.</p> <p>- Major compliance -</p>	<p>The management has provided with employment contract from India, Bangladesh, Indonesia and Nepal and the terms of employment are clearly specified in the contracts, which included position offered, period of employment, salary, overtime rate, rest days every sixth day, rate of pay when working on rest days, days and hours of work, approved deductions, termination of employment, holiday pay, rate of pay when working on holidays, leave pay, sick leave, passage expenses, expatriations of remains and burial arrangement and insurance. Sampled of employment contract for workers as below:</p> <p><u>Gomali Estate</u></p> <ol style="list-style-type: none"> 1. Employee id: 1PDP/IOI/1115/23418 2. Employee id: 1PDP/IOI/0909/23364 3. Employee id: 1PDP/IOI/0319/23383 4. Employee id: 1PDP/IOI/0516/23554 <p><u>Tambang Estate</u></p> <ol style="list-style-type: none"> 1. Employee id: 1PIP/IOI/0208/24735 2. Employee id: 1PIP/IOI/1219/24437 3. Employee id: 1PIP/IOI/0118/24214 	Complied

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		4. Employee id: 1PIP/IOI/1013/24436 5. Employee id: 1PIP/IOI/1115/24195 <u>Paya Lang Estate</u> 1. Employee id: 1PIP/IOI/1110/25164 2. Employee id: 1PIP/IOI/0914/25190 3. Employee id: 1PIP/IOI/0118/25257 4. Employee id: 1PIP/IOI/0910/25344 <u>Sagil Estate</u> 1. Employee id: 1PIP/IOI/1115/22387 2. Employee id: 1PIP/IOI/0285/22446 3. Employee id: 1PIP/IOI/0418/22440 4. Employee id: 1PIP/IOI/0120/22520	
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 -	IOI Gomali Certification Unit have implemented a new SAP System that includes a transparent time recording system. The SAP System captures the working days, productivity, working hours and overtime among others. Besides that, manual logbooks are also maintained to monitor the working days, hours and overtime of each workers.	Complied
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 of the employees and overtime rates are specified in the employment contract i.e. 8 hours per day and overtime rates are in accordance with the Employment Act 1955. Sampled of check roll and overtime record for workers as below: 1. Employee ID: 1PDP/IOI/1115/23418 2. Employee ID: 1PDP/IOI/0909/23364	Complied

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		3. Employee ID: 1PDP/IOI/0319/23383 4. Employee ID: 1PDP/IOI/0516/23554 5. Employee ID: 1PIP/IOI/0208/24735 6. Employee ID: 1PIP/IOI/1219/24437 7. Employee ID: 1PIP/IOI/0118/24214 8. Employee ID: 1PIP/IOI/1013/24436 9. Employee ID: 1PIP/IOI/1115/24195	
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 -	Pay slips clearly showed the basic pay or piece rate, number of days worked or total output, any allowable deductions and net amount. Any overtime, holiday pay, working on rest days and any other special day, when applicable, are also shown on the pay slips.	Complied
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. - Minor compliance -	The workers are offered incentives on output, provided training, access to medical care and other benefits such as free housing, free water supply and minimal charge (RM 5.00) for electricity supply. Under the Minimum Wages & Leave Pay Policies, the management as part of the KPIs for Estate Manager, must take pro-active measures to increase the workers' productivity, with target earnings of at least 20% more than the minimum wage for each worker during normal working hours (daily spread over period of ten hours). Local workers are provided with free education facilities (government school, free childcare, and medical services to their dependents).	Complied
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. - Major compliance -	The management has provided adequate amenities to their local and foreign workers as well the grouping has provided adequate housing, water supplies, medical, educational, and public amenities. Workers are provided free living quarters constructed of permanent materials that have living rooms, bedrooms, kitchen and toilets. All the	Complied

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		<p>houses are supplied with treated water and electricity. The workers are provided with medical, educational and public amenities as the Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446). Workers housing inspection been done weekly basis by Hospital Assistant, sampling in Tambang estate the inspection record available dated 25/05/2021,17/05/2021 and 10/05/2021.</p> <p>Disposal of domestic waste is collected by the management twice a day and transport to a specific location away from the community. The waste is stored in bins provided by independent contractor and collected every 10 days to be disposed to local authority approved landfill. In Sagil Estate, line site inspection was done weekly basis latest record was on 24/05/2021.</p>	
4.4.5.12	<p>The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.</p> <p>- Major compliance -</p>	<p>The management has established the Policy on Harassment at Workplace, last reviewed on June 2018 and undersigned by N.B Sudhakaran, Plantation Director. The management also establish SOPs and guidelines for woman in estate as per below: -</p> <ol style="list-style-type: none"> 1. Women and Empowerment Committee; Doc Ref: IOI/G/SE/001; Rev: 1; Dated 17/02/2020. 2. Guidelines on Reproductive Health, Doc Ref: IOI/G/SE/001; Rev: 02; Dated 05/10/2020. 3. Guidelines for Handling Harassment at Workplace; Doc Ref: IOI/G/SE/004; Rev 02; Dated 26/11/2020. 	Complied
4.4.5.13	<p>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</p>	<p>The policy provides the definition adopted by the management based on UN definition on harassment and sexual harassment. Grievance channels are in place such as Grievance Hotline, Employee Consultative Council (ECC), Joint Consultative Council (JCC), Woman and Empowerment Committee (WEC), via email or by post verification as per below record; -</p>	Complied

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	<p>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>	<ol style="list-style-type: none"> 1. WEC meeting in Tambang estate is conducted every 6 months. Verified the latest WEC Meeting Minutes dated 22/05/2021 and 28/11/2020. 2. In Sagil Estate, WEC Meeting Minutes was available for verification dated 30/12/2020. 3. JCC Meeting in Gomali Estate is conducted every 2 months. Verified the meeting records dated 12/04/2021 and 26/02/2021. 	
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 be exposed to hazardous working conditions.</p> <p>- Major compliance -</p>	<p>IOI Gomali Certification Unit has established Equal Opportunity Employment & Freedom of Association Policies, last reviewed on October 2017 and signed by N.B Sudhakaran, Plantation Director.</p> <p>The policy covers the management commitment on equal opportunities in employment and freedom of association for all workers in line with the ILO Core conventions.</p> <p>It was verified that the sampled estates had formed the JCC, ECC and WEC as a mechanism for consultation with workers and stakeholders.</p>	Complied
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>IOI Gomali estates have established a training program for all workers based on the training need analysis conducted on a yearly basis.</p> <p>COVID-19 training and briefings were sighted for the estates. Interview with the sampled workers and staff indicated that they were aware on the SOP during the MCO such as social distancing, regular sanitization and use of PPE (Face Mask).</p> <p>Records of trainings were maintained by the estates as below: -</p>	Complied

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Criterion / Indicator		Assessment Findings		Compliance
		<u>Gomali Estate</u>		
		Training	Date	
		Payslip and VLP Training	03/05/2021	
		Company Policies Training	24/04/2021	
		Grievance & Complaints Procedure Training	13/04/2021	
		Sexual Harassment Reporting Procedure Training	06/04/2021	
		Tractor Attachments – Grabber System Training	24/05/2021	
		<u>Tambang Estate</u>		
		Training	Date	
		Payslip and VLP Training	19/02/2021	
		Company Policies Training	24/03/2021	
		Grievance & Complaints Procedure Training	29/03/2021	
		Sexual Harassment Reporting Procedure Training	24/03/2021	
		Sustainability Training – Contractor	02/04/2021	
		<u>Paya Lang Estate</u>		
		Training	Date	

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Criterion / Indicator		Assessment Findings		Compliance
		Payslip and VLP Training	22/04/2021	
		Company Policies Training	28/04/2021	
		Grievance & Complaints Procedure Training	26/04/2021	
		Sexual Harassment Reporting Procedure Training	26/04/2021	
		<u>Sagil Estate</u>		
		Training	Date	
		Company Policies Training	07/05/2021	
		Harvesting Training	16/06/2020	
		Grievance & Complaints Procedure Training	07/05/2021	
		Sexual Harassment Reporting Procedure Training	07/05/2021	
		Buffalo Maintenance Training	17/02/2021	
		COVID-19 Control Measures Training	15/02/2021	
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>IOI Gomali Certification Unit estates have conducted training need analysis for all employees, management and contractors. The training need analysis was conducted based on the job designation and training required by the job type. Sighted the Estate: Recommended Training Needs for the year 2021 for all estates.</p>		

Criterion / Indicator		Assessment Findings	Compliance
4.4.6.3	<p>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>A training programme has been developed and available in the Annual Sustainability Programme 2021. The trainings were sighted to have been sub categorised to trainings on Environmental, GAP, SOP, Social, Traceability, Building & Structure Inspection, SUS Program and Legal Program.</p>	Complied
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 in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>IOI Plantation have established the Sustainability Palm Oil Policy signed by the GMD and CEO, Dato Lee Yeow Chor, revised on October 2020. The policy states the Environmental Management and the commitment of the organisation towards protecting the environment. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice boards within the estates.</p> <p>Verified the briefing on the Sustainability Palm Oil Policy as below:</p> <ol style="list-style-type: none"> Gomali Estate: 30/12/2020 Tambang Estate: 24/03/2021 Paya Lang Estate: 28/04/2021 Sagil Estate: 07/05/2021 	Complied
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <ol style="list-style-type: none"> An environmental policy and objectives; The aspects and impacts analysis of all operations. <p>- Major compliance -</p>	<p>IOI Gomali Certification Unit estates have established an Environmental Management Plan reviewed on May 2021. The Environmental Management Plan consist of the following.</p> <ol style="list-style-type: none"> Waste Management Plan Pesticide Reduction Plan 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		3. Chemical and Fertilizer Reduction Plan 4. Continuous Improvement Plan IOI Gomali Certification Unit estates have also established Environmental Aspect & Impact Assessment (EAIA) which covers the following workstations and activities such as Replanting, Mature maintenance, Harvesting, FFB collection, Tractor Washing Bay, Chemical Store, Fertilizer Store, Premix Station, Clinic and Waste Collection Areas among others. The EAIA was reviewed on 22/05/2021 and was available for verification for all estates. Sampled the EIA available for FFB Loading using Grabber available at all the estates that have implemented the new system.	
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored. - Major compliance -	IOI Gomali Certification Unit estates have established an Environmental Management Plan reviewed on May 2021. The Environmental Management Plan consist of the following. 1. Waste Management Plan 2. Pesticide Reduction Plan 3. Chemical and Fertilizer Reduction Plan 4. Continuous Improvement Plan Among the Environmental Improvement Plans available at the estates were verified as below. <u>Gomali Estate</u> 1. Waste Management and Reduction Plan for Linesite, Shop and Creche. 2. Waste Management and Reduction Plan for Fertilizer Store.	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>3. Waste Reduction Plan for Buffalo Holding Area.</p> <p><u>Tambang Estate</u></p> <p>1. Waste Management Plan and Reduction Plan for Lubricant Store. 2. Waste Management and Reduction Plan for Linesite and Shop.</p> <p><u>Paya Lang Estate</u></p> <p>1. Waste Management and Reduction Plan for Oil Palm Field. 2. Waste Management and Reduction Plan for Linesite. 3. Waste Management and Reduction Plan for Diesoline Skid Tank.</p> <p><u>Sagil Estate</u></p> <p>1. Waste Management and Reduction Plan for Chemical Store 2. Waste Management and Reduction Plan for Linesite.</p>	
4.5.1.4	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p>- Minor compliance -</p>	<p>IOI Gomali Certification Unit estates have established the Environmental Management Plan based on the Environmental Aspect & Impact Assessment. All the estates continue to promote activities that gives positive impact to the environment by continuously providing awareness and training to the employee, implementation of SOPs and Good Agricultural Practices as well as maintaining compliance to legal requirements.</p> <p>Among the programmes to promote positive impacts planned for year 2021 are as below:</p> <p><u>Gomali Estate</u></p> <p>1. To reduce waste from office such as paper.</p>	Complied

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	<p>2. To ensure Water Stream Quality is complied with.</p> <p>3. To reduce usage of Diesel & Petrol.</p> <p>4. To encourage the use of organic fertilizer.</p> <p><u>Tambang Estate</u></p> <p>1. To apply more organic material to improve the soil structure and fertility.</p> <p>2. To reduce diesel usage.</p> <p>3. To provide clean water for domestic usage.</p> <p>4. To ensure all recycle items generated from household usage to be recycled.</p> <p><u>Paya Lang Estate</u></p> <p>1. To reduce purchase and generation of excessive 20L empty chemical containers.</p> <p>2. Retest the water quality until the results comply to the requirements.</p> <p><u>Sagil Estate</u></p> <p>1. To reduce rat baits for control of rat bait population.</p> <p>2. To reduce office waste such as paper.</p> <p>3. To ensure natural water streams are not polluted. To provide clean and safe water for workers.</p> <p>4. To reduce usage of diesel and petrol.</p>	

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Criterion / Indicator	Assessment Findings	Compliance																										
<p>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.</p> <p>- Major compliance -</p>	<p>Continual awareness and trainings were conducted by the estates management in order to equip all workers and staffs with relevant knowledges. Sighted the training as below:</p> <p>Gomali Estate</p> <table border="1" data-bbox="1048 568 1868 866"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Buffer Zone Training</td> <td>15/02/2021</td> </tr> <tr> <td>RTE Species Training</td> <td>30/04/2021</td> </tr> <tr> <td>HCV Training</td> <td>02/06/2021</td> </tr> <tr> <td>Waste Segregation Training</td> <td>11/02/2021</td> </tr> <tr> <td>IPM Beneficial Plant Training</td> <td>12/08/2020</td> </tr> </tbody> </table> <p>Tambang Estate</p> <table border="1" data-bbox="1048 959 1868 1206"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>HCV & RTE Species Training</td> <td>26/04/2021</td> </tr> <tr> <td>Waste Segregation Training</td> <td>03/05/2021</td> </tr> <tr> <td>IPM Training</td> <td>25/02/2021</td> </tr> <tr> <td>Beneficial Plant Training</td> <td>20/02/2021</td> </tr> </tbody> </table> <p>Paya Lang Estate</p> <table border="1" data-bbox="1048 1299 1868 1390"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Oil Trap Maintenance Training</td> <td>04/02/2021</td> </tr> </tbody> </table>	Training	Date	Buffer Zone Training	15/02/2021	RTE Species Training	30/04/2021	HCV Training	02/06/2021	Waste Segregation Training	11/02/2021	IPM Beneficial Plant Training	12/08/2020	Training	Date	HCV & RTE Species Training	26/04/2021	Waste Segregation Training	03/05/2021	IPM Training	25/02/2021	Beneficial Plant Training	20/02/2021	Training	Date	Oil Trap Maintenance Training	04/02/2021	<p>Complied</p>
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Training	Date																											
Oil Trap Maintenance Training	04/02/2021																											

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Criterion / Indicator		Assessment Findings		Compliance
		Waste Segregation Training	19/05/2021	
		RTE Species & HCV Training	19/05/2021	
		Water Quality Index Training	12/03/2021	
		Buffer Zone Training - Sprayers	09/02/2021	
		Sagil Estate		
		Training	Date	
		Waste Segregation Training	24/04/2021	
		Water Quality Index Training	28/04/2021	
		RTE Species & HCV Training	29/04/2021	
		Buffer Zone Training	29/04/2021	
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -	IOI Gomali Certification Unit estates discussed environmental related issues in the Environmental Meeting that are conducted on a quarterly basis. The meeting minutes were available for verification as below: <u>Gomali Estate</u> Environment Committee Meeting – 28/09/2020 (3-2020), 21/12/2020 (4-2020) and 29/03/2020 (1-2021) <u>Tambang Estate</u> Environment Committee Meeting – 15/03/2021 (1-2021), 17/12/2020 (4-2020) and 23/07/2020 (3-2020) <u>Paya Lang Estate</u> Environment Committee Meeting – 31/03/2021 (1-2021)		Complied

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Criterion / Indicator		Assessment Findings	Compliance																																				
		<u>Saqil Estate</u> Environment Committee Meeting – 29/04/2021 (1-2021), 28/12/2020 (4-2020)																																					
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 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. - Major compliance -	IOI Gomali Certification Unit estates have established baseline for non-renewable energy base on average of last 5 years usage/FFB produced. The monitoring of non-renewable energy usage was conducted on annual basis. Sighted the sampled monitoring records for diesel, electricity and water usage for FY 2020 (estate and contractor) as follows: <u>Gomali Estate</u> <table border="1"> <thead> <tr> <th>Month</th> <th>Diesel</th> <th>Water</th> <th>Electricity (kWh)</th> </tr> </thead> <tbody> <tr> <td>Jan 2020</td> <td>5273</td> <td>11623</td> <td>9369</td> </tr> <tr> <td>Feb 2020</td> <td>6303</td> <td>6728</td> <td>10337</td> </tr> <tr> <td>Mar 2020</td> <td>6328</td> <td>9402</td> <td>8546</td> </tr> <tr> <td>Apr 2020</td> <td>6664</td> <td>9257</td> <td>8288</td> </tr> <tr> <td>May 2020</td> <td>5699</td> <td>6569</td> <td>5875</td> </tr> <tr> <td>Jun 2020</td> <td>7667</td> <td>11987</td> <td>6006</td> </tr> <tr> <td>Jul 2020</td> <td>7183</td> <td>13077</td> <td>6445</td> </tr> <tr> <td>Aug 2020</td> <td>9119</td> <td>7589</td> <td>2727</td> </tr> </tbody> </table>	Month	Diesel	Water	Electricity (kWh)	Jan 2020	5273	11623	9369	Feb 2020	6303	6728	10337	Mar 2020	6328	9402	8546	Apr 2020	6664	9257	8288	May 2020	5699	6569	5875	Jun 2020	7667	11987	6006	Jul 2020	7183	13077	6445	Aug 2020	9119	7589	2727	Complied
Month	Diesel	Water	Electricity (kWh)																																				
Jan 2020	5273	11623	9369																																				
Feb 2020	6303	6728	10337																																				
Mar 2020	6328	9402	8546																																				
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May 2020	5699	6569	5875																																				
Jun 2020	7667	11987	6006																																				
Jul 2020	7183	13077	6445																																				
Aug 2020	9119	7589	2727																																				

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		Sept 2020	8672	15045	5078		
		Oct 2020	7160	10337	5858		
		Nov 2020	7168	9718	4679		
		Dec 2020	6057	9413	4909		
		<u>Tambang Estate</u>					
		Month	Diesel	Water	Electricity (kWh)		
		Jan 2020	5548	15060	20392		
		Feb 2020	6233	14970	19335		
		Mar 2020	5674	15100	21393		
		Apr 2020	7403	14500	21222		
		May 2020	7519	15010	21314		
		Jun 2020	8164	14800	20128		
		Jul 2020	7189	15200	20530		
		Aug 2020	7469	14920	20181		
		Sept 2020	8785	15005	18974		
		Oct 2020	6322	15380	19996		
		Nov 2020	5214	14900	18441		
Dec 2020	5042	15867	18300				

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		<u>Paya Lang Estate</u>				
		Month	Diesel	Water	Electricity (kWh)	
		Jan 2020	5168	45002	29373	
		Feb 2020	5048	40648	27676	
		Mar 2020	4893	44748	31448	
		Apr 2020	5976	44690	31500	
		May 2020	5701	37913	34023	
		Jun 2020	5991	42304	33287	
		Jul 2020	5721	43886	31659	
		Aug 2020	5880	46121	32572	
		Sept 2020	6549	38467	26577	
		Oct 2020	5140	22865	35474	
		Nov 2020	4794	26467	32441	
		Dec 2020	5160	29322	33775	
		<u>Sagil Estate</u>				
		Month	Diesel	Water	Electricity (kWh)	

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Criterion / Indicator		Assessment Findings				Compliance
		Jan 2020	3393	4500	29133	
		Feb 2020	5230	4350	27151	
		Mar 2020	5440	4650	30924	
		Apr 2020	7087	4500	30221	
		May 2020	6968	4650	30686	
		Jun 2020	6106	4500	29917	
		Jul 2020	5482	4650	30655	
		Aug 2020	4613	4650	30505	
		Sept 2020	3603	4500	28494	
		Oct 2020	3123	4650	30067	
		Nov 2020	2955	4500	27504	
		Dec 2020	2954	4650	27923	
4.5.2.2	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. - Major compliance -	IOI Gomali Certification Unit estates have provided the baseline value for the diesel, water and electricity usage on a monthly basis. The estates are required to report to the Sustainability Team if the usage exceeds the baseline values. For example, the baseline for Diesel Usage is 90,000 litres per month. It was noted that the monthly usage of diesel for all estates were below the stated baseline.				Complied
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	IOI Gomali Certification Unit estates have implemented the use of solar energy by using solar powered streetlights in the estate.				Complied
Criterion 4.5.3: Waste management and disposal						

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Criterion / Indicator		Assessment Findings	Compliance
4.5.3.1	<p>All waste products and sources of pollution shall be identified and documented.</p> <p>- Major compliance -</p>	<p>IOI Gomali Certification Unit estates have established a Waste Management and Reduction Plan which includes the identification of waste products and pollutants, Waste Generation, Action Plan & Monitoring, Documents to be Reviewed, Management Review and time bound and Person In-Charge.</p> <p>Among the Waste Management and Reduction Plan sampled were as follows:</p> <ol style="list-style-type: none"> 1. Waste Management and Reduction Plan Linesite. <ul style="list-style-type: none"> - Domestic Waste, Sewage, Garden Residue, Recycle items, Motor Lube Containers, Motor Lube Spillage, Electrical Fitting. 2. Waste Management and Reduction Plan for Scrap Iron. <ul style="list-style-type: none"> - Store or office Upgrading, Old trailers, Old wheelbarrows. 	Complied
4.5.3.2	<p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <ol style="list-style-type: none"> a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products <p>- Major compliance -</p>	<p>IOI Gomali Certification Unit estates have established the Waste Management Plan incorporated in the Environmental Management Plan reviewed on May 2021.</p> <p>Among the Waste Management Plan available at the estates were verified as below.</p> <p><u>Gomali Estate</u></p> <ol style="list-style-type: none"> 1. Waste Management and Reduction Plan for Linesite, Shop and Creche. 2. Waste Management and Reduction Plan for Fertilizer Store. 3. Waste Reduction Plan for Buffalo Holding Area. <p><u>Tambang Estate</u></p> <ol style="list-style-type: none"> 1. Waste Management Plan and Reduction Plan for Lubricant Store. 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>2. Waste Management and Reduction Plan for Linesite and Shop.</p> <p><u>Paya Lang Estate</u></p> <ol style="list-style-type: none"> 1. Waste Management and Reduction Plan for Oil Palm Field. 2. Waste Management and Reduction Plan for Linesite. 3. Waste Management and Reduction Plan for Diesoline Skid Tank. <p><u>Sagil Estate</u></p> <ol style="list-style-type: none"> 1. Waste Management and Reduction Plan for Chemical Store 2. Waste Management and Reduction Plan for Scrap Iron 3. Waste Management and Reduction Plan for Linesite 	
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>Standard Operating Procedures for Handling of Chemicals were available in several documents such as:</p> <ul style="list-style-type: none"> - Occupational Safety & Health Management System: Prosedur Kerja Selamat Penyimpanan dan Pengurusan Stor Bahan Kimia, dated 06/01/2020, Rev No: 5, Doc Reference: IOI-OSH 3.2.2. - Occupational Safety & Health Management System: Scheduled Waste Procedures, dated 22/05/2020, Rev No: 1, Doc Reference: IOI-OSH 3.2.2. - Occupational Safety & Health Management System: Pengurusan Bekas Bahan Kimia Kosong, dated 06/01/2020, Rev No: 3, Doc Reference: IOI-OSH 3.2.2. <p>Sampled the latest disposal of Schedule Waste as below:</p> <p><u>Gomali Estate</u></p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	<p>1. SW 305: Waste Oil – Tractor; Quantity: 0.350 Mt; Waste Code: Spent Lubricant Oil; Consignment Note Number: 20210521108LA095; Date of Disposal: 21/05/2021; Waste Manager: Kualiti Alam Sdn Bhd.</p> <p>2. SW409: Jumbo Bag; Quantity: 0.70 mt; Waste Code: Contaminated Container; Consignment Note Number: 2021052110GL4TDK; Date of Disposal: 21/05/2021; Waste Manager: Kualiti Alam Sdn Bhd.</p> <p>3. SW404 – Clinical Waste: Quantity: 0.0013mt; Consignment Note Number: 2210407083RWBOM; Date of Disposal: 07/04/2021; Waste Manager: Kualiti Alam Sdn Bhd.</p> <p><u>Tambang Estate</u></p> <p>1. SW104 – Used Welding Rod: Quantity: 0.0011mt; Consignment Note Number: 2021040916A9XY03; Date of Disposal: 09/04/2021; Waste Manager: Kualiti Alam Sdn Bhd.</p> <p>2. SW1312 – Oil Trap Mixture With Water: Quantity: 0.2760mt; Consignment Note Number: 2021040916A7CM9H; Date of Disposal: 09/04/2021; Waste Manager: Kualiti Alam Sdn Bhd.</p> <p>3. SW305 – Spent Lubricant Oil: Quantity: 0.2200mt; Consignment Note Number: 2021040916CID304; Date of Disposal: 09/04/2021; Waste Manager: Kualiti Alam Sdn Bhd.</p> <p>4. SW410 – Filters and PPEs Contaminated with Chemicals: Quantity: 0.0360mt; Consignment Note Number: 2021040916BPL97T; Date of Disposal: 09/04/2021; Waste Manager: Kualiti Alam Sdn Bhd.</p> <p><u>Paya Lang Estate</u></p>	

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Criterion / Indicator	Assessment Findings	Compliance
	<ol style="list-style-type: none"> 1. SW409 – Contaminated Container; Quantity: 0.0140 mt; Consignment Note Number: 2021031609UD48AO; Date of Disposal: 16/03/2021; Waste Manager: Kualiti Alam Sdn Bhd. 2. SW104 – Used Welding Rod; Quantity: 0.750 mt; Consignment Note Number: 2021031609EU12AK; Date of Disposal: 16/03/2021; Waste Manager: Kualiti Alam Sdn Bhd. 3. SW305 – Lubricant Oil; Quantity: 0.4680 mt; Consignment Note Number: 2021031609L5HNAM; Date of Disposal: 16/03/2021; Waste Manager: Kualiti Alam Sdn Bhd. 4. SW404 – Clinical Waste; Quantity: 0.0024 mt; Consignment Note Number: 202103160909Z8LF4V; Date of Disposal: 16/03/2021; Waste Manager: Kualiti Alam Sdn Bhd. <p><u>Sagil Estate</u></p> <ol style="list-style-type: none"> 1. SW104 – Used Welding Rod; Quantity: 0.0001 mt; Consignment Note Number: 2021043018O68TYR; Date of Disposal: 30/04/2021; Waste Manager: Kualiti Alam Sdn Bhd. 2. SW312 – Oil and Grease Interceptor; Quantity: 0.0700 mt; Consignment Note Number: 2021043018R5T8OU; Date of Disposal: 30/04/2021; Waste Manager: Kualiti Alam Sdn Bhd. 3. SW410 – Used Filter; Quantity: 0.0820 mt; Consignment Note Number: 2021043019N5K4UB; Date of Disposal: 30/04/2021; Waste Manager: Kualiti Alam Sdn Bhd. 4. SW305 – Spent Lubricant; Quantity: 0.4500 mt; Consignment Note Number: 2021043019XGS1CD; Date of Disposal: 30/04/2021; Waste Manager: Kualiti Alam Sdn Bhd. 	

Criterion / Indicator	Assessment Findings	Compliance
<p>4.5.3.4 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>Excess chemical containers that were not used for premixing have been triple rinsed and punctured was categorized under scheduled waste and disposed through licensed scheduled waste contractor Kualiti Alam Sdn Bhd</p> <p>Sighted the empty container disposal records at the estates visited as follows:</p> <p><u>Gomali Estate</u> SW409: Jumbo Bag; Quantity: 0.70 mt; Waste Code: Contaminated Container; Consignment Note Number: 2021052110GL4TDK; Date of Disposal: 21/05/2021; Waste Manager: Kualiti Alam Sdn Bhd.</p> <p><u>Tambang Estate</u> SW409: Contaminated Container with Chemicals; Quantity: 0.80 mt; Consignment Note Number: 20210409160SLT80; Date of Disposal: 09/04/2021; Waste Manager: Kualiti Alam Sdn Bhd.</p> <p><u>Paya Lang Estate</u> SW409 – Contaminated Container; Quantity: 0.750 mt; Consignment Note Number: 2021031609UD48AO; Date of Disposal: 16/03/2021; Waste Manager: Kualiti Alam Sdn Bhd.</p> <p><u>Saqil Estate</u> SW409 – Contaminated Container; Quantity: 0.1600 mt; Consignment Note Number: 2021043018BWJP50; Date of Disposal: 30/04/2021; Waste Manager: Kualiti Alam Sdn Bhd.</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
4.5.3.5	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. - Minor compliance -	<p>Proper disposal of waste material is carried out as per the company procedures. The procedures are fully understood by workers and managers.</p> <p><u>Gomali Estate</u> Domestic waste was collected three times a month by licensed outsourced contractor MS Mido Enterprise. Verified the latest disposal records dated 31/05/2021.</p> <p><u>Tambang Estate</u> Domestic waste was collected three times a month by licensed outsourced contractor MS Mido Enterprise. Verified the latest disposal records dated 09/05/2021 (D.O Number: 2836)</p> <p><u>Paya Lang Estate</u> Domestic waste was collected three times a month by licensed outsourced contractor MS Mido Enterprise. Verified the latest disposal records dated 31/05/2021 (D.O Number: 2941) and 20/05/2021 (D.O Number: 2939).</p> <p><u>Saqil Estate</u> Domestic waste was collected three times a month by licensed outsourced contractor MS Mido Enterprise. Verified the latest disposal records dated 04/05/2021 (Transaction Number: 107203)</p>	Complied
Criterion 4.5.4: Reduction of pollution and emission			
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid	All polluting activities were assessed through the aspect and impact method and were documented. The activities are inclusive of green	Complied

Criterion / Indicator		Assessment Findings	Compliance
	wastes and effluent. - Major compliance -	gas emissions, chemicals, fertilizer, scheduled waste, solid waste and household waste. Data relating to such activities were collected, analysed and presented during the environmental meetings held by the estates.	
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	<p>IOI Gomali Certification Unit estates have established the Pollution Reduction Plan incorporated in the Waste Management and Reduction Plan reviewed on May 2021.</p> <p>Among the Management Plan available at the estates were verified as below.</p> <p><u>Gomali Estate</u></p> <ol style="list-style-type: none"> 1. Waste Management and Reduction Plan for Linesite, Shop and Creche. 2. Waste Management and Reduction Plan for Fertilizer Store. 3. Waste Reduction Plan for Buffalo Holding Area. <p><u>Tambang Estate</u></p> <ol style="list-style-type: none"> 1. Waste Management Plan and Reduction Plan for Lubricant Store. 2. Waste Management and Reduction Plan for Linesite and Shop. <p><u>Paya Lang Estate</u></p> <ol style="list-style-type: none"> 1. Waste Management and Reduction Plan for Oil Palm Field. 2. Waste Management and Reduction Plan for Linesite. 3. Waste Management and Reduction Plan for Diesoline Skid Tank. 	Complied

Criterion / Indicator	Assessment Findings	Compliance	
	<p><u>Sagil Estate</u></p> <ol style="list-style-type: none"> 1. Waste Management and Reduction Plan for Chemical Store 2. Waste Management and Reduction Plan for Scrap Iron 3. Waste Management and Reduction Plan for Linesite 		
Criterion 4.5.5: Natural water resources			
<p>4.5.5.1</p>	<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> <ol 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. e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented. f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually. 	<p>IOI Gomali Certification Unit estates have established a Water Management Plan for the year 2021 available for verification. The purpose of the plan is to maintain the quality and availability of the natural water resources. Verified the water management plan and its implementations as below:</p> <p><u>Gomali Estate</u></p> <ol style="list-style-type: none"> 1. Water usage is monitored on a monthly basis by the estate and the data has been provided under indicator 4.5.2.1. Previously water used for consumption was treated in the estate using the water source available. As of September 2020, the estate obtains government water supply from Syarikat Bekalan Air Johor (SAJ). 2. Monitoring of incoming and outgoing water course at Sungai Senarut Hilir was done twice a year by the estate management. The recent water sampling was done on 10/03/2021. The analysis was done by IOI Research Centre and the report results (Report Number: GME/31/03/2021) was available for verification. The results indicated that the incoming water had high Ammoniacal Nitrogen which exceeds the national Water Quality Standards. The management has brought forward this issue to the neighbouring estates management awaiting their respond. 3. Riparian zones were maintained along the Sungai Senarut Hilir river. The management have erected signages stating prohibition 	<p>Minor Non-Conformity</p>

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<p>- Major compliance -</p>	<p>of chemical and fertiliser application along the riparian zone. Awareness trainings have been conducted for the staffs and workers to ensure the riparian zone is protected.</p> <p><u>Tambang Estate</u></p> <ol style="list-style-type: none"> 1. Water usage is monitored on a monthly basis by the estate and the data has been provided under indicator 4.5.2.1. Previously water used for consumption was treated in the estate using the water source available. As of May 2021, the estate obtains government water supply from Syarikat Bekalan Air Johor (SAJ). 2. Monitoring of incoming and outgoing water course at Anak Sungai A in Tambang Estate was done twice a year by the estate management. There are 3 sampling point located at the estate as verified in the map provided during the assessment. The recent water sampling was done on 11/03/2021. The analysis was done by IOI Research Centre and the report results (Report Number: TME/15/04/2021) was available for verification. The results indicated that all parameters were well within the permitted range. 3. Riparian zones were maintained along the Anak Sungai A. The management have erected signages stating prohibition of chemical and fertiliser application along the riparian zone. Awareness trainings have been conducted for the staffs and workers to ensure the riparian zone is protected. <p><u>Paya Lang Estate</u></p> <ol style="list-style-type: none"> 1. Water usage is monitored on a monthly basis by the estate and the data has been provided under indicator 4.5.2.1. Water is 	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>supplied by Gomali Mill Water Treatment Plant for domestic use. Monitoring of WQI is done by the mill on a monthly basis.</p> <ol style="list-style-type: none"> Monitoring of incoming and outgoing water course at Stream A, Stream B and Stream C at Paya Lang Estate was done twice a year by the estate management. There are 6 sampling point located at the estate as verified in the map provided during the assessment. The recent water sampling was done on 10/03/2021. The analysis was done by IOI Research Centre and the report results (Report Number: PLE/15/04/2021) was available for verification. The results indicated that all parameters were well within the permitted range except for the Ammoniacal N showing readings exceeding the range. The estate has investigated the issue and concluded that the root cause was due to residues from buffalo dung/urine. Hence the estate has established fencing along the stream as the corrective action plan. Riparian zones were maintained along the Stream A, Stream B and Stream C at Paya Lang Estate. The management have erected signages stating prohibition of chemical and fertiliser application along the riparian zone. Awareness trainings have been conducted for the staffs and workers to ensure the riparian zone is protected. <p><u>Sagil Estate</u></p> <ol style="list-style-type: none"> Water usage is monitored on a monthly basis and the data has been provided under indicator 4.5.2.1. Water for domestic use is treated at the estate Water Treatment Plant (Source; Gunung Ledang Water Catchment) and supplied to the workers quarters. Water Quality Monitoring is done twice a year as per the Water Management Plan. The most recent water sampling was conducted on May 2021 by Lotus Laboratory 	

Criterion / Indicator		Assessment Findings	Compliance
		<p>Services (M) Sdn Bhd indicated all parameters were within the approved specification.</p> <p>The request for JTK License (Kebenaran Menggunakan Bekalan Air Persendirian Di bawah Seksyen 6(1)(a) Akta Standard- Standard Minimum Perumahan Dan Kemudahan Pekerja (1990) has been rejected by JTK due to the sampling done by KKM resulting in Offspecs results. There was no action plan available in the Water Management Plan to address situations such as this. Thus a Minor Non-conformity was raised.</p> <p>3. Monitoring of incoming and outgoing water course at the river and natural stream at Sagil Estate was done twice a year by the estate management. There are 9 sampling point located at the estate as verified in the map provided during the assessment. The recent water sampling was done on 20/03/2021. The analysis was done by IOI Research Centre and the report results (Report Number: SGE/20/03/2021) was available for verification. The results indicated that all parameters were well within the permitted range</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>	No bunds were sighted across main rivers and waterways in all estates.	Complied
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>	The practice of water harvesting from road-side drains being directed and stored in conservation roadside pits was established in all estates.	Complied
<p>Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value</p>			

Criterion / Indicator	Assessment Findings	Compliance
<p>4.5.6.1 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> <ul style="list-style-type: none"> a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. b) Conservation status (<i>e.g.</i> 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>- Major compliance -</p>	<p>HCV assessment was conducted by the IOI Group HQ and documented in a report dated Oct 2010. The assessment was done on April 2014 and reviewed in February 2021. The exercise has taken into consideration all aspects of environmentally sensitive areas such as ponds, streams, wildlife boundaries and was documented in the HCV report. The reports state the HCV Identification, methods of managing and monitoring the identified.</p> <p><u>Gomali Estate</u></p> <ul style="list-style-type: none"> 1. The HCV Report was available for verification, latest review was on 13/02/2021. 2. The report states the identified HCV as below: <ul style="list-style-type: none"> ▪ Internal Stream channels into Sg. Muar ▪ Worshiping Areas ▪ Hindu Cemetery <p><u>Tambang Estate</u></p> <ul style="list-style-type: none"> 1. The HCV Report was available for verification, latest review was on 13/02/2021. 2. The reports state the identified HCV as below: <ul style="list-style-type: none"> ▪ Internal Stream – Stream A ▪ External River – Muar River (flowing nearby the estate) ▪ Worshiping Areas (Surau and Temples) ▪ Cemetery 	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		<p><u>Paya Lang Estate</u></p> <ol style="list-style-type: none"> The HCV Report was available for verification, latest review was on April 2021. The reports state the identified HCV as below: <ul style="list-style-type: none"> Internal Stream – Stream A, Stream B & Stream C Worshiping Areas (Surau and Temples) <p><u>Sagil Estate</u></p> <ol style="list-style-type: none"> The HCV Report was available for verification, latest review was on April 2021. The report states the identified HCV as below: <ul style="list-style-type: none"> River and Natural Stream (4.48 Ha) Steep Area (0.54 Ha) Ladang Forest Reserve Worshiping Areas Cemetery 	
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> <ol style="list-style-type: none"> Ensuring that any legal requirements relating to the protection of the species are met. Discouraging any illegal or inappropriate hunting, fishing, or collecting activities; and developing responsible measures to resolve human-wildlife conflicts. <p>- Major compliance -</p>	<p>IOI Gomali Certification Unit estates have conducted a Rare, Threatened and Endangered Species (RTE) assessment for their respective estates. The assessment states the mechanism for RTE monitoring and reporting, wildlife monitoring records and awareness on RTE wildlife species. The implementations of the RTE measures are as below:</p> <ol style="list-style-type: none"> <u>RTE Species Training</u> <ul style="list-style-type: none"> Gomali Estate – 30/04/2021 Tambang Estate – 26/04/2021 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> ▪ Paya Lang Estate – 19/05/2021 ▪ Sagil Estate – 30/06/2020 <ol style="list-style-type: none"> 2. Estate’s management have displayed posters on RTE species and briefed all workers on the importance to protect the wildlife. 3. Estates have implemented a Wildlife Monitoring Record book for recording of any sightings of wildlife in the estates. 	
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>IOI Gomali Certification Unit estates have conducted a Rare, Threatened and Endangered Species (RTE) assessment for their respective estates. The RTE Assessment also states the management plan for protecting the RTE species within the estate. This includes:</p> <ol style="list-style-type: none"> 1. To educate the workforce regarding animals, aquatic fauna and birds that are protected and listed as RTE under IUCN RED list and penalties for hunting without license. 2. To ensure there are no forms of hunting, trapping collecting and fishing of RTE species being carried out within the operating center. 3. To ensure constant monitoring is conducted. Sightings of RTE to be reported to Jabatan Perhilitan and to obtain report from them. 4. To ensure RTE species is not caged or kept anywhere in the estate. 	Complied
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>IOI Plantation have implemented a Zero Burning Policy dated May 2018 undersigned by NB Sudhakaran, Plantation Director and available for verification. The policy stated the company’s commitment towards zero burning practices across the estates as part of the efforts in protecting the environment and combating the haze problems.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		No open burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	
4.5.7.2	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. - Major compliance -	No open burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	Complied
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 -	No controlled burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	Complied
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	Noted based on the records on the land clearing and felling for the replanting at visited estates, method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	Complied
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 -	Standard Operating Procedures (SOPs) in the form of written document for estates were documented and maintained. It covers procedures all operations related to the management of the estate. The estate's management process and operations are guided by the following documents:	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ol style="list-style-type: none"> 1. Group Safe Operating Procedures (SaOP) 2. Group Standard Operating Procedure (StOPs) for estate dated 30/09/2020. 3. Group Social Impact Assessment and Management Action Plans (Guidance Document) dated 10 Oct 2011. 4. Group Environmental Impact Assessment and Management Action Plans dated December 2007. 5. Internal Audit procedure dated 03 May 2018. <p>The StOPs reflect best industry practices as detailed in IOI's agricultural policy document. Aside from StOPs for operations estates there exists also SaOPs for management but not limited to:</p> <ul style="list-style-type: none"> • Consultation and communication. • Negotiation on compensation. • Guidance and procedure for gifts and hospitality. • Selection and contracting of contractors including recruitment agencies. • Employment procedures for recruitment, selection, hiring, promotion, retirement and/or termination. • Remediation and Compensation Procedure (RaCP) • Accident and emergency procedures • Proper disposal of waste materials. 	
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 waterways. Measures shall be put in place to prevent	The operations in the estate is guided by the Environmental Management Guidelines; Doc Number: IOI/G/EV/006; Rev Number: 0; Issue Date: 28 th August 2020. The guidelines states among others:	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	contamination of surface and groundwater through runoff of either soil, nutrients or chemicals. - Major compliance -	<ol style="list-style-type: none"> 1. No new planting of oil palm on any individual, contiguous area of steep terrain (greater than 25 degrees) larger than 25 ha. 2. Replanting of Oil Palm. <ul style="list-style-type: none"> - Zero burning to be adapted for replanting. Trunk chips to be stacked at inter-rows for natural decomposition as well as to provide a level of prevention from soil erosion. - Chemical Spraying and fertilizer application are avoided especially along stream banks to avoid chemical runoff into watercourse. - Leguminous cover plants to be planted as ground covers and beneficial plants to be planted immediately after oil palm planting. 	
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	IOI Gomali certification Unit sampled Estates had a visual identification/reference system for each established field/block and maps established. Field numbers and hectare were marked on palms and in some areas on concrete slaps.	Complied
Criterion 4.6.2: Economic and financial viability plan			
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	The 5 Year Business Plan was established for all IOI Gomali Certification Unit estates and available for verification. The Business Plan is reviewed on a yearly basis by the management. The Business Plan covers the area statement, Crop (FFB) by Year Planting, Crop (FFB) Monthly Breakdown, 10 Years Replanting Programme, Summary Replanting programme by Field, Detail Replanting Programme by Field, Executive/Staff & Workers requirement, General Charges Statement, Mature Oil Palm Costing Statement, Capital Expenditure Statement and Summary Replanting Cost to Maturity.	Complied
4.6.2.2	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be	Annual replanting programme has been established by the estates under Gomali Certification Unit. Verified the 10 Years replanting	Complied

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Criterion / Indicator		Assessment Findings					Compliance																														
	<p>established and review annually, where applicable every 3-5 years.</p> <p>- Major compliance -</p>	<p>Programme Summary 2020/2021 – 2029/2030. The replanting programme for the next 5 years has been stated below.</p> <table border="1"> <thead> <tr> <th>Gomali Certification Unit</th> <th>21/22</th> <th>22/23</th> <th>23/24</th> <th>24/25</th> <th>25/26</th> </tr> </thead> <tbody> <tr> <td>Gomali Estate</td> <td>155</td> <td>262</td> <td>210</td> <td>205</td> <td>234</td> </tr> <tr> <td>Tambang Estate</td> <td>142</td> <td>81</td> <td>186</td> <td>258</td> <td>68</td> </tr> <tr> <td>Paya Lang Estate</td> <td>157</td> <td>209</td> <td>267</td> <td>242</td> <td>-</td> </tr> <tr> <td>Sagil Estate</td> <td>-</td> <td>-</td> <td>35</td> <td>-</td> <td>-</td> </tr> </tbody> </table>					Gomali Certification Unit	21/22	22/23	23/24	24/25	25/26	Gomali Estate	155	262	210	205	234	Tambang Estate	142	81	186	258	68	Paya Lang Estate	157	209	267	242	-	Sagil Estate	-	-	35	-	-	
Gomali Certification Unit	21/22	22/23	23/24	24/25	25/26																																
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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>c) Cost of production : cost per tonne of FFB</p> <p>d) Price forecast</p> <p>e) e) Financial indicators : cost benefit, discounted cash flow, return on investment</p> <p>- Major compliance -</p>	<p>The 5 Year Business Plan was established for all IOI Gomali Certification Unit estates and available for verification. The Business Plan is reviewed on a yearly basis by the management. The Business Plan covers the area statement, Crop (FFB) by Year Planting, Crop (FFB) Monthly Breakdown, 10 Years Replanting Programme, Summary Replanting programme by Field, Detail Replanting Programme by Field, Executive/Staff & Workers requirement, General Charges Statement, Mature Oil Palm Costing Statement, Capital Expenditure Statement and Summary Replanting Cost to Maturity.</p> <p>Verified the FFB Crop (Mt) actual (2020/2021), estimate (2021/2022) and projection (2022/2023 – 2023/2024) for the sampled estates as below:</p> <table border="1"> <thead> <tr> <th>FY Year</th> <th>Gomali Estate</th> <th>Tambang Estate</th> <th>Paya Lang Estate</th> <th>Sagil Estate</th> </tr> </thead> <tbody> <tr> <td>2020/2021</td> <td>47,589.81</td> <td>28,240</td> <td>39,420</td> <td>24,508</td> </tr> <tr> <td>2021/2022</td> <td>52,250.00</td> <td>29,128</td> <td>38,000</td> <td>26,989</td> </tr> </tbody> </table>					FY Year	Gomali Estate	Tambang Estate	Paya Lang Estate	Sagil Estate	2020/2021	47,589.81	28,240	39,420	24,508	2021/2022	52,250.00	29,128	38,000	26,989	Complied															
FY Year	Gomali Estate	Tambang Estate	Paya Lang Estate	Sagil Estate																																	
2020/2021	47,589.81	28,240	39,420	24,508																																	
2021/2022	52,250.00	29,128	38,000	26,989																																	

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Criterion / Indicator		Assessment Findings					Compliance
		2022/2023	47,760.00	28,753	33,560	26,261	
		2023/2024	49,940.00	28,090	33,280	21,879	
		2023/2024	49,940.00	30,001	33,280	22,135	
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 on a monthly basis. The progress report contains the updated actual usage as to date.					Complied
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 -	All contractor that supply services to the estates have an agreement contract between IOI Plantations Berhad and the contractors. All pricing mechanisms for the services is documented in the contract agreement and effectively implemented as verified in the estates and interview with the sampled contractors. Verified the contract agreement for SGSS Mutiaraa Builders available dated 01/07/2020. Invoice dated 30/04/2021 and Payment Voucher (3400002679) dated 17/05/2021 was available for verification for the contractor. This complied with the agreement that the payment will be made not more than 90 days of invoice date.					Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Based on the contracts agreed between contractors/service providers and the estates, it is evident that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. Interview with parties concerned confirmed that business practices with local businesses were conducted in a fair and transparent manner. It is further verified that payments to contractors					Complied

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Criterion / Indicator		Assessment Findings	Compliance
		and other service providers are paid within the period specified in the contract agreement.	
Criterion 4.6.4: Contractor			
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	External contractors are usually engaged for FFB/EFB and Harvesting works. Interview with the sampled contractors' workers indicated that they have brief understanding on the MSPO requirements. Information such as policies and procedures are provided to all contractors and their workers during the induction and meetings with them. Verified the agreement for SGSS Mutiaraa Builders with Dynamic Plantations Berhad dated 01/07/2020. Under Special Conditions mentioned: the contractor also requested to oblige to all the requirements of RSPO, MSPO and ISCC. Training on MSPO Requirements was available for contractor dated 21/4/2021.	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Contract agreements are signed between the respective Estate Managers and the Contractor. The terms and conditions of the contract are explained to the contractor. A copy of the contract is given to the contractor. In the special conditions mentioned: the contractor also requested to oblige to all the requirements of RSPO, MSPO and ISCC.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	Acceptance is confirmed by the Management prior to the audit via acceptance of Audit contract and Audit Plan and the 5-year MSPO certification programme. Management has the IOI Group-Additional requirements for contractors and service providers and Transport Policy which stated that the company and its certification bodies have the right to audit the contractor/service provider regarding the above.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
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 -	Estates has monitored the productivity of the contractors' workers through the monthly actual distribution and work progress book before the actual payment is invoiced.	Complied
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 -	<p>Paya Lang Estate have replanted 15 Hectares of Oil Palm in 2021 previously planted with Rubber in their estate. The felling of the rubber field started in September 2020 and the completion of Oil Palm planting was done in April 2021.</p> <p>Prior to the replanting of Rubber to Oil Palm, a Land Use Risk Identification Assessment was conducted internally The intent of the risk identification was to identify "low risk" and "risk areas" in conjunction with the interpretation of RSPO P&C 2018 document. The assessment was conducted on 10/01/2020 and concluded that the proposed replanting of Rubber to Oil Palm is categorized as low risk.</p> <p>A HCV Assessment was conducted to determine the presence of sites with high conservation attributes. The assessment was conducted for the whole estate in April 2014 and reviewed in April 2019, which includes the newly planted area. The report states that:</p> <ol style="list-style-type: none"> 1. There is no any rare, threatened and endangered species that are significant at global, regional or national level found around Paya Lang Estate. 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		2. Paya Lang Estate is not located at large-landscape level ecosystems and no any ecosystem mosaic significant at global, regional or national level found.	
4.7.1.2	<p>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.</p> <p>- Major compliance -</p>	<p>Paya lang Estate have replanted 15 Hectares of Oil Palm in 2021 previously planted with Rubber in their estate. The felling of the rubber field started in September 2020 and the completion of Oil Palm planting was done in April 2021</p> <p>Prior to the replanting of Rubber to Oil Palm, a Land Use Risk Identification Assessment was conducted internally The intent of the risk identification was to identify “low risk” and “risk areas” in conjunction with the interpretation of RSPO P&C 2018 document. The assessment was conducted on 10/01/2020 and concluded that the proposed replanting of Rubber to Oil Palm is categorized as low risk.</p> <p>A HCV Assessment was conducted to determine the presence of sites with high conservation attributes. The assessment was conducted for the whole estate in April 2014 and reviewed in April 2019, which includes the newly planted area. The report states that:</p> <ol style="list-style-type: none"> 1. There is no any rare, threatened and endangered species that are significant at global, regional or national level found around Paya Lang Estate. 2. Paya Lang Estate is not located at large-landscape level ecosystems and no any ecosystem mosaic significant at global, regional or national level found. <p>Hence it was concluded that the replanted are from rubber to oil palm does not fall under the category Environmentally Sensitive Areas.</p>	Complied
Criterion 4.7.2: Peat Land			

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Criterion / Indicator		Assessment Findings	Compliance
4.7.2.1	<p>New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice.</p> <p>- Major compliance -</p>	<p>Paya lang Estate have replanted 15 Hectares of Oil Palm in 2021 previously planted with Rubber in their estate. The felling of the rubber field started in September 2020 and the completion of Oil Palm planting was done in April 2021</p> <p>Prior to the replanting of Rubber to Oil Palm, a Land Use Risk Identification Assessment was conducted internally The intent of the risk identification was to identify "low risk" and "risk areas" in conjunction with the interpretation of RSPO P&C 2018 document. The assessment was conducted on 10/01/2020 and concluded that the proposed replanting of Rubber to Oil Palm is categorized as low risk.</p> <p>The soil map was available for Paya lang Estate. The area that has been converted from rubber to oil palm has soil categorization as follows:</p> <ol style="list-style-type: none"> 1. Telemong Series 2. Akob Series 3. Local Aluvium Series <p>It was noted that these soils don not fall under the category of peat or marginal soils.</p>	Complied
Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)			
4.7.3.1	<p>A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations.</p> <p>- Major compliance -</p>	<p>Paya Lang Estate have replanted 15 Hectares of Oil Palm in 2021 previously planted with Rubber in their estate. The felling of the rubber field started in September 2020 and the completion of Oil Palm planting was done in April 2021</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		A Social Impact Assessment and Environmental Impact Assessment were conducted prior to the replanting or rubber to oil palm in the estate.	
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 external stakeholders. - Major compliance -	Paya Lang Estate have replanted 15 Hectares of Oil Palm in 2021 previously planted with Rubber in their estate. The felling of the rubber field started in September 2020 and the completion of Oil Palm planting was done in April 2021 A Social Impact Assessment and Environmental Impact Assessment were conducted prior to the replanting or rubber to oil palm in the estate. The SIA and EIA include the previous land use and effects brought due to its changes.	Complied
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 -	Paya Lang Estate have replanted 15 Hectares of Oil Palm in 2021 previously planted with Rubber in their estate. The felling of the rubber field started in September 2020 and the completion of Oil Palm planting was done in April 2021 A Social Impact Assessment and Environmental Impact Assessment were conducted prior to the replanting or rubber to oil palm in the estate. The SIA and EIA include the management plan to address the issues that has been identified from the assessments.	Complied
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 -	Not applicable as the development does not include smallholder schemes.	Not applicable
Criterion 4.7.4: Soil and topographic information			

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Criterion / Indicator		Assessment Findings	Compliance
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 -	<p>Paya Lang Estate have replanted 15 Hectares of Oil Palm in 2021 previously planted with Rubber in their estate. The felling of the rubber field started in September 2020 and the completion of Oil Palm planting was done in April 2021</p> <p>The soil map was available for Paya Lang Estate. The area that has been converted from rubber to oil palm has soil categorization as follows:</p> <ol style="list-style-type: none"> 1. Telemong Series 2. Akob Series 3. Local Aluvium Series <p>It was noted that these soils do not fall under the category of peat, fragile or marginal soils.</p>	Complied
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 -	<p>Paya Lang Estate have replanted 15 Hectares of Oil Palm in 2021 previously planted with Rubber in their estate. The felling of the rubber field started in September 2020 and the completion of Oil Palm planting was done in April 2021</p> <p>Topographic information such as field remote sensing image dated Aug 2015 was available for verification. The estate also had GIS images, soil map and terrain maps to guide the planning of replanting in the mentioned field.</p>	Complied
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 -	<p>Paya lang Estate have replanted 15 Hectares of Oil Palm in 2021 previously planted with Rubber in their estate. The felling of the rubber field started in September 2020 and the completion of Oil Palm planting was done in April 2021</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>The soil map was available for Paya Lang Estate. The area that has been converted from rubber to oil palm has soil categorization as follows:</p> <ol style="list-style-type: none"> 1. Telemong Series 2. Akob Series 3. Local Aluvium Series <p>It was noted that these soils do not fall under the category of peat, fragile or marginal soils.</p> <p>Terrain maps were available for the estate. It was noted that the area replanted was not categorized as steep area with 25 degrees or more.</p>	
4.7.5.2	<p>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.</p> <p>- Major compliance -</p>	<p>Paya lang Estate have replanted 15 Hectares of Oil Palm in 2021 previously planted with Rubber in their estate. The felling of the rubber field started in September 2020 and the completion of Oil Palm planting was done in April 2021</p> <p>The soil map was available for Paya Lang Estate. The area that has been converted from rubber to oil palm has soil categorization as follows:</p> <ol style="list-style-type: none"> 1. Telemong Series 2. Akob Series 3. Local Aluvium Series <p>It was noted that these soils do not fall under the category of peat, fragile or marginal soils.</p>	Complied
4.7.5.3	<p>Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion.</p> <p>- Major compliance -</p>	<p>Paya lang Estate have replanted 15 Hectares of Oil Palm in 2021 previously planted with Rubber in their estate. The felling of the rubber field started in September 2020 and the completion of Oil Palm planting was done in April 2021</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>The soil map was available for Paya Lang Estate. The area that has been converted from rubber to oil palm has soil categorization as follows:</p> <ol style="list-style-type: none"> 1. Telemong Series 2. Akob Series 3. Local Aluvium Series <p>It was noted that these soils do not fall under the category of peat, fragile or marginal soils.</p>	
Criterion 4.7.6: Customary land			
4.7.6.1	<p>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.</p> <p>- Major compliance -</p>	<p>Paya Lang Estate have replanted 15 Hectares of Oil Palm in 2021 previously planted with Rubber in their estate. The felling of the rubber field started in September 2020 and the completion of Oil Palm planting was done in April 2021. Therefore, this indicator is not applicable as it does not involve customary land.</p>	Not Applicable
4.7.6.2	<p>Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites.</p> <p>- Minor compliance -</p>	<p>Paya Lang Estate have replanted 15 Hectares of Oil Palm in 2021 previously planted with Rubber in their estate. The felling of the rubber field started in September 2020 and the completion of Oil Palm planting was done in April 2021. Therefore, this indicator is not applicable as it does not involve customary land.</p>	Not Applicable
4.7.6.3	<p>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.</p> <p>- Major compliance -</p>	<p>Paya Lang Estate have replanted 15 Hectares of Oil Palm in 2021 previously planted with Rubber in their estate. The felling of the rubber field started in September 2020 and the completion of Oil Palm planting was done in April 2021. Therefore, this indicator is not applicable as it does not involve customary land.</p>	Not Applicable

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Criterion / Indicator		Assessment Findings	Compliance
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 -	Paya Lang Estate have replanted 15 Hectares of Oil Palm in 2021 previously planted with Rubber in their estate. The felling of the rubber field started in September 2020 and the completion of Oil Palm planting was done in April 2021. Therefore, this indicator is not applicable as it does not involve customary land.	Not Applicable
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	Paya Lang Estate have replanted 15 Hectares of Oil Palm in 2021 previously planted with Rubber in their estate. The felling of the rubber field started in September 2020 and the completion of Oil Palm planting was done in April 2021. Therefore, this indicator is not applicable as it does not involve customary land.	Not Applicable
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 -	Paya Lang Estate have replanted 15 Hectares of Oil Palm in 2021 previously planted with Rubber in their estate. The felling of the rubber field started in September 2020 and the completion of Oil Palm planting was done in April 2021. Therefore, this indicator is not applicable as it does not involve customary land.	Not Applicable
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance -	Paya Lang Estate have replanted 15 Hectares of Oil Palm in 2021 previously planted with Rubber in their estate. The felling of the rubber field started in September 2020 and the completion of Oil Palm planting was done in April 2021. Therefore, this indicator is not applicable as it does not involve customary land.	Not Applicable
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 -	Paya Lang Estate have replanted 15 Hectares of Oil Palm in 2021 previously planted with Rubber in their estate. The felling of the rubber field started in September 2020 and the completion of Oil Palm planting was done in April 2021. Therefore, this indicator is not applicable as it does not involve customary land.	Not Applicable

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 Corporation Berhad has documented the Group Sustainable Palm Oil Policy (SPOP) revised October 2020 signed by Dato Lee Yeow Chor (Group Managing Director & Chief Executive Officer and Dr Surina Ismail (Group Head of Sustainability).	Complied
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 had also clearly stated the company’s commitment which included continual improvement in the overall aspects of plantation management and community development. Example as below: 1. Environmental management. 2. Human rights and workplace. 3. Community development and social impact. 4. Traceable supply chains. 5. Transparency and wider engagement. The training has been conducted in the Mill on MSPO Policy under SPOP dated 26/04/2021 attended by workers and staff trained by Mr. Fernandez. The record was available for verification.	Complied
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 -	Internal Audit is conducted on annual by the IOI Sustainability Team. The record was available as per email record dated 12/04/2021. There is a documented procedure for conducting Internal audit available for verification. The procedure for Internal Audit was established and documented, i.e. SOP-08; Issue 1; Rev: 01; Doc Date: 03/05/2018.	Complied

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<p>4.1.2.2</p>	<p>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.</p> <p>- Major compliance -</p>	<p>Internal audit was conducted in Gomali POM on 10/02/2021. There were 12 nonconformities and 30 OFI raised during the Internal Audit. Audit results were evaluated, and corrective actions taken on the non-conformances and all non-conformities were successfully closed by the mill.</p>	<p>Complied</p>
<p>4.1.2.3</p>	<p>Reports shall be made available to the management for their review.</p> <p>- Major compliance -</p>	<p>The audit reports were documented provided to the management after the audit. The Internal Audit Report was available for verification at the mill. The report also was discussed in the yearly Management Review.</p>	<p>Complied</p>
<p>Criterion 4.1.3 – Management Review</p>			
<p>4.1.3.1</p>	<p>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.</p> <p>- Major compliance -</p>	<p>Management Review for Gomali certification unit was conducted and minutes of meeting were maintained and available for verification. The status of the implementation of MSPO was noted to be discussed. In Gomali Mill the Management Review Meeting was conducted on 12/03/2021.</p>	<p>Complied</p>
<p>Criterion 4.1.4 – Continual Improvement</p>			
<p>4.1.4.1</p>	<p>The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company.</p> <p>- Major compliance -</p>	<p>Continuous improvement plan for Gomali POM were verified and documented under long range budget and CAPEX. The coverage is mainly on the mill’s operation and safety related budget. Among the plan schedule for year 2021 are as below:</p> <ol style="list-style-type: none"> 1. To improve efficiency of boiler and to comply with Ringleman Chart-1. 2. To reduce the dependent of genset for power supply. 3. To reduce the reading of BOD. 4. To prevent any EFB leachate to overflow and better drainage system 	<p>Complied</p>

<p>4.1.4.2</p>	<p>The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.</p> <p>- Major compliance -</p>	<p>Gomali POM has developed training programs which cover the safety & health and sustainability aspect for year 2021. This program is based on the training needs analysis that was established in the beginning of the year. Systems to improve practices were also adopted. Verified the introduction of improvement practices as below:</p> <ol style="list-style-type: none"> 1. Introduction of new Management Reporting System - Transition from Pinfosys System to SAP System. 	<p>Complied</p>
<p>4.2 Principle 2: Transparency</p>			
<p>Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements</p>			
<p>4.2.1.1</p>	<p>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.</p> <p>- Major compliance -</p>	<p>The management has adopted an open and transparent method of communication and consultation when dealing with relevant parties e.g. its workers, government agencies, contractors, neighboring plantations by personal invitation to attend the internal and external stakeholders’ consultation meetings.</p> <p>Gomali POM conducted external stakeholder meeting on April 2021 using letter and email due to COVID-19 restrictions. The Internal Stakeholder Meeting was conducted on 08/04/2021, attended by workers representative and staff with a total of 18 attendees.</p>	<p>Complied</p>
<p>4.2.1.2</p>	<p>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.</p> <p>- Major compliance -</p>	<p>Management documents such as Policies, Stakeholder consultation processes, Financial Annual Reports are available upon request and published at the IOI website: http://www.ioigroup.com/Content/S/S_Policy</p> <p>Any commercially confidential information will need special request before being provided.</p>	<p>Complied</p>
<p>Criterion 4.2.2 – Transparent method of communication and consultation</p>			

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<p>4.2.2.1</p>	<p>Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -</p>	<p>IOI Gomali POM has established procedures and mechanisms to conduct stakeholders’ consultations, handle complaints and grievances through stakeholders’ meetings, Women Empowerment Committee (WEC), Employee Consultative Committees (ECC), Safety & Health Committees (SHC). Reference were taken to: - Stakeholder Complaint Procedure Flowchart; SOP 6.11; Appendix 9.0; Rev: 1B; Dated: 17/01/2017. - Stakeholder Request Procedure Flowchart; SOP 6.11; Appendix 1.0; Rev: 1B; Dated: 28/12/2020.</p>	<p>Complied</p>
<p>4.2.2.2</p>	<p>The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i>. - Minor compliance -</p>	<p>Gomali POM - Mill Manager is overall responsible for any issues raised by local communities and other affected or interested parties regarding mill operations. Social Liaison Officers are also nominated to coordinate activities of the stakeholders, WECs, ECCs and SHCs. Appointments letters as issued to the respective Social Liaison Officers. Sighted the appointment letter of Mr. Fernandez Samy Francis (Assistant Manager) dated 18/02/2020.</p>	<p>Complied</p>
<p>4.2.2.3</p>	<p>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 -</p>	<p>Latest stakeholders list sighted at Gomali POM was updated on 01/04/2021 which included all contractors such as FFB and EFB Transporters and Schedule Waste Contractors. Records of consultation and communication included attendance lists, minutes of the meetings, photographs of the meetings and meeting notes. Gomali POM conducted external stakeholder meeting on April 2021 via letter and email due to COVID-19 restrictions. Internal Stakeholder Meeting was conducted by Gomali POM on 08/04/2021, attended by 18 workers representatives and staffs</p>	<p>Complied</p>
<p>Criterion 4.2.3 – Traceability</p>			

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<p>4.2.3.1</p>	<p>The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. - Major compliance -</p>	<p>IOI Gomali POM has established, implemented, and maintained a procedure for traceability of FFB from the estates to the CPO and PK produced by the POM, documented in Traceability: Doc Number: SOP/COC/3; Issue No: 05; Dated: 01/01/2018.</p>	<p>Complied</p>
<p>4.2.3.2</p>	<p>The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -</p>	<p>IOI Gomali POM continues to comply with the traceability system through regular inspections, checking of records and internal audits. Verified the latest Internal Audit Report dated 10/02/2021 for the mill.</p>	<p>Complied</p>
<p>4.2.3.3</p>	<p>The management shall identified and assign suitable employees to implement and maintain traceability system. - Minor compliance -</p>	<p>The Palm Oil Mill Organization Charts and job responsibilities of employees (Mill Manager, Assistant Manager, Engineers, Assistant Engineers, Technicians, Security Officer, Weighbridge Operator, Laboratory Chemist and Clerks) have been suitably defined for the implementation and maintenance of the traceability procedure. Mr. Fernandez was appointed as the person in charge to implement and maintain the traceability system as verified in the appointment letter dated 11/01/2021.</p>	<p>Complied</p>
<p>4.2.3.4</p>	<p>Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance -</p>	<p>Gomali POM maintains all records pertaining to the FFB received, stored and sold/delivered and was verified to be traceable via the Delivery Note, Lorry Ticket and Weighbridge Ticket which were verified at the mill.</p>	<p>Complied</p>
<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 shall be in compliance with applicable local, state, national and ratified international laws and regulations. - Major compliance -</p>	<p>IOI Gomali POM continued to comply with legal requirements. Sampled permit and licenses were verified as below: 1. MPOB License; License Number: 500117204000; License Validity Period: 01/02/2021 – 31/01/2022; Possessing Capacity: 540.000 mt FFB a year.</p>	<p>Complied</p>

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		<ol style="list-style-type: none"> 2. Fire Certificate; Certificate Number: JBPM: JH/7/232/2020; License Validity Period: 31/05/2020 – 30/05/2021. The mill has requested for certificate renewal on 06/05/2021 pending approval. 3. DOE Compliance Schedule; License Number: 004713; License Validity Period: 01/07/2020 – 30/06/2021. 4. BAKAJ Water Extraction License; License Number: 08/A/Sgt/003; Water Extraction Limit: 4008³/ day. 5. JTK Permit Kebenaran Menggunakan Bekalan Air Persendirian; Permit Serial Number: TK(NJ).SEGT/43/; License validity Period: 22/12/2019 – 21/12/2021 6. Permit Barang Kawalan Berjadual; Reference Number: JH(SGT)0136/07 PSK; Description: Diesel; Storage Capacity: 32,000 liters. License Validity Period: 08/07/2020 – 07/07/2021 7. Private Installation License; License Number: LP 12/1/4/100 (CO-GEN); Licensed Capacity: 6.2; License Commencement Date: 16/01/2020; License Expiry: 10 years from the license commencement date. 	
<p>4.3.1.2</p>	<p>The management shall list all relevant laws related to their operations in a legal requirements register. - Major compliance -</p>	<p>IOI Gomali Certification Unit has established and updated list of applicable laws and regulations that are applicable for the estates. The legal register is prepared by Sustainability Unit (SU) Department. Verified the document 'list of revision' which includes the following:</p> <ol style="list-style-type: none"> 1. National Wage Consultative Council Act 2011, Minimum Wages Order 2020 2. Section 22(A), Emergency (Prevention and Control of Infectious Diseases) Amendment – Ordinance 2021 3. Workers' Minimum Standards of Housing and Amenities Regulations 1990 – Amendment 	<p>Complied</p>

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		4. Employees Minimum Standards of Housing, Accommodations and Amenities (Accommodation and Centralised Accommodations) Regulation 2020	
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance -	Document titled Mechanism for Tracking Changes in Law; revised on 30/01/2020 was available for verification. IOI Sustainability Unit Team will update the legal register if any new regulation or if there is amendment in the legal and will distribute it to the mill. The changes in law are monitored via methods as below: 1. Subscribed to Lexis-Nexis Advance Malaysia. 2. News release through printed and online newspaper 3. Law change tracked by book publisher (MDC Book Publications) and Federal Government Gazette. 4. Circulars from relevant associations. e.g. MPOA, MPOB, MAPA, SOCSO, EPF, DOE, DOSH Headquarters etc. The sustainability team then issues the changes to all operating units to update existing records. Then the mill management implements applicable changes in law accordingly. The sustainability team monitors the implementation/updating of information via RSPO, MSPO & ISCC Internal Audits.	Complied
4.3.1.4	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements. - Minor compliance -	Tracking systems were available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Sustainability Unit Team. Interviews with office personnel and records verification indicates that the system is appropriate to the operations. Tracking system on any changes in the law was well implemented.	Complied

		The management has appointed the Assistant Manager, Mr. Kaw Meng Chung on 11.03.2021 as the Legal Liaison Officer in Gomali POM to monitor any changes on the laws related to the operating centre and update the management on the day to day compliance as stated in the appointment letter undersigned by the Mill Manager.	
Criterion 4.3.2 – Lands use rights			
4.3.2.1	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. - Major compliance -	Communities surrounding Gomali POM can move freely without any issues or problems. Verified during site inspection that no such limitations had occurred.	Complied
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land. - Major compliance -	Gomali Palm Oil Mill is located within the Paya Lang Estate compound and the quit rent is paid by the estate management.	Complied
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	Gomali POM resides under the land title of Paya Lang Estate. Legal land title was available and verified during the audit. The boundary to the estate is demarcated with fencing all along the perimeters to indicate the mill area.	Complied
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 -	Gomali Palm Oil Mill is located within the Paya Lang Estate compound therefore there are no disputes.	Complied
Criterion 4.3.3 – Customary rights			

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<p>4.3.3.1</p>	<p>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 -</p>	<p>Not applicable as the lands are titled lands which are not encumbered by customary rights.</p>	<p>Not Applicable</p>
<p>4.3.3.2</p>	<p>Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -</p>	<p>Appropriate landscape maps with latitude & longitudes showing the legal boundary and neighbouring / surrounding areas of the estates were available and maintained. The lands at Gomali Grouping are legally owned or leased by IOI Group and it is verified that there were no other users or affected parties in the land areas.</p>	<p>Complied</p>
<p>4.3.3.3</p>	<p>Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -</p>	<p>Not applicable as the titled lands are not encumbered by customary rights.</p>	<p>Not Applicable</p>
<p>4.4 Principle 4: Social responsibility, health, safety and employment condition</p>			
<p>Criterion 4.4.1: Social Impact Assessment (SIA)</p>			
<p>4.4.1.1</p>	<p>Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -</p>	<p>Social Impact Assessment, Management Action Plans and Continuous Improvement Plan (2021-2026) for the POM and Estates was last review on Feb 2021 for Gomali POM. The SIA contains inputs from external and internal stakeholders' consultation. Gomali POM conducted external stakeholder meeting on April 2021 via letter and email due to COVID-19 restrictions. Internal Stakeholder Meeting conducted by Mill on 08/04/2021, attended by 18 workers representatives and staffs. Monitoring records were retained and made available as evidence that actions had been taken.</p>	<p>Complied</p>
<p>Criterion 4.4.2: Complaints and grievances</p>			

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<p>4.4.2.1</p>	<p>A system for dealing with complaints and grievances shall be established and documented. - Major compliance -</p>	<p>The management had established the following grievances SOP/guideline: 1. SIA (8.5 Grievance Procedure). 2. Guidelines for Implementation Women and Empowerment Committee (WEC) Doc Ref: IOI/G/SE/001 Rev no: 01, issue date: 17/02/2020 Appendix B: Internal Grievances Standard of Procedure. 3. Grievance procedure Do ref: IOI/P/GP/001 Rev No: 1, Rev date: 20/01/2020.</p>	<p>Complied</p>
<p>4.4.2.2</p>	<p>The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - Major compliance -</p>	<p>The procedure and flowchart outlined the mechanism whereby all complaints or grievances will be received and be acted upon by the Social Liaison Officers who will investigate the matter and resolve with the affected parties. Furthermore, the process requires the compliant and grievance to be resolved within 24 hours (acknowledge), 30 working days (investigate) and 10 working days (meet up). No complaints related to sexual harassment received so far, but the procedures stated such issues will be handled with the utmost privacy and confidentiality by the GCC. Verified that there no instances of any serious disputes.</p>	<p>Complied</p>
<p>4.4.2.3</p>	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. - Minor compliance -</p>	<p>Employees and affected stakeholders can make complaints by recording in the Complaints & Grievance Book kept at the Estate offices. Sample of last complaint reviewed: Complaint record dated 16/11/2020 by workers was verified, the management has taken action on this issue on 27/11/2020.</p>	<p>Complied</p>
<p>4.4.2.4</p>	<p>Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. - Minor compliance -</p>	<p>The Management informed the workers and surrounding communities at the internal and external Stakeholders consultations regarding them complaint/grievance procedure and feedback mechanism.</p>	<p>Complied</p>

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		<p>External stakeholders' consultation with the local communities and employees. Participation of external stakeholders were verified, including participants from contractors, suppliers, government agencies, police, neighbouring estate, etc.</p> <p>The presentation during the stakeholder consultation was reviewed and confirm that such briefing was provided during the stakeholder consultation meeting.</p> <p>The complaint and grievances can be submitted through the following channels established by the POM and estates are:</p> <ul style="list-style-type: none"> - In the Complaint/Grievance book located at the respective mill or estate office. - Email: grievance@ioigroup.com - Telephone: 603-8947 XXXX - In writing to, IOI Corporation Bhd: Attention to Sustainability Department (Grievance Coordinator) 	
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>- Major compliance –</p>	<p>The Complaint and Grievance Books that recorded the nature of complaints and the resolutions had been maintained and available for the past 3 years.</p>	Complied
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>Main contribution of the mill to the local development was demonstrated in the provision of facilities and monetary contributions, where feasible.</p> <p>The contribution provided from Gomali POM are:</p> <ol style="list-style-type: none"> 1. Mill provided Black Soil to Masjid Gemereh Segamat as requested dated 17/9/2020 with total 4,610Kg (Weighbridge ticket dated 21/09/2020). 	Complied

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 have established the Occupational Safety, Health and Hygiene Policy (Reference Number: IOIPD-PL- SH-003) signed by the Plantation Director, Mr. N B Sudhakaran on April 2019. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice boards within the estates.</p> <p>Verified the Communication of the Occupational Safety, Health and Hygiene Policy conducted on 26/04/2021 to all mill workers.</p>	Complied
4.4.4.2	<p>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 	<p>The Occupational Safety and Health Plan for the year 2021 were available for Gomali POM. The Safety and Health Plan covered the implementation among others as below:</p> <ul style="list-style-type: none"> a. IOI Plantation have established the Group Policy on Occupational Safety, Health and Hygiene Policy (Reference Number: IOIPD-PL-SH-003) signed by the Plantation Director, Mr. N B Sudhakaran on April 2019. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice boards within mill. <p>Verified the Communication of the Occupational Safety, Health and Hygiene Policy as stated in 4.4.4.1.</p> <ul style="list-style-type: none"> b. IOI Gomali POM have conducted risk assessments for all the operations and documented in the Hazard Identification, Risk Assessment, and Risk Control (HIRARC). The HIRARC is guided by the document Occupational, Safety and Health Management System – Hazard Prevention and Control Measures; Doc Reference Number: IOI – OSH 3.3.4; Document Date: 01/08/2012. The assessment covers all main operations and support operations. 	Complied

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<p>Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>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.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept and 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>	<ul style="list-style-type: none"> - HIRARC was used to register and assess all risks associated to the mill operations. Sighted latest HIRARC available for all operations reviewed on 03/05/2021 such as Workshop, Engine Room and Boiler Room. - Chemical Health Risk Assessment (CHRA) was conducted to assess the hazards associated with the hazardous chemicals used in the estate. The latest CHRA review for Gomali POM was conducted on 24/04/2019 by ENV Consultancy & Monitoring Services Sdn Bhd (DOSH Registration: HQ/04/ASS/00/193). The CHRA Report (Report Number: HQ/04/ASS/00/193 – 2019/021) was available for verification. - Medical Surveillance was conducted for 74 mill workers on 19/04/2021 to 05/05/2021 as per OSHA-USECHH 2000 requirements. The medical surveillance was conducted by Klinik Segamat (Occupational Health Doctor: HQ/08/DOC/00/545). The Medical Surveillance Report (Report Number: 042/OHD/2021) stated that all 74 workers passed the medical program and were fit to work. - Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety & Health (Noise Exposure) Regulations 2019 in the mill. The NRA was conducted by ETOSH Consult & Engineering Plt (DOSH Reg Number: JH/03/04/125) on 22/05/2021 & 25/05/2021. The Baseline Noise Risk Assessment Report (Report Number: HQ/LPROYKPEB/21/00) was available for verification. - Audiometric Medical Examination and review of Abnormal Audiograms was conducted for 50 mill workers identified to be exposed to excessive noise as recommended in the NRA at Klinik Segamat from 10/09/2020 to 05/11/2020. The results indicated that 6 workers had normal hearing, 5 workers with moderate hearing loss and 2 workers with severe hearing loss.
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		<p>The report (Report No. 04/MEN2020) was available for verification.</p> <p>c. IOI Gomali POM has established training programs for management team, workers and contractors including chemical handlers, programmed throughout the year. The trainings were conducted by those with knowledge in chemical handling.</p> <ul style="list-style-type: none"> - SOP Chemical Store Management Training – 10/02/2021 - SOP Chemical Handling & SDS Training – 10/02/2021 <p>d. Appropriate PPE is provided by the mill’s management based on the job scope to the workers without any charges. Verified the Borang Pemberian Alat Pelindung Diri (Individu) available for for the mill which records the PPE issuance for each worker.</p> <p>e. Standard Operating Procedures for Handling of Chemicals were available in several documents such as:</p> <ul style="list-style-type: none"> - Prosedur Pengoperasian Dan Keselamatan IOI Group Palm Oil Mill; Bab 17: Pengendalian Bahan Kimia; Issue Date: 02; Date: 01/08/2018. <p>Pesticides were found stored in the mill’s Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. At the entrance door, signage requiring donning of PPE were visibly posted as verified from the pictures provided. The Chemical Store signage with required Hazard Symbols were available at the entrance. The up-to-date chemical register, trade and generic names, and their Safety data Sheet were available for verification.</p>	
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		<p>f. IOI Gomali POM has appointed Safety Officers as the person responsible for all safety and health issues within the operating unit.</p> <ul style="list-style-type: none"> - The Mill Manager Mr. Kesavan Manohar has been appointed as the Safety & Health Chairman for Gomali POM as stated in the appointment letter dated 04/09/2020 undersigned by the Mill Controller. <p>g. IOI Gomali POM conducted regular OSH committee meetings on quarterly basis and when necessary due to accidents that occur. The meeting discussed issues on employees’ safety, health and welfare such as operational risks and health achievement report, mill security, safety compliance by contractors, workplace inspection, legal compliance, safety and health trainings. Sighted the latest OSH Meeting Minutes dated as follows:</p> <ul style="list-style-type: none"> • Year 2021 – 12/01/2021 • Year 2020 – 22/01/2020, 29/04/2021, 06/07/2020 and 20/10/2020. <p>h. Emergency Response Plan Flow Charts were available to address emergencies such as Accident and Dangerous Occurrence, Physical Injury, Chemical Spillage, Vehicle Accident, Fire Outbreak, Major Spillage, Chemical Poisoning & Prevention of COVID-19 Infection at the mill.</p> <p>The mill has established Emergency Response Team lead by the Mill Manager. The ERT chart and Fire Extinguisher Map were available for verification. Sighted the ERP trainings as below:</p>	
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		<ul style="list-style-type: none"> - Emergency Response Team Training – 20/12/2020 i. First aiders were stationed at all workstation/operations at the mill. The first aiders were responsible for first aid box at each workstation/operation assigned to them by the management. The first aid boxes are frequently replenished with to replace used items and expired items. The first aid box holders were regularly trained on usage and the latest training records were available for verification dated 21/01/2021. j. Records of accidents were maintained by the mill and updated to the HQ on a monthly basis. Accidents that occur are also discussed in the quarterly held JKPP Meetings. <ul style="list-style-type: none"> - The mill management has submitted the JKPP 8 form for the year ending 2020 to the Department of Safety & Health on 22.01.2021, Reference No: JKPP8/65210/2020. There was a total of 10 accident cases reported for the year with a loss of 188 days. There were also 8 cases of hearing impairment caused by noise reported as recommended by the audiometric test. - There were no accident cases reported for the year 2021 as of the audit date. 	
<p>Criterion 4.4.5: Employment conditions</p>			
<p>4.4.5.1</p>	<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>The management had established the “Group Sustainable Palm Oil Policy” in Oct 2020 signed by Group Managing Director & CEO, Dato’ Lee Yeow Chor which covered the necessary aspects of human rights related issues. This policy can be accessed at IOI Group’s website link https://www.ioigroup.com/Content/S/S_Enquiries</p>	<p>Complied</p>

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		<p>There also policy on Equal Opportunity Employment & Freedom of Association Policies dated Oct 2017.</p> <p>The Policy Training has been conducted at the Mill dated 26/04/2021 attended by workers and staff trained by Mr Fernandez.</p>	
<p>4.4.5.2</p>	<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, nationality, social origin or any other distinguishing characteristics.</p> <p>- Major compliance -</p>	<p>The management had established the Equal Opportunity Employment & Freedom of Association Policies where the commitments included:</p> <ol style="list-style-type: none"> 1. In line with ILO Core Conventions. 2. All workers will receive equal treatment 3. The company respect freedom of association and collective bargaining as part of our commitment to support the fair and equitable treatment of our workers; 4. The workers have the right to join or form trade unions of their own choosing. 5. Trade unions have access to the company estates and will not interfere with the organizing of activities of workers. 6. The freedom of association shall be instituted according and within the Trade Union Act 1959, Industrial Relations Act 1967 and Immigration Act 1956/63 7. The workers can submit their grievances through the Employees Consultative Committee (ECC). 8. The purpose of these policies is to ensure that workers of the company is recruited and provided an environment which is free from unlawful discrimination, harassment or victimization and that we are implementing the Group’s commitment to equal opportunities, freedom of association and collective bargaining at all times. 	<p>Complied</p>

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		The policy was last reviewed on October 2017 and signed by Mr. N.B Sudhakaran, Plantation Director. Employment records showed that this policy had been implemented and maintained.	
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 -	<p>Documentation and conditions of pay for foreign workers hired in the mill was available. Employment agreement with foreign workers, who are Indian, Bangladesh, Nepalese and Indonesian, stated all statutory fringe benefits and eligible incentives, e.g. working hours, overtime, leave and medical benefits, maternity leave for women, insurance coverage, deductions, resignation notice period, company rules. Company procedures require the employment contract to be explained by management to potential migrant workers before contracts are signed.</p> <p>Pay slips available for verification showed the workers were able to earn descent living wages that meet the Minimum Wage Order 2020. For those workers employed before the Minimum Wage Order 2020, New/Amended Terms and Conditions of Employment Contract was signed by the workers on the new Minimum Wage Order 2020.</p> <p>Sampled the pay slip for the month of March, June and Nov 2020 for the workers with employee ID as per below: -</p> <ol style="list-style-type: none"> 1. Employee ID: 1PDP/IOI/0519/26008 2. Employee ID: 1PDP/IOI/0317/26037 3. Employee ID: 1PDP/IOI/0709/26416 4. Employee ID: 1PDP/IOI/1011/26112 5. Employee ID: 1PDP/IOI/0120/26163 	Complied
4.4.5.4	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.	There are no contractor workers in Gomali POM during this assessment.	Complied

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	- Minor compliance -		
4.4.5.5	<p>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.</p> <p>- Major compliance -</p>	<p>The management maintained a master-list of employees that recorded the employee identification number, full names, identification number or passport number, gender, date of birth, age, date joined, and job assignment.</p> <p>A brief description of the work that the foreign workers will be performing is written into the Offer of Employment as the Mill Worker. Full job descriptions are documented for senior positions, such as Managers, Social Liaison Officer, and Safety & Health Officer with official appointment letter etc.</p>	Complied
4.4.5.6	<p>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.</p> <p>- Major compliance -</p>	<p>The management has provided employment contract in native languages for India, Bangladesh, Indonesia and the terms of employment are clearly specified in the contracts, which included position offered, period of employment, salary, overtime rate, rest days every sixth day, rate of pay when working on rest days, days and hours of work, approved deductions, termination of employment, holiday pay, rate of pay when working on holidays, leave pay, sick leave, passage expenses, expatriations of remains and burial arrangement and insurance.</p> <p>Employment Contracts were verified for workers with employee ID as below: -</p> <ol style="list-style-type: none"> 1. Employee ID: 1PDP/IOI/0519/26008 2. Employee ID: 1PDP/IOI/0317/26037 3. Employee ID: 1PDP/IOI/0709/26416 4. Employee ID: 1PDP/IOI/1011/26112 5. Employee ID: 1PDP/IOI/0120/26163 	Complied

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<p>4.4.5.7</p>	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.</p> <p>- Major compliance -</p>	<p>At Gomali POM, Biometric Recording system was used to record the daily working hours and overtime of each worker.</p> <p>Verification of Overtime Record for the month of March, June and Nov 2020 for the workers with employee ID as per below: -</p> <ol style="list-style-type: none"> 1. Employee ID: 1PDP/IOI/0519/26008 2. Employee ID: 1PDP/IOI/0317/26037 3. Employee ID: 1PDP/IOI/0709/26416 4. Employee ID: 1PDP/IOI/1011/26112 5. Employee ID: 1PDP/IOI/0120/26163 	<p>Complied</p>
<p>4.4.5.8</p>	<p>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.</p> <p>- Major compliance -</p>	<p>Verification of Overtime Record for the month of March, June and Nov 2020 for the workers with employee ID as per below: -</p> <ol style="list-style-type: none"> 1. Employee ID: 1PDP/IOI/0519/26008 2. Employee ID: 1PDP/IOI/0317/26037 3. Employee ID: 1PDP/IOI/0709/26416 4. Employee ID: 1PDP/IOI/1011/26112 5. Employee ID: 1PDP/IOI/0120/26163 <p>The working hours of the employees and overtime rates are specified in the employment contract i.e. 8 hours per day and overtime rates are in accordance with the Employment Act 1955.</p>	<p>Complied</p>
<p>4.4.5.9</p>	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p>- Major compliance -</p>	<p>Pay slips clearly showed the basic pay or piece rate, number of days worked or total output, any allowable deductions and net amount. Any overtime, holiday pay, working on rest days and any other special day, when applicable, are also shown on the pay slips.</p> <p>Training on the pay slip and briefing on the deduction including the calculation is provided during induction and refresher training is conducted annually. Briefing is conducted using a nominated translator</p>	<p>Complied</p>

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		from the workers themselves. Training material was reviewed and noted to be adequate. Assessment is also conducted to ensure the workers understand the briefing. Payslips and Wages Training dated 29/4/2021 was available for verification.	
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 -	The workers are offered incentives on output, provided training, access to medical care and other benefits such as free housing, free water supply and minimal charge for electricity supply. Under the Minimum Wages & Leave Pay Policies, the management as part of the KPIs for Mill Manager, must take pro-active measures to increase the workers' productivity, with target earnings of at least 20% more than the minimum wage for each worker during normal working hours (daily spread over period of ten hours). Local workers are provided with free education facilities (government school, free childcare, and medical services to their dependents).	Complied
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 -	The management has provided adequate amenities to their local and foreign workers as well the grouping has provided adequate housing, water supplies, medical, educational, and public amenities. Workers are provided free living quarters constructed of permanent materials that have living rooms, bedrooms, kitchen, and toilets. All the houses are supplied with treated water and electricity. The workers are provided with medical, educational, and public amenities as the Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446). The management also conducted the weekly Line site Inspection to ensure the living quarters are in good condition.	Complied
4.4.5.12	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	IOI Plantation has established the Policy on Harassment at Workplace, last reviewed on June 2018 and undersigned by N.B Sudhakaran, Plantation Director. The management also establish SOPs and guidelines for woman in estate as per below: -	Complied

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		<ol style="list-style-type: none"> 1. Women and Empowerment Committee; Doc Ref: IOI/G/SE/001; Rev: 1; Dated 17/02/2020. 2. Guidelines on Reproductive Health, Doc Ref: IOI/G/SE/001; Rev: 02; Dated 05/10/2020. 3. Guidelines for Handling Harassment at Workplace; Doc Ref: IOI/G/SE/004; Rev 02; Dated 26/11/2020. <p>Gender Committee Meetings are conducted quarterly in the mill. The latest meeting recorded was on 19/05/2021. No issue raised in the minute meeting as per verification.</p>	
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>The policy provides the definition adopted by the management based on UN definition on harassment and sexual harassment. Grievance channels are in place such as Grievance Hotline, Employee Consultative Council (ECC), Joint Consultative Council (JCC), Woman and Empowerment Committee (WEC), via email or by post verification as per below record; -</p> <ol style="list-style-type: none"> 1. JCC meeting at Gomali POM was conducted every 2 months. The JCC Meeting Minutes dated 10/03/2021 and 17/05/2021 was available for verification. 	Complied
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.</p> <p>- Major compliance -</p>	<p>IOI Gomali Certification Unit has established Equal Opportunity Employment & Freedom of Association Policies, last reviewed on October 2017 and signed by N.B Sudhakaran, Plantation Director.</p> <p>The policy covers the management commitment on equal opportunities in employment and freedom of association for all workers in line with the ILO Core conventions</p>	Complied
Criterion 4.4.6: Training and competency			

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<p>4.4.6.1</p>	<p>All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.</p> <p>- Major compliance -</p>	<p>IOI Gomali POM has established a training program for all workers based on the training need analysis conducted on a yearly basis.</p> <p>COVID-19 training and briefings were sighted for the mill. Interview with the sampled workers and staff indicated that they were aware on the SOP during the MCO such as social distancing, regular sanitization and use of PPE (Face Mask).</p> <p>Records of trainings were maintained by the estates as below: -</p> <table border="1" data-bbox="1048 703 1872 1050"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Payslip, Wages and Overtime Calculation</td> <td>29/04/2021</td> </tr> <tr> <td>SOP Reception & Grading Training</td> <td>07/05/2021</td> </tr> <tr> <td>Company Policy Training</td> <td>26/04/2021</td> </tr> <tr> <td>SOP Boiler Training</td> <td>23/02/2021</td> </tr> <tr> <td>Working at Height Training</td> <td>20/04/2021</td> </tr> <tr> <td>Sustainability Policy Training - Contractor</td> <td>06/04/2021</td> </tr> </tbody> </table>	Training	Date	Payslip, Wages and Overtime Calculation	29/04/2021	SOP Reception & Grading Training	07/05/2021	Company Policy Training	26/04/2021	SOP Boiler Training	23/02/2021	Working at Height Training	20/04/2021	Sustainability Policy Training - Contractor	06/04/2021	<p>Complied</p>
Training	Date																
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Working at Height Training	20/04/2021																
Sustainability Policy Training - Contractor	06/04/2021																
<p>4.4.6.2</p>	<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>IOI Gomali POM have conducted training need analysis for all employees, management and contractors. The training need analysis was conducted based on the job designation and training required by the job type. Sighted the Safety and Health Training Matrix and Training Need Analysis Fr the Year 2021 – Gomali Palm Oil Mill.</p>	<p>Complied</p>														
<p>4.4.6.3</p>	<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>A training programme has been developed and available in the Safety and Health Training Matrix and Training Need Analysis Fr the Year 2021 – Gomali Palm Oil Mill. The trainings were sighted to have been sub categorised to trainings on Environmental, GAP, SOP, Social,</p>	<p>Complied</p>														

	- Minor compliance -	Traceability, Building & Structure Inspection, SUS Program and Legal Program.	
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 shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented. - Major compliance -	IOI Plantation have established the Sustainability Palm Oil Policy signed by the GMD and CEO, Dato Lee Yeow Chor, revised on October 2020. The policy states the Environmental Management and the commitment of the organisation towards protecting the environment. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice boards within the estates. Verified the briefing on the Sustainability Palm Oil Policy conducted on 26/04/2021	Complied
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 -	IOI Gomali POM have established an Environmental Management Plan reviewed on May 2021. The Environmental Management Plan consist of the following. 1. Waste Management Plan 2. Pesticide Reduction Plan 3. Chemical and Fertilizer Reduction Plan 4. Continuous Improvement Plan IOI Gomali POM have also established Environmental Aspect & Impact Assessment (EAIA) which covers all workstations and activities such in the mill such as furrow, boiler and workshop. The EAIA was reviewed on 22/05/2021 and was available for verification for the mill.	Complied

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<p>4.5.1.3</p>	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored. - Major compliance -</p>	<p>IOI Gomali POM have established an Environmental Management Plan reviewed on May 2021. The Environmental Management Plan consist of the following.</p> <ol style="list-style-type: none"> 1. Waste Management Plan 2. Pesticide Reduction Plan 3. Chemical and Fertilizer Reduction Plan 4. Continuous Improvement Plan <p>Among the Environmental Improvement Plans available at the mill were verified as below.</p> <ol style="list-style-type: none"> 1. Waste Management and Reduction Plan for Boiler and Genset. 2. Waste Management Plan and Reduction Plan for Chemical Store. 3. Waste Management Plan and Reduction Plan for Linesite. 	<p>Complied</p>
<p>4.5.1.4</p>	<p>A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -</p>	<p>IOI Gomali POM have established the Environmental Management Plan based on the Environmental Aspect & Impact Assessment. The mill continues to promote activities that gives positive impact to the environment by continuously providing awareness and training to the employee, implementation of SOPs and Good Agricultural Practices as well as maintaining compliance to legal requirements.</p> <p>Among the programmes to promote positive impacts planned for year 2021 are as below:</p> <ol style="list-style-type: none"> 1. To improve efficiency of boiler and to comply with Ringleman Chart 1. 2. To reduce the dependent of genset for power supply. 3. To reduce the reading of BOD. 4. To prevent any EFB leachate to overflow and better drainage system. 	<p>Complied</p>

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<p>4.5.1.5</p>	<p>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>	<p>Continual awareness and trainings were conducted by the mill's management in order to equip all workers and staffs with relevant knowledges. Sighted the training as below: 1. Wildlife Training – 16/04/2021 2. Waste Segregation Training – 16/04/2021 3. Water Quality Index Training – 08/05/2021</p>	<p>Complied</p>																				
<p>4.5.1.6</p>	<p>The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance -</p>	<p>IOI Gomali POM discussed environmental related issues in the Environmental Performance and Monitoring Committee Meeting that are conducted on a quarterly basis. The meeting minutes were available for verification as dated 24/06/2020, 26/08/2020, 30/12/2020 and 18/03/2021.</p>	<p>Complied</p>																				
<p>Criterion 4.5.2: Efficiency of energy use and use of renewable energy</p>																							
<p>4.5.2.1</p>	<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 - Major compliance -</p>	<p>IOI Gomali POM have established baseline for non-renewable energy base on average of last 5 years usage/FFB produced. The monitoring of non-renewable energy usage was conducted on annual basis. Sighted the sampled monitoring records for diesel, electricity and water usage for FY 2021 (mill and contractor) as follows:</p> <table border="1" data-bbox="1048 1070 1872 1347"> <thead> <tr> <th>Month</th> <th>Diesel (L)</th> <th>Water (m³)</th> <th>Electricity (kWh)</th> </tr> </thead> <tbody> <tr> <td>Jan 2021</td> <td>20347</td> <td>16810</td> <td>579602</td> </tr> <tr> <td>Feb 2021</td> <td>15404</td> <td>13830</td> <td>441560</td> </tr> <tr> <td>Mar 2021</td> <td>12986</td> <td>13680</td> <td>607177</td> </tr> <tr> <td>Apr 2021</td> <td>15920</td> <td>13730</td> <td>413964</td> </tr> </tbody> </table>	Month	Diesel (L)	Water (m³)	Electricity (kWh)	Jan 2021	20347	16810	579602	Feb 2021	15404	13830	441560	Mar 2021	12986	13680	607177	Apr 2021	15920	13730	413964	<p>Complied</p>
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		May 2021	23080	15150	694678	
4.5.2.2	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. - Major compliance -	IOI Gomali POM have provided the baseline value for the diesel, water and electricity usage on a monthly basis. The mill is required to report to the Sustainability Team if the usage exceeds the baseline values.				Complied
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	The mill was available to use renewable energy as the source of firepower for the boiler startup. The use of fiber and shell for the year 2021 is stated below:				Complied
		Month	Fibre (mt)	Shell (mt)		
		Jan 2021	2178.97	1287.57		
		Feb 2021	2411.66	1425.07		
		Mar 2021	3011.94	1779.78		
		Apr 2021	2912.40	1720.96		
		May 2021	1528.57	1528.57		
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 -	IOI Gomali POM have established a Waste Management and Reduction Plan which includes the identification of waste products and pollutants, Waste Generation, Action Plan & Monitoring, Documents to be Reviewed, Management Review and time bound and Person In-Charge. Among the Waste Management and Reduction Plan sampled were as follows:				Complied

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		Source	Waste & Pollution	
		Chemical Store	Chemical Spillage, Empty Chemical Containers & Used Rags	
		Linesite	Domestic Waste, Sewage, Garden Residue, Recycle Items, Motor Lube Containers, Motor Lube Spillage	
4.5.3.2	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <p>a) Identifying and monitoring sources of waste and pollution.</p> <p>b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</p> <p>- Major compliance -</p>	<p>IOI Gomali POM have established the Waste Management Plan incorporated in the Environmental Management Plan reviewed on May 2021.</p> <p>Among the Waste Management Plan available at the mill were verified as below.</p> <ol style="list-style-type: none"> 1. Waste Management and Reduction Plan for Boiler and Genset. 2. Waste Management Plan and Reduction Plan for Chemical Store. 3. Waste Management Plan and Reduction Plan for Linesite. 	Complied	
4.5.3.3	<p>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</p> <p>- Major compliance -</p>	<p>Standard Operating Procedures for Handling of Chemicals were available in several documents such as:</p> <ul style="list-style-type: none"> - Occupational Safety & Health Management System: Prosedur Kerja Selamat Penyimpanan dan Pengurusan Stor Bahan Kimia, dated 06/01/2020, Rev No: 5, Doc Reference: IOI-OSH 3.2.2. - Occupational Safety & Health Management System: Scheduled Waste Procedures, dated 22/05/2020, Rev No: 1, Doc Reference: IOI-OSH 3.2.2. - Occupational Safety & Health Management System: Pengurusan Bekas Bahan Kimia Kosong, dated 06/01/2020, Rev No: 3, Doc Reference: IOI-OSH 3.2.2. <p>Sampled the latest disposal of Schedule Waste as below:</p>	Complied	

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		<ol style="list-style-type: none"> 1. SW 305: Spent Lubricant; Quantity: 1.880 Mt; Waste Code: Spent Lubricant Oil; Consignment Note Number: 2021042914WNXHJ4; Date of Disposal: 29/04/2021; Waste Manager: Kualiti Alam Sdn Bhd. 2. SW 306: Spent Hydraulic Oil; Quantity: 0.6900 Mt; Consignment Note Number: 2021042914REX3Q2; Date of Disposal: 29/04/2021; Waste Manager: Kualiti Alam Sdn Bhd. 3. SW 409: Contaminated Chemical Containers; Quantity: 0.3300 Mt; Consignment Note Number: 2021042914S0WP8K; Date of Disposal: 29/04/2021; Waste Manager: Kualiti Alam Sdn Bhd. 4. SW 410: Contaminated Filter: Spent Hydraulic Oil; Quantity: 0.1300 Mt; Consignment Note Number: 2021042914D4HATJ; Date of Disposal: 29/04/2021; Waste Manager: Kualiti Alam Sdn Bhd. 	
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>Proper disposal of waste material is carried out as per the company procedures. The procedures are fully understood by workers and managers.</p> <p>Domestic waste was collected three times a month by licensed outsourced contractor MS Mido Enterprise. Verified the latest disposal records dated 31/05/2021. (D/O Number: 3788)</p>	Complied
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>All polluting activities were assessed through the aspect and impact method and were documented. The activities are inclusive of green gas emissions, chemicals, fertilizer, scheduled waste, solid waste and household waste. Data relating to such activities were collected, analysed and presented during the environmental meetings held by the mill.</p>	Complied

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		<p>Sampled the Stack Emission Monitoring for the Mill Boiler as below: Facility: Boiler 2 – Chimney No.2 (Date: 03/02/2021)</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Results</th> <th>Limit Value</th> </tr> </thead> <tbody> <tr> <td>Total Particulate Matter (mg/m³)</td> <td>110</td> <td>150</td> </tr> <tr> <td>Sum of SO and SO₃ expressed as NO₃ (mg/m³)</td> <td>61.1</td> <td>400</td> </tr> <tr> <td>Sum of NO and NO₂ expressed as NO₂ (mg/m³)</td> <td>22</td> <td>400</td> </tr> <tr> <td>Dark Smoke</td> <td>Ringelmann Chart No.1</td> <td>Ringelmann Chart No.1</td> </tr> </tbody> </table> <p>Facility: Boiler 1 – Chimney No.2 (Date: 22/04/2021)</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Results</th> <th>Limit Value</th> </tr> </thead> <tbody> <tr> <td>Total Particulate Matter (mg/m³)</td> <td>15.2</td> <td>150</td> </tr> <tr> <td>Sum of SO and SO₃ expressed as NO₃ (mg/m³)</td> <td>3.7</td> <td>400</td> </tr> <tr> <td>Sum of NO and NO₂ expressed as NO₂ (mg/m³)</td> <td>49</td> <td>400</td> </tr> <tr> <td>Dark Smoke</td> <td>Ringelmann Chart No.0</td> <td>Ringelmann Chart No.1</td> </tr> </tbody> </table>	Parameter	Results	Limit Value	Total Particulate Matter (mg/m ³)	110	150	Sum of SO and SO ₃ expressed as NO ₃ (mg/m ³)	61.1	400	Sum of NO and NO ₂ expressed as NO ₂ (mg/m ³)	22	400	Dark Smoke	Ringelmann Chart No.1	Ringelmann Chart No.1	Parameter	Results	Limit Value	Total Particulate Matter (mg/m ³)	15.2	150	Sum of SO and SO ₃ expressed as NO ₃ (mg/m ³)	3.7	400	Sum of NO and NO ₂ expressed as NO ₂ (mg/m ³)	49	400	Dark Smoke	Ringelmann Chart No.0	Ringelmann Chart No.1	
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<p>4.5.4.2</p>	<p>An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -</p>	<p>IOI Gomali POM have established the Pollution Reduction Plan incorporated in the Waste Management and Reduction Plan reviewed on May 2021.</p>	<p>Complied</p>																														

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		<p>Among the Management Plan available at the mill were verified as below.</p> <ol style="list-style-type: none"> 1. Waste Management and Reduction Plan for Boiler and Genset. 2. Waste Management Plan and Reduction Plan for Chemical Store. 3. Waste Management Plan and Reduction Plan for Linesite. 	
4.5.4.3	<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>Gomali Palm Oil Mill has license for discharge of POME through land application based on the Environmental Quality Act (Act 127) with BOD specification <2500 mg/L, Suspended solids ≤411mg/L, Oil and Grease ≤50 mg/L, Ammoniacal nitrogen <150mg/L, total nitrogen <200 mg/l and pH 5.0 - 9.0. This parameter is tested alternately by in-house lab and accredited lab and analyzed on weekly basis. There are 17 effluent ponds in Gomali Palm Oil Mill and the list of ponds, and their functions were available for verification.</p> <p>The monitoring of the Final Discharge point is done on a monthly basis. Samples are sent to NALCO Industrial Services Sdn Bhd for testing. Sampled the Results as below:</p> <ol style="list-style-type: none"> 1. Sample Number: 9980/21; Report Number: EF/0142/11/21; Date Sampled: 19/05/2021; The results indicated that all readings were well within the limits of discharge. 2. Sample Number: 9913/21; Report Number: EF/0142/09/21; Date Sampled: 14/04/2021; The results indicated that all readings were well within the limits of discharge. 	Complied
Criterion 4.5.5: Natural water resources			
4.5.5.1	<p>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>	<p>IOI Gomali POM have established a Water Management Plan for the year 2021 available for verification. The purpose of the plan is to maintain the quality and availability of the natural water resources.</p>	Complied

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	<p>a) Assessment of water usage and sources.</p> <p>b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill’s current activities.</p> <p>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.).</p> <p>- Major compliance -</p>	<p>Verified the water management plan and its implementations as below:</p> <ol style="list-style-type: none"> 1. Water usage is monitored on a monthly basis by the mill and the data has been provided under indicator 4.5.2.1. 2. Water for consumption is treated by the mill at the Water treatment Plant. As stated in the JTK License, the mill monitors the water quality on a quarterly basis. Sighted the water sampling results as below: Certificate for Analysis <ul style="list-style-type: none"> - Date of Sampling: 06/12/2020; Reference Number: SL/1220/825; Laboratory: Spectroscience Laboratories Sdn Bhd. The results indicated that all parameters were within the permitted range for Drinking Water Quality. - Date of Sampling: 05/03/2021; Reference Number: SL/1321/173; Laboratory: Spectroscience Laboratories Sdn Bhd. The results indicated that all parameters were within the permitted range for Drinking Water Quality. 3. The mill monitors the incoming and outgoing of the natural Stream near the mill. There were 4 sampling points available at the natural stream. The latest sampling was done on 10/03/2021 and the Sampling Report (Report Number: GMPOM/31/03/2021) was available for verification. The results indicated that the ammoniacal value has exceeded the permitted parameter range. Since the reading was captured at the incoming sampling point, the management has communicated with the neighbouring estate on this matter. 	
<p>4.5.5.2</p>	<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>Gomali Palm Oil Mill has license for discharge of POME through land application based on the Environmental Quality Act (Act 127) with BOD specification <2500 mg/L, Suspended solids ≤411mg/L, Oil and</p>	<p>Not Applicable</p>

	- Major compliance -	Grease ≤50 mg/L, Ammoniacal nitrogen <150mg/L, total nitrogen <200 mg/l and pH 5.0 - 9.0.	
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Mill Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	<p>Standard Operating Procedures (SOPs) in the form of written document for mill were documented and maintained. It covers procedures all operations relayed to the management of the mill.</p> <p>The mill's management process and operations are guided by the following documents:</p> <ol style="list-style-type: none"> 1. Group Standard Operating Procedures (StOP) for Palm Oil Mill Operations, 01/07/2017 2. Group Safe Operating Procedures (SaOP) 3. Group Social Impact Assessment and Management Action Plans (Guidance Document) dated 10 Oct 2011 4. Group Environmental Impact Assessment and Management Action Plans dated December 2007. 5. Internal Audit procedure dated 3 May 2018 <p>The StOPs reflect best industry practices as detailed in IOI's agricultural policy document. Aside from StOPs for operations of mill there exists also SaOPs for management but not limited to:</p> <ul style="list-style-type: none"> • Consultation and communication • Negotiation on compensation. • Guidance and procedure for gifts and hospitality. • Selection and contracting of contractors including recruitment agencies 	Complied

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		<ul style="list-style-type: none"> • Employment procedures for recruitment, selection, hiring, promotion, retirement and/or termination. • Procedures for Supply Chain. • Internal Audit procedure for Supply Chain • Remediation and Compensation Procedure (RaCP) • Accident and emergency procedures • Proper disposal of waste material 																					
4.6.1.2	All palm oil mills shall implement best practices. - Major compliance -	The mill has implemented best practices in their daily operating activities. The implementation has been monitored by the top management of the palm oil mill which include water management, emission monitoring, effluent discharge, safety & health monitoring and waste disposal	Complied																				
Criterion 4.6.2: Economic and financial viability plan																							
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	<p>The 5 Year Business Plan was established for all IOI Gomali POM and available for verification. The Business Plan is reviewed on a yearly basis by the management. The Business Plan covers the Summary Supplying Estates 5 years Crop Projection, 5 Year Mill Capacity and Projection and detailed expenditure costs.</p> <p>5 Year Mill Capacity and Projection was available as below.</p> <table border="1"> <thead> <tr> <th>Financial Year</th> <th>MT</th> <th>OER %</th> <th>KER %</th> </tr> </thead> <tbody> <tr> <td>2020/2021</td> <td>368,831</td> <td>21.75</td> <td>5.00</td> </tr> <tr> <td>2021/2022</td> <td>381,016</td> <td>22.00</td> <td>4.80</td> </tr> <tr> <td>2022/2023</td> <td>393.322</td> <td>22.00</td> <td>5.75</td> </tr> <tr> <td>2023/2024</td> <td>405,751</td> <td>22.00</td> <td>5.75</td> </tr> </tbody> </table>	Financial Year	MT	OER %	KER %	2020/2021	368,831	21.75	5.00	2021/2022	381,016	22.00	4.80	2022/2023	393.322	22.00	5.75	2023/2024	405,751	22.00	5.75	Complied
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		2024/2025	418,305	22.00	5.75	
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 -	All Fresh Fruit Bunches (FFB) supplied to the mill are from IOI's own supply base estates. The pricing for FFB is managed by the Headquarters.				Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Based on contracts agreed between contractors/service providers and the estates, it is evident that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. Interview with parties concerned confirmed that business practices with local businesses were conducted in a fair and transparent manner. It is further verified that payments to contractors and other service providers are paid within the period specified in the contract agreement.				Complied
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 -	Verified the contractor for Gomali POM, Kausila Enterprise, hired for Grass Cutting at Pond Area and other Mill Area. The contract agreement (Contract Number: GMM/002-20/21) has been sign on 01/12/2020. The contract, stated under the Special Conditions, mentioned: The contractor also requested to oblige to all the requirements of RSPO, MSPO and ISCC.				Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Contract agreements are signed between the Mill Manager and the Contractor. The terms and conditions of the contract are explained to the contractor.				Complied

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		<p>A copy of the contract is given to the contractor. Verified the contract agreement for Kausila Enterprise (Contract Number: GMM/002-20/21) have been sign on 1st December 2020</p>	
<p>4.6.4.3</p>	<p>The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required.</p> <p>- Minor compliance -</p>	<p>Acceptance is confirmed by the Management prior to the audit via acceptance of Audit contract and Audit Plan and the 5-year MSPO certification programme.</p> <p>Management has the IOI Group-Additional requirements for contractors and service providers and Transport Policy which stated that the company and its certification bodies have the right to audit the contractor/service provider regarding the above.</p>	<p>Complied</p>

Appendix B: List of Stakeholders Contacted

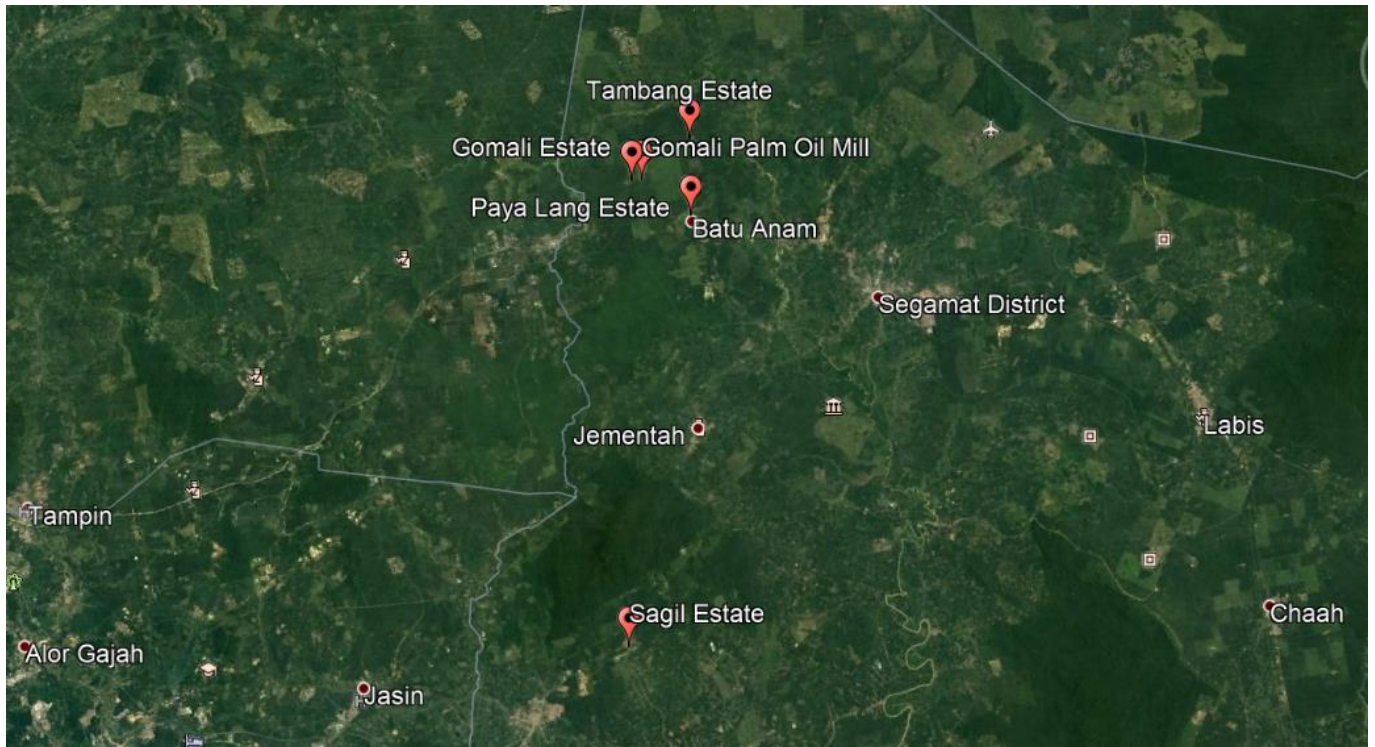
<p>Government Officer: Nil</p>	<p>Community/neighbouring village: Anata Trading (Shop keeper)</p>
<p>Suppliers/Contractors/Vendors: Ah Teng Earthwork GN Murni Enterprise Rajan Excavator EFB transporter (Mr Tirovalar)</p>	<p>Worker’s Representative/Gender Committee: Norimah – JCC representative & Gender Representative</p>

Appendix C: Smallholder Member Details

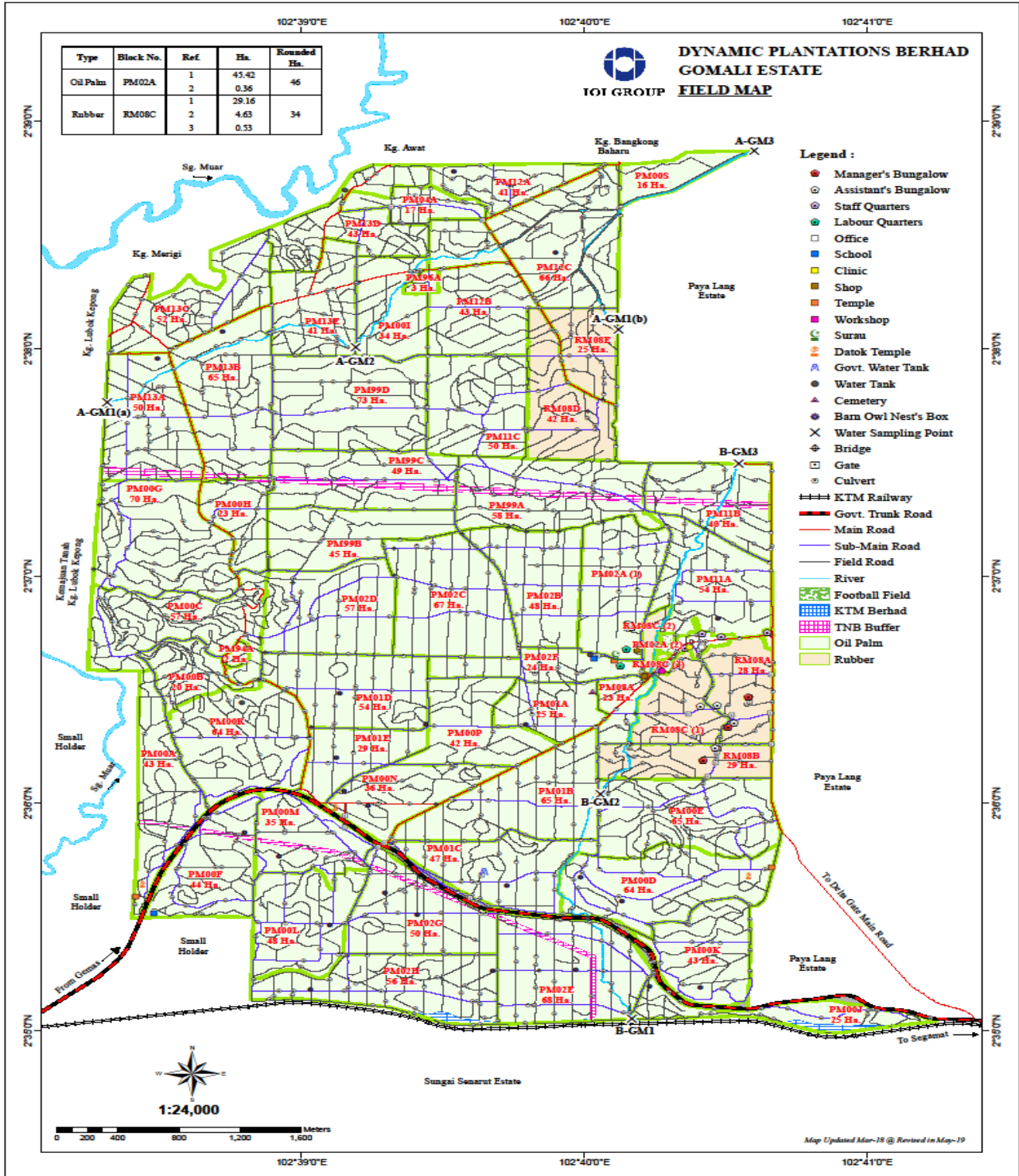
Not Applicable

Appendix D: Location and Field Map

Gomali Palm Oil Mill

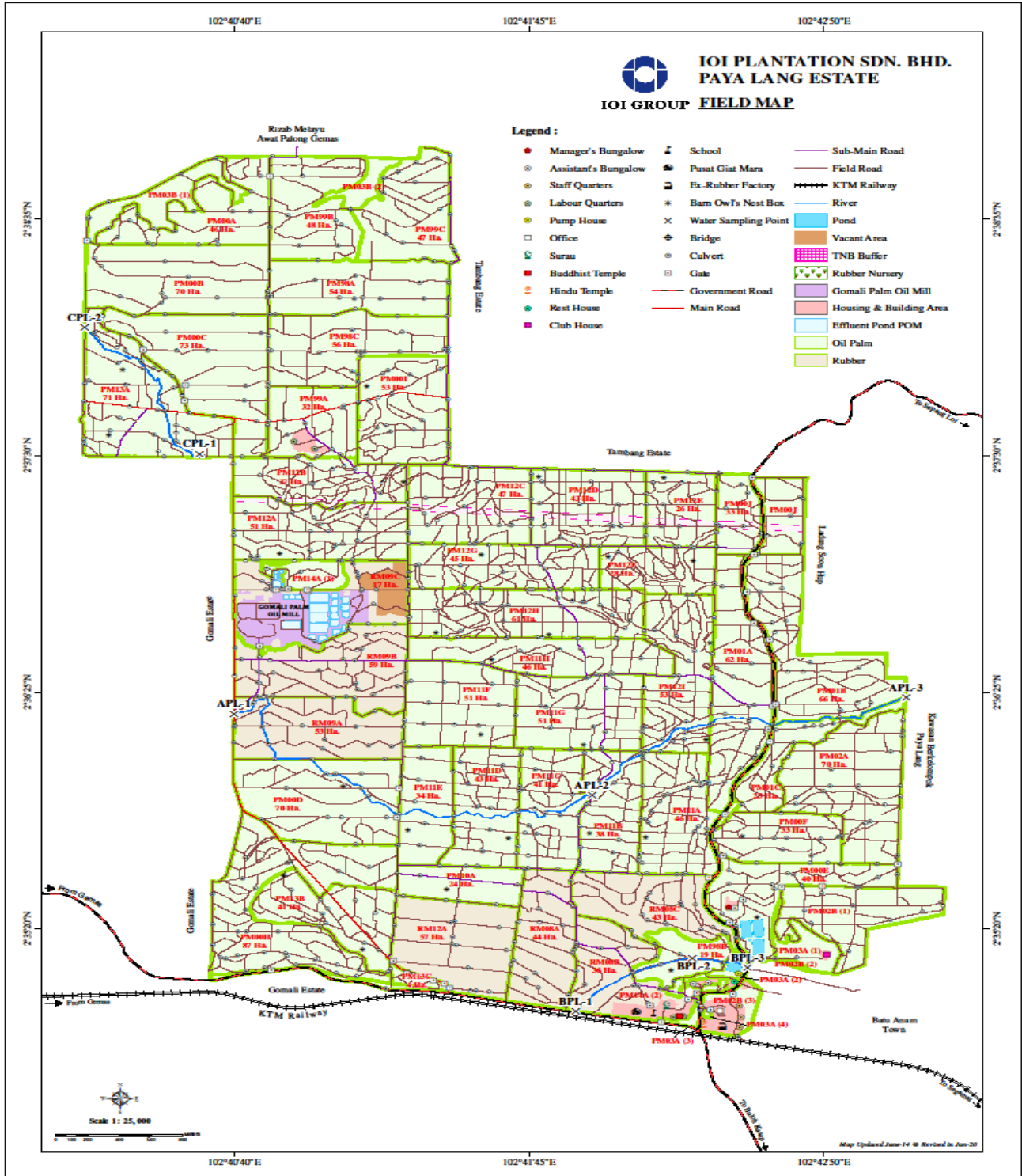


Gomali Estate



MSPO Public Summary Report
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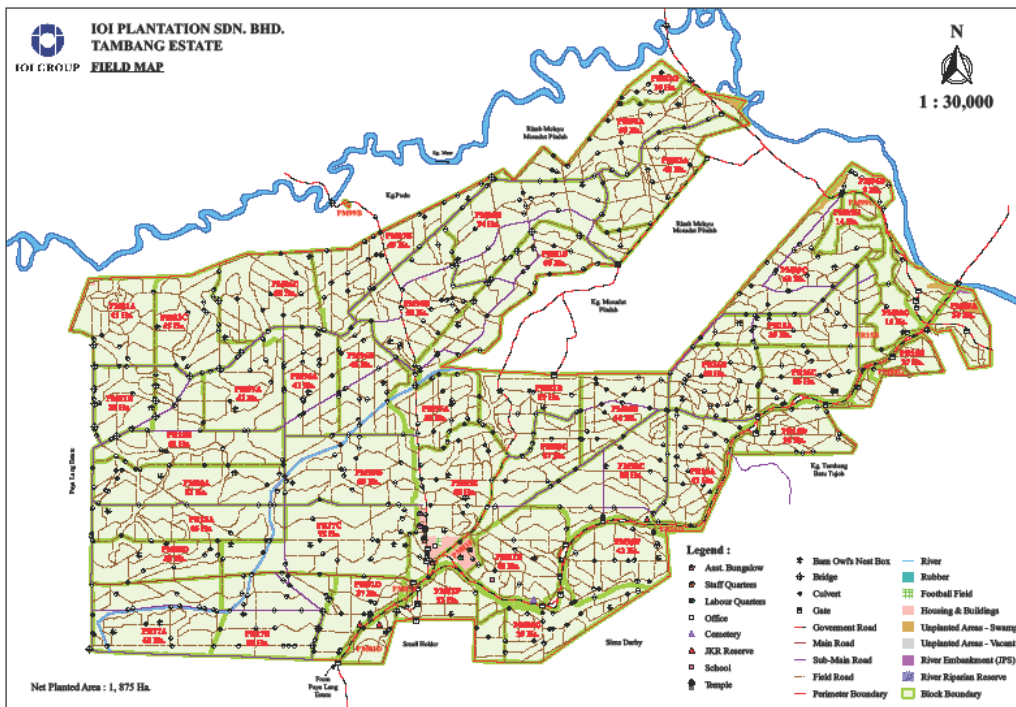
Paya Lang Estate



Sagil Estate



Tambang Estate



Appendix E: 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
GIS	Geographic Information System
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